

Review of needs-based funding requirements 2019–public submission

Tasmanian Department of Education

Stakeholder type: Approved system authority

Jurisdiction: Tasmania

Submission

30 September 2019

Mr Michael Chaney AO

Chair

NATIONAL SCHOOL RESOURCING BOARD

Dear Chair

Thank you for the opportunity to formalise the Tasmanian Department of Education's (DoE) feedback in relation to the *Review of Needs Based Funding Requirements* (the Review) and the opportunity that was provided to meet with Board Members on 25 July 2019.

DoE notes that the Review's Terms of Reference require the Board to consult with the sector to:

- support the development of a shared understanding of the legislative requirements placed on approved system authorities to distribute all Australian Government recurrent funding, and to have a needs-based funding arrangement
- identify and make recommendations on:
 - additional guidance required from the Commonwealth to support compliance by approved system authorities with the legislative requirement to have a needs-based funding arrangement
 - future actions by the Department and approved system authorities that would support a comprehensive assessment in a subsequent compliance review of needs-based funding arrangements.

DoE is fully committed to continuous improvement in its needs-based funding arrangements. Currently, this is best represented by the significant work that has gone into implementing a new Educational Adjustments funding model for students with disability in Tasmanian Government Schools, which will deliver funding to schools from 2020. The new Educational Adjustments approach will support further inclusive practice in schools, and align supports to the educational adjustments teachers make in the classroom to assist students with disability to access, participate and engage in quality learning programs.

This exemplifies the positive outcomes that can be achieved when needs-based funding arrangements truly reflect subsidiarity, and the need for systems and schools to inform resource distribution. The Educational Adjustments funding model is constructed from teacher and school level knowledge of student and system level funding principles, rather than simply applying the Schooling Resource Standard (SRS) loadings as prescribed under Commonwealth legislation.

The Review's Issues Paper poses several questions for consideration. With DoE's Educational Adjustments funding model in mind, DoE considers that there are some fundamental concepts relevant to all of the questions posed.

The importance of subsidiarity in resource allocation for education cannot be overstated. The local context in which education is delivered must inform resource allocation to maximise efficiency and truly reflect need. This

is particularly relevant when considering that the Australian Government is the minority funder for the Government School sector and that education is the constitutional responsibility of states and territories.

DoE will have significant concerns if this Review makes recommendations for more prescription around the application of the Australian Government's SRS loadings. DoE's views are that:

- The accountabilities should be broad and flexible. In respect of loadings under the SRS, they may serve the purpose for equitable distribution of funding by the Australian Government but that in itself does not recognise the diversity of circumstances and complexity across jurisdictions, which is why 'subsidiarity' at the state level is critical.
- The accountabilities should be principle based and outcomes focussed rather than prescriptive; this echoes strong messages that DoE has heard from our principals through consultation on school improvement. When reviews have been undertaken of the State's Fairer Funding model the types of principles that have been considered are whether the model is outcome focused, transparent, fair, consistent, predictable, flexible and accountable.
- Flowing on from the above, there needs to be recognition of programs that are best served to run across schools at the system level as opposed to all funds being provided to schools as a per student rate.

For small jurisdictions, there is a proportionately greater impact from prescriptive Australian Government accountability measures. The outcome of unnecessarily detailed and complex administrative processes is that sparse resources are diverted from school improvement. This is not to suggest that there should not be accountability, an alternate question may rather be 'is there already sufficient accountability?'

There is already a range of accountabilities at the Australian Government and state level, for example reporting against Tasmania's Bilateral Agreement, *My School* Reporting, Report on Government Services reporting, NAPLAN, State Annual Reports and Financial Statements and the existing block acquittal to the Australian Government. In respect of the latter, it remains a concern that the block acquittal requests information at the per student loading level, when the Bilateral Agreement is based on funding at the system level, this suggests a conflicting purpose or objective for accountability.

DoE also believes that findings from the Board's *Review of Needs Based Funding Requirements* should be binary, specifically, compliant or non-compliant with supporting analysis as opposed to findings on 'the extent to which the system is compliant'.

The Tasmanian Government and DoE have an absolute focus on school improvement and needs-based funding arrangements that support our improvement agenda. I look forward to understanding how this Review will support improvement in Tasmania's education outcomes.

Yours sincerely



Tim Bullard
SECRETARY