



# AUSTRALIAN PARENTS COUNCIL Inc.

*Representing parents of students attending non-government schools in support of choice, equity, quality and voice for all Australian children*

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## SUBMISSION

### **Inquiry into the Australian Education Amendment Bill**

**May 2017**

The Australian Parents Council (APC) is the nationally recognised parent organisation representing the interests of parents with children in non-government schools and Australia's parent population more generally. These interests extend down to early childhood development and learning, and up to post-school transitions.

We are pleased to have the opportunity to make a submission to the Senate Standing Committee on Education and Employment inquiry into the Australian Education Amendment Bill 2017, and have the following commentary:

1. The timeframe for submissions to this inquiry is extremely short and there are no terms of reference. For our parent organisation, this has made it very difficult to provide a comprehensive submission, especially given the limited information we have been provided and the amount of conflicting media the new funding model has generated.
2. APC wants the best outcome for every student in Australia and, in this context, are committed to the accessibility and affordability of non-government schools for parents who choose them for the education of their children. Choice of education will be undermined if the funding and the necessary legislative safeguards do not provide parents with long-term surety and confidence that they will be able to exercise their choice. APC recognises the advantages of surety of funding past budget and election cycles but has concerns that a ten year funding model entrenched in legislation does not recognise that forward estimates only extend for four years and it is impossible to predict the environment that schools will be operating in in ten years from now. There are many valid reasons why budget forward estimates are only four years.
3. APC supports some aspects of the proposed new funding model but has significant concerns that its application is not truly sector blind and the methodology that determines need bases relies on an imperfect SES model. The Government's ongoing use of SES scores to determine school funding has been shown to disadvantage non-government schools,



however its financial impact has, until now, been offset by the use of a system-weighted average SES for states and territories by some sectors. The proposed approach may be divisive and lead to school communities competing against each other for funding. We recommend that the Index of Community Socio-Educational Advantage (ICSEA) be investigated as an alternative methodology which might inform a revised SES score. Locations of schools, particularly in metropolitan areas, do not necessarily reflect the reality of differential capacity of parents to pay fees.

4. We call on every endeavour to be made to support those schools and their communities who face negative funding changes with a quantum of funding that supports their transition. Analysis of the non-government sector indicates that over 600 Catholic and Independent schools, including those in lower wealth areas, will be allocated less Commonwealth funding in 2027 than they have been allocated in 2017.
5. Like many stakeholders, we are disappointed with the lack of consultation prior to the model being announced. APC expects to be provided with good quality information as the funding model and implementation of the same progresses. The jump from a 125-year transition arrangement in the old model to a 10 year transition in the new model, in our opinion lacks the necessary additional funds by Government to ensure the impacts do not affect students and their families.
6. All parent organisations expect and must be consulted in the upcoming review by Mr David Gonski AC. Indeed, if the government were to progress their intended Students First reform policy pillar on parent engagement in schooling, the positive impact of embedded parental engagement practice would be realised and enable a sustained way to improve student outcomes. While the government has said the focus will be on practices proven to make a difference in the context of teaching and learning strategies, we want the review's Terms of Reference to have a clear focus on parent engagement.
7. The funding announcement and Quality Schools papers talk about funding being tied to reforms. However, these reforms will only be discussed early next year after the report by Mr David Gonski AC has been received. Compliance measures to reforms adds to teacher and school time and while necessary at times, further stretches the already tight budgets of schools. It is then family budgets that have to be readjusted to accommodate these school initiatives that require funding.
8. It has been stated that the Students with Disability loading will be based on the NCCD



data. We are concerned that previously the Minister for Education has stated that the NCCD for students with disability fails a basic credibility test yet now describes it as “broadly reliable” nationally. The application of the NCCD model was described by the Price Waterhouse Review of quality assurance in 2016 as being not of sufficient sample size to be a reliable predictor of SWD funding. To accept the NCCD method risks invalid and inconsistent allocation of funds. Significant consultation with all stakeholders including parents is required to determine a more valid methodology to calculate SWD funding that is needs based and applied transparently to students with disabilities, recognising that schools and systems are best placed to determine the ultimate use of these funds for the benefit of the students and their families.

9. APC calls for explicit, public reporting of expenditure on Students with Disability and other loadings (e.g. Indigenous, low SES, English proficiency) and outcomes being achieved as a result.
  
10. It is important that legislation ensures that funding is indexed to match the real costs of education in schools to minimise the impact on families through school fee increases.

**Shelley Hill**  
**President**  
**Australian Parents Council**

**25 May 2017**