

Chapter 4

Policy administration

4.1 The committee is critical of the implementation process of the changes the Government has legislated for. This has resulted in a number of significant deficiencies in the administration of programs which might not have occurred had things been done differently. A characteristic of good government is that evolutionary policy change is marked by a smooth transition. This cannot be achieved without public knowledge and reassurance of what is to follow. Proper consultation allows people to become reconciled to new procedures, in cases where change is contentious, as this one has been. People affected by change can be assured of fair treatment within a new system, and public confidence in government programs can be maintained. It is all a matter of trust.

4.2 It is difficult to escape the conclusion that in this instance the process of change has alienated people affected by it. This failure of administration has been as much as anything a failure of anticipation: a failure to take the time to win approval for policies through more intensive consultation. There has been a lack of respect shown in this process, which the committee has gleaned not only from comments from indigenous people, but also from school principals. Conflicting advice from some officials, and some tactless treatment of school principals and system administrators, demonstrates poor preparation and inadequate training at the official level. The imposition of urgent deadlines may have been regarded as an administrative necessity, but in relation to what DEST probably refers to as 'the client group' it was a public relations disaster. Indigenous people do not immediately complain and at the same time 'get on with it'. For many of those associated with schools the disbanding of ASSPA without preparing the ground for its successor was to be seen as a withdrawal of trust.

4.3 Nor has administrative haste resulted in schools being able to access funds in a timely fashion. As described in earlier chapters, the PSPI and ASPA program funding arrangements have kept many schools waiting for long periods, assuming that their concept plans had been successful. Delay in the delivery of ITAS suggests that the learning needs of students were given low priority.

4.4 The committee considered a number of reasons for the delays, including the timing of the federal election¹ and the fact that the new system relies on a multi-stage assessment. Even if one accepts that these were delaying factors, they only strengthen the argument that 2005 should have been a transition year, enabling appropriate levels of consultation, organisation and planning to have taken place. Instead, a debacle has ensued which has seen a significant numbers of students disadvantaged by delayed programs.

1 Mr Tony Greer, *Committee Hansard*, 27 April 2005, p.2

4.5 It is clear that, in grappling with its implementation of the new programs, the Department of Education, Science and Training (DEST) had left a great many schools without much enlightenment on matters such as 'concept plans' and other hoops through which schools must jump in order to qualify for Commonwealth funding. It ought to be well-known that communication with schools is difficult through December and January. Amidst the anger and frustration expressed to the committee, there was a recognition of the difficulty faced by DEST officers 'on the ground', and an appreciation of the efforts of a majority of them in dealing flexibly with confusing red tape. However, from the committee's experience of listening to principals, teachers and administrators in both government and non-government schools in the Northern Territory, Western Australia and Queensland, it comes to the only conclusion possible: that whatever view is taken of the Government's indigenous education funding policy, its hasty implementation resulted in inadequate and inconsistent consultation with those most in need of timely and accurate information: people in schools.

4.6 This inadequacy was fed back to the committee almost everywhere it visited, but a typical comment came from a Queensland principal, a participant at a meeting held by the committee at Kirwan State High School in Townsville:

To me, the biggest problem is the rush to get this on board and the time line. If you have spent 20 hours sitting down going through all the material, you could find the answers to some of the things we have been talking about today but it is too rushed. We should have had a time frame to move into the new program.²

4.7 A participant in committee discussions at Yarrabah had this to say:

We [an Indigenous schools alliance] had a teleconference yesterday. One of the discussions concerned frustration over the concept plans where there has been community consultation. Communities are under the understanding, because they are familiar with the old ASSPA process, that their consultation has been put into the concept plans and that those concept plans will be approved and there will be dollars on the ground for their kids. But very few communities have heard where that situation is at, so there are lots of questions about where the process is at.³

4.8 The committee notes at this point that it found less concern among school communities about funding reductions for IEDA programs than for the maladministration of processes for the application and receipt of these funds. It is not yet clear as to whether the Government is aware of how it has brought unnecessary opprobrium on itself. It is rare for a Government to succeed in avoiding criticism for a funding reduction, and then incur unpopularity for its lack of administrative finesse.

2 Kirwan State High School discussion, *Committee Hansard*, 6 April 2005, p. 53. See also, for instance, Mrs Margaret Talbot, *Committee Hansard*, 1 March 2005, p.25

3 Discussion at Yarrabah State School, *Committee Hansard*, 7 April 2005, p.7

This raises the question of whether the requirements of implementation are likely to work against the success of the outcomes which everyone would wish to see achieved.

The consequences of program devolution

4.9 Problems with consultation and communication extended beyond the initial introduction of the changes. Consistency of assessment appeared to be a problem in each of the areas visited by the committee. It seemed common for one school to be told one thing, while another school was given different, and often contradictory, advice. This was advice on the process for funding applications, and the kind of applications likely to attract funding. The committee was reminded that the IEDA was an example of a 'devolved' program, largely administered by DEST local officials. DEST informed the committee:

...The program is designed for local communities and schools to work together – Indigenous parents and schools – to identify local barriers to achieving educational outcomes and to identify local solutions to address those. It is not possible to say that nationally the barriers are the same in every local community and the solutions are the same and therefore these are the solutions which we shall prescribe. The nature of the program is such that it was designed to allow flexible approaches at the community level.⁴

4.10 The committee commends this approach. The wonder is that DEST did not take steps to ensure that the mindset of its regional and local officials was sufficiently focussed on this. Only since the release of the early transcripts of the committee hearings in relation to inconsistency has DEST 'finetuned' guidelines and directions to officers to achieve improved consistency.⁵ The nature and form of the finetuning process appears to lie in improving the standard of communication between DEST regional offices and schools, and clarification of which programs (and in which circumstances) would or would not be considered for funding. For instance, directives have been issued instructing regional offices that nutrition programs, where they are linked to outcome such as attendance, should be viewed favourably.⁶

4.11 This remedial action is welcome. As to whether it will undo any damage which marked the first round of concept plan submissions, discussed elsewhere in this report, remains to be seen. The confusion on the part of both DEST and schools about the appropriate content of concept plans takes on another complexion when it is considered that some schools reported being given informal indications from DEST that they should expect funding to be delivered in due course. The school representatives at Kirwan High School were clear on this point, and described what they interpreted as a 'wink and nod' approach by local DEST officers and an underlying message of 'don't ask for more than last year's ASSPA allocation, and

4 Mr Shane Hoffman, *Committee Hansard*, 27 April 2005, p.14

5 Mr Tony Greer, *Committee Hansard*, 27 April 2005, p.7

6 *ibid.*, p. 30. See also responses to Questions on Notice received 6 May 2005, tabled documents

you'll be alright'.⁷ In many instances, schools which expected funding did not receive it. This has worsened an already poor financial outlook for some schools, as programs have been continued and funded from within school budgets on the understanding that no radical changes would occur to the bottom line.

Concept plans

4.12 For the first time, most or all schools in receipt of Commonwealth funding have to deal directly with DEST in a two-stage competitive tendering process, rather than have their state or territory department or system as the intermediary body.⁸ Public schools are increasingly in direct interaction with the Commonwealth. Funding of some indigenous education programs requires that the school and its community develop a concept plan. This is a significant development, and explains why these plans have provoked a great deal of anxiety and uncertainty among principals and school communities generally. This is the case with funding for homework centres and proposals under the Parent School Partnership Initiative.

Concept plan rationale

4.13 Neither the Minister nor DEST has explained the rationale for concept plans in any detail. They are not set out in the Guidelines, although there are detailed instructions on how they are to be submitted. The committee's view, as it understands the Government's thinking, is that they are part of the accountability process: that the receipt of funding is most ideally preceded by a statement that the school understands its needs. Or rather, as Opposition senators would argue, that the school understands what the Government believes its needs to be. An initial submission in the form of a concept plan is intended to demonstrate to DEST approvers that the school is serious about funding and determined to address its educational needs. As Opposition senators have observed before: such a process is intended to counter what the Government believes to be a mendicant mentality, especially in public school, where one simply waits for the money to flow in through the usual channels. The principle of entitlement is to be replaced with the principle of submission. Initiative and enterprise are seen by the Government as demonstrable requirements for success under the new funding arrangement.

4.14 Once the hurdle of the concept plan has been leapt (and it is proving to be difficult) the next challenge is the detailed submission which is an application for specific funding. In due course, evaluation and reporting requirements must be met to ensure the continuation of funding, assuming that it continues in this form in the next quadrennium. In short, the emphasis is on creating a climate wherein schools must be seen to be working for their funding.

7 Discussion at Kirwan State High School, *Committee Hansard*, 6 April 2005, pp.45-47

8 As noted elsewhere in the report, procedures in Western Australia reflect a large measure of state ownership of this process.

4.15 The committee considers it to be more than likely that the guidelines instituted for indigenous education programs will eventually become a model for broader DEST funding programs, and affect all public schools, other systemic schools and independent schools. It may force other state governments to look closely at the policies adopted by the Government of Western Australia which ensure that it retains, as far as possible, administrative oversight of Commonwealth funded programs, and ensures that it is not 'outflanked' by DEST curriculum and social program initiatives.

4.16 DEST officials explained to the committee the requirement for concept plans as a first stage of funding application thus:

The two-stage process was designed so that, in the initial stage, we were looking at simple ideas and concepts worked out between the schools and the parents. There was a relatively simple three-page concept plan template to assist in that process – for school communities to engage Indigenous parents in the process. When this program was being designed, it was felt that having that as a first stage, rather than going to an application stage first, would assist in parental involvement. It also meant that we could provide feedback to the school-community partnership which put in the concept plan. We could go back to them and provide them with feedback about their proposals and provide them with assistance before they put in a fully developed, fully worked up application.⁹

4.17 This process may have merit, but it could not be done properly within the timeframe. It also raises questions – not addressed so far by DEST – about the future of its direct contact with schools. At most of the schools visited by the committee, school staff expressed concern that not only would they be required to compile submissions to compete for funding, but that this would be required of them regularly. In this sense, the requirement for a concept plan and an application was viewed by many as a 'double process' rather than a single one.

4.18 On the matter of multi-application processes, the committee noted comments from a senior DEST official that having five rounds of concept plans was not provided for the sake of bureaucratic convenience, but so as to allow maximum opportunities for community consultation. The committee was informed that DEST officials at state and local levels worked hard to design this process.¹⁰ If this is so, the effort was largely wasted, probably because few people thoroughly understood the new ground rules and their policy rationale.

4.19 Principals and teachers had two main complaints. First, they expressed frustration at having to take time from already full schedules to compose submissions for funding. At a number of schools, the person responsible for drafting the plans reported spending upwards of ten hours doing so.¹¹

9 Mr Shane Hoffman, *Committee Hansard*, 27 April 2005, p.41

10 Dr Wendy Jarvie, *Committee Hansard* (Budget Estimates), 2 June 2005, p.52

11 See, for instance, Mr Peter Moore, *Committee Hansard*, 2 March 2005, p.15

4.20 Second, school staff appeared unanimous in their view that the drafting of submissions for funding was not properly the task of an educator, or even a school administrator. To be required to take time away from tasks which would generate more direct educational benefits for their students evoked a good deal of frustration in a number of witnesses.¹² These tasks were formerly done by state departmental officials experienced in such processes and knowledgeable about school needs. Independent schools, with no system administrators to do this work, have even more reason to complain about excessive bureaucratic demands.

4.21 The committee's interim report noted that DEST appears to be unaware of the impracticability of its submission and administrative requirements. There was evidence that concept plans were beyond the capacity of communities to come to grips with, and accountability requirements are now extreme and counter productive. Things cannot be done in indigenous communities overnight, and time for discussion is needed. The following view encapsulates much of what has been expressed by nearly all teachers who spoke to the committee:

The whole process that is in place at the moment is what we call a white process. In the past...they would sit and discuss as a group and then put in a submission, which was quite a simple submission to write up. Now, with the concept plans followed by applications, it is an extremely complicated process for people for whom English is a foreign language to have to fill in. I do not think people have taken that into account when they have designed all these forms and procedures. They have forgotten that for most of the Indigenous people—particularly in the Northern Territory—English is a foreign language. Therefore, there needs to be a lot more streamlining of the whole application process and concept plan.

Why are we doing a concept plan that gets approved by committee when you then have to go to an application that you may not get approved? Then there is all this evaluation and things you need to do afterwards with regard to it all. If you have three or four concept plans running you are going to spend all your time administering the concept plans rather than getting on and trying to improve the literacy, numeracy and activities within the communities. It has probably gone too far overboard trying to be accountable and part of the process needs to be putting a balance into place. What we are doing at the moment is disempowering Indigenous people in the process because of the high level required with regard to all the form filling, concept plans and those sorts of processes.¹³

4.22 Much of this sentiment was expressed in February 2005, when the failure rate of first attempts at concept plans was causing considerable anxiety. It is to this matter that the committee now turns.

12 See, for instance, Kirwan State High School discussion, *Committee Hansard*, 6 April 2005, pp. 50-52; South Hedland Primary School, *Committee Hansard*, 30 March 2005, p.14

13 Mr Peter Moore, *op.cit.*, p.15

The failure rate of concept plans

4.23 The committee notes the high number of schools reporting that their concept plans have been rejected outright, at least at the first submission. This meant that they were without funding for up to six months. Most of these schools, which have received ASSPA funding in the past, and have come to rely on it for programs they consider essential to the successful running of the school.

4.24 DEST provided the committee with some information on the number of concept plans received and the proportion of those which led to an invitation to submit an application for funding. A comprehensive analysis of DEST's response is hampered by data relating to concept plans being provided 'as at' three different dates.¹⁴ This represents a 'pass rate' of less than 57 per cent. The committee was advised at the beginning of June 2005 that of the 450 concept plans received, 384 PSPI and homework centre applications had been approved. But it appears that this number represents only about 57 per cent of total applications, because many concept plans included multiple project applications.

4.25 Ms Thelma Guest is the Indigenous Programs Coordinator for 32 Catholic schools, which together comprise the largest population of indigenous children attending Catholic schools in Queensland. Ms Guest and her colleagues represented the Queensland Indigenous Education Commission, reported that their concept plans for funding totalling \$968 000 were rejected outright, and that the same fate had befallen concept plans from the Brisbane archdiocesan CEO. They both pointed to the lack of clarity coming from DEST:

[W]e were not clear on how the concept plans were going to be assessed, and the letters we got back, as far as I was concerned, did not give us enough feedback in terms of what we had done and what we not done enough of and what we really needed to do.¹⁵

4.26 The reasons given for rejection were usually unclear and there was even some anger expressed about this. The Queensland Catholic Education Commission provided the committee with a copy of correspondence from the Education Officer at the DEST Mt Isa office. The letter, at Appendix 4, may not be typical of 'rejection notices', but it indicates the extent of a cultural divide which operates when DEST attempts to involve its officers in direct contact with schools. The letter is an unhelpful pastiche of ministerial statements and reports of bureaucratic processes remote from the experience of school principals and teachers. Nor is the guidance they need provided in the rejection letter.

14 Total concept plans received by 31 March 2005 were 450, of which 255 were asked to submit an application for funding. 195 concept plans rejected outright by 19 April 2005. Total approved WOSIS funding per by state and territory was provided, as at 27 April 2005.

15 Ms Thelma Guest, *Committee Hansard*, 6 April 2005, p.4

4.27 The strongest criticism of DEST appeared to come from principals in Queensland. The committee draws no conclusion from this. One of the critics at Townsville said:

We have a lot of committed parents and teachers who wrote the applications, doing the best they could with the information they had, and nothing came out of it. That says something about the roll-out. If people are all off writing applications and no-one gets any money you cannot say, 'Well, none of you knew what was happening.' Perhaps they should have known what was happening. I personally feel that that is part of a bigger problem that we have had with the department in terms of their attitude towards clients and whether they have a service driven mentality. I personally do not believe that they have had that in the past.¹⁶

4.28 Much similar evidence, known to DEST officers who accompanied the committee, was also recorded on Hansard. Other issues associated with concept plans also angered principals and system administrators, for instance, closure of ASSPA bank accounts.

4.29 In Townsville, the committee heard of an instance where a school principal was informed that his concept plan could not proceed with assessment because ASSPA bank accounts from the previous year had not been closed down or acquitted.¹⁷ It appeared that closure of the account was proving to be exceedingly difficult because signatories to the account could not be located. Correspondence from DEST to school principals appeared to be unclear as to whether acquittal issues were the only cause of the delay.¹⁸ The CEO in Townsville told the committee that one of its schools had also been remiss in regard to acquitting an ASSPA account, and admitted the school had apparently failed to read the small print.

4.30 The department's later response to this concern was that the requirement for full acquittal prior to approval of concept plans was limited to the Townsville area, and was not common practice. Officers submitted that the committee's inquiry had highlighted a problem which had now been rectified.¹⁹ It appears that the local office of DEST was either over-zealous in this instance, or that it failed to read instructions from Canberra. Effective DEST supervision, either from Brisbane or Canberra, would have ensured that these public relations issues did not test the goodwill of DEST's 'clients'.

4.31 As noted in the interim report, even the most energetic principals in innovative schools have trouble with concept plans. Principals, with their close knowledge of the needs of their schools have a natural tendency to believe that their ideas for expenditure will find ready acceptance. Local or state DEST officials,

16 Mr John Livingstone, *Committee Hansard*, 6 April 2005, p.27

17 Discussion at Kirwan High School, *Committee Hansard*, 6 April 2005, p.37

18 Ms Nola Ogilvy, *Committee Hansard*, 6 April 2005, p.39

19 Mr Tony Greer, *Committee Hansard*, 27 April 2005, pp. 39, 41

working to strict criteria, may find it more comfortable to follow the 'one size fits all' approach.

4.32 It appears from evidence given to the committee that this is not what DEST policy makers in Canberra appear to have intended after all. In the case of Shepherdson College on Elcho Island, the principal put in a plan to link its eight homelands schools by computer. The plan was rejected because, according to the principal, DEST did not consider it important. If ASSPA funds had been available in 2005, the principal said he would have demonstrated its importance. Another of Shepherdson's concept plans for a homework centre was rejected because it placed an emphasis on literacy and numeracy.²⁰ It should be noted that Shepherdson College on Elcho Island is a relatively large and well-equipped school, is notably well conducted and has widely experienced and well-qualified teaching staff. It enjoys a very close association with the community. It is highly likely that it is in a far more advantageous position to adjust to changes being implemented.

4.33 It is this confusion about what should and should not form part of a concept plan which lies at the heart of much of the frustration. It seemed to the committee that no two schools shared a common understanding of what was likely to be approved by DEST as a concept plan. Officials from the Western Australian Department of Education and Training had some pertinent observations to make on concept plans:

The problem with the concept plans at the moment is the misinformation that obviously always is the case when you have a new process in place that is going out. It is a changing menu from day to day with regard to what the concept plans might or might not have in them, and what might or might not be rewarded.²¹

4.34 The official went on to explain that in Western Australia, the state department retained some ownership over the concept plans and the ranking of the concept plans. As far as the committee is aware this has not occurred in other states or in the Northern Territory. It is certainly the case that although criticism of the IEDA changes was voiced in some Western Australian schools, this did not extend to the administration of the application process.

4.35 The committee heard a number of criticisms of time taken to complete DEST requirements. One principal said that she was no longer prepared to work between midnight and 5am completing these administrative tasks. Little things become irritating, such as the fact that DEST was closed the day the PSPI applications were due.²² Such sentiments were probably best summed up by one principal from a group of teachers who met the committee in Cairns:

20 Mr Peter Moore, *Committee Hansard*, 2 March 2005, pp.19-20

21 Mr Bob Somerville, *Committee Hansard*, 29 March 2005, p.20

22 Ms Anne Manger, *Committee Hansard*, 7 April 2005, p.24

The...other comment I would like to make is that one broad problem which applies to the program we are talking about and to a number of the Commonwealth programs is that, by being submission based, they are building a huge inefficiency into the system. ...administrators and other people in schools end up spending huge amounts of time chasing funds to make things happen and have very little time to actually make them happen in the school. There is also the frustration of getting a good program going, only to have the funding and the program disappear. I am not saying that will be the case with this one. I know it is over a quadrennium, and I guess that is great and we will get some continuity. But then you have the gaps in between, as has happened in this particular case between the quadrenniums. If I could make one plea to you it would be that you trust people in schools and school communities. We are happy to be accountable. If you give us funds and give us criteria to address, we can make a difference. But please do not make our job harder by building these inefficiencies into the system.²³

4.36 While many schools expressed frustration at having to compete for funding through a submission based system, others were willing to embrace such a system if only they were provided with a better understanding of the 'ground rules'.²⁴

4.37 DEST attempted to explain the value of concept plans. It informed the committee that the purpose of concept plans was to improve consistency in program funding. It was stated that concept plans:

... enable schools, particularly schools who may not have the capacities that better equipped schools have, to write applications. It was a simple tool – a three page document to capture what it was that a school might have wanted to do to enable the department of the assessing group to work with that school to further flesh that out ... I think some disappointment may have entered into these arrangements to date because a number of schools, perhaps of their own volition, went beyond in the initial stages filling out the concept plan – a short, three-page format – to actually moving in one fell swoop to a full-blown application.²⁵

4.38 That view accords with the committee's own impression. It hopes that when expressing its disappointment in schools magnifying the difficulty of their tasks, DEST understands this to have resulted from its own failure to communicate effectively. Officials may stress that all that was required was a three page document. Yet, the evidence shows that principals appeared to agonise over these for days or weeks. This seemed wasted effort since the initial rejection rate for concept plans was so excessively high as to bring the validity of the process into serious question.

23 Mr John Baskerville, *Committee Hansard*, 7 April 2005, p.27

24 See, for example, Dr Jim Heslop, *Committee Hansard*, 29 March 2005, p.46

25 Mr Tony Greer, *Committee Hansard*, 27 April 2005, p.7

4.39 DEST has not conceded responsibility for this failure, but it assured the committee following the tabling of the interim report that action had been taken across jurisdictions to improve consistency in assessment procedures.²⁶ The committee will follow this up in 2006 to assess how successful DEST has been in making amends for past mistakes. The committee will also request the Auditor-General to conduct an efficiency audit on the operation of the IEDA program, with particular regard to the quality and timeliness of DEST state and local administration of funding applications and advice.

Recommendation 5

The committee recommends that the Auditor-General be requested to conduct an efficiency audit on current arrangements for the application and processing of funding for PSPI programs.

Assessment procedures

4.40 The committee was interested in the process for assessing individual concept plans. DEST informed the committee that arrangements differed between jurisdictions, but cited arrangements in the Northern Territory as an example of how assessment is sometimes carried out. In that jurisdiction, a regional assessment panel is composed of the DEST district office manager, managers from the regional Indigenous Coordination Centre (ICC) and the regional NTDEET manager, when or if this official was available for this task. Most often, they were not. According to DEST, a typical assessment panel might comprise a representative from each of the Catholic and public school systems, an independent schools body, a DEST officer and a community representative. DEST acknowledged that none of these positions would necessarily be occupied by a person holding educational qualifications.

4.41 DEST argue that the ability to make a judgement merely on whether proposals fall within program guidelines does not require knowledge of educational principles.²⁷ That may be the case for some proposals, where funding is sought for activities clearly outside guidelines. The committee argues it is less likely that officials without experience in schools would be able to assess the value of programs based on local needs. It is doubtful whether local DEST officers are familiar with local needs. This would not have been a normal requirement for them in their previous role. Concept Plans are almost always developed by teachers and principals, all of whom have not only educational qualifications but also extensive working knowledge of the needs of their students. The committee is struck by the fact that, under these arrangements, judgements are made by panels which in most cases are unqualified to make them. In order to make an informed judgement on the likely success or otherwise of proposals,

26 Mr Tony Greer, *Committee Hansard*, 27 April 2005, p. 8. At page 12, Mr Greer stated that a nationally consistent approach was in place.

27 Mr Shane Hoffman, *Committee Hansard*, 27 April 2005, p.36

the committee is firmly of the view that at least one assessor should hold educational qualifications and has accordingly recommended this.

Recommendation 6

The committee recommends that local or regional committees which assess funding applications from schools include at least one member with educational qualifications and experience, and at least one indigenous member active in a school community.

4.42 In passing, the committee notes that staff training is now on the DEST agenda, and is aimed at improving the knowledge of officers and ensuring improved liaison with clients. The need for this has been made obvious to the committee.

Reporting requirements and related matters

4.43 The legislation gives particular emphasis to improving levels of accountability. This is in large measure to ensure that schools are kept up to the mark in regard to learning outcomes. This does not come without cost, and the cost is borne by schools and system administration. One reporting requirement that provoked criticism was the funding identified for the education of indigenous students which is part of general recurrent grants. It will be recalled that the Government is particularly concerned to ensure that schools do not use funding under IESIP and IEDA programs to make up their entire indigenous education expenditure. Commonwealth funds are directed, as much as anything else, to leveraging additional funds from the states and other systems or individual school budgets. Yet this presents an administrative problem for schools and systems.

4.44 The Catholic Education Office in Townsville described difficulties with meeting reporting requirements as the important issue it wanted to discuss with the committee. The CEO acting director stated:

...[L]egislation requires the commission—and this will affect all dioceses—to report on all Indigenous funding, including our general recurrent grants that are identified for the education of Indigenous students. That is a new...regime of accountability. That takes time; that takes a lot of energy and effort, and there is no recognition of that. The accountability requirements being proposed will be difficult to deliver, given that our systems do not record what proportion of funding is attributed to Indigenous students from that general recurrent system. The apportioning of costs to meet such requirements will be onerous and, basically, artificial. It is very easy for people to come out and see—particularly in our diocese if you walk into a school such as St Michael's on Palm Island—that the children, with the exception of, I think, six who belonged to some of our staff members, are Indigenous children who live on the island. The infrastructure costs, the cost of staffing and the cost of housing are all accommodated for out of our general recurrent budget. We then have to turn around and report on that as well as what we see as quite a minimal percentage on top. We are not saying don't give it to us but, compared to the actual cost of establishing, running and staffing a school, which comes

out of general recurrent budget, reporting on that and then reporting on the Indigenous funding as if they are almost similar in response seems nonsensical to us.²⁸

4.45 This demonstrates that Commonwealth funding comes at a heavy cost to school administrative workloads. It requires the identification or manipulation of data which is either not available, or when compiled has very little validity.

4.46 The Association of Independent Schools of South Australia makes a different point: that reporting requirements are out of proportion to the funds that are applied for. The range of funding sources for different programs and projects require a correspondingly complex range of reporting requirements. The AISSA appears to doubt whether current accountability arrangements effectively ensure the improvement of educational outcomes.²⁹

4.47 Concentration on the funding application process meant that witnesses and submissions did not dwell on reporting of program outcomes. The first and most important goal was to obtain the funding. But anecdotal comment indicates that reporting is an area which needs to be looked at. The committee would be concerned if, together with excessive application time required, equally excessive reporting requirements were ever a deterrent to a funding application. In this, as in many other things to do with funding, the Commonwealth needs advice from MCEETYA, specifically from its chief executives committee.

Recommendation 7

The committee recommends that the Minister, through MCEETYA, addresses the need for schools to report on the expenditure of Commonwealth funds in a way which is least burdensome, preferably through a single document which includes data on all programs that have been funded and are currently running.

4.48 A more intractable problem results where data is unable to be shared between jurisdictions. An example of the types of data being requested is the number of remote students and the proportion falling below the benchmarks. In the case cited to the committee, it is the state government which is unable or unwilling to provide the information to the Commonwealth, in cases where students are transferred from one system to another. The issue apparently hinges on the interpretation of state privacy laws.³⁰ This problem results in delaying funding which is usually badly needed in cases where student entitlements need to be transferred to another school. This complaint was made by the CEO, which finds itself in an impossible position. This plight is no doubt shared by other systems and individual schools. The committee recommends that this matter be taken up by MCEETYA and properly resolved.

28 Ms Cathy Day, *Committee Hansard*, 6 April 2005, p.2

29 AISSA, *Submission 17*, p.5

30 Queensland Catholic Education Office discussion, *Committee Hansard*, 6 April 2005, p.17

Recommendation 8

That MCEETYA address the problem of restricted access to student records maintained by state agencies in cases where it is required by schools to facilitate enrolment in another system or school, and where it is for the educational advantage of the student.

4.49 The reporting requirements of DEST also appear skewed for the purpose of obtaining near impossible outcomes. Officers of the Western Australian Department of Education and Training put down data reporting as one of the unresolved differences between that state and the Commonwealth.

Some of the unresolved matters are around data collection and the data that DEST is requiring us to report on. For example, currently DEST is requiring us to report on quartiles. The process for the quartile reporting is totally incorrect and the data analysis is incorrect. At the national level there are already discussions on being able to provide data across a range. PMRT is currently putting that together. But DEST is ignoring that and going ahead with a process that will not work and will give invalid data. We have brought this up on a number of occasions, but they just ignore it. We brought it up at the multilaterals only last week. Again, they ignored the advice that was provided. That is an example of some of the difficult negotiations that occur. As to data-setting, DEST is very clear on the targets and very difficult to negotiate with in regard to those targets. Some of those targets—and this is what occurred in the last quadrennium—are just impossible to reach.³¹

4.50 The committee is concerned that DEST data management is driven by political considerations: a requirement for improvements that may not be achievable. Western Australian officials told the committee that some of those targets were for 60 per cent gap closures, which they considered to be impossible to obtain. Officials reported that at one stage in the negotiations with DEST they walked out of the proceedings.³² It was suggested that the setting of unrealistic targets would place the Commonwealth in a stronger position should it later decide to withhold funding from states and territories, although the committee trusts such reasoning does not lie behind target settings. The same officials told the committee that the gap would be closed slowly, especially in remote areas. It would require very considerable funding.

4.51 However, DEST reported to the committee that all states and territories, including Western Australia, have agreed to provide the Commonwealth with the data requested.³³ Advice to the committee from Western Australian officials is that some compromises were achieved.

31 Mr Bob Somerville, *Committee Hansard*, 29 March 2005, p.35

32 *ibid.*, p.36

33 Mr Tony Greer, *Committee Hansard*, 27 April 2005, p.23

Recommendation 9

That MCEETYA look more closely at reporting requirements attached to Commonwealth funded programs to ensure that they reflect criteria based on sound and agreed educational principles, and realistic expectations of learning outcomes.

State-Commonwealth issues

4.52 Throughout this report, and particularly in Chapter 1, the committee has made clear its concern about what appears to be a tussle between the Commonwealth and the states over indigenous education funding policy. As noted previously, the committee has long agreed that the Commonwealth has a vital role to play in exercising national leadership to ensure comparability in educational funding and national standards of quality performance in teaching and learning, and educational outcomes generally.

4.53 MCEETYA is the national policy clearing house, the source of such overarching national agreements as the AEP. It seems to the committee that the effectiveness of MCEETYA in this role rests on two principles. The first is acknowledgement of the Commonwealth's leadership role, and its role as the primary source of education funding. Second is acknowledgement of the role of the states in administering the majority of schools, and in accrediting all of them. States, systems and schools are the primary source of expertise and knowledge, gained through experience in relation to curriculum, in its broadest meaning. The two principles recognise that while the Commonwealth may (and should) ensure that states, systems and schools provide value for money, and meet benchmarks and outcomes, these measures of achievement can only be arrived at through agreement with the states, advised by other systems and independent authorities as appropriate. Commonwealth agencies have little or no standing as authorities on matters relating to teaching and learning outcomes.

4.54 The committee has some concerns that the current Government, through the agency of DEST, in its earnest funding initiatives, sometimes fails to acknowledge the limitations placed on them by the fact that they do not run schools. This current inquiry has revealed the differences in outlook which funding bodies like DEST have toward education, as distinct from schools and systems that are directly running schools, or independent schools. The committee recognises the efforts which DEST has made recently to correct previous administrative errors revealed by this inquiry, but the essential problem has been that DEST has been venturing into an administrative role previously filled by state education departments. It is part of the lore of education that teachers and principals have always been wary – to say the least – about the 'department'. Now they may have reason to complain about two departments.

4.55 The committee has no information other than from Western Australia about state attitudes to the Commonwealth initiatives, but the experience outlined to the committee in Perth is unlikely to very different in the case of other states. There is

more than a hint of this in the delay in reaching agreement on the new funding arrangements. Other states have been more reticent in describing what has occurred. A number of issues arise from the committee's consideration of evidence from the Western Australian Government.

Commonwealth micro-management tendencies

4.56 The Scaffolding Project for improvement in indigenous literacy and numeracy is funded under the IESIP program, and is therefore only marginally relevant here. But evidence given to the committee in Perth on Scaffolding highlights a general problem which is central to this inquiry. The committee put to Western Australian officials that state officials have not been told what the scaffolding policy is, and that they have an agreement which does not reflect discussions held with DEST. State officials confirmed this. They told the committee:

The Commonwealth money comes with a whole lot of tags attached to it. To give you an example, the Commonwealth in the rhetoric has the same sorts of expectations that we have. Literacy, numeracy and attendance retention are the major ones. In particular, you have to go to the areas of greatest disadvantage—that is, the remote community schools. ...What we had been developing was a mandated, structured literacy strategy across all of our remote schools. We would have appreciated having more of an opportunity to sit down with the Commonwealth and say, 'Look, this is what we have developed. This is based on the best knowledge we've got about how to improve literacy, including for Aboriginal students.' The problem was that, when it came to us, there was not the opportunity to have that sort of conversation and say, 'Look, we've got some pretty good ideas about how to do this which are built on a firm foundation.' Instead, what the Commonwealth said was, 'Look, we think that the strategy for Aboriginal students is the scaffolding program.'³⁴

4.57 Western Australian officials told the committee that it would need to find ways, through ITAS or some other program to meet the guidelines and expectations of the Commonwealth while still meeting what the state believes to be its strategic purpose. The problem is not that states have any disagreement with Commonwealth priorities or general national policies directed by the Commonwealth, but that the 'tags' put on implementation strategies often make it very difficult for states to operate as they would wish. Fortunately, the Commonwealth's micro-management tendencies have not been evident with the IEDA programs, apart from those so far reported on.

State administration of IEDA programs

4.58 It appears that a number of states are directly administering IEDA programs. As mentioned in Chapter 1, the Western Australian Government has insisted on administering the PSPI funding arrangements, including the application processes and consultations. There are established procedures to handle this. The committee notes

34 Mr Kevin O'Keefe, *Committee Hansard*, 29 March 2005, p.37

that it heard no complaints from public school principals about concept plans, in contrast to other states. That may be partly explained by the following advice to the committee:

We have been out providing advice at principals conferences to principals that the concept plans need to be simple. They are not to be overbureaucratic or overwritten. We have provided advice to the committees that overwritten concept plans should be placed at the end, rather than at the beginning, because the whole thing is supposed to be simple. We are trying to get the competitive nature out of the concept planning. But of course it is still going to be ranked, so there is still some competition there, which is always the worry.³⁵

4.59 The committee was told about the very tight deadlines for concept plan submissions in the Northern Territory. The decision made in Western Australia was to work a bit more slowly to allow schools to put in their submissions and take time for local consultation, so that the process was right. It was not expected that money will begin to flow until second term. The committee regards this as demonstrating that states can do these things better than the Commonwealth because they are dealing with their own schools, and have a closer knowledge of what is needed.

The complexity of indigenous education funding

4.60 The committee notes the various sources of funding for indigenous education. These include not only state and Commonwealth government departments, but increasingly other departments for projects relating to specific areas. Examples might include schools being referred to the Department of Health and Ageing for funding related to nutrition programs, or the Department of Communication, Information Technology and the Arts for funding of a music program.

4.61 The committee received a lot of feedback on the difficulty and complexity of accessing indigenous education funding. Indeed, at least two witnesses considered it to involve the most complex administrative arrangements of any that a principal has to deal with. The following comments from school principals apply to any of the funding processes that schools are involved in, extending well beyond IEDA. As one principal remarked:

A lot of hurdles are put in our way. Every time we think we have passed one hurdle they put another one in our way. As a team we believe that the forms from district and central offices wanting to know how we are dealing with Aboriginal learning styles or how we are catering for their specific learning styles are just a lot of paperwork.³⁶

4.62 It is important to remember that indigenous-related funding is only one of a number of funding 'buckets' for which submissions need to be generated. The

35 Mr Bob Somerville, *Committee Hansard*, 29 March 2005, p.22

36 Mr David Knox, *Committee Hansard*, 30 March 2005, p.29

committee was reminded of the often exhaustive process involved in such exercises, where documents are required to be drafted, checked against criteria, consulted on, redrawn and submitted. Adding to confusion and frustration is the perception that performance and evaluation criteria are in constant flux. When asked whether goalposts move often, one witness said:

I would say there are no more goalposts. There used to be some and we could at least aim for them, and then they started moving them, but now they do not exist any more.³⁷

4.63 Another witness in Townsville saw DEST's propensity to change priorities as a sign of naivety about everyday school life.

The issue for us is that there is often not an understanding of the reality of trying to manage an educational system from the DEST officers. We get these fairly blasé statements about shifting our priorities and that if we believe a program is worthwhile we will find the money for it. I find it very annoying and distressing at times because it shows a great lack of understanding.³⁸

4.64 When questioned about the rationale for multiple sources of funding, a DEST senior official explained that PSPI funding was focussed on 'linkages with the school plan and how you might better improve student outcomes'. He considered that:

...there may be aspects of initiatives that the community or the school is looking for that can be better handled in a whole-of-government context by contributions from other mainstream programs – that is, for music, art and language programs, which are not a mainstream responsibility of education.³⁹

4.65 Quite why DEST is not responsible for education in relation to music, art and language is not clear. This is the response that might be expected from someone unacquainted with the preoccupations and work of teachers. It would seem to the committee that a whole-of-government approach should, by definition, involve a single port of call for schools through which to access government funding, and not individual submissions to individual agencies.

4.66 It is scarcely much wonder that schools weigh the costs of applying for grants. For some, the rewards are not worth the effort. Many schools, apparently, make a decision not to allocate precious resources to submission writing, do not apply for funding, and programs for students simply do not occur. A commonplace view was summed up by a school representative in Townsville:

37 Discussion at Kirwan State High School, *Committee Hansard*, 6 April 2005, p. 50. See also Queensland Catholic Education Office discussion, *Committee Hansard*, 6 April 2005, p.26

38 Ms Jane Ceolin, *Committee Hansard*, 6 April 2005, p.26

39 Mr Tony Greer, *Committee Hansard*, 27 April 2005, p.11

It [making funding applications] is not worth the effort. I have teachers who are working full time now. We are not program writers. I am sick to death of it. It is almost like going crawling on the carpet begging for money. You have to write this submission to be trusted to have the money to do the job. In trying to match the outcomes, I would have to spend hours running around to make sure that everything was right on target for \$4 000 or \$5 000. Why would I do that?...I think that what is going to happen is that the people in the know will go for the buckets of money through submission writing and the rest will pretend they do not exist and will get on with the job as best they can with the resources they have.⁴⁰

4.67 The committee does not believe that this is an outcome which the Government intends. As a first step DEST should explore ways of using state or systemic structures to administer assistance to schools.

4.68 There is some evidence that DEST is aware of the confusions and frustrations that results from its multitude of programs, all of which attract separate funding applications. The committee believes that some rationalisation of programs is essential. This is a task for MCEETYA: to ensure improved intersection between state and Commonwealth programs. This is a matter about which the committee is likely to take a long-term interest because of increasing overlap in programs and jurisdictional complications and tensions.

Recommendation 10

The committee recommends that the Minister addresses the need to rationalise funding grants to minimise the number of applications that have to be made by schools.

Conclusions

4.69 A number of terms were used by respondents to describe the situation as it relates to Commonwealth Indigenous education funding under the new IEDA arrangements. People described the state of affairs variously as a mess, a debacle, and a crisis. One respondent even invoked the topical term 'educational tsunami' to describe the situation.⁴¹

4.70 The committee hopes that something may be salvaged from this wreckage, although it fears that faith in Commonwealth processes may have been damaged over the long term. Much will depend on the attitudes and discretion of local DEST officials, and the extent to which senior DEST officials (and indeed the Minister) support their efforts. It is doubtful whether many of these officers are as well-equipped as they should be in putting themselves in the shoes of educators when exercising their financial discretions. It is something relatively new in educational

40 Discussion at Kirwan State High School, *Committee Hansard*, 6 April 2005, p.51

41 Yarrabah State School discussion, *Committee Hansard*, 7 April 2005, p.22

administration that non-educators have the role of deciding matters which were formerly in the hands of experienced professionals and who made funding decisions on the basis of educational considerations.

4.71 The committee makes an obvious comment that the closer the processes of DEST come to school operations, the more likelihood complications will result from incompatible systems of administration and different attitudes to effective program delivery. Teaching and learning look easier than they are to those whose working experience has been in the counting house rather than the classroom. This arises from differences in focus and operational function and purpose. School systems, and individual schools, have developed ways of working which result from years of experience, community knowledge and experiments with curriculum practice. In spite of the exhaustive rhetoric, the application of DEST guidelines appears to have taken little account of local or state priorities even when these are compatible with national policy.

4.72 In past reports the committee has urged the Commonwealth to lose no opportunity to assume national leadership on educational matters, notwithstanding the tenuous constitutional responsibility it has. This includes ensuring that states and territories understand their obligations in regard to accountability for the expenditure of Commonwealth funds. Such a role does not require a direct say in the operations of school, neither independent nor schools public or systemic schools. A consequence of this would be what the committee has observed in this inquiry: principals and teachers across the country being distracted from their work, and are unnecessarily preoccupied by the need to meet Commonwealth requirements to an extent which is out of proportion to the funds they actually receive.

4.73 The committee believes that this role is most effectively exercised through serious engagement with states through MCEETYA. The Commonwealth agenda needs to be genuinely negotiated with states. If it is imposed contrary to state advice that it is impractical or because it is contrary to experience and expertise, then the effectiveness of the program must be questionable. The finger of the Commonwealth cannot extend to the classroom desk, and it is at that level that performance has meaning and where outcomes are achieved. It is inconceivable that the Commonwealth would want to take over the running of schools. That being so, the programs run by DEST should, as far as possible, be run through state processes, including those which can target funds and report on program effectiveness. A worthy task of the Commonwealth may be to urge MCEETYA to ensure that state structures and procedures run effectively, but it should resist the temptation to replicate them.

Recommendation 11

That so long as Government policy continues to require direct contact between schools and DEST officials, that these officials are provided with adequate training in how to deal with principals and teachers, and gain some familiarisation with the operations of schools and at least some rudimentary insight into teaching inputs and learning outcomes.

Recommendation12

The committee recommends that a copy of the report be sent to the Aboriginal and Torres Strait Islander Social Justice Commissioner with a request for comment on the implications of the PSPI program in relation to the progress and achievement in indigenous education.

