Dear Minister

Re: Legislative amendments to reduce regulatory burden on schools and systems

Thank you for your invitation dated 2 April 2014 to participate in consultations on regulatory burden.

This response features five key propositions which have their foundation in the Australian Parents Council’s (APC) policies and objectives:

- Accountability for the allocation and expenditure of Australian Government funding must be a fundamental expectation
- It is essential that governments, parents, schooling authorities and the general population know the true cost of schooling and that they have some criteria by which to judge whether that cost is reasonable
- The Australian Government must retain its funding, monitoring and supporting roles in school education
- The Australian Government must retain the capacity to ensure that all funding for students attending non-government schools that passes through State/Territory treasuries, actually reaches the schools/systems these students attend and
- The Australian Government must not resile from its distinctive capacity to initiate proposals and policies to innovate, monitor and support school improvement and enhance student outcomes.

The Context
The Australian Government has indicated it is considering current agreements and arrangements in respect of schooling. The underlying principle must be that funding and accountability requirements ensure policy visions for schooling are assessed, implemented, reviewed and achieved. Improvement of measures regarding accountability for Commonwealth funds and for the outcomes of schooling should therefore always be rigorous but not cumbersome.
The Australian Parents Council is very concerned at the prospect of a funding regime for the non-government schooling sector that loses all connection with the average government school recurrent cost, flawed and manipulated as that figure has been, or that would see a reduction in the accountability of States/Territories and schooling systems for appropriate use of funding provided by the Commonwealth.

APC is also strongly opposed to the recent Commission of Audit’s recommendation that policy and funding responsibility for non-government schools, as well as government schools be transferred to the States and Territories. Such a step would represent a retrogressive move away from the currently tenous but appealing notion of national consistency in school education.

The possibility of national rigour and transparency in the funding of schooling has already been diminished with the non-acceptance of the Gonski panel’s recommendation for the establishment of an independent body to assess and distribute funding. States/Territories and sectors now have multiple ‘grab bag’ agreements and it makes sense that connection with some form of national cost index is essential if a progressive environment of national consistency is to be achieved. It is historically evident, in this context, that the Consumer Price Index does not adequately reflect schooling costs.

It is essential that governments, parents, schooling authorities and the general population know the true cost of schooling locally and nationally. It is also vital that they have some criteria by which to judge whether that cost is reasonable.

Australian Parents Council Comment
In an environment of high uncertainty about future Australian Government directions, we offer the following comments in the context of what we presently know:

• The Australian Government’s policies and directions for improved schooling outcomes for all students are supported. It is a long held principle of APC that a focus on funding students and their individual needs is essential to achieve educational potential.

• Current promises and State/Territory – Commonwealth funding agreements must be upheld.

The parents of students in non-government schools already contribute over $8 billion towards the provision of schooling and many make significant sacrifices to do so.

History has demonstrated that the Australian Government fulfils a critical role in ensuring this willing burden does not become prohibitive to the exercise of choice.

• The Australian Parents Council fundamentally believes that the Australian Government must retain the capacity to ensure that all funding for students attending non-government schools that passes through State/Territory treasuries, actually reaches the schools/systems these students attend. Through our affiliates’ dialogues with various State/Territory government ministers and senior officials, we are patently aware that they often fail to realise that they have a responsibility to all schools in their jurisdictions and often see themselves as being in competition with the non-government schooling sector.

• Our recent representations to the Senate Select Committee on School Funding demonstrated the Australian Parents Council’s strong support for the Gonski Panel’s recommendation to establish an independent body to administer funding for schooling so as to progress national consistency, mitigate the ‘public-private’ schooling divide and
deliver appropriate oversight of the resourcing of schooling from arm’s length. This could be achieved economically by a small, streamlined body and would be a sensible approach as it would place the educational needs of students above political ideology and electoral cycles.

- The Australian Government must not resile from its distinctive capacity to initiate proposals and policies to innovate, monitor and support school improvement and enhanced student outcomes. High quality schooling is a national imperative and there is no doubt that Australia needs to lift its performance against other advanced countries. It is essential that the Australian Government’s capacity to drive a national vision for education is not diminished.

- As stated above, the Australian Parents Council strongly opposes the Commission of Audit’s recommendation that policy and funding responsibility for government and non-government schools be transferred to the states and territories. This would be the quickest route to dismantling the hard won degree of national consistency and directions in school education achieved to date.

Withdrawal of the Commonwealth’s 40 years of oversight of school education would herald a return to the bunker mentality in the States and Territories with an inevitable decline in the level of support for diversity and choice. It would also lead to a diminution in the level of national co-operation on policy and outcomes which needs to be constantly built and sustained.

- Accountability for the allocation and expenditure of Australian Government funding must be a fundamental expectation. Non-government schools and sectors already report on financial and educational outcomes to multiple agencies in multiple ways. Stringent reporting has been in place for a long time and must continue. Commonwealth Administrative Guidelines, Commonwealth agreements between sectors and schools and reporting requirements for program compliance must remain a feature of Commonwealth funding for non-government schools.

The present consultation provides a timely opportunity to review current processes to ensure that duplications across government jurisdictions in reporting by non-government schools and systems across are identified and removed.

- The Australian Parents Council also expects improved accountability of State/Territory jurisdictions for government schools. One of the difficulties for any national approach to schooling is the reluctance of State/Territory governments to provide sufficiently detailed schooling budgets and their tendency to decrease or hide schooling expenditure. They must be held to greater account if efficiency in Commonwealth expenditure is to be maximised and national goals and targets are to be achieved.

Expectations of parents of students attending Australia’s non-government schools
The Australian Government must retain its funding, monitoring and supporting roles in school education and it is with this conviction that APC approaches this consultation into reduction of the regulatory burden on schools and systems.

The key questions that need to be addressed are:

- Is the current regulatory burden more than is required to meet policy requirements?
- Is the regulatory burden on schools currently imposed or to be imposed excessive and amounting to rigid conformity to formal rules that may be redundant or bureaucratic?
What are the regulatory requirements that will provide robust evidence to assure governments, parents and the general population that quality education is being provided to all school students, and at a reasonable cost?

These are questions that should be answered by the regulators in consultation with parents and the schooling sectors now and subsequently as any additional reporting requirements are developed.

The regulations must be examined to ensure that they are necessary to achieve the outcomes required. They should not be duplicated or drafted to provide information available in other formats or via other reporting regimes. Reporting to one body may well satisfy the requirements of another. Commonwealth and State/Territory governments should be able to design their reporting requirements in concert to avoid duplication. Indeed this should be expected and required.

The non-government sector should be adequately represented on any government bodies which oversee such requirements. The Australian Parents Council represents the key stakeholders in the sector, parents, and as such should be part of such representation.

The Australian Parents Council is firmly of the opinion that the current consultation should seek from the State/Territory governments and the non-government schooling authorities the ways in which matters already reported could be taken to fulfil reporting and compliance conditions. For example, we note that Regulation 44 provides that as most schools produce school improvement plans there will be no need to produce a separate plan if the requirements of regulation 44 are incorporated. There could be other instances when the regulations could recognise that reporting requirements are already met.

Yours faithfully

Caz Bosch
President