



Independent Schools
Council of Australia

Employment Review Taskforce
Department of Prime Minister and Cabinet
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The Forrest Review – Submission on Behalf of Independent Schools

The Independent Schools Council of Australia (ISCA) welcomes the opportunity to present this submission in response to the Forrest Review of Indigenous Training and Employment Programmes.

ISCA is the peak national body representing the independent schools sector and comprises the eight State and Territory Associations of Independent Schools (AISs). Through these Associations, ISCA represents a sector with 1,080 schools and 567,000 students, accounting for 16 per cent of Australian school enrolments.

ISCA's major role is to bring the unique needs of independent schools and their educational activities to the attention of the Australian Government and to represent the sector on national policy issues.

About Independent Schools

Independent schools are a diverse group of non-government, not-for-profit (NFP) schools serving a range of different communities. Many independent schools provide a religious or values-based education. Others promote a particular educational philosophy or interpretation of mainstream education.

Their legal structures can be diverse with many falling into the following categories:

- Schools that are fully owned by a church (e.g. some Uniting Church Schools);
- Schools established by state Acts of Parliament with the specific purpose of establishing the school as a charitable institution (e.g. some Grammar Schools);
- Schools which are an administrative unit operating within an Association or “system” owned by a church;



- Schools which are a company. Many of these are limited by guarantee and assets can be owned by an underlying church property trust. In some cases the company owns the school outright; and
- Public benevolent institutions (e.g. some Indigenous Schools).

Some schools with common aims, religious affiliations and/or educational philosophies also belong to a system within the sector. This means that some operational functions are carried out by the system on behalf of all schools within the system.

Independent schools include:

- Schools affiliated with larger and smaller Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Seventh Day Adventist and Presbyterian schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Indigenous community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other risk factors.

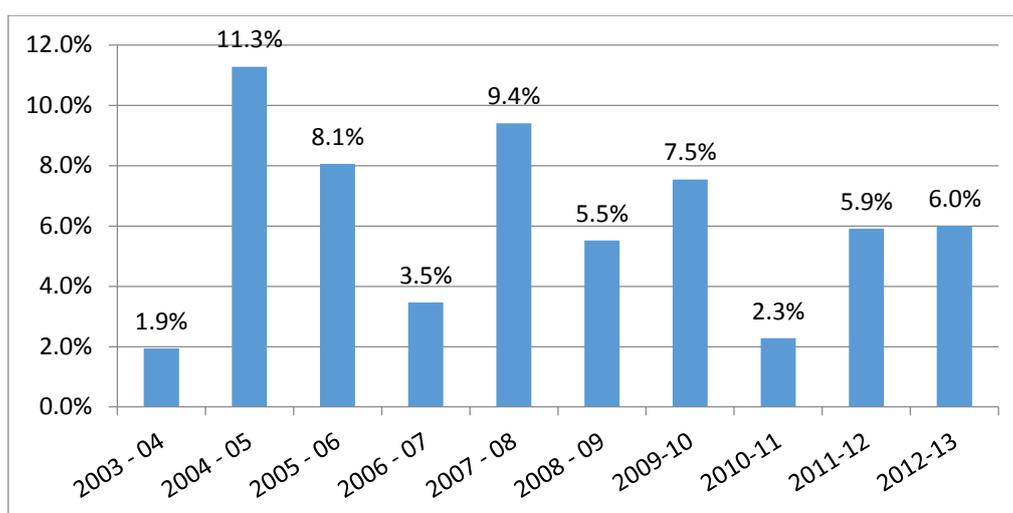
Independent schools are registered with the relevant state or territory education authority and most are set up and governed independently on an individual school basis. Those that are administered as systems, account for 18 per cent of schools in the independent sector. Independent Catholic schools are a significant part of the sector, accounting for 8 per cent of the independent sector's enrolments. However, all schools have formal boards of governors or committees of management that are the key decision-making bodies for most independent schools and are responsible for issues such as the school's educational provision, current and future development and staffing.

Independent Schools and Indigenous Education

Independent schools serve a broad range of students, reflecting the diversity of Australian society and have a long standing commitment to supporting quality education for Indigenous students, right across Australia. As a group, Indigenous students face significant barriers to educational achievement and the independent sector welcomes the opportunity to provide high quality support for the many Indigenous parents who enrol their children in independent schools.

Indigenous student enrolments are spread broadly across the sector and in 2013 there were 10,669 Indigenous students enrolled in 756 independent schools. Some 70 per cent of independent schools in Australia enrolled Indigenous students in 2013. Enrolments of Indigenous students in independent schools have grown at an average of more than 6 per cent per year over the last two decades (see table below).

Growth in Indigenous Students at Independent Schools



There are independent schools that provide education to significant populations of Indigenous students, and some cater entirely for Indigenous students. A significant number of these schools are located in rural or remote areas. It is often the case that independent schools in remote Indigenous communities are the sole providers of education for these communities; 38 schools in the independent sector have an Indigenous enrolment of more than 50 per cent.

Other independent schools, including many urban and regional boarding schools, also have large numbers of Indigenous students. Many independent boarding schools provide scholarships to support access to education for Indigenous students or are involved in community based programs to provide scholarships to these students.

Indigenous Students in the Independent Schools Sector, 2013

Indigenous student enrolments	10,669
Independent schools with 50%+ Indigenous enrolment	38
Independent schools with Indigenous enrolments	756
Independent boarding schools with Indigenous enrolments	134

Funding for Indigenous students

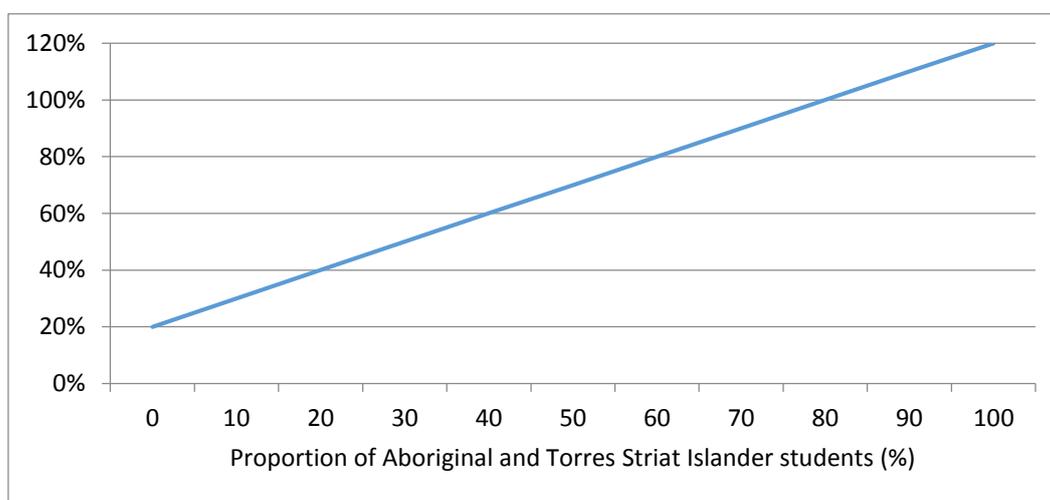
Implementation of the new Schooling Resource Standard (SRS) model of school funding from 2014 has been problematic for the independent schools sector. Regrettably, the rhetoric about addressing educational need has not been adequately reflected in the distribution mechanisms used in the model. In particular, the complexities and uncertainties of its impact on individual independent schools during the transition period is likely to have a negative impact on many schools that are attempting to educate high needs students.

The model comprises of two components for Indigenous students. A per-capita component is based

on the Schooling Resource Standard (SRS) which purports to measure the cost of effective and efficient provision of schooling in Australia. For independent schools, this component is discounted by a measure known as the ‘capacity to contribute’ of the school community. Majority Indigenous schools and remote ‘sole provider’ schools are exempt from the ‘capacity to contribute’ requirement and at least in theory may receive the full SRS per student amount, if and when the full transition occurs.

The second component for Indigenous students is a loading that applies to these students. The loading commences at 20 per cent of the per student amount for the first Aboriginal or Torres Strait Islander student in a school, increasing up to 120 per cent for schools with 100 per cent Aboriginal and Torres Strait Islander students.

Indigenous Loading Parameters



The independent school sector has concerns with the implementation of the new model.

In theory, under the SRS funding model, all Indigenous students are entitled to the same loading amount. However, under the transition arrangements, schools do not receive their full entitlement under the loadings. In reality, the majority of independent schools are receiving only a small proportion of their additional funding entitlement under the model and the full loading as originally envisaged is unlikely to eventuate.

An additional issue for the independent sector is that loadings provided directly to independent schools effectively removes the capacity within the sector to provide support across the sector. As the only non-systemic school sector, the new funding arrangements mean that the sector has lost its capacity to access co-ordinated sector-wide support and economies of scale. The other school sectors have retained this feature. This inequity is of considerable concern to the independent schools sector.

Indigenous students in rural and remote areas

Independent schools that serve significant or solely Indigenous student populations often have very limited capacity to raise private income through fees and fundraising; in many cases this ability is non-existent. These schools rely heavily on government assistance to maintain their operations. The majority of these schools face high costs, in employment, provision of staff housing, transport, and

accessing professional and student learning and cultural opportunities, due to their remoteness or distance from large population centres.

Independent schools frequently need to provide many additional educational, health, recreational, wellbeing and pastoral care services in order to assist students to learn successfully.

2014 -15 Budget additional funding for Boarding Schools

In the 2014-15 Budget the Australian Government recognised the additional costs associated with boarding and educating Indigenous students from remote communities. The Budget allocated \$6.8 million to specific non-government schools for these costs for one year only.

The assistance will be provided to non-government schools with more than 50 Indigenous boarding students from remote or very remote areas, or where 50 per cent or more of their boarding students are Indigenous students from remote or very remote areas. This is anticipated to apply to approximately 15 schools.

This additional allocation is a one year interim measure to support schools which qualify while a broader welfare review is conducted. While recognition of the additional costs is welcomed, a longer term solution is required for the future viability of these schools.

Recommendations of the Forrest Review

While this submission does not attempt to address all the findings of the Review, the broad direction of the Review's educational recommendations are generally supported by the independent school sector. The sector strongly supports the objective of having policies in place that enable the educational outcomes for this highly disadvantaged group in our society to be equivalent to those of the rest of the Australian community.

In developing public policy to improve educational outcomes, ISCA suggests that the following principles need be acknowledged in relation to the operations of independent schools involved in Indigenous education:

- In many rural and remote Indigenous communities sole provider independent schools perform a crucial educational and community role.
- Independent schools enhance the education choices available to Indigenous families and communities to address educational and social disadvantage.
- Governments have the responsibility to provide adequate funding to meet the wide ranging needs of Indigenous students.
- Funding arrangements need to ensure that Indigenous students are not disadvantaged because they are enrolled in an independent school.

The Review highlights issues relating to school attendance and in particular draws attention to the educational consequences of poor attendance. While the conclusions about consequences are not disputed, it is also important to recognise that the role of an independent school in ensuring student attendance has severe limitations in both a legal and practical sense.

It is well known that many independent schools devote considerable energy and resources to encouraging students and their families to improve their attendance. These schools understand the importance of regular attendance and are proactive in many Indigenous communities even though no specific public funding is provided to assist this activity.

In developing future policies that respond to the Review's recommendations, ISCA also wishes to make the following points:

- ISCA recognises the significant funding investment made by the Australian Government in supporting Indigenous education. ISCA supports the principle that funds should be directed equitably to all service providers and this will require a review of current funding mechanisms at a Commonwealth, State and Territory level.
- Many independent schools require greater overall resources to address the variety of additional needs of Indigenous students. The additional resources required to effectively support Indigenous students are not being adequately provided in the SRS funding model and there is limited capacity within many independent school communities to close the funding gap.
- The funding provided by governments to independent school communities is intended to partially address the costs incurred by schools in delivering educational services. The additional efforts and resources that schools dedicate in order to support Indigenous students attend school regularly and consistently are not financed through the ordinary school funding model.
- While compulsory school attendance is a legal requirement in all states and territories, independent schools have no power to compel a student to attend the independent school at which she or he is enrolled.
- A policy of imposing financial penalties on schools based on attendance alone is likely to have severe negative long-term unintended consequences for the availability of high quality educational services in rural and remote areas.
- Conversely a greater focus on building stronger, long lasting capacity in delivering education to Indigenous students in remote areas will strengthen existing services and encourage new services to be established.
- Providing greater support for teacher professional development and supporting quality teacher participation in remote schools is crucial to supporting student attendance and outcomes.
- Schools could be used as community hubs for the distribution of a range of services to Indigenous families to encourage parental engagement and school attendance.
- ISCA supports a review of ABSTUDY to ensure that levels of funding meet community needs, are appropriately targeted, and that administration requirements are simple and flexible.

ISCA would be happy to provide further advice in respect to the information provided in this submission.

Bill Daniels
Executive Director
19 September 2014