

**INDEPENDENT SCHOOLS COUNCIL OF AUSTRALIA
RESPONSES TO QUESTIONS ON NOTICE FROM SENATOR MCKENZIE**

1. What is your opinion of the funding detail in the Bill?

The lack of detail in the Bill is disappointing for the independent sector. The Australian Education Bill, while providing a broad outline of the Australian Government's goals and plan for school funding and improvement, provides no detail on either the specific funding arrangements or administrative implications for schools.

2. Does it provide certainty for Independent schools?

No. The current lack of certainty regarding future government funding is making it very difficult for schools to undertake critical financial and administrative planning.

3. What does the Australian Government's modelling show you about the impact of funding for Independent schools?

As stated in ISCA's evidence to the Committee, for independent schools, the modelling shows there are several hundred schools that are still outside of the model; that is, their current funding levels are higher than what they would be entitled to under the full implementation of the proposed model. While the treatment of these schools is still under negotiation, there is concern that these schools will experience a reduction in real terms funding.

4. Will the Australian Government's model expect parents sending their children to Independent schools to pay more fees?

The impact of the proposed funding model on individual independent schools is yet to be finalised. However, any reduction in real terms funding for independent schools will mean either an increase in school fees or a reduction in educational offerings at the school and consequent reduction in the quality of education provision.

5. How many of your schools would you expect to increase their fees if the new funding model was brought in?

The impact of the proposed funding model on individual independent schools is yet to be finalised. The response to any reduction in real terms government funding for an individual independent school would be determined by the Board of the individual schools concerned.

6. Would you support the retention of the existing funding model for your schools, either as an interim measure, or permanently?

As noted in ISCA's evidence to the Committee, ISCA is not currently in a position to categorically state that the sector would support the retention of the existing funding model permanently. The sector would support any measures undertaken by governments to provide funding certainty for independent schools beyond 2013. It should also be noted that ISCA's key concern for any funding model is that no independent school should lose any public funding in real terms.

7. How would you describe the level of consultation your sector had with the government in developing the bill?

ISCA has been involved in ongoing consultation with officials since the release of the Final Report. While these consultations have been focussed on adjustments to the model, there has been little engagement on funding outcomes for individual independent schools.

8. Do you think that the Bill recognises the contribution of Independent education providers to Australia over its history?

ISCA considers that a major omission from the Bill is the specific reference to the Prime Minister's statement in her 3 September 2012 speech whereby the Australian Education Act would establish the nation's support for a child's education as one of the entitlements of citizenship.

9. How confident are you that right for parents to choose a school will be protected in the Bill?

The Bill makes no specific reference to choice. A critical element for supporting the right of parents to choose a school is a funding model that provides stable and appropriate funding to independent schools. While parents are the major contributors for the funding of independent schools, many schools in the sector rely on Australian Government funding to ensure that they can set realistic fees and maintain their affordability for a broad range of the community. This ensures the sector can continue to provide real educational choice to those parents that may not otherwise be able to afford an independent school.

10. Will the role of systems change under the Bill?

The future role of systems remains subject to negotiation with the Australian Government.

11. How are the needs of low-SES students dealt with in the Bill?

The Bill includes provision to address educational disadvantage through a loading for low SES students. There is no detail in the Bill regarding the quantum or application of this loading.

12. How are the needs of regional students dealt with in the Bill?

The Bill includes provision to address educational disadvantage through a loading based on the location of a student's school. There is no detail in the Bill regarding the quantum or application of this loading.

13. How are the needs of students with a disability dealt with in the Bill?

The Bill includes provision to address educational disadvantage through a loading for students having a disability. There is no detail in the Bill regarding the quantum or application of this loading.

14. Does the Independent school sector support the Australian Government's proposed funding model based on the Gonski review?

In principle, the independent sector could support the proposed funding model based on the Gonski Review. However, due to the nature of the independent sector, the model must be assessed in terms of its impact on each individual independent school in the sector. ISCA could not support a model which resulted in a reduction in real terms funding for any independent school.

16. Would it be accurate to suggest that the Independent sector has had some frustrations with the Australian Government over the negotiations on the Gonski model?

While the independent sector has been engaged in discussions with the Government, the more complex and critical aspects of the Gonski Review outcomes are yet to be settled. In fact, despite the timeline imperatives, there is little indication that there has been any substantive progress in negotiations with state and territory governments. While ISCA appreciates the complexity of the Government's task, the school communities of the 1,100 independent schools have ongoing concerns about the continuing uncertainty of future funding arrangements, particularly as the Review is now entering its fourth year without any tangible outcomes in sight.

17. Can you describe in broad terms, as you currently understand it, the expected impact of the Gonski model on different types of Independent schools – primary/secondary/combined and metropolitan/country?

As negotiations are continuing, ISCA is not currently in a position to provide detailed information on the impact of the proposed model on different types of independent schools.

18. What will the impact on Independent schools be if you do not sign up to the new funding model?

Whilst ISCA is keen to ascertain the impact on independent schools of not signing up to the new funding model, ISCA has not been able to obtain a definitive response from the Government on this issue.

19. When do you anticipate the last school will come off transition arrangements under this model?

As negotiations are continuing, ISCA is not currently in a position to provide detailed information on this aspect of the proposed model.

20. Do you have a view on how the proposed might be changed to satisfy the Independent sector?

Throughout the Review of Funding for Schooling, ISCA's key outcome of the Review has been that no independent school should lose any public funding in real terms. The sector has also highlighted that any new funding model should be assessed against the following criteria: equity; incentive; flexibility; simplicity; predictability and consistency.

21. What arrangements for capital funding are included in the Bill?

The Australian Education Bill 2012 does not address the issue of capital funding for non-government schools. The independent sector is the fastest growing schooling sector and the demand for capital support is high. Parents contribute more than 80 per cent of the cost of buildings and equipment in the independent sector, mainly through school fees. (This figure reflects the long term funding trends in the sector and does not include the one-off effect of the Building the Education Revolution). Capital Grants Program funding is critical to those schools in the independent sector with the least capacity to raise private income for capital purposes, including low SES schools and schools that are newly established and experiencing enrolment growth. A clear commitment from the Australian Government for continuing the Capital Grants Program for non-government schools is required.

22. Have capital funding arrangements for Independent schools been subject to discussion in your negotiations?

No. At the time of the release of the Final Report, the Government's only response was to advise that following the significant outlays under the Building the Education Revolution for capital grants in schools, the Government was not considering any additional funding for capital grants.

23. What comments would the Independent sector have on the level of additional administration of funding model at a system wide and individual school level?

The independent sector is concerned to ensure that any administration associated with the funding model will not impose an additional burden on individual independent schools. In independent schools, any additional administrative costs must be met by the school community.

24. How do you view the contents of the National Plan for School Improvement (NPSI) as they are included in this Bill?

The Government's national plan seeks to capitalise on many of the effective elements of independent schools and encourage their application across all sectors. The concern in the independent sector is that the national plan will, by stipulating many prescriptive elements at the individual school level, produce the unfortunate outcome of a reduction in autonomy, innovation, flexibility and diversity in independent schools, the very qualities so essential to their success.

The independent sector is concerned to ensure that the implementation of the national plan will focus on empowering schools to make a real difference to student learning outcomes rather than becoming an additional bureaucratic burden necessitating the further transfer of resources away from schools' core business of educating students.

25. Specifically, possible future considerations for the National Plan for School Improvement include provision of students with access to one of 4 Asian languages study, can you comment on the capacity of your members to deliver on the wide number of announcements made by the government regarding future considerations in terms of cost, administration and autonomy to the Independent school sector.

The Government has made a number of announcements regarding requirements under the Plan including in relation to Asian languages, teacher quality and more recently literacy. It is ISCA's view that any increased costs to independent schools resulting from these obligations will need to be recognised and funded accordingly. Similarly, ISCA would be concerned at any requirements under the Plan which would reduce the autonomy of independent schools.

26. What will be the implication for staff workload?

It is not possible to determine with certainty the implications for staff workload for individual independent schools. As noted earlier, it is ISCA's view that increased costs including staffing implications, must be recognised and funded accordingly.

27. In your opinion, has enough money been allocated to ensure implementation?

It is not yet clear how the Government is planning to support implementation. ISCA is concerned that implementation will have significant cost implications for the sector.

28. Page 14 of submission- Please update the committee on your understanding of how the non- government school education authorities will work with the Commonwealth.

As outlined in ISCA's submission to the Committee, it is not clear how the non-government sector will work with the Australian Government to develop a national plan. No further clarification is available at this time.

29. Page 16 of submission- Please update the committee on your confidence on the latest iteration of data being used to determine loadings, leadership, teaching and school improvement.

ISCA continues to have major concerns regarding the quality of the data being utilised by the Government for modelling the proposed funding arrangements.