



IEUA Comments:-

**REVIEW OF FUNDING FOR SCHOOLING - DISCUSSION PAPER AND
DRAFT TERMS OF REFERENCE**

The Independent Education Union of Australia (IEUA) welcomes the opportunity to comment on the discussion paper and the draft terms of reference for the review of funding for schooling.

The IEUA notes the undertaking by the Deputy Prime Minister that the review will be transparent, consultative, informed by evidence and not about taking money away from schools.

The IEUA is the federally registered organisation which represents the industrial and professional interests of education workers in all non-government education institutions across Australia. It has a current membership of over 66,000 members.

The IEUA has a strong interest in the Commonwealth's funding policy in terms of its impact on the operations of non-government schools. Clearly such policy affects the quality of educational provision to students and the professional and industrial lives of education workers in non-government schools. Government recurrent funding of non government schools is the fundamental component of the salaries and conditions for teachers and support staff employed in the non government sector.

All schools, both government and non-government, are important social institutions in which Australian children engage with and learn about their fellow citizens and come to acknowledge and appreciate their differences, beliefs and values. The comprehensiveness across both the government and non-government systems is a great strength of the Australian education system and should be preserved.

Key Issues for Review

In welcoming the review the IEUA considers that key issues in relation to school funding need to be acknowledged and addressed by the review. In particular the IEUA urges that:

- The review must be informed by data that is comprehensive, comparable and accurate. One of the the most glaring difficulties in considering current school funding arrangements across the nation is the absence of data that is genuinely comparable.
- The responsibilities of schools and their engagement in an increasingly broader educational agenda beyond the 'compulsory schooling years' means that funding arrangements need to be mindful of school commitments in relation to early childhood education and vocational education. Federal government initiatives and priorities in these areas and the integral role of schools in their delivery needs to be acknowledged in the review.
- A needs-based approach to funding, that recognises the relative educational needs of students, is essential
- Particular importance be given to students with special needs including students with a disability, students with behavioural difficulties, indigenous students, students in rural and remote areas, students with English as a second language or who are otherwise disadvantaged and the resourcing

needs for schools to provide appropriate learning environments and support for teachers and school officers

- The significant private contribution to the costs of education made by school parents and communities in both the government and non-government sectors form part of the consideration of total resources available to schools.

Comments on the Draft Terms of Reference

The IEUA notes that the Draft Terms of Reference (p19) indicates that the Review “may consider” the list of 16 dot points. The IEUA believes that a number of the listed points are essential to any review that purports to achieve “a funding system...which is transparent, fair, financially sustainable and effective...”

Indeed, without wishing to prioritise the elements of the review, the IEUA believes that without due consideration and investigation of almost all of the listed elements, the review will not be able to successfully deliver high quality recommendations.

- [dot point 2] *‘the likely growth of demand and student need’*
The IEUA believes that further explication is required to ensure that the review examines enrolment trends and enrolment growth, particularly within and between sectors and consider long term trends and projections.
- [dot point 4] *‘whether a basic entitlement for every student is required and how it should be determined’*
The IEUA would request that the conceptual understanding of ‘basic entitlement’ be clearly identified and clarified as to whether it refers to base level funding or a resource standard. Further, the IEUA believes that the review needs to examine the individual student need aspect of a ‘basic entitlement’ as it relates to students with special needs and in particular funding those students irrespective of the school sector they attend .
- [dot point 6] *‘the best way to meet the costs of specific factors such as indigeneity, location, disability and socio-economic disadvantage which can act as barriers to educational achievement’*
The IEUA believes that this element needs to be expanded to clearly consider matters such as student behavioural challenges (not always defined as disability), Non-English Speaking Background (NESB) students and issues relating to rural and remote educational settings.
- [dot point 7] *‘how to achieve cost-effectiveness in the provision of school funding’*
The IEUA would be concerned if the intent of this element was to achieve *increased* cost-effectiveness in the provision of school funding. The IEUA believes that ‘service delivery’ in school education in Australia is already very effective, such a perspective would only impact negatively on the workload and working conditions of our members and whilst the review proposes to look at international comparisons for other elements (see dot point 10), it is

not clear that Australia's relatively modest per capita expenditure by OECD standards would be reviewed in this element.

- [dot point 11] *'the appropriate composition of school funding, including teaching, capital and other costs of schooling'*
The review needs to recognise that funding for schools is not currently 'packaged' as a composite model of recurrent funding, capital monies and special needs or special projects funding. In this context therefore, the review should consider each of these elements separately and distinctly. A recommendation in relation to the notion of 'appropriate composition' might arise from the review but of itself is not a currently useful construct for clarifying existing arrangements.
- [dot point 13] *'the place of voluntary and private contributions and fees in school funding arrangements'*. Schools in both the government and non-government sector receive funds in addition to the funding provided by federal and state governments. These funds are not limited to voluntary and private contributions and fees but can include income received from leasing school property or resources. The IEUA believes that this element needs to be expanded to look at the broad funding resources in both the government and non-government sectors and equally to consider those that relate to recurrent expenditure and those that relate to capital works or improvements..
- [dot point 15] *'What forms of regulatory oversight are necessary to ensure high standards of delivery and probity among schools receiving public funding'*.
The IEUA notes that, in addition to federal government regulations, state and territory regulations in relation to schools vary considerably across the jurisdictions. These regulations relate to curriculum, teacher registration, school building standards and a range of other state based industrial laws, building codes, service industry regulations and child protection legislation. Whilst there are emerging 'national standards', the current patchwork of state/territory regulations needs to be recognised and acknowledged by the review.
- [dot point 16] *'What, if any, transitional assistance should be offered to schools in making the transition to a new system'*.
The IEUA urges, consistent with comments made by the Deputy Prime Minister, that this element be amended to delete the words "if any". Primarily, the IEUA supports funding stability and security in the best interest of its members and the effective operation of schools. Transitional provisions must ensure for the capacity of schools to plan ahead.

Chris Watt
Federal Secretary
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