

Independent Schools  
Council of Australia

## **Senate Education and Employment References Committee**

**Inquiry into current levels of access and attainment  
for students with disability in the school system, and  
the impact on students and families associated with  
inadequate levels of support**

**Submission by  
Independent Schools Council of Australia (ISCA)**

**21 August 2015**



## About ISCA

The Independent Schools Council of Australia (ISCA) is the peak national body representing the Independent schooling sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISCA represents a sector with 1,080 schools and 576,000 students, accounting for approximately 16 per cent of Australian school enrolments. ISCA's major role is to bring the unique needs of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

Independent schools are a diverse group of non-government 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.

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 disability;
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other risk factors.

Many Independent schools have been established by community groups seeking to meet particular needs. Examples include the Independent community schools for Indigenous students in remote areas, Special Schools for students with disability and boarding schools to educate children from rural and remote areas. There are also schools that seek to reflect the religious values of a particular community or that seek to practise an internationally recognised educational philosophy such as Rudolf Steiner or Montessori schools. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran systems. Systemic schools account for 18 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

## Key points

- The role of the Independent sector in educating students with disability has increased dramatically in recent decades. Enrolments of students with disability have been increasing at a higher rate than overall enrolments for many years. In 2014, over 18,000 students with disability were enrolled in Independent schools.
- Students with disability enrolled in Independent schools do not receive the same level of additional funding as their counterparts in government schools. In Independent schools, these costs are borne directly by the parent body and school community.
- The Independent sector believes that students with disability must be appropriately and equitably resourced by governments regardless of the type of school they attend.
- In order to address this inequity, the Independent sector seeks an injection of additional funding for students with disability.
- With the introduction of the new Schooling Resource Standard (SRS) Funding model from 2014, the Commonwealth funding arrangements for students with disability have significantly changed for Independent schools. The SRS funding entitlements and allocations only directly apply to the 900 non-systemic Independent schools.
- With the introduction of the SRS funding model, it has become clear that some types of Independent schools, such as Special Schools and Special Assistance Schools, are not structurally suited to the SRS funding arrangements and do not 'fit' within the SRS funding model.
- The outcome for most Independent Special Schools has been that rather than being fully publicly funded, as recommended by Gonski Review Final Report, there has been an overall and ongoing reduction over time in their levels of public funding.
- Over its three year duration the More Support for Students with Disabilities initiative provided much needed capacity building to support students with disability in Independent schools.
- At this stage of the implementation of the Nationally Consistent Collection of Data on School Students with Disability data is not yet mature and as such is not yet fit for purpose to be used to support a needs based funding system for students with disability.

## *Introduction*

The Independent Schools Council of Australia (ISCA) welcomes the opportunity to provide this submission to the Senate Education and Employment References Committee inquiry into current levels of access and attainment for students with disability in the school system, and the impact on students and families associated with inadequate levels of support.

The Independent school sector in Australia makes a significant contribution to enabling students with disability to access quality educational opportunities, and supporting the learning needs and goals of students with disability who are enrolled in Independent schools.

As the inquiry's Terms of Reference highlight, ensuring that Australia's schools meet the learning needs of students with disability requires discussion of a wide range of complex issues related to both policy and practice.

The need for adequate and equitable levels of government support for students with disability enrolled in Independent schools continues to be a key priority for ISCA. Australian Government funding is a critical element for the resourcing and support of students with disability in Independent schools. Increased funding support to facilitate the access and educational attainment for students with disability is a core issue for the sector. On this basis, this submission will focus on the critical issue of adequate government funding to support students with disability in Independent schools.

This submission:

- provides background for the Committee by outlining the characteristics of the Independent school sector in Australia;
- outlines the numbers of students with disability enrolled in the Independent sector, including the significant growth in enrolments over recent decades;
- highlights the range of barriers to access and attainment that students with disability face;
- provides information on current funding arrangements for students with disability in Independent schools;
- notes issues experienced by schools in the Independent sector due to the loss of Commonwealth Targeted Programs; and
- discusses the impact of the More Support for Students with Disabilities initiative and the progress of the Nationally Consistent Collection of Data on School Students with Disability.

## *About the Independent School Sector*

Independent schools are not-for-profit institutions that are set up and governed independently on an individual school basis. Independent schools are registered by the relevant state or territory education authority.

Boards of governors or committees of management are the key decision-making bodies for most Independent schools and are responsible for issues such as a school's educational provision, current and future development and staffing.

Unlike other sectors, the majority of **Independent schools operate autonomously**. These schools do not rely on central bureaucracies or bodies and are separately accountable to their parent and school communities.

There is a common perception, often encouraged through media portrayal, that Independent schools are large, urban schools which only cater to high income families. In fact, **90 per cent of Independent schools are low to medium fee establishments** which cater to the full spectrum of Australian society.

Independent schools cater to specific groups of disadvantaged students including: high needs students with disability attending Special Schools; indigenous students attending remote 100 per cent indigenous schools in Western Australia and the Northern Territory; and highly disadvantaged urban youth who have been excluded from both government and non-government schools attending Independent Special Assistance Schools.

**The numbers of disadvantaged students in Independent schools**, including students with disability, Indigenous students, students with a language background other than English, **have been increasing at a higher rate than overall enrolments for many years.**

Virtually all Independent schools in all states and territories have chosen to become members of their Association of Independent Schools (AISs). AISs are not-for-profit bodies who represent and provide services to Independent schools in their state or territory. AISs are funded by their member schools through membership subscriptions for member services. As the majority of Independent schools operate as individual, autonomous bodies, they elect to become members of AISs and pay their subscriptions from school funds as they appreciate the advice and services provided by their AIS.

As well as providing core member services to schools, under the previous funding model the AISs also administered a range of Australian Government and state and territory government programs for all Independent schools in their jurisdiction, regardless of AIS membership, via Targeted Programs.

More recently governments and their agencies have relied on AISs to provide advice on and assistance with the implementation of other government programs and initiatives including, in the case of the Australian Government, the development of the Australian Curriculum, national testing, Smarter Schools National Partnerships and the development of NAPLAN online. AISs are willing to assist government and provide services to their member schools, but it should be recognised that AISs are not funded by government for all of these support roles.

## *Students with Disability Enrolled in Independent schools*

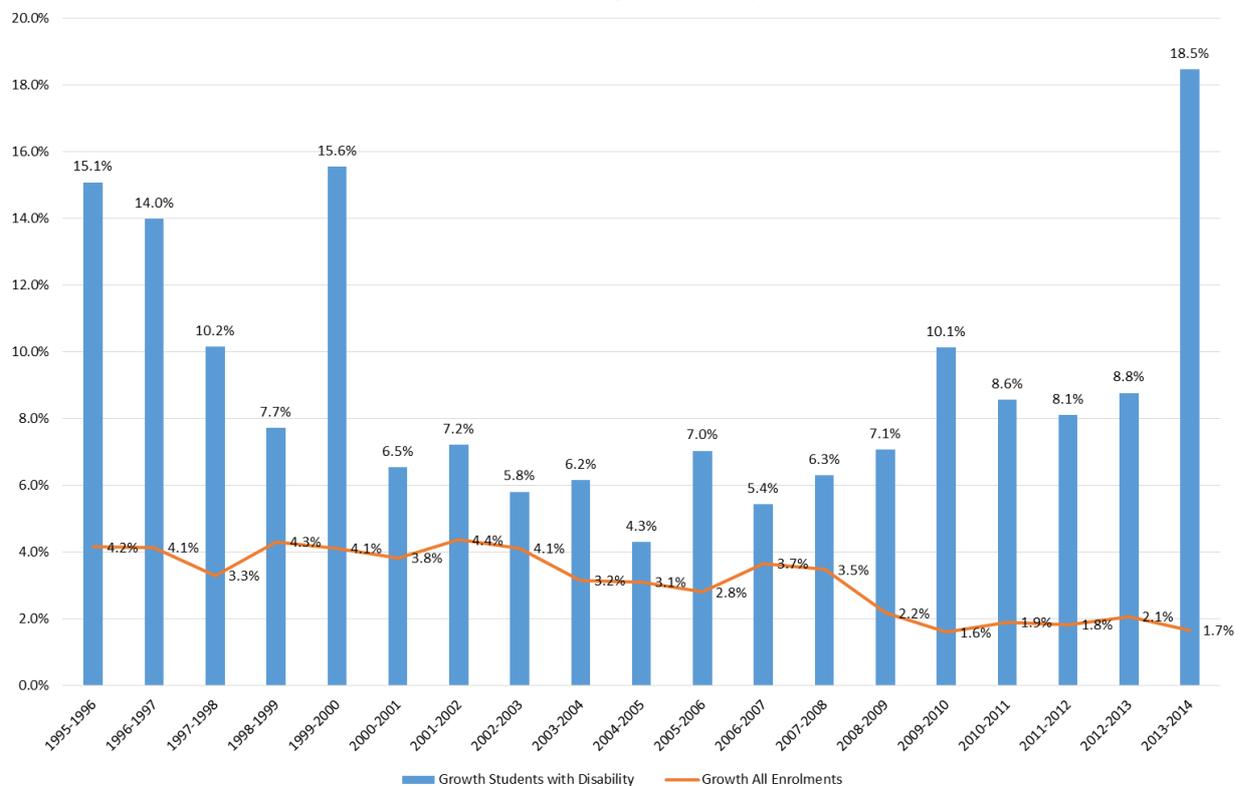
**The role of the Independent school sector in educating students with disability has increased dramatically in recent decades.** There is no shortage of students with disability seeking to attend Independent schools and no lack of will on the part of Independent schools to enrol them. Despite the unsatisfactory levels of government funding support students with disability in Independent schools, the number of these students in Independent schools is significant and continues to increase annually.

**Under the *Disability Discrimination Act 1992*, the accompanying Disability Standards for Education 2005 and associated state and territory-based legislation, all schools including Independent schools have an obligation to enrol and educate students with disability.**

Under the Act, **parents have the right to select a school of their choice.** Schools must consider the enrolment application on the same basis as applications for other students regardless of the level of supplementary assistance that may be available, unless they can categorically prove undue hardship due to the enrolment of a student with disability.

Over the last 20 years there has been a consistent and steady trend of increasing enrolments of students with disability in Independent schools. **In 2014, over 18,000 students with disability<sup>1</sup> were enrolled in Independent schools.** This is almost three times the number of students with disability who were enrolled in Independent schools in 1999.

**Enrolment Growth in the Independent Sector - Students with Disability & All Enrolments (1995–2014)<sup>2</sup>**



<sup>1</sup> As defined and funded under current state or territory based definitions

<sup>2</sup> Department of Education & Training *Non-Government School Census 2015* - excludes Independent Catholic enrolments

**The growth in enrolments of students with disability has been greatest in mainstream schools**, which now account for some 82 per cent of students with disability in Independent schools, including many students with high to very high support needs.

There has also been significant growth in the number of students enrolled in Independent Special Schools which provide alternative educational settings for students with high-level needs.<sup>3</sup> This growth is partially due to the number of such Special Schools opening in the last 20 years. During this period more than 30 new Independent Special Schools or campuses of existing schools opened. **In 2014 there were 82 Independent Special Schools** across Australia educating around 18 per cent of students with disability enrolled in Independent schools. Many Special Assistance Schools also enrol students with disability.

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<sup>3</sup> Department of Education & Training *Non-Government School Census 2015* – includes Independent Catholic enrolments

## *Barriers to Students with Disability Reaching Full Potential*

### **Funding**

**Students with disability enrolled in Independent schools do not receive the same level of additional funding as their counterparts in government schools.** Lack of adequate government support for students with disability in Independent schools is a major constraint for schools seeking to enrol these students. **The Independent sector believes that students with disability must be appropriately and equitably resourced by governments regardless of the type of school they attend.**

There is no argument about the willingness of Independent schools to meet their social and legal obligations to enrol students with disabilities. It should, however, be recognised that **enrolment of a student with disability may operate differently in an Independent school than an enrolment in a school that is part of a system.**

The *Disability Discrimination Act 1992* and associated Standards requires schools to accept enrolments of all students irrespective of the nature of their disability. The overall costs to facilitate access to and participation in the education provided by the school as specified in the Standards, are often substantial. **The obligations that have been outlined for providers to meet have not been matched by commensurate and equitable funding provisions to support students and providers in the Independent school sector. In Independent schools, the costs of the shortfall in government funding are borne directly by the parent body and school community.**

In order to address this inequity, **the Independent sector seeks an injection of additional funding for students with disability.** The sector advocates that any additional funding be administered through state and territory AISs. Utilising the expertise of the AISs will overcome many of the existing problems with funding for students with disability in Independent schools currently not experienced by schools operating in a systemic environment. These issues are further discussed in detail later in this submission.

### **Access to services**

**Educators in Independent schools, along with those in the Catholic and government sectors, are highly aware of the barriers that may exist** to appropriately meet the needs of students with disability. In many cases schools and individual educators are the closest non-family support to students with disability, their parents and associates.

While the *Disability Discrimination Act 1992* and its associated Disability Standards for Education 2005 provide a framework to ensure that students with disability are able to access and participate in education on the same basis as other students, other factors beyond the influence of schools may mean that students from regional, rural or remote areas, from culturally and linguistically diverse backgrounds, or who are Aboriginal or Torres Strait Islander still experience barriers to access and full participation.

**There is a clear lack of specialist trained teaching staff and allied health professionals** in rural and remote areas. Families are often required to travel extensive distances to access appropriate support. This inhibits families from obtaining much needed professional opinion, diagnosis and access to services. Parents of students in low socio economic areas often

experience similar difficulties as those families in rural and remote areas, having limited access to allied health professionals due to extensive waiting lists in many government agencies.

Students, particularly those within smaller Independent schools, requiring mental health services are not always able to access counselling and child and adolescent mental health support services and are reliant on government agencies with extensive waiting lists or on private services to provide the necessary support to the student, family and the school.

**For many years under Targeted Programs AISs provided information and support, professional learning, and special education services to Independent schools enrolling students with disability.** Many AISs implemented specific programs aimed at assisting classroom teachers to identify student need and then identify strategies and adjustments that teachers could implement to assist students with disability, in order to reduce the barriers to accessing education faced by students with disability.

These services included working collaboratively with school principals, classroom teachers, administration staff, students with disability, their families and associates to collectively implement the individual planning process for each student. The individual planning process identified the student's needs and outlined adjustments and procedures for implementing appropriate strategies to maximise student access, participation and the provision of support services.

Some AISs engaged consultants who supported schools in determining needs in terms of adjustments to school facilities and the equipment and resources required for individual students. These consultants, educators with postgraduate qualifications in special education and experience in both management and teaching in the area of supporting schools enrolling students with disability, worked to assist schools to appropriately support students and adequately interpret their obligations outlined under the Standards.

**The capacity of AISs to provide these services has decreased as funding to address disadvantage is now passed on to individual Independent schools**

In addition, in order to better cater for the educational needs of students with disability, all schools in all sectors would benefit from pre-service and in-service education that is targeted at professional learning in the areas of engaging, supporting and teaching students with diverse needs in the mainstream school setting.

## ***Funding of Students with Disability in the Independent Sector***

With the introduction of the new SRS Funding model from 2014, the Commonwealth funding arrangements for students with disability have significantly changed for Independent schools.

Under the previous socio-economic status (SES) funding model, schools received general recurrent grants directly from the Commonwealth. Funding for students with disability, as with other funding to address disadvantage, was distributed via the AISs using the Commonwealth Targeted Programs (CTPs).

**The new SRS funding model theoretically provides base funding and loadings for disadvantage directly to schools. In practise however, school systems, such as government and Catholic systems, receive the SRS funding for all their schools and are able to redistribute their schools' funding entitlements within the system according to their own needs-based methodologies.**

**This means that the SRS funding entitlements and allocations only apply to the 900 non-systemic Independent schools.** Most schools in Australia (90%) will not be funded according to the model, but according to their own jurisdictional or system priorities.

### **The SRS funding model**

The SRS funding model has two main components.

#### *1. Base funding*

The base funding in the SRS funding model is a per student amount which aims to measure the cost of effective and efficient provision of schooling. The base amount is indexed annually by 3.6% to reflect estimated increases in the costs of all schools. In 2015, the base funding amounts are:

Primary - \$9,605

Secondary - \$12,632

The amount of base funding a non-government school receives is reduced by the school community's 'capacity to contribute', measured using the previous funding model's SES scores. Some Independent schools are entitled to as little as \$1,921 per student.

#### *2. Loadings for disadvantage*

There are six loadings designed to address different areas of disadvantage. These are:

- Size
- Location
- Low SES
- English Language Proficiency
- Students with Disability
- Indigenous students

The loadings are intended to be fully publicly funded.

Once a school's SRS funding entitlement is calculated<sup>4</sup>, the total is split into the Commonwealth share and the state share based on historical Commonwealth / state funding proportions.

However, only new schools will be immediately funded under the new funding model. Funding for all pre-existing schools will transition from the previous funding model to the SRS funding model.

### **Transition arrangements**

While the SRS funding model has been introduced, it is not fully implemented.

- From 2014, schools with a higher SRS entitlement than their previous funding entitlement are transitioning up to the SRS. They are considered to be 'below the SRS'.
- Schools with a lower SRS entitlement than their previous funding entitlement are transitioning down to the SRS. They are considered to be 'above the SRS'.

Transition funding is not a reflection of a school's SRS funding entitlement. In general terms, schools 'below the SRS' receive their previous year's funding plus 4.7% indexation<sup>5</sup> plus a proportion of additional SRS funding to move them towards their SRS funding entitlement.

Schools 'above the SRS' receive their previous year's funding plus 3% indexation. As the indexation rate for schools above the model is lower than the indexation rate for the SRS, over time these schools transition down to the SRS<sup>6</sup>.

The impact of these transition arrangements means that Independent schools that are in transition are still receiving funding largely on the basis of the previous funding model.

Most Independent schools are in transition. According to the Department of Education and Training, only 16 Independent schools, mostly new schools, are expected to be 'on the SRS' in 2015; that is actually receiving their SRS funding entitlement. Eighty per cent of Independent schools are below the SRS and are transitioning up to their SES entitlement.

While the transition was originally intended to take six years and to achieve 95% of SRS funding<sup>7</sup>, currently only the first four years of the transition have been guaranteed. At this point in time, it is unclear whether most schools will ever achieve full SRS funding.

### **The loading for students with disability**

The current students with disability loading is an interim loading and was only ever intended to deliver back to schools the quantum of funds then being expended on students with disability at the time of the introduction of the SRS funding model with no additional funding elements.

Further, it is a set per student amount, not differentiated by level of disability or need. The students with disability loading is currently set at 186% of the SRS. Students with disability in Special Schools receive a higher rate of 223% of SRS.

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<sup>4</sup> Under the Australian Education Act 2013, funding is calculated for an Approved Authority which may be one or more schools. For the purposes of this submission, 'school funding' is funding for an Approved Authority.

<sup>5</sup> 4.7% is the indexation rate for the Commonwealth share from 2015.

<sup>6</sup> All SRS funding is calculated on a per capita basis

<sup>7</sup> Except for the ACT where the projected transition path achieved 100% of SRS in 2019.

The fact that the loading is a flat rate is extremely problematic for Independent schools. The inability of Independent schools to access differential funding rates depending on a student's level of disability affects Independent schools' ability to enrol high needs students with disability.

### **Funding for students with disability**

With the introduction of the new SRS funding model and the transition arrangements put in place, it has become clear that there are significant issues with the way the loading for students with disability is being delivered to schools and the quantum of funds schools are able to access to fund these students.

#### *Schools 'below the SRS'*

Schools operating below their full SRS funding entitlement are transitioning up to their new funding level. As noted earlier, funding for these schools continues to be based on the previous funding model plus each year they receive small amounts of 'additionality' (additional SRS funding) which incrementally moves them towards their full SRS funding entitlement. This means that they are not yet receiving the full loading amount for students with disability.

The further away from their SRS entitlement a school is, the smaller proportion of SRS funding, including loadings, it actually receives.

**This incremental approach to increased funding means that contrary to popular rhetoric, these students are not receiving the loading for students with disability, rather they are receiving a proportion of the loading for students with disability.**

#### *Schools 'above the SRS'*

Schools operating above their full SRS funding entitlement are transitioning down to their new funding level. Any additional students who enrol at these schools will only receive the average per student funding attributed to existing students, regardless of any additional disadvantage, such as being a student with disability.

This means that for these schools, **the total additional cost of taking on an additional student with disability has to be borne by the school and the school community.**

### **Timing of payments**

For all schools there is the issue of the final funding entitlement based on student characteristics not being paid until the end of the year, regardless of when a student enrolls in the school.

Funding for students with disability in the Independent sector is dependent on students being identified in the Non-government School Census which takes place in August. The calculation of a school's final entitlement is made after schools have completed the Census. The final payment to schools, which incorporates adjustments on the basis of the Census, is usually made in October. This means that **schools have to find funding for newly enrolled students with disability prior to receiving funding for them, possibly for the entire school year.**

### **Special Schools and Special Assistance Schools**

With the introduction of the SRS funding model, it has become clear that **some types of Independent schools are not structurally suited to the SRS funding arrangements and do**

**not 'fit' within the SRS funding model. These schools include Special Schools and Special Assistance Schools.**

This is because their particular demographics and levels of disadvantage are not adequately captured or recognised by the new funding model. These schools need modified funding arrangements tailored to meet their particular needs to ensure that they receive sufficient funding to continue to meet the high needs of their students.

#### *Special Schools*

Special Schools provide education under special programs, or special activities, designed specifically for students with disability.

Under the SRS funding model, most Special Schools are calculated to be operating above their SRS funding entitlement and are thus transitioning down to their SRS funding level over time. This equates to a **reduction** in funding over time.

The SRS model is not capable of generating sufficient funding to meet the resource needs of Special Schools because it cannot take into account the full costs associated with running a Special School. Previously under Targeted Programs, AISs had sufficient flexibility to allocate students with disability funding to Special Schools to meet student need.

The Gonski Review Final Report actually recommended that Special Schools be fully publicly funded for their existing resource levels, including their existing levels of private income. Instead, **the outcome for most Special Schools has been that rather than being fully publicly funded, there has been an overall and ongoing reduction over time in their levels of public funding.** This will inevitably affect these schools' ability to offer quality educational programs to their students.

#### *Special Assistance Schools*

Special Assistance Schools primarily cater for students with social, emotional or behavioural difficulties and are in a similar situation to Special Schools.

Further, unlike Special Schools which are entitled to a higher loading for the students with disability in their schools (223% of the SRS), Special Assistance Schools receive the same loading as mainstream schools (186% of the SRS).

**For many Special Assistance Schools, almost 100 per cent of enrolments are students with disability but these schools cannot access the additional loading amount as they are not designated Special Schools.** This is an historical anomaly as previously some Special Schools were advised by the Commonwealth Department of Education and Training to become Special Assistance Schools. This change in status is now having significant financial consequences.

### **Loss of Targeted Programs**

As noted above, under the previous funding model, the AISs in each state and territory delivered Commonwealth Targeted Programs which addressed areas of disadvantage in the Independent sector. Under these arrangements, individual Independent schools received both financial assistance and access to expert assistance and advice to help them to meet the needs of disadvantaged students and maximise educational outcomes through CTPs.

Under the new school funding arrangements, the function of CTPs to address educational disadvantage have been transferred to the loadings to address educational disadvantage directed to individual Independent schools. In providing funding directly to schools, **the sector has lost the capacity to provide economies of scale for Independent schools both in terms of purchasing power and the breadth of expertise that can be sourced.**

With the provision of small amounts of supplementary funding provided directly to individual schools, the capacity of many individual schools to purchase services for their educationally disadvantaged students is extremely limited. Most individual Independent schools do not have the capacity to devote significant time and resources to researching and sourcing expertise. Directing targeted funding through AISs maximised the utility of targeted funding by increasing the purchasing power of available funding. AISs also employed specialist staff to assist schools with professional services that, individually, schools are now not in a position to purchase or access.

This provided sectoral capacity to deliver and access central advice and economies of scale in running programs and assessments for students with disability. The loss of these programs means that the Independent sector has lost the capacity to direct funds to extremely high needs students and the capacity of individual schools to purchase services for disadvantaged students may be extremely limited.

Under Targeted Programs, AISs were also able to provide limited amounts for capital funding for schools to assist in accommodating students with disability. Without this funding, many schools are struggling to find the funding required to provide the infrastructure necessary to accommodate some students with disability.

Government and non-government systems, including Catholic systemic schools, have retained the ability to distribute loadings across schools to meet differential school and student need. For this reason, the impact of changes to funding arrangements have not impacted systems in the same way that they have impacted non-systemic schools.

As the only non-systemic school sector, the new funding arrangements mean that the only sector to lose their capacity to access co-ordinated sector-wide support and economies of scale is the Independent sector. This significantly impacts on the capacity of individual Independent schools to address educational disadvantage. It is further recognised that those schools most affected will be schools with the lowest resource capacity which are often those schools which enrol students with the greatest levels of educational disadvantage.

As has already been highlighted, under the transition arrangements, schools would not receive their full entitlement under the loadings until the model was fully implemented. In the absence of full implementation, it is likely that schools will not be provided with sufficient additional funding to enable them to respond to changes in their school community, particularly changes in the numbers of disadvantaged students.

### **Public perception of funding for students with disability**

The rhetoric around the introduction of the SRS funding model has caused a great deal of confusion for parents and the wider community, leading to a belief that not only are schools getting the full loadings now, but also that the current students with disability loading is intended to cover the costs of a student with disability to attend any school.

**The reality is that students with disability in Independent schools are still getting less support than in a government school and if a student changes from a government school to an Independent school, they do not receive the same levels of funding.** As illustrated under the issues associated with the transition, it is being left to individual schools to absorb the bulk of costs associated with educating students with disability. This means that the costs are being borne by parent and school communities. This can have a significant impact on schools, particularly small schools, and affects their ability to enrol additional students with disabilities and to maximise educational outcomes.

### ***More Support for Students with Disabilities Program***

In May 2011 the Australian Government introduced the More Support for Students with Disabilities (MSSD) initiative. The MSSD provided \$200 million to provide extra support for students with disability in Australian schools. Funding was allocated to Government, Catholic and Independent sectors to deliver services during the 2012 and 2013 schools years, concluding in December 2013.

In April 2013 the Australian Government provided an additional \$100 million in funding in order to extend the MSSD initiative for the 2014 school year.

The initial two year funding for the MSSD, and the extension for the 2014 school year, was welcomed by the Independent sector as an important initiative which, for its duration, provided much needed additional funding support for students with disability in Independent schools.

Under the MSSD outputs were developed to allow flexibility to meet the particular needs, context and capacity of schools. This emphasis aligned to support a continuous improvement approach in schools.

The intent of the MSSD was as a capacity building program to enable schools and teachers to better meet the needs of students with disability. The MSSD was not designed or understood to be a replacement for direct government funding, whether targeted or recurrent, to Independent schools.

The Independent sector would support further programs to support capacity building for schools and teachers as more students with disability are enrolled in mainstream schools. However, it should be noted that a program of this sort will not address schools' and parents' underlying concerns about the lack of adequate direct assistance and resourcing for students with disability. Support for schools to build capacity and direct government support for students with disability should be seen as separate but inter-related issues.

### ***Nationally Consistent Collection of Data on School Students with Disability***

The implementation of a nationally consistent collection of data on school students with disability in all Australian schools was endorsed by all Education Ministers from Commonwealth, state and territory governments in May 2013.

ISCA is represented on the Joint Working Group to Provide Advice on Reform for Students with Disability (JWG), the committee tasked with progressing the Nationally Consistent Collection of Data on students with disability (NCCD).

The intent of the NCCD was to provide a nationally consistent definition and count of students with disability in all schools across Australia.

The NCCD is an iterative process which is being nationally phased in over a three year period. This collection is being progressively rolled out over the period 2013 – 2015, with all Australian schools expected to participate in the collection in this year.

Fifty three per cent of Independent schools are participating in the NCCD for the first time in 2015.

The NCCD represents a significant change in the way schools identify and report on students with disability and bringing all schools into the collection will be a significant challenge for schools and systems.

The original purpose of the NCCD was to develop a nationally consistent approach for identifying students with disability who are provided with additional educational support in order to enable a useful and reliable collection of data to inform future planning and assist schools to better support and improve educational outcomes for students with disability.

The aim of the collection was to enable the number of students with disability to be reported in a transparent, consistent and equitable way that better informs policy development at a national and jurisdictional level. At this stage of the implementation of the NCCD the suitability of the collection for funding purposes is yet to be resolved. It may be several years before the collection is sufficiently mature to reliably provide robust data suitable for the fine-grained funding arrangements necessary for Independent schools.

**The NCCD was originally designed as a count of students with disability not as a potential funding mechanism. It is not clear at this time whether this collection will be fit for purpose to be used to develop a needs based funding system for students with disability.**

It should be noted that in the Independent sector data will need to be rigorous enough to identify students with disability at the school level, as outlined in the discussion of the SRS funding model above.

## ***Conclusion***

ISCA welcomes the opportunity to make this Submission to the Senate Education and Employment References Committee inquiry into current levels of access and attainment for students with disability in the school system, and the impact on students and families associated with inadequate levels of support.

The Independent sector educates a significant and increasing number of students with disability with over 18,000 students with disability now enrolled in Independent mainstream, Special and Special Assistance Schools. This is despite the fact that students with disability enrolled in Independent schools do not receive the same level of additional funding as their counterparts in government schools. In Independent schools, these extra costs are borne directly by the parent body and school community.

The Independent sector believes that students with disability must be appropriately and equitably resourced by governments regardless of the type of school they attend. As this is currently not the case, Independent schools are seeking extra funds in the short term to address this inequity.

I would welcome the opportunity to address any further questions you may have on the basis of this submission.

Colette Colman  
**Acting Executive Director**  
**21 August 2015**