

Review of the loading for students with disability 2019–public submission

Association of Independent Schools of South Australia

Stakeholder type: Peak body

Jurisdiction: South Australia

Summary

The Association of Independent Schools of South Australia (AISSA) represents the interests of 103 South Australian Independent schools with an enrolment in excess of 48,700. The AISSA supports the submission made by its national body, the Independent Schools Council of Australia. The AISSA submission makes the following additional key points:

- feedback from member schools indicates that, in general, the additional funding under the students with disability loading provided for a student requiring a Supplementary adjustment is considered to be adequate. However, the loadings for students requiring Substantial and Extensive adjustments are currently not set at a level sufficient to meet the educational needs of students requiring such adjustments
- the funding for students under the students with disability loading categorised as receiving Extensive supports (severe, complex and multiple needs), is considered to be seriously inadequate to cover the total investment required to ensure the student is able to access the relevant educational services
- this is a particular issue in Special School settings, where Extensive category students are the majority enrolment
- a key cost driver which is not currently sufficiently captured in current funding arrangements is that of capital expenditure, for example, equipment, technology, transport, fencing, staffing related to use of capital items
- it is essential that, in calculating the loading levels, in addition to the direct support to students, the calculation includes the costs related to administrative practices around identification of adjustments required, monitoring and reviewing, consultation and maintenance of evidence along with direct staffing requirements.

Submission

Questions

Is the funding provided under the loadings for the top three NCCD levels of adjustment appropriate to support students with disability to access and participate in education on the same basis as other students?

How does the level of resources required to support a student at each level of adjustment differ?

The Association of Independent Schools of South Australia (AISSA) represents the interests of 103 South Australian Independent schools with an enrolment in excess of 48,700. Independent schools educate students within a curriculum underpinned by a diverse range of religious beliefs (Anglican, Baptist, Christian, Christadelphian, Greek Orthodox, Islamic, Lutheran, Seventh-day Adventist, Uniting) and educational philosophies (Montessori, Waldorf Steiner). The sector also includes a number of secular schools, special assistance schools and two Special Schools which educate students with severe disabilities. The South Australian Independent school sector has experienced a significant increase in the numbers of students with disabilities. In 2019 there were 5,742 funded students with disability (4,705 Supplementary, 876 Substantial and 161 Extensive).

It is essential to note that the current students with disability loading represents a proxy measure of costs rather than a loading based on the real costs of education for students with a disability. It is also the case that, due to the transition arrangements for the Australian Government funding model, the vast majority of Independent schools are not receiving their full loading entitlement.

Feedback from member schools indicated that, in general, the additional funding under the students with disability loading provided for a student requiring a Supplementary adjustment is considered to be adequate to support the student's additional educational needs. However, the feedback identified that the loadings for students requiring Substantial and Extensive adjustments are currently not set at a level that is sufficient to meet the educational needs of students requiring such adjustments.

For students categorised as receiving Substantial supports, the costs of providing an inclusive environment, such as Professional Learning for all staff to build capacity along with human resources, may vary greatly depending on the disability of the student, and at a significantly higher cost than current funding levels provide for. The AISSA recommends that the loading percentage for this level of adjustment is increased. The AISSA does not support any further differentiation within the categories which would lead to a greater administrative burden being placed on schools.

The funding for students under the students with disability loading categorised as receiving Extensive supports (severe, complex and multiple needs), is considered to be seriously inadequate to cover the total investment required to ensure the student is able to access the relevant educational services. This is particularly the case for students in Special Schools. These students generally require one-to-one support at a cost to the school per student far greater than the funding received from all sources, including fees. The AISSA strongly recommends that the loading percentage for this level of adjustment is increased.

Does school setting or context impact on the cost of adjustments provided?

While the loading settings are problematic for Extensive students in general, they are a particular issue in Special School settings, where Extensive category students are the majority enrolment. Students in these schools often require significant support in health and personal care, for example toileting, feeding, supervision of daily routines, and medical supports, in addition to the support they require to enable them to fully participate in their education. The cost of an Education Support Officer (ESO), qualified to provide one-to-one support to a student with a disability, generally ranges between \$82,486 and \$90,521, including on costs. The AISSA strongly recommends that consideration is given to a Special School specific loading for students with disabilities.

Due to location, schools in rural and remote areas also face difficulties in accessing professional advice and learning opportunities intended to build capacity. Not only can the cost of accessing such services be inflated, the lack of availability of assessment materials provided by external Allied Health practitioners can further cause difficulty in determining adjustments that are reasonable. School size can also impact, with smaller schools often not having the financial capacity to employ a specialised staff member to manage the support of students with disability.

Does the stage of education impact the cost of adjustments needed; for example, in the early years and transitioning to secondary education?

Feedback from member schools indicated that schools need to provide a higher level of support to students with disability at points of transition, in part due to the need to provide initial training, resources and environmental adjustments. Regardless of the stage of schooling, however, a student is able to be reported at the level of adjustment the student is reported to have received. As a consequence, early years and transition points are stages of schooling where a higher level of adjustment may be reported than in the years following (for that same student).

What costs of supporting students with disability (for example, fixed system costs, costs of collection, assurance and management of the NCCD at a school level) should be factored into the loadings?

The loading levels should be determined having regard to the actual costs of adjustment for each level based on best practice. It is essential that, in calculating the loading levels, in addition to the direct support to students, the costs related to administrative practices around identification of adjustments required, monitoring and reviewing, consultation and maintenance of evidence along with direct staffing requirements (for example, teaching, monitoring, planning support, supervision, health management such as toileting, feeding, supervision of daily routines, medical supports, registered nursing support provided to guide practice of school staff) are included.

It is also necessary to measure the ongoing costs associated with training and development, for example, training focused on inclusive practice, understanding of obligations, application of the NCCD model, along with training and development which is specific to the individual needs of students with disability. Training is also required to support parents.

A key cost driver which is not sufficiently captured in current funding arrangements is that of capital expenditure, for example, equipment, technology, transport, fencing, staffing related to use of capital items. In addition, the administrative tasks related to NDIS applications, communication and planning, along with ongoing communication, are significant. This work relates at times to access and participation and is directly linked with NCCD related adjustments and communication.

Are there any other factors that impact on the level of resources required to provide adjustments?

As previously noted, transition and early years of school are key periods of time where additional resources may be required. The initial burden of funding is carried by the school as NCCD funding is retrospective (considering students at points of transition where initial outlay of resources might be significant).

Socio-economic factors can also have a significant impact on the level of adjustment required, in particular, in cases where multiple risk factors contribute to difficulties in accessing services or communication. A number of member schools also reported that sourcing appropriately trained staff and providing appropriate training within a suitable time frame can be an issue.

Access to specialised and appropriate equipment within an appropriate time frame remains a key issue. The interface between education and the NDIS, including in regard to communication, organisation of resources, and goal setting remains a key issue along with managing the differences in expectations and capacity between parents and schools in order to plan and agree upon adjustments.

Are Australian Government assurance processes, undertaken to support the accuracy of information provided to calculate a school's Australian Government funding entitlement relating to students with disability, appropriate and sufficiently robust and how might they be effectively improved?

The 2019 NCCD Guidelines and associated resources are considered to be a significant improvement on previous iterations and now provide a comprehensive set of resources for schools. Feedback further indicates that the NCCD portal is also now considered comprehensive and provides robust processes and materials suitable for informing decision-making at the school level. The AISSA considers that further resources identifying best-practice, particularly in the area of selection of adjustments, would be beneficial to schools.