



Australian Government  
Department of Education,  
Skills and Employment

# The National School Resourcing Board's Review of the loading for students with disability

Australian Government Response





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The document must be attributed as the Review of the loading for students with disability - Australian Government response.



## Summary

The Australian Government welcomes the National School Resourcing Board's (the Board) Review of the loading for students with disability (the Review). The Board made eight recommendations, all of which the Government agrees with or agrees with in principle.

The Board was asked to conduct a review of the settings of the loadings for students with disability. They were specifically asked to consider, provide findings and make recommendations relating to the current settings for the loadings for the top three Nationally Consistent Collection of Data on School Students with Disability (NCCD) levels of adjustment, taking into consideration:

- previous research on funding for students with disability, including work commissioned for the Joint Working Group to Provide Advice on Reform for Students with Disability (JWG)
- the level of resources used to support students with disability at each level of adjustment under the NCCD
- the level of funding for educational adjustment provided by approved system authorities to member schools for students with disability under each system's needs-based funding arrangements
- any significant variations related to school setting or context.


The Board undertook extensive consultation to inform its advice and recommendations. The Board also commissioned three research projects to test the validity of the current loading settings, and a fourth to review current Australian Government assurance processes for the loading.

The Board found limitations on the initial research underpinning the current loading settings and concluded there is a need to build an evidence base to inform updated estimates of the cost of reasonable adjustments for students with disability. In response, the Government will work with stakeholders to commission research to develop the evidence base, from which a refined costing model will be developed to inform the loading settings from 2023.

The Board also found that the cross-sectoral approach taken by Australian governments and the non-government sector has contributed positively to building capacity in the sector to implement the NCCD. The Board recommended that this work continue, noting in particular the need for ongoing support to build the capacity of non-systemic schools. The Government will continue to work closely with sector partners to further build capacity across the sector.

While noting the assurance processes used by the Department of Education, Skills and Employment (the department) to ensure accuracy of the NCCD compares favourably with best practice, the Board found limitations in the processes used for the annual Census Post Enumeration (PE) exercise, which is used to measure the accuracy of student data and compliance across a sample of non-government schools. While the department conducts annual reviews of the PE exercise, the Government will support an independent review in 2020 to ensure it remains fit for purpose.

Finally, the Board noted the benefits of improved transparency to both the quality of the NCCD and compliance, subject to privacy considerations. The Government will work with state and territory education Ministers with a view to publishing school level NCCD data on the My School website.



Responses to all recommendations will be funded through the Government's allocation of \$20 million from 2017 - 2021 under the NCCD Continuous Improvement measure for national projects to address the learning needs of students with disability, build school capacity and inform continuous improvement and assurance initiatives.

The Government would like to thank all those who contributed to the Review, with particular thanks to the members of the student with disability loading review sub-committee, Professor Ken Smith, Chair, Professor Stephen Lamb and Professor Greg Craven AO.



## Context for the review

The National School Resourcing Board was established on 1 November 2017 under section 128 of the *Australian Education Act 2013* (the Act) to provide independent oversight over Commonwealth school funding and ensure the funding model is using the best available data and methodologies, as well as making sure funding is used in line with the Act.

### Australian Government funding for schools and the student with disability loading

Funding for schools is provided under the governing legislation of the Act and the Australian Education Regulation 2013 and gives the department legislative authority to give Australian Government funding to school approved authorities, block grant authorities and non-government representative bodies.

Australian Government recurrent school funding is based on the Schooling Resource Standard (SRS). The SRS is an estimate of how much total public funding a school needs to meet the educational needs of its students, as recommended by the 2011 Gonski *Review of Funding for Schooling*. The SRS is made up of a base amount for every primary and secondary student, along with six loadings to provide extra funding for disadvantaged students and schools, one of which is the student with disability loading. The student with disability loading is an estimate of the cost for reasonable adjustments that schools make to meet students' needs. It is expressed as a percentage of the base per student amount.

The NCCD is used to inform Australian Government funding under the student with disability loading. Through the loading, additional resources are provided for students receiving supplementary, substantial or extensive levels of educational adjustment as assessed within schools in accordance with the NCCD Guidelines.

### The Review of the student with disability loading

The Board undertook a review of the student with disability loading to identify and make recommendations relating to the current settings for the loading and Australian Government assurance processes to support the accuracy of information provided to calculate funding entitlements for students with disability.

The Board consulted extensively to inform its advice and recommendations, including targeted face-to-face consultations with representatives from 19 stakeholder groups, and two policy roundtables with representatives from State and Territory education departments and non-government school peak bodies. The Board circulated a consultation paper on 9 July 2019, which attracted 33 submissions.

Noting the technical nature of the issues, the Board also established an Expert Panel comprising members with expertise in students with disability policy, education system administration and economic and financial modelling. This Panel commissioned three research projects, each using a different approach, to test the validity of the current loading settings, and a fourth to review current Australian Government assurance processes for the loading.

The Board presented its report to the Minister for Education on 23 December 2019.

# Australian Government Response to Recommendations

## Recommendation 1

***The Australian Government should retain the settings for the loading in the short term while further work is undertaken to evaluate the validity of the settings.***

## Recommendation 2

***The Australian Government, in collaboration with State and Territory governments, should invest in the development of a strong evidence base (over two years) to inform a refined costing model for the students with disability loading. This costing model should inform the settings for the loading from 2023.***

## Recommendation 3

***The work program to develop an evidence base to inform a refined costing model should be an Education Council priority; supported by a reference panel comprising representatives from all States and Territories, and the Catholic and independent sectors.***

**The Government agrees with these recommendations.**

The research used to derive the students with disability loading was based on a 2015 survey of school spending on students in the NCCD to determine the combined average costs for additional resourcing provided at each level of adjustment across mainstream and special schools.


The Board found limitations with this research and commissioned independent studies into the cost of reasonable adjustments for students with disability. The Board concluded that there is insufficient evidence to determine changes to the current loading settings, and recommended the current settings be retained while the evidence base is developed.

In response, the Government, in consultation with the sector through state and territory education Ministers, will commission research commencing early in the 2020-21 financial year to build the evidence to inform a refined costing model for implementation in 2023. This research will use a range of approaches to determine the cost of adjustments, cognisant of the varying contexts in which these adjustments are made: school location, systemic and non-systemic, numbers of students with disability within a school, and stage of schooling.

## Recommendation 4

***The Australian Government should continue its current level of investment in comprehensive training and development to support consistency in the collection and moderation of data under the NCCD until at least 2023. This should include the Australian Government taking a leadership role in a national approach to moderation.***

**The Government agrees with this recommendation.**



Recommendation 4 is in two parts: it calls for the Australian Government to continue its current level of investment in training and development to support consistency of the NCCD collection, an element of which is to take a leadership role in a national cross-sectoral approach to moderation of data.

The Board found the Government's cross-sectoral approach has contributed positively to building capacity in the sector to implement the NCCD and that the Government's contribution has been well received. The department has worked closely with education authorities through the Joint Working Group to Provide Advice on Reform for Students with Disability to embed the NCCD in schools, build capacity and quality assure the collection, supported with funding through the NCCD Continuous Improvement Measure.

A key initiative implemented under the measure is the launch of the NCCD Portal (<https://www.nccd.edu.au/>), an interactive platform housing information on the NCCD, along with national training materials and resources for school leaders, teachers, support staff, parents and carers, which is now the primary source of NCCD information used by schools. Research on the implementation of the NCCD in schools continues to provide direction for refinement and addition to supporting resources.

In response to the recommendation to continue current levels of investment, the Government, in consultation with the sector, will review progress towards the quality assurance and capacity building goals of the current NCCD Continuous Improvement Measure in advance of expiry at the end of 2020-21 and identify areas where further support is required.

The Board found that moderation of NCCD data is valuable in ensuring consistency of teacher judgement on levels of adjustment. Moderation of NCCD data currently occurs both within and across schools but is not consistent across sectors and jurisdictions. The Board recommended the Government take a leadership role in a national cross-sectoral approach to moderation. In response, the Government will commission a project to examine existing practice and resources to develop a best practice national approach to moderation.

## Recommendation 5

***The Australian Government should ensure, in its provision of support funding through the Choice and Affordability Fund and the Non-Government Reform Support Fund, that there is ongoing support and resources to build the capacity of non-systemic schools to implement the NCCD.***

**The Government agrees in principle with this recommendation.**

The Government notes the specific challenges for non-systemic schools in administering the NCCD.

In response, the Government will conduct research to explore options for the application of the NCCD in these schools that is sensitive to their challenges while balancing the need for appropriate assurance of Commonwealth funding. The Government will continue to work with non-government representative bodies to continue to invest in capacity building efforts.

## Recommendation 6

***The Australian Government should refine the design and delivery of the post enumeration process for assurance of the NCCD to ensure it is consistent and responsive to school context.***

**The Government agrees with this recommendation.**

The department undertakes a number of assurance activities to monitor the quality and consistency of the NCCD as part of its remit to provide the community and Government with information about schools and students with disability in Australia and ensure the appropriate use of taxpayer funds.

The department's annual census post-enumeration (PE) process for non-government schools includes review of NCCD data from a statistically significant number of schools, with a balance of location and school profile, as well as a sample of schools targeted based on analysis of their submitted data.

The department continually refines its approach to PE. In response to stakeholder feedback and findings from recent research, the department conducted training on the NCCD for PE contractors to ensure greater consistency in approach and awareness of the various school environments, prior to commencing the PE process in 2020.

The Review found these processes compare favourably with best practice, and is commensurate with the Australian Government's funding contribution for students with disability.

Nonetheless, in response to the recommendations, the Government will commission an independent review to supplement the annual activity to refine the PE process, to ensure it is fit for purpose.

In addition, the Government notes that all non-government schools are subject to the PE process, however the department has less visibility of assurance processes in government schools. Building on the work undertaken by the department in 2019 that examined how the NCCD is being applied in the non-government sector, research will be commissioned to better understand application of the NCCD in the government sector to ensure comparable levels of assurance are in place.

## Recommendation 7

***As part of its assurance processes, the Australian Government should use data analytics to identify variations in the Nationally Consistent Collection of Data on School Students with Disability data from past years and between jurisdictions, sectors and schools.***

**The Government agrees with this recommendation.**

Each year, the Government analyses school census data to identify variations in NCCD data as part of its quality assurance processes. For example, this analysis was used in 2019 to commission a project to explore the reasons for significant variations in NCCD data across a selection of targeted non-government schools. The Government will continue to use data analytics to inform ongoing assurance activity.



## Recommendation 8

***The Education Council should pursue publishing school-level NCCD student numbers (by adjustment level) on the My School website, in line with the other Schooling Resources Standard inputs, having due regard for privacy issues.***

**The Government agrees in principle with this recommendation.**

A significant amount of capacity building and assurance work has been done to improve data quality. The Board concluded that the quality of NCCD data has improved sufficiently to be used to calculate funding and is, therefore, suitable for publication, bearing in mind the imperative of protecting the privacy of individuals.

Publication of school level data would enhance transparency, which in turn will lead to improved quality of data over time. The Government will work with state and territory education Ministers with a view to publication of school-level data on the *My School* website.

### **Building on current assurance and capacity building activity**

The Government is confident that the measures taken to review the settings for the student with disability loading will provide a more robust evidence base for development of an updated costing model to inform the setting for the loading from 2023.

The Government's response to the Board's report builds on the measures the department has already implemented in refining activity to assure the NCCD data collection. With a larger data set now available, analysis on data from past years and between jurisdictions, sectors and schools is now possible, which will provide an additional method to assure the data, adding to the current expansion and improvement of the PE process.

The Government's response also re-affirms the consultative approach taken by the department to continue to work with government and non-government sectors to identify and address areas of need in the application of the NCCD.

### **Conclusion**

The Government welcomes the National School Resourcing Board's report on the Review of the loading for students with disability and agrees, or agrees in principle, with all eight recommendations.

The Government's response to the Board's Review is consistent with the intentions of the Alice Springs (Mparntwe) Declaration in that it commits to work in collaboration with stakeholders to promote increased guidance, accountability and transparency for the students with disability loading and to ensure that funding is provided to those students who need it most.

The Government looks forward to working closely with stakeholders to implement projects that will enhance the Government's assurance and capacity building activity and provide a robust evidence base for development of a future costing model for the loading.