

A Submission Presented to the House Standing Committee on Education and Employment Inquiry into the Australian Education Bill 2012

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Executive Summary

This submission is a response to the *Australian Education Bill 2012*. It draws attention to the claim that the Bill purports to meet the educational needs of all school students equally, yet it does not remediate the legislated inequitable funding of the lowest funded, school students in Australia – non-government distance education (NGDE) students.

The submission demonstrates that NGDE is significantly underfunded. This underfunding is a direct result of problematic Commonwealth legislation.

A comparison of NGDE funding with the rest of Australia's schooling demonstrates this underfunding empirically.

The submission also highlights that:

- NGDE is cost effective in that it saves the public purse repetitive investments in land and infrastructure;
- NGDE does require significant recurrent funding for daily operations;
- NGDE underfunding creates adverse outcomes for NGDE students and their schools;
- policy makers have failed to deal with NGDE underfunding;
- legislative change is required to redress this chronic educational discrimination;
- without legislative change prior to the development of future funding models, NGDE underfunding may remain the policy of the future; and
- NGDE funding ought to be appropriate to the needs of NGDE providers.

Finally, the submission presents a two-part strategy to overcome the chronic problem of legislated NGDE underfunding.

1 Introduction

Christian Education Ministries is focussed to providing quality education for its students, who are enrolled in the Australian Christian Colleges in various states of Australia. Three of these Colleges have distance education departments, which provide full time education to non-government distance education (NGDE) students.

This submission is a response to the *Australian Education Bill 2012* (Commonwealth of Australia, 2012). It brings to the attention of the committee that NGDE has been indiscriminately allocated, in legislation (Commonwealth of Australia, 2008a), the lowest level of recurrent funding possible in the SES funding system. The only substantive way this underfunding of NGDE can be dealt with is by changing legislation. The *Australian Education Bill 2012*, makes no mention of this issue, so critical to around 5,000 distance educated school students across Australia.

1.1 The *Australian Education Bill 2012* Implies Funding Equity to All Students

The *Australian Education Bill 2012* implies that school funding will be allocated to all school students, in an equitable manner, appropriate to the provision of high quality education. The Bill's Preamble states:

"All students in all schools are entitled to an excellent education, allowing each student to reach his or her full potential"

Part 2-Section 9 School funding (b) states that:

"base recurrent funding will be allocated according to a formula that calculates an appropriate amount for every school in recognition of the costs of providing a high quality education;"

Further, in the Prime Minister's Second Reading of the Bill she states reiterates the importance of funding all Australian school students, stating that she is committed to "not only teach them well, but to fund them well." (Gillard, 2013).

1.2 The *Australian Education Bill 2012* Implies Appropriate Support to All Teachers

Part 2-Section 7 Quality Teaching states:

(1) "All teachers will have the skills, and the support they require, to improve their performance over time and to deliver teaching of a high quality to all of their school students."

(3) "Leaders in schools will have the resources, the skills, and greater power to make decisions and implement strategies at the local level"

1.2 NGDE Has Experienced Chronic Funding Inequity

The Bill uses the terms "all students", "every school", "recognition of the costs", "All teachers" and "will have the resources". In the case of NGDE, these terms are meaningless rhetoric.

Since 2001, NGDE has been the most underfunded form of schooling in Australia. The Commonwealth's track record has been chronically unfair and unjust when it comes to resourcing NGDE students. The brevity and vagary of the *Australian Education Bill 2012* creates no certainty for the 13 schools, which provide NGDE, that this underfunding of NGDE will be redressed.

The funding plight of NGDE schools was publicised in 2011, in two state-based newspapers in Queensland and Western Australia when per student recurrent funding figures were released in 2011 on the MySchool website (Chilcott & MacDonald, 2011; Tillett, Ryan, & Trigger, 2011). Both reports found that the lowest funded schools in both states were non-government schools, which provided NGDE.

The Weekend Australian also reported on the levels of funding of Australian schools in 2011 (Ferrari & Hooke, 2012, Mathieson, 2012). It stated that the national average expenditure per student was \$11,754. It comes as no surprise that the lowest funded schools in Australia are the schools which provide NGDE. The lowest funded school in Australia in 2011 was the Australian Christian College – Moreton, which averaged \$3,739 in per student recurrent funding (Ferrari & Hooke, 2012, p.10). Further, Chilcott (2012) corroborated these figures for the Australian Christian College - Moreton, in her online report on the funding of schools in Queensland. Chilcott (2012) reported that the average per student recurrent funding in Queensland for that year was \$13,730, a figure that dramatically overshadowed the \$3,739 per student funding of Australian Christian College – Moreton.

2 Demonstrating this Legislated Funding Inequity

2.1 A National Comparison

It is clear that Commonwealth per student, recurrent funding is grossly inadequate for NGDE. Harding (2012 a, b & c) has empirically demonstrated this by comparing the recurrent funding of school students in the government, Catholic and independent sectors, with the funding of Australia's NGDE students. Figure 1 demonstrates this comparison using figures from the Gonski (2011) Review of Funding for Schooling: Final Report, and a typical NGDE school's financial figures.

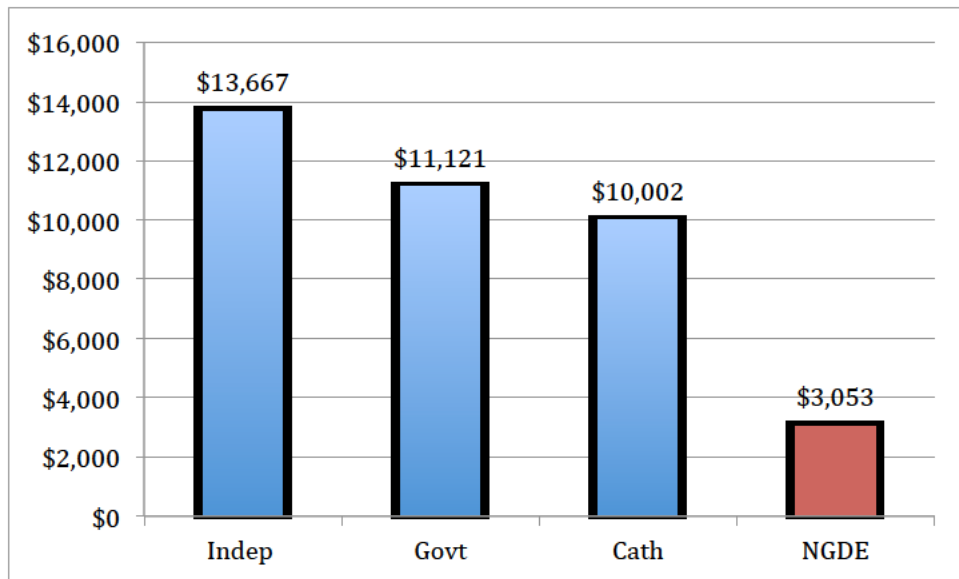


Figure 1 A Comparison of per-student funding figures for all sectors with NGDE funding

This underfunding of NGDE students primarily negatively impacts (i) the number of teachers, which can be employed and the (ii) services and resources, which can be accessed by schools in the provision of NGDE.

2.2 Comparing Non-Government Day School Funding with NGDE funding – Day Schooling is Funded Appropriately, NGDE is Not

A comparison between the non-government sector’s Commonwealth funding levels for on-campus day school students and its distance education students, who are enrolled in the same school, highlights the underfunding of NGDE. Figure 2 shows comparisons between Commonwealth funding of on-campus non-government day school students (NGDS) and NGDE students, in 2010, for three schools. These three non-government schools are located in the states of Queensland (Australian Christian College – Moreton), New South Wales (Australian Christian College – Marsden Park) and Western Australia (Australian Christian College – Southlands).

I have chosen these three schools to illustrate the point of NGDE underfunding, as I have direct access to their financial details. These figures may marginally differ, for all other providers of NGDE across Australia; however, they are sufficiently typical of the funding levels of all NGDE providers, so as to clearly present the general picture of Commonwealth NGDE per-student funding for all NGDE providers in Australia.

In order to make the funding comparison consistent with the rest of the figures in this submission, I have used the schools’ averaged primary and secondary Commonwealth per-student recurrent funding figures.

Figure 2 also cites the separate SES rankings of the day school and distance education departments of each of the three schools. The SES ranking of 130 is prescribed specifically for NGDE schools in the problematic legislation. This is an abnormal condition for non-government schooling, as all other non-government schools have only one SES rank. Schools providing NGDE, however, must have two SES ranks. The SES rank for their day school, reflects the needs-based SES determination for

that school. The second SES rank of 130 is a fixed rank for NGDE, which does not correspond to the needs of the school nor of the families of NGDE students. It is this second SES rank which is the legislated mechanism by which the underfunding of NGDE is actioned.

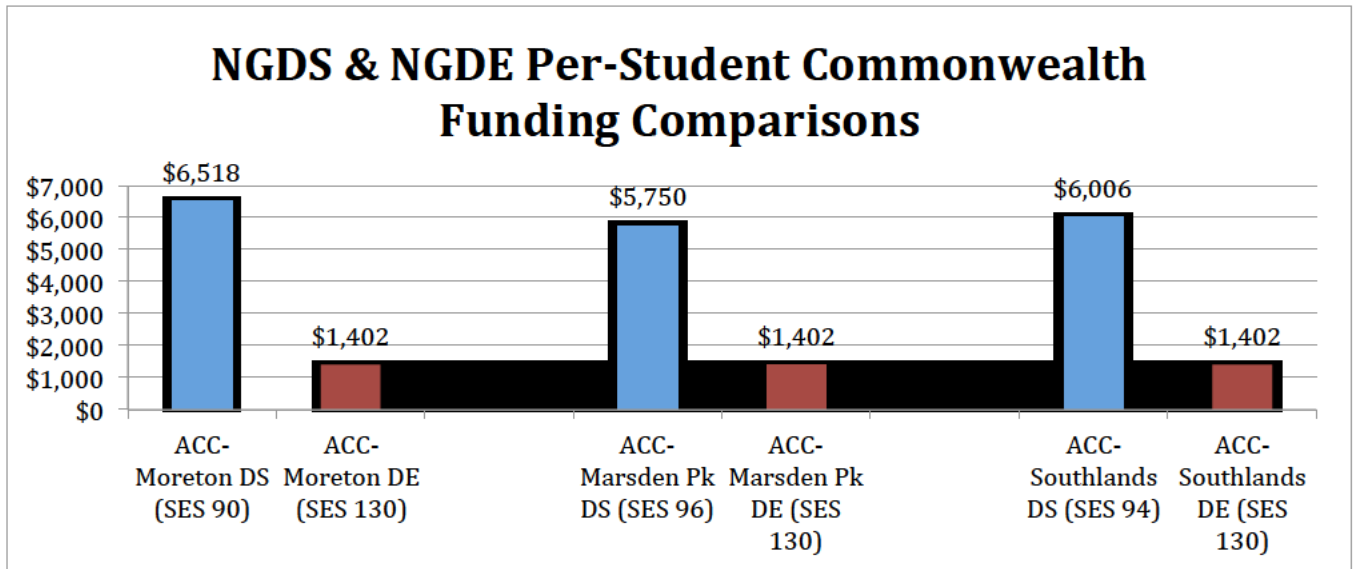


Figure 2. Commonwealth Funding of NGDS & NGDE Students in the Same Schools in 3 States

The graph demonstrates that:

- the Commonwealth funds NGDS students to a much greater level than NGDE students, even though they are enrolled in the same school.
- schools that provide NGDE are each allocated two different SES ranks; a needs-based rank for the day school and one fixed, non-needs-based rank (130) for the distance education department of the same school. This rank is legislated and for this reason, redress of NGDE underfunding requires specific changes in legislation.

2.2.1 Three Examples of the Differences in the Commonwealth Funding of NGDS & NGDE Students Enrolled in the Same Non-Government School

2.2.1.1 Queensland – Australian Christian College - Moreton

NGDE students enrolled at Australian Christian College-Moreton are allocated only 22% of the Commonwealth funding which is allocated to their fellow NGDS students.

2.2.1.2 New South Wales – Australian Christian College-Marsden Park

NGDE students enrolled at Australian Christian College-Marsden Park are allocated only 24% of the Commonwealth funding, which is allocated to their fellow NGDS students.

2.2.1.3 Western Australia – Australian Christian College-Southlands

NGDE students enrolled at Australian Christian College-Southlands are allocated only 23% of the Commonwealth funding which is allocated to their fellow NGDS students.

2.3 Comparing government distance education funding with government day school funding – Both are Well Funded - But DE Always Receives More

Figures 3 - 5 show comparisons between GDE and GDS funding in the states of Queensland, New South Wales and Western Australia. The government day schools selected for this comparison, are located in the same towns as the government schools of distance education. These schools are variously located in each of the four MCEECDYA schools location regions, which are classified as: metropolitan (Met), provincial (Prov), remote (Rem) and very remote (V Rem).

In figures 3 – 5, the darkened colours represent distance education funding and the paler colours represent day school funding.

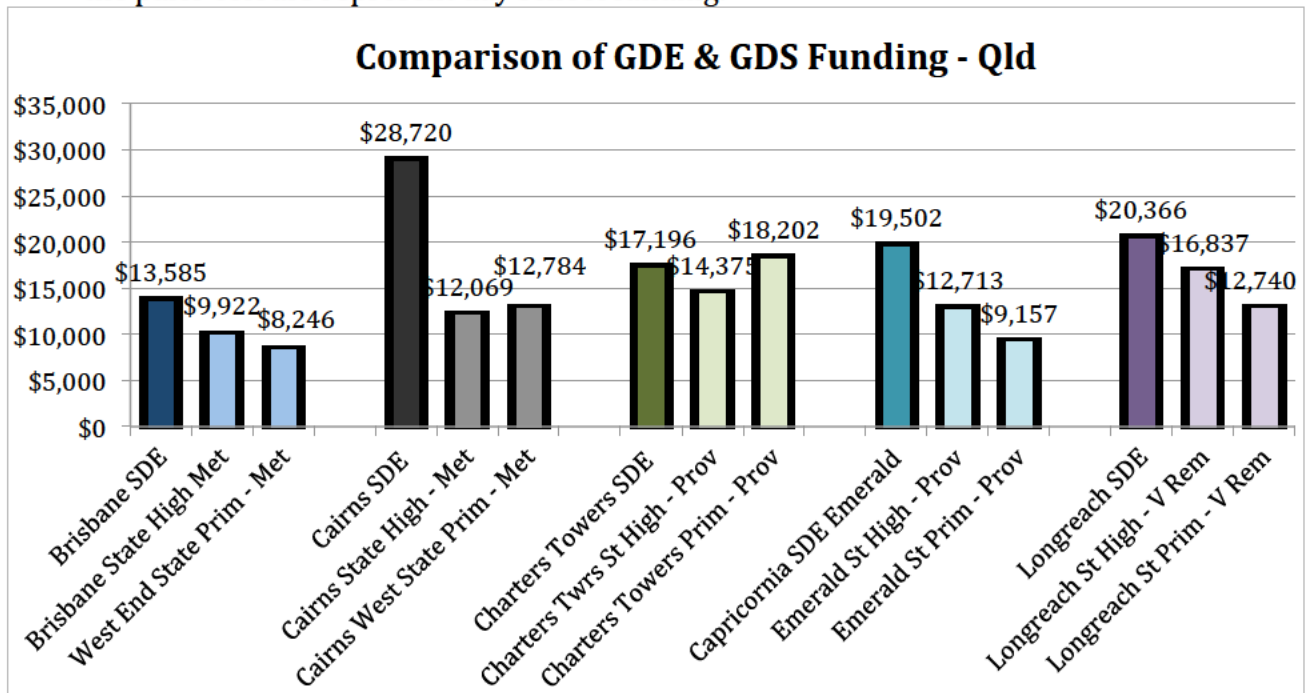


Figure 3. Comparison of GDE & GDS Per-Student Funding in Queensland

Comparison of GDE & GDS Funding - WA

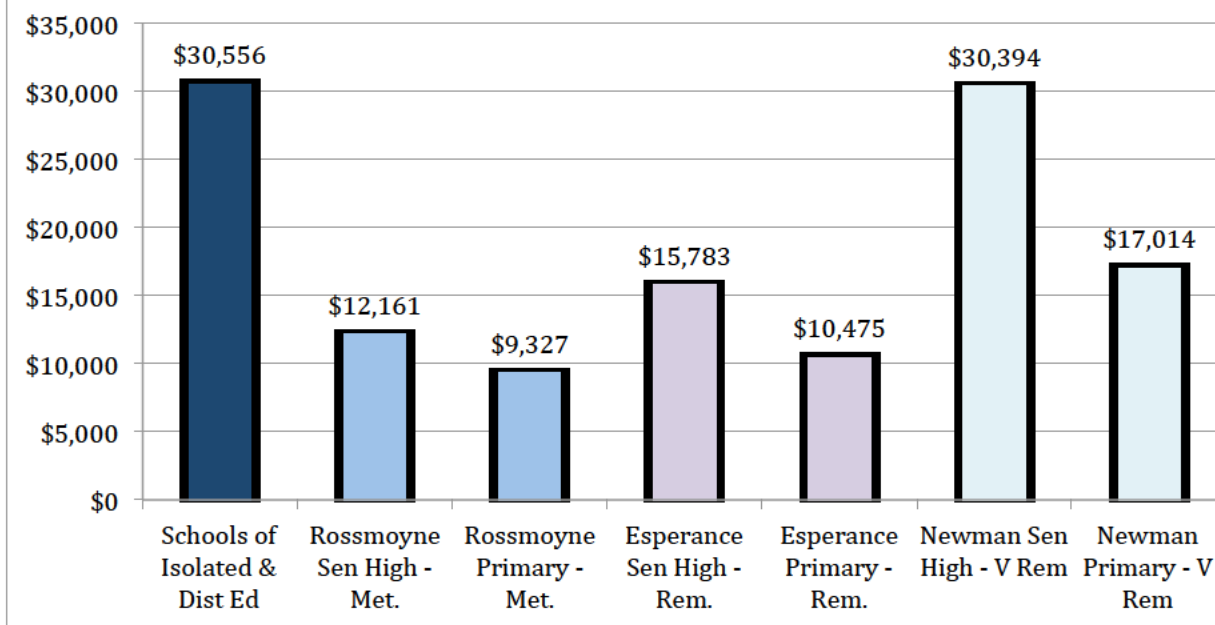


Figure 4. Comparison of GDE & GDE Per-Student Funding in Western Australia

Comparison of GDE & GDS Funding - NSW

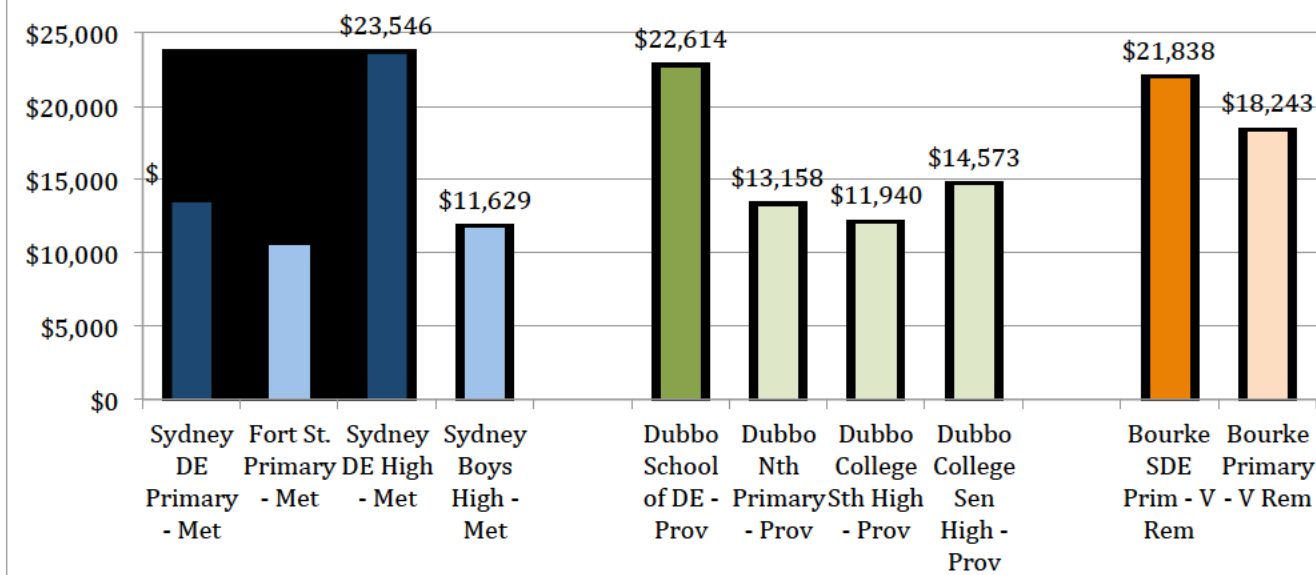


Figure 5. Comparison of GDE & GDS Per-Student Funding in New South Wales

The graphs indicate the consistent trend that GDE is allocated greater recurrent funding than GDS, in each of the three states. This trend is true for the government sector, irrespective of whether the schools are located in the metropolitan, provincial, remote or very remote MCEECDYA regions. Thus, Australian governments recognise that distance education generally requires more per-student recurrent funding than on-campus day schooling. It is regrettable to note that this recognition is

not consistently attributed to distance education schooling in the non-government sector.

2.4 Government distance education funding compared with non-government distance education funding – NGDE is grossly underfunded

A direct comparison between the funding of government schools of distance education and that of non-government schools of distance education graphically illustrates the funding inequity between the two sectors. Figures 5 and 6 show comparisons between GDE and NGDE per-student recurrent funding in the states of Queensland and Western Australia. They demonstrate the major discrepancy between the funding of the government sector’s schools of distance education and the non-government sector’s schools of distance education. GDE schools are represented by various colours and the NGDE schools are represented by the maroon colour.

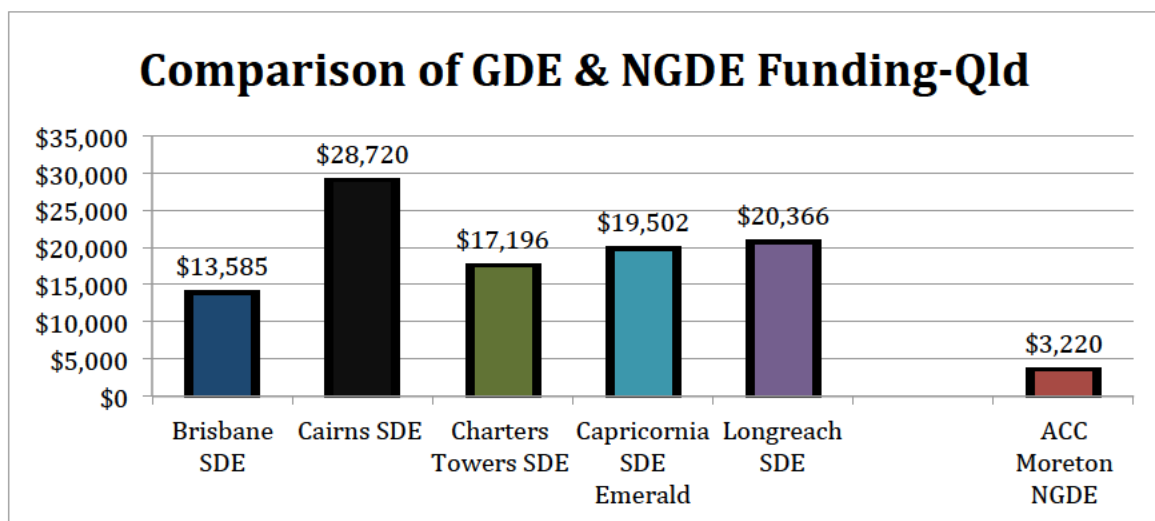


Figure 6. Comparison of GDE & NGDE Per-Student Funding in Queensland

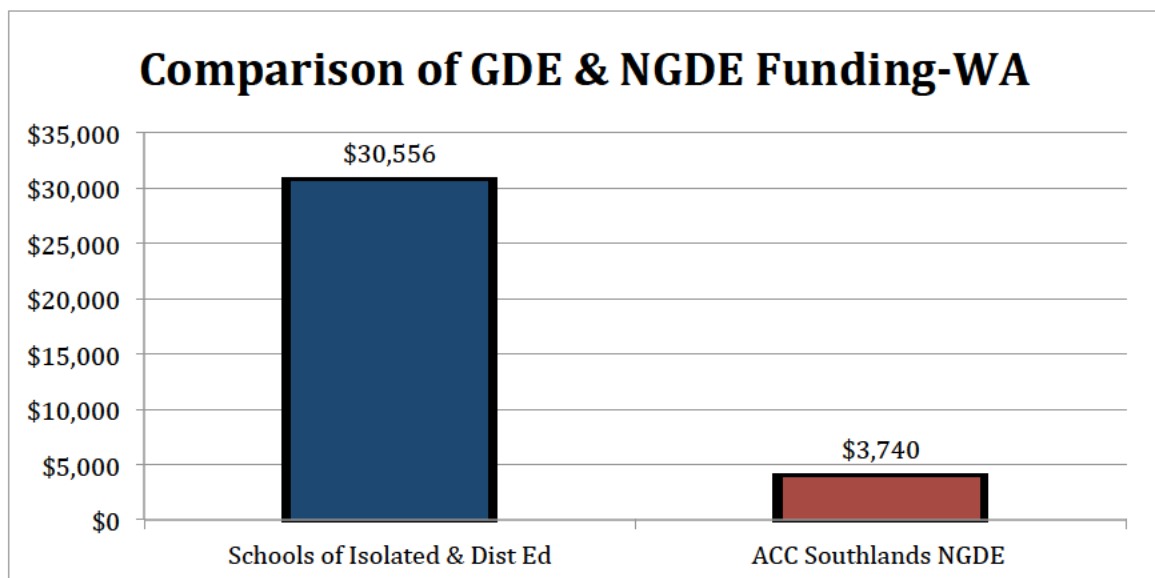


Figure 7. Comparison of GDE & NGDE Per-Student Funding in Western Australia

The graphs demonstrate that whilst distance education in the government sector is appropriately funded in Queensland and Western Australia, distance education in the non-government sector is by comparison, significantly underfunded in those states.

Whilst it is true that government schools and non-government schools are funded under separate regimes, yet for the purpose of understanding NGDE's funding dilemma, it is important to note that:

- governments recognise that distance education in the government sector, should be adequately funded, yet
- in the non-government sector, this recognition of distance education is not given similar treatment in policy and practice.

2.5 Summary of the Demonstration of this Legislated Funding Inequity

The above figures 1 - 7 clearly demonstrate that NGDE students are grossly underfunded. The figures indicate:

1. NGDE is underfunded compared to all three sectors of Australian schooling (Figure 1).
2. NGDE is underfunded compared to non-government day schooling. The Commonwealth does not recognise that distance education in non-government schooling requires higher recurrent funding than day schooling (Figure 2).
3. Governments recognise that distance education requires higher recurrent funding than day schooling and thus fund distance education appropriately in the government sector (Figures 3-5).
4. NGDE is underfunded compared to government distance education. (Figures 6 & 7).

The funding inequity enacted against NGDE schools, their students, parents and wider learning communities is obvious. This inequity has been set in the concrete of legislation since 2000. It requires immediate redress because NGDE students need adequate numbers of teachers and educational resources, just like the rest of Australia's school students.

3 NGDE is Cost Effective

It is not often stated, but it must be realised, that NGDE is a highly economical form of educational delivery. Unlike traditional day schooling, schools of distance education do not require the purchase of large portions of land in every city, town and regional population centre in the state, nor do they require large numbers of appropriately equipped school buildings, their ongoing maintenance and complicated infrastructure, which is an unquestioned necessity for on-campus day schooling. Thus, NGDE does not draw upon the Treasury in the same way that traditional on-campus day schooling draws upon the public purse.

However, the Commonwealth must realise and take responsibility for the fact that NGDE does require adequate recurrent funding to meet staffing and daily operational costs. Harding's (2012a) study of non-government distance education in Australia, lists the operational cost centres of NGDE. Appendix 1 in this submission cites some of these expenses incurred by schools, which provide NGDE.

In summary, NGDE saves on capital costs, which must be repeated in every town, but it requires appropriate recurrent funding to adequately support its students. A study of the funding of distance education in the government sector, strongly supports this

view (Figures 3 – 7) and it further supports the view that NGDE is grossly underfunded.

4 Legislation – The Heart of NGDE’s Underfunding Problem

4.1 History of NGDE Legislation

The Commonwealth Government’s funding of NGDE was formally legislated in 2000. When introducing this legislation, the Education Minister, the Hon. David Kemp, stated in his second reading speech: “For the first time it (the bill) provides recurrent funding for distance education students in the non-government sector receiving that education from non-government schools” (Kemp, 2000). The *States Grants (Primary and Secondary Education Assistance) Act 2000* (Commonwealth of Australia, 2000a) provided a legislative foundation for the Commonwealth Government’s financial support of NGDE in all Australian states and territories. This support commenced with the 2001 – 2004 funding quadrennium.

NGDE’s low recurrent funding level remains the same today, as it was in 2001 and is reiterated legislatively in the *Schools Assistance Act 2008* (Commonwealth of Australia, 2008a).

4.2 Examining the Current NGDE Legislation

Whilst this Act formally recognised NGDE and committed Commonwealth funding to NGDE students, it did not treat them in the same way as other non-government school students. The Act prescribed that NGDE students should be resourced at the lowest possible funding level for non-government school students.

Rather than allowing NGDE students to be assessed in the needs-based socioeconomic status (SES) system for the allocation of recurrent funding to non-government schools, the authors of the Act took the unprecedented step of automatically assigning the highest SES rank of 130 to NGDE. In turn, this rank automatically prescribed the lowest level of Commonwealth funding in the SES system to NGDE students. The SES rank of 130 prescribes funding to a school at the rate of 13.7% of the Average Government School Recurrent Cost (AGSRC).

4.2.1 Anomaly 1 – NGDE’s AGSRC % Cited in Legislation – Circumvents the Point of the SES Model – The Capacity of NGDE Communities to Contribute

One unusual aspect of this allocation of the highest SES rank to NGDE is that the AGSRC percentage figure for NGDE is written, verbatim, into Commonwealth legislation (Commonwealth of Australia, 2008). The *Schools Assistance Act 2008* (Commonwealth of Australia, 2008) states in “Division 7 – Distance education funding”, in section 57, that for primary school students in NGDE, the

“assistance amount per student, for a program year, means the amount worked out using the formula: 13.7% x AGSRC for primary education for the program year”

Similarly, Section 58 of “Division 7 – Distance education funding”, states that for secondary school students in NGDE, the

“assistance amount per student, for a program year, means the amount worked out using the formula: 13.7% x AGSRC for secondary education for the program year”

(Commonwealth of Australia, 2008a, sections 57 & 58)

The insertion of the actual AGSRC percentage figure for NGDE into Commonwealth legislation is not usual practice for the allocation of Commonwealth funding to non-government schools. Rather, SES ranks and AGSRC percentage figures for non-government schools are assigned to schools according to the socioeconomic status (SES) of the families whose children are enrolled in the school. An SES rank is not arbitrarily assigned to a school; it is assigned according to the needs of the school’s families and the capacity for school communities to contribute to their children’s education.

Because the recurrent funding level of NGDE is set in legislation, if there is to be any change to NGDE funding in future, such a change would require a change to legislation.

4.2.2 Anomaly 2 – Schools Providing NGDE have Two SES Ranks – An Aberrant Concept within the SES Model.

Unlike any other schools in the independent education sector, schools that provide NGDE have two distinct SES rankings (see Figure 2). The first SES ranking applies to the school’s on-campus day school students. It is determined by the needs-based SES criteria, which takes into account the socioeconomic needs of families whose children are enrolled in the school. The second SES ranking is for the school’s distance education students. It is the predetermined, legislated rank of 130. It makes no reference to the socioeconomic status of NGDE families nor to the pedagogical needs of NGDE schools, for the delivery of NGDE.

4.2.3 Anomaly 3 – NGDE’s SES Rank is Higher than Australia’s Elite Private Schools! – A Complete Absurdity

NGDE’s SES funding rank of 130 is higher than the SES rank of Australia’s elite private schools. This rank implicitly assumes that NGDE families are among Australia’s most highly salaried parents and that they reside in Australia’s more exclusive locations. This SES rank allocates to NGDE students, a funding amount that is lower than the funding amounts allocated to Australia’s most elite and well resourced, private schools. Table 1 demonstrates this anomaly.

School	SES	AGSRC %	Primary \$	Secondary \$
All NGDE Schools	130	13.7%	\$1,378	\$1,705
Knox Grammar, NSW	129	15%	\$1,509	\$1,867
Presbyterian Ladies’ College, WA	125	20%	\$2,012	\$2,489
Brisbane Boys’ College, Qld	123	22.5%	\$2,263	\$2,801

Table 1 Comparison of 2012 SES Ranks, AGSRC % & Funding Rates of NGDE with 3 Elite Private Schools (DEEWR, 2012)

NGDE families do not fit the demographic profile of an SES rank of 130. NGDE families must be single income families in order for one parent to forego paid employment and to remain in the home to supervise the children's education (Harding, 2011a & b, 2012a). It is clear that NGDE families would not rank in the SES system at a higher socioeconomic status than families of Australia's elite private schools. For NGDE to be arbitrarily ranked in legislation at SES 130 is an irrational assertion and an obvious educational injustice, which creates disadvantage and inappropriate educational outcomes.

4.3 The Outcomes of Bad Legislation

In effect, the practice of citing the AGSRC percentage figure in legislation, has excluded NGDE students and their families from the needs-based SES funding determinants, used to appropriately resource non-government students and their schools throughout Australia. Commonwealth legislation and policy has effectively precluded needy students, who are almost entirely from single income families (Harding, 2012a), from the nation's needs-based educational safety net.

Harding (2012 a & b) has posited that because NGDE funding levels are prescribed in Commonwealth legislation (*Schools Assistance Act 2008a*) that NGDE students are precluded, legislatively, from what is considered to be a basic requirement on the Australian educational landscape, that is adequate educational resourcing. Because this inadequate resourcing is legislatively mandated, NGDE students have been the victims of a legislated social injustice which has taken the form of a Commonwealth-enforced, educational deprivation.

Harding's research (2012a) outlines in greater detail, how the underfunding of NGDE has delivered disadvantage to NGDE school communities. In summary, these outcomes include:

- significantly fewer teachers in NGDE;
- highest student-to-teacher ratios in Australian school education;
- limited teacher-to-student contact;
- limited educational resourcing;
- limited DE-specific curriculum development;
- limited access to Information Communications Technology (ICT);
- work overload for teachers;
- work overload for school administrations and
- limited career advancement for NGDE teachers.

Thus, with respect to any future Commonwealth legislation, NGDE funding levels must be redressed, if NGDE students, their schools and staff are to be resourced adequately.

5 NGDE Overlooked Thus Far

5.1 The Gonski Review

The Gonski-commissioned studies of Australia's school funding (ACER, 2011, Allen Consulting Group, 2011, Deloitte Access Economics, 2011, MGSE, NILS &

NOUS Group, 2011), and the final report of the Review of Funding for Schooling (Gonski, 2011) failed to mention, let alone address, the underfunding of NGDE. My discussion with Dr. Ken Boston, a member of the Review Panel, led him to conclude that NGDE funding “may have been overlooked” (Personal Communication, Dr. Ken Boston with T. Harding, May, 22, 2012). This is despite my having made a submission to the Panel and having had a personal interview with Mr. Gonski (16 July, 2010).

5.2 The Minister

Furthermore, the Minister, though requesting from the author, a nationwide report on NGDE (Harding 2012a) in order to consider the matter of NGDE funding, has stated that he does not propose to make changes to the current school funding arrangements, in view of the future reforms to Australia’s school’s funding. (Personal correspondence, Minister Garrett to T. Harding, 28 November, 2012).

With all due respects to the Minister, to continue this disgraceful educational deprivation towards a specific cohort of Australian school students is an abrogation of the responsibility of the office of Education Minister, when it is the Minister’s responsibility to support all Australian schools and their students as agreed to in the *Melbourne Declaration in Education Goals for Young Australians* (MCEETYA, 2008). Rather than address the problems created for NGDE by the *Schools Assistance Act 2008* (Commonwealth of Australia, 2008), the Minister’s comment uses this problematic legislation to justify inactivity and to thus perpetuate the educational deprivation of NGDE students.

The underfunding and under resourcing of NGDE has been the legislated norm since 2001. It is imperative to bring this matter to the attention of this committee, in its current context of considering the 2012 legislation.

5.3 The Gonski-Proposed Future for NGDE Funding

Without specific legislative change, the future government resourcing of NGDE seems to be set for continued underfunding.

The *Australian Education Bill 2012* (Commonwealth of Australia, 2012) states in Part 2-Section 9 School funding (b) that the

“base recurrent funding will be allocated according to a formula that calculates an appropriate amount for every school in recognition of the costs of providing a high quality education;”

The currently proposed formula of the Gonski model for the future of schools funding, bases the funding of non-government schools on their SES rank (Gonski, 2011). Thus NGDE would still remain locked into the underfunding, which is prescribed to it, due to its SES rank of 130. Further, the Gonski model prescribes that schools with an SES Rank of 130 would also have their percentage of the Gonski-proposed extra loadings determined by their SES rank. Thus NGDE’s current SES rank would:

1. continue to condemn NGDE to underfunding with respect to the Gonski-proposed Schooling Resource Standard (SRS) and

2. prescribe NGDE to underfunding with respect to the Gonski-proposed extra loadings, should it qualify for any of these.

Whilst Gonski (2011) has prescribed a percentage of 20-25% of the standard SRS for schools with an SES of 130, the Australian Government is considering other figures, which are different to this percentage. These figures are being considered by COAG, but are subject to confidentiality agreements and thus are not public knowledge. Irrespective of whatever percentage is determined, NGDE should not be ranked at SES 130.

Currently, there has been a process of recalibration of the SES ranks of non-government schools. Again this process is not open to public scrutiny or input, so the future of NGDE is uncertain. If NGDE were to be included in the recalibration of SES scores, then for the first time since 2001, NGDE may be allocated an SES rank which truly reflects the socioeconomic status (or capacity to contribute) of these single income families and their school communities.

At this stage however, the reality of NGDE is that its legislated SES rank is:

1. totally inappropriate;
2. legislatively unappealable (Commonwealth of Australia, 2008 a & b); and
3. the basis for the Gonski-proposed future funding of NGDE.

In summary, the key to NGDE's past, present and future underfunding is its SES rank of 130, which is set into legislation. The key to NGDE receiving adequate educational funding and resourcing is to CHANGE THE LEGISLATION and to allocate an SES rank to NGDE providers, which is appropriate. This will allow NGDE to be funded in a more appropriate manner, as a future national funding model is developed and implemented.

5.4 The Opposition's Position

The Shadow Minister for Education, Christopher Pyne MP, has stated that should the coalition form a government in the future, that it would retain the current SES funding model, but include some elements of the Gonski report.

The coalition's position on school funding relies heavily on the current system. This again means that for NGDE to obtain appropriate funding, its current legislated SES rank must be changed, legislatively.

5.5 The Uncertainty of Change

There is much uncertainty about the rollout of funding changes for Australian schooling. The Prime Minister recently announced that changes would be introduced in 2014 and that they would take at least six years to implement.

Further uncertainty about the implementation of change surrounds the political debate as to the participation and contribution of the states and territories. NGDE needs immediate positive change, rather than further, extended delay.

6 Proposal to redress the injustice

Gilbert et al. (2011) argued that in democracies, “democratic imperatives surrounding equity, equality and social justice” (p. 1) create high social expectations among citizens, and that large quantities of resources should be dedicated to education in order to reduce educational disadvantage. Clearly, a redistribution of funding, in measures equitable to other forms of schooling is the only answer that will deliver a degree of educational equity and social justice and bestow parity of participation in education to NGDE communities.

The problem of the Commonwealth’s NGDE underfunding policy may be addressed in two stages, firstly an immediate short-term solution, which would give immediate relief and assistance to these schools and a more appropriate, research-based long-term solution, which would align NGDE funding with optimal practice in the provision of distance education.

6.1 Short-Term Equity Funding Solution – A Distance Education Grant

The short-term equity funding solution would be to allocate a “Distance Education Grant” to all NGDE providers until the Long-Term Appropriate Funding Solution is implemented. This grant would be a “top up” of Commonwealth funding to the amount equivalent to what the school would have received, had all of its NGDE students been allocated the same SES rank as its day school students. This would at least provide the same level of funding for the school’s distance education students as is provided for its day school students.

6.2 Long-Term Appropriate Funding Solution

The long-term appropriate funding solution would be the result of a research-based determination of the costs of providing NGDE. It would depend upon (i) the model of funding for schools, which will be implemented by Australian governments in the future and (ii) applying an additional, calculated distance education loading, on an equal basis, to both the government and non-government providers of distance education.

7 Summary

In this submission, I have sought to demonstrate the unjustified funding position of NGDE schools, their staff, their students and their wider communities nationwide. This discussion is relevant to this Standing Committee because NGDE’s problem is legislatively derived, and this committee is seeking the public’s response to new legislation, which does not deal with NGDE’s legislated problems.

The critical elements of this submission are below.

1. NGDE is underfunded.
2. This underfunding is prescribed in legislation.
3. This underfunding has been demonstrated by comparing NGDE funding with the funding amounts of:
 - a) government distance education
 - b) non-government day schooling and
 - c) the rest of Australia’s schooling.

4. NGDE underfunding adversely affects the education of NGDE school students.
5. The Gonski funding review has overlooked NGDE funding.
6. NGDE's current SES rank will determine future Gonski-proposed funding levels, thus further perpetuating NGDE funding problems.
7. The Minister has denied NGDE immediate redress of underfunding.
8. The Coalition would retain the current SES model, if elected.
9. Legislative change is the solution to NGDE underfunding.
10. The *Australian Education Bill 2012* makes no mention of changing the SES of NGDE.

8 Conclusion

Because NGDE has been established on the Australian educational landscape for 12 years, it is important that governments genuinely recognize and support it as a bona fide pedagogy and that they allow it to develop in its own context. Marsden (1996) argued that distance education ought not to be deemed as an inferior form of education; rather, that an educational hegemony, mostly uninitiated to distance education, ought to seek to understand and support it. As the emerging participant in distance education delivery, NGDE should be nurtured by Australia's education system, rather than being admitted to it and then starved by underfunding.

The Commonwealth's policy of underfunding NGDE clearly contradicts its stated educational policies of resourcing students and their schooling, as, for example, is indicated in the *Melbourne Declaration in Education Goals for Young Australians* (MCEETYA, 2008). This policy has become an example of a chronic resource inequity and a social injustice on the Australian educational landscape.

By depriving NGDE schools and their students equal access to educational resourcing, current policy excludes these students from what is considered to be essential in our society, that is, what the Prime Minister described as "a fair chance to a great education" (Christenson, 2010). Thus, unlike the rest of twenty-first-century schooling in Australia, NGDE is restricted to a resourcing level comparable to the minimalist funding of non-government schooling in the 1970s. At that time, the Karmel Report (Karmel, 1973) recommended that governments provide adequate levels of funding for all schools in Australia.

Without redress of the current legislation, NGDE learning communities will continue to be subjected to entrenched resourcing disadvantage. The Gonski (2011) review of school funding in Australia provides a platform for redress of this funding inequity, in the long term. However, because of the gross inequality and serious nature of this legislated defective funding policy, and the broad extent of its reach, community expectations of educational equity and social justice would warrant a short-term expeditious rectification of the problem of the Commonwealth's underfunding of NGDE.

As a pioneer, researcher with significant experience in and knowledge of NGDE, I am happy to offer my assistance to any process of such a rectification.

9 References

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Appendix 1 Educational Expenses in NGDE

Below are some of the cost considerations, which are significant to the provision of NGDE in Australia.

Pedagogical Requirements of NGDE

Like government distance education, NGDE has pedagogical requirements, which are quite distinct from traditional classroom pedagogy. Distance education in both the government and non-government sectors requires the construction and maintenance of an at-distance learning environment. Distance education requires:

- distinctive curriculum design,
- curriculum development,
- course management
- course delivery
- specific educational infrastructure and
- specialised staff-to-student transactions (McFarlane, 2011).

Distance education also requires a high level of resourcing. Whilst print and postage is a vital part of the delivery of distance education, ICT requirements are a growing integral part of NGDE. These requirements include:

- hardware,
- software,
- Internet connectivity and
- extensive use of electronic services such as phone and fax.

Harding's research (Harding, 2012a) cited the many tools and resources, which are required to create an optimal NGDE learning environment. NGDE principals and their staff cited (in addition to traditional paper-based educational resources) the following, as part of the NGDE process for communications between the school and its students.

- Phone tutoring
- Email
- Teaching chat rooms
- On-line learning management systems
- Skype meetings
- Forum posts
- Video conferencing
- On-line tutorial groups
- On-line individualised teaching
- Practical applications
- Fax
- Blogs
- On-line interactive white board
- On-campus individualised teaching
- On-campus activities
- On-campus tutorial groups
- Student e-Magazine

(Harding, 2012a, p.66)

NGDE schools also indicated that they communicated with their students and parents in the following ways:

- Teacher visits to the student's home
 - Parent-mentor visits to the student's home
 - Field trips and camps
 - Excursions
 - Workshops
 - Group activity days
 - Newsletters
 - Residential programs
 - Student Councils
 - Concerts
 - Awards presentation nights
 - Non-NGDE school contact teacher for part time NGDE students
- (Harding, 2012a, p.66)

NGDE students have high expectations of their schools and their schooling. Oliver, Osborne and Brady (2009) examined the expectations that high school distance education students have with respect to their distance education courses. They found that these high expectations include, "detailed and interactive content, peer-to-peer collaborative activities and speedy feedback" (Oliver, Osborne, & Brady, 2009, p. 42), all of which require adequate communication tools and resourcing. Current Commonwealth funding of NGDE, precludes NGDE students from an adequate experience of such appropriate educational practices.

When the Commonwealth formally recognized NGDE in 2000, ICT pedagogical requirements were much less than they are today. In order for NGDE students to have modern, appropriate, educational experiences and outcomes, NGDE schools need appropriate funding to enable NGDE teachers to have adequate tools to create and maintain optimal at-distance learning environments.

Individualised Education for NGDE Students

A key difference between traditional day schooling and distance education is that day schooling deals with groups of students, whereas distance education mostly deals with the individual student. The DE teacher interacts with the student on a one-on-one basis. The DE teacher diagnoses each student's learning gaps, prescribes specific remediation and then prescribes a learning programme and appropriate resources for the student to proceed from that point of remediation. A day school teacher can deal with students in groups and thus can exercise economies of scale, which are unavailable to DE teachers.

In a similar manner, the DE teacher has to resource each student individually, whereas in classrooms, a day school teacher can have one set of resources for a whole class.

In short, dealing with NGDE students in a bona fide manner is both labour and resource intensive. This would require specific funding to meet DE-specific educational needs.

NGDE Attracts Students with Special Needs

Further, distance education attracts a significant proportion of students with needs, which extend beyond the norm. Research (Harding, 2011) indicates that many parents choose NGDE to remediate problems, which could not be remediated in on campus day schooling. Such extenuating needs include issues such as:

- gifted and talented students;
- literacy and numeracy problems;
- students disengaged from learning at day schools;
- students with health problems;
- students with psychological problems;
- students with social problems;
- pregnant students; and
- students who live in remote locations.

NGDE Needs More Teachers

Both prominent educators (Brock, 2010; Gilbert, Keddie, Lingard, Mills, & Renshaw, 2011) and the Gonski-commissioned research (Deloitte Access Economics, 2011) have stated that appropriate funding plays a key role in the teaching quality of a school. The inappropriate Commonwealth funding of NGDE negatively impacts upon the selection, training, professional development, career progression and retention of teachers in NGDE.

Teacher Training

Distance education teachers need to be trained beyond the training of traditional classroom teachers. Not only do they need to be knowledgeable of traditional pedagogy and course content, Oliver, Osborne and Brady (2009) demonstrated that distance education teachers need to be

- trained and able to teach online,
- able to use an appropriate range of educational tools, specific to distance education,
- able to use specialised at-distance communication skills,
- able to provide timely feedback,
- actively teaching rather than just moderating courses and
- providing individualised instruction to individual students.

There is currently no serious attempt by teacher training institutions to incorporate the above distance education-specific pedagogical skills into traditional tertiary education training. NGDE providers administer this teacher training from within their own schools. Such provision of on-the-job training means that these schools must resource and fund their own teacher training processes, at their own costs in time and revenue. Again, this means a further financial impost to be born by these schools, which are the least funded.

Selection, Career Progression and Retention of Teachers

Principals of schools providing NGDE indicated (Harding, 2012a) that inadequate funding negatively impacted the teacher and teaching cultures in their schools. Low funding hindered NGDE schools in:

- attracting high quality teachers,
- rewarding high calibre teaching,
- shaping the allocation of teachers across and within schools and
- increasing teacher quality over time, via professional development.

The Commonwealth's underfunding policy has created a problematic teaching culture for NGDE schools. These schools are compelled to provide NGDE to their students, on low budgets, which in turn, limit their ability to attract and retain highly experienced teachers. It limits the schools' ability to develop their teachers over time, to outline normal pathways for teacher career progression and higher remuneration opportunities for NGDE teachers.

Communicating with NGDE Parent Supervisors

NGDE teachers not only have to deal with each student individually, they must also deal with the student's parent supervisor / home tutor on an individual basis. This may involve assisting the parent with some training, e.g. motivation of the student, administrative procedures of the school or assisting the parent in understanding how to deal with academic problems. Dealing with parent supervisors on an individual basis, as part of a school's educational programme is very labour intensive.

Induction and Professional Development for Parent Supervisors

The Parent Supervisor is usually not a trained teacher. Harding (1997) found that 83% of home educating parents, were not trained. It may well be that this percentage is similar for distance education parents. There are several areas, specific to distance education, for which parent supervisors require professional development. These include:

- a) Induction to NGDE
- b) Ongoing Parent Supervisor development
- c) ICT training
- d) Australian Curriculum implementation training

Technology

Distance education in 2013 is very different to distance education in 2000 (when legislated recognition and Commonwealth funding was first enacted). The very nature of educating students across distances requires the sophisticated implementation of Information Communications Technologies (ICT). NGDE staff and students need access to ICT hardware, software, support services and broadband connectivity as an educational necessity.

Post

Another core educational operative, specific to distance education is a strong reliance on postage. Australia post and courier services provide the means to send school communications, academic resources and testing instruments to and from the school and the student's home.

Print

NGDE still relies heavily on printed curriculum materials as part of its educational delivery.

Activity Days

NGDE includes Activity Days, field trips, camps and other such gatherings, which are of great benefit to both students and the parent supervisors. The cost to deliver these services is considerable in terms of finances, staffing and resourcing.

Remoteness

A significant minority of non-government distance education (NGDE) students are located in regional, remote and very remote locations. These students face unique educational challenges including limited digital delivery and distance from resources.

Part of the solution to isolation for these students includes:

- a) Allowing College teachers to reside in regional centres rather than the current requirement that they must operate from the College campus
- b) Providing activity days in regional centres
- c) Home visits, where practicable
- d) Annual camps
- e) Field trips

All of these educational activities require appropriate staffing and resourcing.