

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

Catholic Education Archdiocese of Canberra & Goulburn

Stakeholder type: Approved authority

Jurisdiction: Canberra/Goulburn

Summary

Some schools have a large number of NCCD students that results in a significant amount of time spent on compliance, but no additional resourcing.

- The level of resources required varies from student to student, resulting in significant challenges in developing a flexible cost-formula model.
- It would be helpful to have greater flexibility between co-located ELC and primary education sites to be able to have the resources to transition students and respond to students' developmental needs.
- In the primary setting, loadings under NCCD should consider the specific implications of individual need and profile of disability on literacy and numeracy instruction, and the social-emotional learning for the student.
- Proportionately, higher resourcing is required in the secondary context compared with the primary context.
- The financial supports for students in secondary contexts are higher than in a primary setting. This cost must be considered in relation to the supplementary, substantial and extensive loadings.
- Fixed system costs for education authorities must be factored into loadings.
- There is a need to ensure that quality assurance activities are efficient and not onerous on teacher time or leadership involvement.
- The expectations of quality assurance processes and rigour around data collection processes from PWC have been significant, and costs and supports must be included in loadings.
- Catholic Education would value a shift from quality assurance related to the accuracy of the NCCD count to a focus on quality instructional practices across contexts and stages of learning for students with disability, particularly regarding students with highly complex needs.
- There needs to be consideration of improvement in the intersection of NDIS with school support for students with disability to facilitate active collaboration opportunities that are funded.
- Alignment between NDIS and NCCD is also not consistent.
- Access to NDIS and allied health therapy services is not consistent across geographic areas.

Submission

This submission has been prepared by Catholic Education Archdiocese of Canberra Goulburn on behalf of 56 Catholic schools and approximately 21,000 students in NSW/ACT.

Catholic Education Archdiocese of Canberra Goulburn believes that all children, including those with disability, have a right to share equitably in public expenditure on education. This right is aligned with the right of parents and families to choose the most appropriate education for their children, including the right to choose a Catholic education.

Catholic schools in ACT and NSW have been providing quality education for Australian children for almost 200 years and educate more than one in five students in our ACT and NSW communities. Our schools have

significant geographical and socio-economic coverage, reflecting the diversity of contemporary Australia. The schools in the Archdiocese are diverse, covering early learning settings, primary, secondary, senior secondary and central (K-10) models of schooling.

Catholic Education values the partnership with government and community that strives to maintain a society where understandings and acceptance of diversity are supported through the education system.

Catholic Education Archdiocese of Canberra Goulburn is committed to ensuring that Catholic education is available for all sectors of society, and is based on values of inclusion, in particular, the rights of students with disability and diverse learning needs.

Response to Review of loading for SWD: Focus questions

1. 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 do the level of resources required to support a student at each level of adjustment differ?

There is currently no resourcing for the Quality Differentiated Teaching Practice level of adjustment. However, there is an administrative and quality assurance cost in the time taken to establish and maintain personalised plans, evidence and NCCD reporting. For some schools, this can encompass a large number of NCCD students, with many hours spent on compliance where the level of support attracts no additional resourcing to the school.

Students with extensive levels of adjustment attract resourcing to the school system. However, the class or cohort along with the student may require full time classroom support and lunch-break supervision in the mainstream school context where the cost could be significantly higher.

Adjustments, as actions taken to enable a student with disability to access and participate in education on the same basis as other students, vary to the same extent that individual student need varies. Adjustments reflect the assessed individual needs of the student. They can be made at the whole-school level, in the classroom, and at an individual student level.

The level of resources required, therefore, varies from student to student, resulting in significant challenges in developing a flexible cost-formula model.

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

Catholic Education in the Archdiocese provides mainstream settings for all students. Additional resourcing for appropriate levels of supervision and support may be required in mainstream settings particularly as the school environment may not have the infrastructure that students with complex needs require e.g. safe boundary play areas. Many mainstream schools have open plan learning areas. This can be problematic when students with disability need to roam, are sensitive to sensory input or distraction or may leave an overly stimulating environment. There are considerations regarding supervision, dignity, safe learning spaces and learning areas responsive to the learning needs of all students.

School communities Australia wide vary greatly. Regional and rural schools that are located significant distances from a regional or major city will not have access to the facilities and services that are often essential in supporting students with additional needs access and participate in learning in the school context. Thus, costs to provide the necessary recommendations to support complex students are incurred at local school level, and often need to incorporate travel time and expense.

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

Where schools have early learning centres aligned to them there needs to be greater flexibility between settings for transition of students with complex disabilities, especially where play and flexible learning is a development requirement and part of a personalised learning plan. The current separation of resourcing between the two settings is not conducive to this. It would be helpful to have greater flexibility between

co-located ELC and primary education sites to be able to have the resources to transition students and respond to students' developmental needs.

Primary schools have a targeted focus on literacy, numeracy and social skill development. Therefore in the primary setting, loadings under NCCD must consider the specific implications of individual need and profile of disability on literacy and numeracy instruction, and the social-emotional learning for the student.

Proportionately, higher resourcing is required in the secondary context compared with the primary context given the complexity of high school organisation and management. Factors outlined below have a potential impact on access and participation in a secondary context;

- numerous teachers
- specialist subject areas
- tension between adjustments and standard assessment requirements, planning for post-school options and supported workplace opportunities and senior school pathways
- support for students with mental health disorders
- staff ownership of adjustments in their subjects
- coordination of support and information regarding students across a large team
- education tailored to adjustments across specific subject areas
- greater resourcing to facilitate team-teaching between a subject teacher and special educator to include programming and delivery so that small group work opportunities and independent (supported) work are provided and normalised
- greater emphasis on assistive technology options for students with low literacy skills e.g. voice to text typing, videos to gain content knowledge, and demonstration of learning separate from essays and written tests

A high level of communication is required with parents at this stage of learning in navigating the social and academic demands of high school along with preparation for post-school life.

The financial supports for students in secondary contexts are higher than in a primary setting. This cost must be considered in relation to the supplementary, substantial and extensive loadings.

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?

Fixed system costs for education authorities must be factored into loadings, and may include staffing, consultancy and time to release staff to plan and deliver adjustments, and other necessary resources.

Inclusion and Diverse Learning Coordinator allocations in schools also provide an important resource for classroom teachers and leadership teams to ensure that students with disability have what they need in place to access and participate in all learning opportunities. Permanent and consistent support staffing from trained para-professional staff is also an important factor in costings.

Costs of assurance and management, including moderation and validation, must also be part of NCCD provisions to schools. There is a need to ensure that quality assurance activities are efficient and not onerous on teacher time or leadership involvement. School staff want to ensure that NCCD funding supports are maximally directed to educating students with disability and are not lost in administrative tasks.

Quality Assurance for NCCD for non-government schools provides consistency and valuable insight into school and system processes and supports. The expectations of quality assurance processes and rigour around data collection processes from PWC have been significant, and costs and supports must be included in loadings.

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

Teacher experience and teacher qualifications provide the basis for the professional judgements upon which level of adjustment under NCCD is based. Not all schools will have a qualified special educator. This needs to be addressed particularly where professional judgement is a key part of the process for claims for NCCD resourcing.

2. 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?

Catholic Education would value a shift from quality assurance related to the accuracy of the NCCD count to a focus on quality instructional practices across contexts and stages of learning for students with disability, particularly regarding students with highly complex needs.

The inclusion of Credible Classroom Practitioners in the NCCD Quality Assurance processes provided some valuable and realistic supports to school staff undertaking the validation process.

There also needs to be consideration of improvement in the intersection of NDIS with school support for students with disability to facilitate active collaboration opportunities that are funded. Collaboration is identified as best practice in supporting students with disability. It is unclear who pays for this collaboration time. While schools can absorb the cost of teacher release time to meet with allied health professionals, they also often pay for the NDIS provider collaboration time. Teachers benefit from specialist input from NDIS providers, however there is no clear mechanism for this at present.

Alignment between NDIS and NCCD is also not consistent, as the NDIS uses a narrow definition of disability (specific criteria based on the medical diagnosis of a specific disability) whereas the NCCD used by schools is based on the broad definition of disability under the DDA and DSE. Therefore, not all students included in the NCCD are eligible for NDIS support. Consideration of the cost and coordination of support services that non-NDIS students require are currently not clearly articulated within loadings provided under NCCD.

Access to NDIS and allied health therapy services is not consistent across geographic areas. For example, there are limited visiting therapy or disability services for children in rural NSW. Families may then need to travel considerable distances to access therapy services. This is at a cost to families, particularly in the context of enduring drought and the flow-on impact to household incomes in rural areas.

The area of personal care needs clarification as to what responsibility NDIS providers have for this in schools. Currently, personal care support at school comes from education funding when NDIS, providing reasonable and necessary supports for whole of life access and participation explicitly does not provide any support for education.

Questions arise in non-government sectors about how provision for this care actually works during the school day. Concerns exist around the provision of personal care support at school and the potential impact on the provision of quality education programs for students. Training for support staff often needs to occur and this incurs a significant expense for the school or system. Alternatively, support staff registered as NDIS providers and paid for from the child's NDIS plan can provide support, however, this brings many complexities in contractual arrangements with staff. This can be disruptive to this intimate area of disability support.