



ABN 40 381 787 467

National Co-Chairs:

Justice Stephen Rothman AM (NSW)  
Mr Daniel Goulburn OAM (NSW)  
Mrs Nechama Bendet (VIC)  
Mr Alan Goldstone (VIC)

Executive Director: Leonard Hain  
Phone: 03 9525 8589  
Fax: 03 8677 2453  
Email: len.hain@acjs.edu.au

## SUBMISSION TO THE NATIONAL SCHOOL RESOURCING BOARD IN RELATION TO THE REVIEW OF THE SOCIO-ECONOMIC STATUS SCORE METHODOLOGY

### INTRODUCTION

#### General

1. The Australian Council of Jewish Schools (ACJS) expresses gratitude to the National School Resourcing Board for the opportunity to have made this submission.
2. Each of the registered schools that are members of the ACJS are also members of their respective Association of Independent Schools (AIS) in their respective State and each school generally supports the submission of their AIS and the ISCA.
3. Our submission deals predominately but not exclusively with those matters of particular importance to Jewish schools together with aspects that are peculiar or of specific interest to our Schools.
4. The ACJS represents 17 Jewish schools (9,200 students) throughout Australia and also has, amongst its membership, an organisation that provides Hebrew language and Jewish studies programs to government schools. There are a further 3 Jewish affiliated schools that are not full members of ACJS. Those schools interests are considered in community related matters.
5. Each school has a board of management, which includes members of the Jewish Community, including parents of students at the school, and operates under very strict governance principles, including the election (sometimes-contested election) of officeholders. Each school operates on a not-for-profit basis and no officeholder is entitled to be employed or remunerated by the school, or to contract with the school other than on a strictly transparent basis.
6. The ACJS Schools are academically non-selective schools and vary in average socioeconomic status considerably. In the 2014-2018 period, 5 of our schools have an SES under 90 with a further school having an SES in the low 90's. The 20 schools' consolidated raw average SES is 111. A weighted average SES is 114. The highest SES is 127 and the lowest 88. Our schools are not part of a system. Each school stands on its own. Funds are not transferrable between schools.
7. Many ACJS Schools will enrol non-Jewish students, although preference is given to students of the Jewish faith (or persons converting to Judaism). Further, the ACJS Schools vary significantly in their approach to religion, culture and ethos.

8. For example, in both Sydney and Melbourne there are schools that cater for Progressive Judaism, modern Orthodox Judaism and “Torah True” Judaism. In Melbourne, there are also schools that cater for “cultural Judaism” (i.e. the teaching of Jewish culture but otherwise consistent with pluralism).
9. All of these schools are represented by the ACJS to both State and Federal Governments, within the AIS community and generally. Their interests are significantly different in some areas, and these interests are generally considered and catered for, by Governments, other non-government and government schools, and the community generally.

### **Enrolment Policy and Internal Subsidies in Each School**

10. As earlier stated, the ACJS Schools are non-selective. The Jewish community has a long history of support for education. Education is one of the key fundamentals of Jewish culture. This has been the case for at least 2000 years. The Jewish community considers that education, including education in its own culture, is one of the cornerstones of Jewish continuity.
11. Judaism (and Jewish culture, which can be different) has developed, or has always taught, policies which would, today, be classified as multiculturalism. The Jewish view is that members of the Jewish community should integrate into general life, while adhering to Jewish values: integration, but not assimilation.
12. As a consequence, the Jewish community has always expended and is prepared to continue to expend a far greater proportion on education than is the norm or perhaps even considered reasonable in some individual circumstances. The community also has continued to adhere to a policy that no Jewish child should be denied an education; nor denied a Jewish education for financial reasons. Parents will sacrifice considerably and often well above their ability to ensure their child receives a Jewish education. The Jewish Community contributes a lot of money to assist those parents in obtaining a Jewish education
13. Enrolment at our schools occurs at a young age. It is often well before general school enrolment is accepted. In 2017 our schools enrolled just over 2000 students in the early learning programs. Enrolment is generally, without regard to the capacity to afford fees. If on the admission of a child, a family is unable to afford education at the particular institution, a number of different methods are used to subsidise that education and to allow the child or children to start or continue at the school.
14. The methods used to cross subsidise poorer members of the community vary from school to school and from State to State. In New South Wales, for example, there is a general communal appeal from which the schools are allocated amounts to subsidise families that are unable to afford the ordinary level of school fees and each school provides further subsidies from its fees. That subsidy will vary depending upon the means of the family. In Victoria, Western Australia, and Queensland, each school takes its own steps in order to subsidise families, often by way of cross-subsidisation from within the fees otherwise received.

15. Generally, , the school will insist upon a commitment to some fees, albeit, in some cases, quite nominal. The number of families on subsidy fluctuates, and the proportion of families varies between the different schools. In 2015, our schools provided on average, financial assistance to 33.9% of the student population. The number of students assisted varied from school to school. The highest proportion of students assisted at any one school was 85.6%. The value of that assistance across Australia in 2015 amounted to a sum exceeding \$32m. That sum is unfortunately growing annually.
16. The means test by which an entitlement to subsidy is measured, and by which the level of subsidy is fixed, includes family income, family size, and takes account of disposable income. If income alone were the criterion by which subsidy was measured, there would be significant anomalies and inequities in the application to different families.
17. Further, there is no academic selectivity in the enrolment process. Except to the extent that a young child may be classified as not yet ready for school (on the same basis that would occur in, say, government schools), all children are accepted, without regard to academic performance.
18. ACJS Schools also have a significant number of students who suffer intellectual and/or physical disabilities, for which a loading is now provided as a part of the present funding model. Five ACJS Schools accommodate over 7% of the student population meeting the medical diagnosis SWD definition in 2017. The highest school accommodated 11.7% of the student population with a diagnosed condition meeting the required level of severity. The overall average number of students accommodated per school was 5.4%. From 2018 the medical diagnosed SWD definition has been superseded. The SWD definition from 2018 is based on the NCCDS definition and criteria. In 2017, seven of our schools accommodated over 20% of the school population that met the NCCDS criteria in the supplementary, substantial or extensive categories. The highest accommodated 32.8% of the student population and the overall average of NCCDS students accommodated in one of the three intervention groups was 18.0%.
19. ACJS Schools are mostly co-educational and operate mostly at both primary and secondary levels. The “Torah True” religious Jewish schools are single gender schools (for at least all classes above Year 4) or operate single gender campuses, for reasons associated with a strict application of religious ethos. Some of the ACJS Schools operate only at a primary school level. Each of the schools conduct a preschool, and/or operate early childhood services, on a sessional or long day-care basis.

### **The Principles for Funding**

20. The first and most obvious principle is that recurrent ordinary funding should be funding per student. Further, each student (or each family in relation to such student) is entitled to a base level of funding that, bearing in mind other available means, goes towards allowing the provision of a reasonable and appropriate level of education.
21. All funding should be determined and calculated transparently and provided equally. The equal provision of funding should not be confused with the same level of funding. Students who are equal should be treated equally and students who are different should be treated differently in accordance with their difference.

22. Any difference in funding between students must be rational, transparent and understood by the community impacted by the outcome. The fact, if it be the fact, that a student is Roman Catholic, Protestant, Muslim or Jewish (or of no religion or any other religion) is neither a basis upon which funding should be calculated, nor a basis upon which funding should be determined. The fact, if it be the fact, that a student attends a Roman Catholic school, any other non-government school or even a government school should not, of itself, be the basis upon which funding is determined or calculated.
23. The foregoing does not mean, and is not intended to mean, that State Governments should not provide free education. Education is a social right and a necessity in a democratic society. The future of Australia, as a flourishing democracy, with a prosperous economy, depends upon the education of the population and it is in the public interest that the Federal Government ensures the availability and provision of high quality education to all.
24. In any change in need determination and or determination of capacity to contribute there are likely to be “winners” and “losers”. Government funding for schools that may be considered over funded due to a change in metric determination should never have their funding frozen. This equates to a drop in grant funding in real terms. Schools are sensitive to any dislocation of this type. The loss of grants will result in poor outcomes such as higher fees or reduced educational/welfare offerings. There should be a 3 tiered transition structure:
  - a. The maintenance of basic funding increases (say standard CPI) for schools that are 'overfunded'
  - b. education CPI or the set rate for schools that are receiving modelled funding and
  - c. an accelerated indexation for schools that are receiving less than the notional entitlement
25. Funding should be set at a level that maintains pace with real cost increases and movements within the industry it affects and be at least maintained in real terms. Education CPI is and has been about double or more than double standard CPI. Currently indexation for schools that are on SRS are not keeping pace with real time indexation. Schools on SRS are effectively going backwards. This is only likely to continue as teacher wages increase. We are aware this is a matter for a separate reference group but wish to note our concern in this area.

### **Application of Principles**

26. The foregoing philosophical approach requires a funding policy that encourages all students in non-government schools to achieve appropriate goals. Further, no students (and no school) should be penalised for achieving those goals or achieving education standards beyond the designated national standard.
27. ACJS further submits that active encouragement by a reward mechanism should exist and be applied to schools that in fact exceed educational outcomes for students.
28. All governments should ensure that all school-aged students have available free education, with appropriate resources, to achieve at least the national goals set by the government. But, parents should be able to choose school options which reflect their needs, their values and their educational philosophy. In that regard, governments should ensure that there remains an ability to choose diversity in schooling.

29. Governments are entitled, if not required, to ensure minimum standards of education in core educational areas are met, and to allow education in other areas or beyond those levels as part of the diversity and autonomy associated with a free and democratic society with an appropriate school system. This includes the capacity of parents to choose faith-based schools or schools with value systems that are different from the majority or even the norm, but not so different as to be inconsistent with the values that are seen to be fundamental to Australian society and the continuation of its democratic principles.
30. In determining an appropriate funding model governments should, therefore, provide adequate funding for all government schools and require them to provide best quality educational product. Governments should also provide sufficient funding, on a needs basis, to non-government schools to allow the choice of values and diversity to which we have earlier referred. That funding for non-government schools must be conditional on appropriate accountability as to expenditure and appropriate accountability on the delivery of educational standards.
31. In that regard the non-government sector must be seen as a partnership between the local communities and the government in the provision of education. Personal or private contributions to education should not have any bearing on the level of government funding that schools receive. Such contributions reflect the priority of the parent body to education of their choice, not capacity to fund.
32. The dilemma for any government in determining a basis for funding and appropriate levels of funding is the reconciliation of equity and affordability. A perfect system is not one in which all schooling is government run, but one in which all schooling runs to standards set by government. The desirability of non-government schools is that these schools, while complying with government standards, impart values, ethos and approaches that are different and which the local community desires. They are also schools that impart Australian values and have been acknowledged as reducing the burden on the public purse.

### **SES FUNDING**

33. The ACJS schools generally supports the continuation of an SES funding model. The funding model exemplified by the SES system is a funding model that, within the non-government sector, determines a basic funding level for all school students that is based on an averaged estimated capacity of the student or student's family to contribute toward the basic cost of education
34. There are however difficulties with the SES model and refinements of the methodology are sought. The refinements to which we refer take into account less common, but practical anomalies that occur. Some of the difficulties and perhaps the more unique circumstances are overcome, even on the current system, by the existence of a robust appeal mechanism. A robust and open appeal mechanism is essential to address and accommodate schools where the averaged proxy data does not capture the true capacity of parents, particularly when a cohort of parents possesses a particular set of circumstances that differs from the neighbourhood in which they reside, congregates at specific schools.

35. The present SES methodology did not naturally determine the outcome SES scores of all our schools mentioned in paragraph 6 above. The 6 schools with an SES below 92 only achieved that outcome after the individual schools successfully appealed the SES score assigned to them using the SES appeal process. The standard SES methodology did not identify the anomaly those schools encountered. The standard SES methodology returned results for those 6 schools between 117 and 120. A 7<sup>th</sup> school has an application currently under consideration.
36. These six schools successfully used the appeal process and demonstrated that there were at those schools identifiable unique characteristics, present in the families at those schools, which affected the schools' community ability to support the school. The appeal outcome as noted saw a significant amendment to the impacted schools' SES scores.
37. Amongst other things, strict observance to Jewish teaching, to some extent, causes the anomalies created for these schools. It is necessary for a strictly observant member of the Jewish community not to drive nor to ride on the Sabbath and the festivals and therefore to be within walking distance (and these distances themselves have limits) of a synagogue and Jewish infrastructures that reflects and gives local access to religious observance and services. Synagogue services have a mandated minimum number of attendees before commencement. As a consequence, strictly observant Jewish families will live in close proximity to each other and often in areas that are, in average terms, beyond their income levels. For example, in areas such as Bondi and Caulfield, many religious Jews will live in apartments the sizes of which do not reflect the size of their family or their income levels.
38. In addition, the orthodox community tend to have families that are significantly larger in number than the average sized Australian family. In turn, the SES scores of these individual families calculate well below the score for the collection district in which they are living. This anomaly became evident when comparing the SES scores with the level of Health Card Benefits, and other like measures, of the parents at the schools. (The Commonwealth SES validation reports provide base average expected correlations). The appeal mechanism allowed the school to determine the actual income levels for each set of parents, adjusted for family size, and determine SES scores on that individual basis, rather than utilising the average SES score for the collection district in which they live.
39. There are other anomalies that require attention. No doubt there are an equivalent number of anomalies at the other end of the spectrum. Hypothetically, a school could enrol the children of professionals (or high SES individuals) even though the collection district in which they live had an average low SES score. One obvious example of this possibility is rural schools. There is no process that deals with such an anomaly, nor are we suggesting one. This is not an issue that detrimentally affects Jewish schools, other than in a global sense that there may therefore be slightly less funding available for allocation to all schools. However, the anomaly disappears (as does the anomaly associated with the successful appeals to which I have referred) if SES scores are calculated on an individual family basis rather than by averages. Such a system, in terms of transparency and equity, is the most desirable. Such a system however would require far more personalised data collection or access to Taxation or Centrelink data. This in itself has a range of concerns and reservations.

40. Any measure of "need" necessarily creates difficulty. The measure is essentially comparing relative advantage or disadvantage. The difficulty in that process is that not all persons or families fit the underlying assumptions or averages that give rise to the capacity to compare. Any comparison must have two features:
  - the widest range of factors to minimise skewing; and
  - a robust appeal mechanism to allow for special circumstances that take families, or arguably the aggregate school outcome into account if it can be demonstrated through the use of empirical evidence that the outcome is in some way unique and not reflecting the true capacity to pay ability of the parent population.
41. It essential the appeal to the SES remains as wide as possible so any evidence-based anomaly can be considered. With introduction of the base funding plus loading model in 2014 (the present funding model), the SES appeal system was left essentially unchanged, from that which applied to the SES funding model (2001-2013). This is a robust mechanism.
42. The appeal mechanism introduced to address anomalies or concerns with the determination of the "loadings", that is the additional funding over the base per capita funding to address identified specific disadvantage within the present funding model, is restricted to the accuracy of the data lodged in terms of the technical definitions. These definitions also use averaged proxy data to determine relativity in disadvantage. The appeal mechanism in regard to the "loadings" does not allow argument to address anomalies identified or relate to comparative differences when a part of the underlying assumption within the model construct does not hold for a group of people. Anomalies will and do occur when using averaged data. It is imperative that there be a robust appeal mechanism & any such mechanism be as flexible as possible to allow proper and accurate consideration of any identified anomaly. The appeal mechanism in place to address anomalies in the determination of the disadvantage loading is inadequate. It needs to be expanded to allow a wide range consideration and the SES appeal mechanism currently in place should as a minimum be maintained and protected.
43. Also, when considering an appeal mechanism, the complexity of data collection and use of weightings and national relative data makes the outcome and appreciation of the data impossible if not extremely difficult for an individual school to test and understand if they fit or do not fit the assigned outcome. The appeal process to address this aspect should contain and maintain a "no disadvantage" provision. The current SES appeal mechanism (introduced in early 2000's) has such a provision. The appeal to any aspect of the "loadings" does not have such a provision. If a school were to appeal their loading compilation the outcome becomes the result without a school being able to test the impact. ACJS proposes the SES appeal mechanism with the no disadvantage provision be maintained and widened to carry across to the "loading" appeal mechanism.
44. We note that there are essentially four dimensions considered to determine the current SES of a school. Those dimensions drawn from census districts are the:-
  - Occupation dimension
  - Education dimension
  - Household income dimension and the
  - Family income dimension

45. Within the family income dimension, family size surprisingly is not a factor. The Family income dimension uses only two variables. It considers families with an income of below \$65,000, (2006) or a similar adjusted sum, as one group, and families with income above \$156,000 (2006), or a similar adjusted sum, as the other group. The variable is applied when a family has at least one dependent child. It is an absolute calculation. The fact that a family might have one child or 10 children is not considered a differential. The reality is equalised family income is very dependent on the number of people in the household and directly impacts on the capacity to contribute. There is no doubt that family disposable income differs considerably consequential on the number of dependents. Yet this is not a present consideration in the SES methodology. It is a factor that impacts on our schools and schools with average family sizes greater than the Australian average.
46. The current SES appeal mechanism addresses the extreme SES variations resulting from the family size anomaly where the average family size of a school is considerably above the national average. The criteria is met for 6 of our schools that can demonstrate the SES allocated to the school as a part of the natural calculation does not reflect the socioeconomic circumstances of the school's community. In each of those cases the school was able to demonstrate through empirical independent evidence that there were identifiably unique characteristics of the families at the school which affected the school community and which was materially and significantly different from the community in which the parents resided. It adversely impacted the parents' capacity to support the school and post the appeal was accordingly adjusted to reflect the actual position of those parents.
47. A number of our other schools enrol families that have more dependents than is the national average. These schools however do not qualify to succeed in an appeal as the appeal criteria is set for an exceptional anomaly that is materially significant. It is a very high variation benchmark. The successful appellant schools as noted had their SES scores lowered from the range of 115 - 120 to the 80's and low 90's. These were considered materially different and extreme anomalies. A number of our other schools did not meet the extreme anomaly requirement. They were determined to be statistical outliers.
48. The schools considered statistical outliers, when comparing the school's SES score with the Commonwealth validation data enrol students on average with family sizes above the national average but not extremely above the national average. Our assessment, and that of appeal outcomes lodged, demonstrated the SES score of those schools, if family size were a criterion, would decline (for those schools) from the 120 to 130 range to the mid to high 110 – 120 range. It was not considered by the Department to be materially significant on an individual school basis to meet the appeal criteria. It however demonstrates that there is an anomaly in that so many of our schools fall into the statistical outlier range. It is sufficient to appear to be an anomaly that requires addressing. The result adversely affects the impacted schools significantly. Each SES point increases or decreases funding. The taking into account of relative family size in the modelling of the SES as a component would reduce the anomaly and result in better accuracy of the SES and of the community's ability to contribute.



## Other considerations for Capacity to Contribute

49. An alternate funding method which we dismiss somewhat perfunctorily, is the voucher system, which would provide equal minimum levels of funding per student to be utilised at any school of choice. The ACJS does not submit such a system operates equitably, in that there is a fundamental need for a well-functioning, properly-resourced and high-standard education that is free and provided by government. A completely equal voucher system would tend, in the long term, to destroy the government system. However, a voucher system that was dependent on actual individual family income levels, if the resulting level of funding was forwarded to the schools, may overcome the anomalies to which we have previously referred.
50. Notwithstanding the foregoing comment about the voucher system, an equitable system of government would discriminate between government and non-government schools, only on a transparent and equitable basis. As earlier stated, equal treatment of students requires a rational differentiation, where there are inequalities. A system based upon the capacity of parents to pay is a rational basis for differentiating funding levels. Further, such a system does not discriminate against excellence in education, as would a system that was based upon test results by students or resources available to the school.
51. In considering the level of funding and the capacity to contribute we note that there are significant differences and costs associated with non-government schools. Other than a very few well-established schools, schools have significant costs associated with the purchase of land and the construction of buildings for which expenditures are met from the income levels received from the parent community. Such costs would also be borne in the Catholic sector, but not necessarily by the school itself, nor allocated to its budget for comparison purposes. Independent schools have a significant cost associated with insurance of buildings, fittings and fixtures, and even general liability whereas schools in both the government and Catholic sector are self-insured. The costs of meeting any claims are not contained in any budget associated with either the Catholic system or the Department. These factors must be given adequate consideration when comparing costs or allocations and affect significantly the comparison that might otherwise be drawn between expenditure in the government sector and the availability of income in the independent sector to be spent on the direct delivery of educational programs.
52. ACJS and other schools that have a high, or relatively high, SES score incur significant costs on land and buildings, because they are compared to other non-government schools in the same SES bracket. Our schools are in long established neighbourhoods, many of the schools are in heritage buildings or in heritage overlay areas. The costs of maintaining those buildings do not necessarily compare equally with other schools and other schools' needs. These differences too must be taken into account when comparing schools and or making allocations for educational purposes.
53. It would also be difficult to compare a newly acquired non-government school campus with the a more established equivalent non-government school (i.e. with the same SES score) which, because it is more established, does not bear land costs as part of recurrent expenditure or does not bear land and/or building costs to the same degree. An obvious example is a comparison of Cranbrook and/or Scots in Sydney, on the one hand, with Moriah College on the other. In the case of Moriah College, it has only recently acquired the land on which its campus is situated and the land costs have a significant effect on the income available for educational needs. Prior thereto, Moriah incurred significant rental costs with much the same effect.

54. The point of the foregoing is not to suggest that government schools do not have land and building costs, nor to suggest that more established schools do not have those costs. In the case of government schools, land costs are drawn from a different budget and are not included in school expenditure setting. The only issue is that, when comparing income per student at different schools, there are factors, unrelated to recurrent educational need, that impact upon appropriate comparisons of the running costs of schools.
55. The submission of the ACJS is that SES funding be maintained, or that a system very similar to SES funding be the basis for determining capacity to contribute. While not perfect, it nevertheless seems to work and it is better than any other system that has been suggested to date. It is further proposed that the same basis be used for funding government schools with the proviso that, unlike non-government schools, there is and can be no requirement on parents to subsidise, in any substantial way, the cost of education. It is necessary however to emphasise briefly some of the aspects of what must qualify the SES system if it were to continue, or any new system that may be introduced.
56. As outlined above, any system to be implemented must contain a wide and robust mechanism by which schools that are disadvantaged, or which perceive disadvantage, are able to appeal their rating. The reasons that such a robust appeal process is necessary is the fact that any generally applicable system that compares relative advantage and/or disadvantage will contain anomalies within a group. Such anomalies may result from the application of the system itself and/or the effect of the system particularly if a significant proportion of the anomalistic group congregate in a single or a small group of schools which their neighbours do not.
57. To the extent that a system involves the use of averages not all schools will meet average criteria. There are obvious examples. The six schools already mentioned are such examples. We understand that a further 5 or six schools that are not affiliated to our schools have also successfully taken advantage of the appeal mechanism and successfully had their respective SES scores amended.
58. There may also be particular disadvantage that may not be measured by the SES score. For example, there may be a need, if it were accepted by government, for the teaching of indigenous culture at a school that consists largely or wholly of indigenous students. That example applies also to other minority/communal cultures that the government considered ought to be the subject of special consideration, in the public interest, and taught at school.
59. The other aspect, which in our submission should be a matter of discretionary appeal, is the issue of the prevalence of immigrant families. The purpose of such an appeal would be to evidence special circumstances, which may bring the school (or its parent body) out of the ordinary in a way that would affect its relative advantage or disadvantage. For example, the prevalence of immigrant families and lower average disposable income (or lower assets base) as a consequence thereof.
60. Any appeal must be able to be processed without prejudice to current or otherwise ascertained funding levels. That is, it must contain a no disadvantage aspect.

61. The technical nature and use of proxy data to ascertain educational disadvantage has within itself a range of concerns. There are within our schools disadvantaged students whose need are not recognised. One of the most obvious is the English language proficiency loading. It recognises a disadvantage only when English is not the first language spoken at home AND neither parent has a year 10 education or above. It fails new arrival students who do not speak English but whose parents are educated to at least year 10 (whether or not their qualification is recognised in Australia) and does not in any way address a student struggling with language. The criteria needs urgent change. Literacy is fundamental.

## **CONCLUSION**

62. Education is one of the most important aspects of Australian society. Further, our future prosperity and productivity depend on investment in education and human capital. As such, educational excellence cannot be compromised. Nor can private expenditure on education be discouraged.
63. Any system of funding should guarantee minimum levels of funding for all students and otherwise based on capacity to pay by the parent body. Differentiation in funding must be rational and transparent and accommodate the social aim of ensuring, to the extent possible, that all children are educated to the best possible levels in the school of their choice.
64. No school, and no student, should have funding reduced on account of the achievement of standards beyond average. No system of education funding should discourage excellence.
65. The ACJS supports the retention of the SES model, or a system similar thereto with a guarantee that there be no reduction in funding and adjustments reflecting the increased costs of education. The model must also include a wide and robust appeals process. The model outcome should be predictability of funding for at least five years in advance. It is our suggestion that funding periods should be six years.
66. Disability funding and other marginal funding schemes should be based on the need of the students and not discriminate against the sector providing the services.
67. The government attitude to the funding of non-government schools should be based upon the principle of the partnership between government and the private sector. Parents who wish to prioritise education for their children on a particular basis should not be penalised for so doing. It must be accepted that government schools should receive funding, which would allow them to provide, generally free of charge, education at the best possible levels. A viable non-government sector is essential for the continuation of an education system that achieves excellence. The partnership between government and private sectors should be based upon the government returning a fair share of the amount of the cost of education that is otherwise borne by non-government schools.
68. In the submission of the ACJS such a system would guarantee, as a minimum or base level of funding, higher levels than are currently guaranteed and would also guarantee higher levels of funding, at the base level, even for the highest SES score schools. This in part we submit could be achieved by reviewing the base funding level and lowering that proportion that is applied to the loadings.

69. At the same time ACJS needs to stress that most parents at our schools struggle & sacrifice to meet the school fee commitments. As living costs continue to rise generally, it is getting harder for our parents (as it is for society generally) to pay the fees; the elastic band can only stretch so far. If that results in some of our parents withdrawing their children from our schools, not only is it a huge loss at all levels for our schools, but a consequent cost to Government. Both the Federal and State Governments would need to build new facilities and provide teachers and other staff. The cost would clearly exceed the cost that could otherwise be provided to the Non-Government schools (including ACJS schools) to address the problem.

Leonard Hain  
Executive Director  
Australian Council of Jewish Schools