

Independent Review into Regional, Rural and Remote Education

Submission by the Independent Schools Council of Australia (ISCA)

29 August 2017

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About ISCA

ISCA is the national peak body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISCA represents a sector with 1,104 schools and 594,200 students, accounting for approximately 16 per cent of Australian school enrolments. ISCA's major role is to bring the unique needs of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Others promote a particular educational philosophy or interpretation of mainstream education. Independent schools include:

- Schools affiliated with Christian denominations for example, Anglican, Catholic, Greek
 Orthodox, Lutheran, Uniting Church, Seventh Day Adventist and Presbyterian schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Indigenous community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other risk factors.

Many Independent schools have been established by community groups seeking to meet particular needs. Examples include the Independent community schools for Indigenous students in remote areas, special schools for students with disability and boarding schools to educate children from rural and remote areas. There are also schools that seek to reflect the religious values of a particular community or that seek to practise an internationally recognised educational philosophy such as Rudolf Steiner or Montessori schools. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example Lutheran systems. Systemic schools account for 18 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

Introduction

The Independent Schools Council of Australia (ISCA) welcomes the opportunity to provide a submission in response to the *Independent Review into Regional, Rural and Remote Education*.

Independent schools serve a broad range of students and communities, reflecting the diversity of Australian society, and have a long-standing commitment to supporting quality education for students across Australia.

The autonomy of Independent schools enables them to respond flexibly, effectively and creatively as professional educational organisations to meet the needs of their school community and to develop, innovate and improve the school to enhance outcomes for students.

ISCA supports the five convictions which have been employed to inform the framing of the Review's Discussion Paper, and notes the nine important themes on which the Paper focuses and the issues, challenges and opportunities associated with them.

ISCA acknowledges that the Discussion Paper does not purport to be an exhaustive treatment of everything that impacts on students, families, schools, and communities in regional, rural, and remote areas. However, the Paper broadly addresses many of educational, social, financial, and other relevant factors related to providing educational services in these areas, and to students from regional, rural, and remote locations pursuing their education elsewhere.

This submission focuses particularly on the provision of educational services by Independent schools for students from remote and regional communities, either living in those communities or furthering their education away from home at an Independent boarding school.

This submission will provide a background to the nature and funding of the Independent school sector, with a particular focus on the funding arrangements for the more than 121,000 students enrolled in 382 Independent schools located in rural, regional and remote Australia, students from these areas being educated in urban schools, and address a range of issues from the review's Terms of Reference and Discussion Paper.

Background Information about the Independent Sector

The Role of State and Territory Associations of Independent Schools

Independent schools in each state and territory are directly represented and supported by the Association of Independent Schools (AIS) in their jurisdiction. While almost all Independent schools choose to become members of their State or Territory Association of Independent Schools, the AIS does not act as a 'system authority' for member schools.

AlSs provide a range of professional services directly to schools, as well as providing educational support such as learning opportunities, advice and information. Many AlSs also offer industrial relations services, policy and compliance support, professional learning services, and implement government programs, for example the Australian Government Capital Grants Program. In

addition, AISs represent the views of the Independent school sector at the state and territory level.

Types of Independent school

There is a common perception, encouraged by media portrayal, that Independent schools are large, urban schools which only cater to high income families. In fact, ninety percent of Independent schools are low to medium fee schools which cater to the full spectrum of Australian society.

Independent schools also cater to specific groups of disadvantaged students including: Indigenous students attending remote 100 per cent Indigenous schools in Western Australia and the Northern Territory; high needs students with disability attending special schools; and highly disadvantaged youth who have been excluded from both government and non-government schools and who are now attending Independent special assistance schools.

This diversity has long been considered a major strength of the Australian schooling system, serving well the needs of a geographically dispersed, socially mixed, multicultural and multi-faith population.

Families and communities are the foundation and at the core of all Independent schools and their broader communities wherever they may be situated but especially so for Independent schools which are located in and/or cater to regional, rural, and remote areas. It is the partnerships which are developed between the school, parents, students, families, and the wider community that enable Independent schools to create learning environments in which education can happen in innovative and diverse ways in order to meet the needs of the school community.

While the Australian Government is the main provider of public funding to Independent schools, it should be recognised that parents, families and school communities are the primary funders of schools in the Independent sector.

The range of tuition fees paid varies greatly from school to school reflecting the diversity of the sector. The spectrum of fees ranges from schools serving highly disadvantaged communities which charge no fees, through to schools which charge in excess of \$20,000 per year. It should be noted that schools charging in excess of \$20,000 per year only represent five per cent of Independent schools. The median fees charged per student in Independent schools are \$4,877 per year.

Most of the 152 boarding schools in the Independent sector charge fees for provision of boarding services which are additional to tuition fees paid per student. For many boarding schools enrolling Indigenous boarding students, boarding costs are supported by the amount of ABSTUDY a school receives for individual students. However, this generally does not cover the full costs of boarding.

Independent School Enrolments and Trends

The Independent school sector is the third largest school education provider in Australia (after the New South Wales Government and the Catholic education systems) and at secondary level is the largest provider of schooling services.

78.1% 77.7% 72.1% 69.2% 65.5% 65.2% 65.2% 19.6% 19.8% 17.5% 14.1% 14.5% 14.1% 1970 1980 1990 2000 2010 2016

Chart 1: Enrolment Share by Sector 1970 to 2016

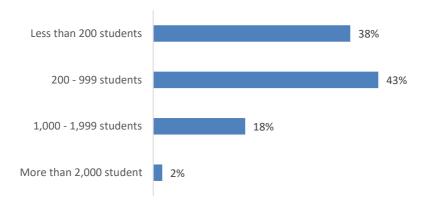
 $Source: ABS\ Schools\ Australia.\ Excludes\ Independent\ Catholic\ schools\ from\ Independent\ school\ share.$

Enrolments in Independent schools have grown steadily since the 1970s. According to ABS data, in 2016 Independent schools accounted for 14.5 per cent of total student enrolments (18.4 per cent of secondary enrolments) compared to 4 per cent in 1970. Full time enrolments have increased from around 124,000 in 1970 to nearly 550,000 in 2016. Including independent Catholic school enrolments, the sector enrolment is almost 600,000 students.

Independent School Size & Location

Independent schools vary greatly in size with the average Independent school size in 2016 being 525 students. This compares with an average of 373 students at government schools. Thirty-eight per cent of Independent schools have fewer than 200 students; 13 per cent have fewer than 50 students.

Chart 2: Independent School Size 2016



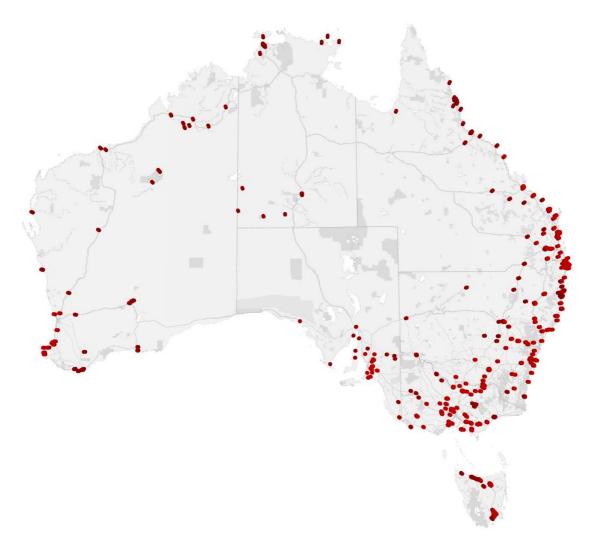
Source: DET Non-Government Schools Census 2016.

The Independent school sector serves diverse communities and not exclusively those located in metropolitan areas. Independent schools make a significant contribution to educating students from Australia's regional, rural and remote areas.

Many students who live in rural and remote areas attend boarding schools in the state and territory capital cities or larger regional centres. Alternatively, they may board elsewhere, but attend school as day students. Others attend Independent schools in their local areas, including Indigenous community schools, and some take up the option of distance education.

As Map 1 below shows, there are a significant number of Independent schools located outside of the major capital cities. Three hundred and eighty-two Independent schools are located in regional and remote areas. This represents almost one in three schools in the Independent sector. These schools enrol 121,345 students and employ 15,795 teachers and other staff.

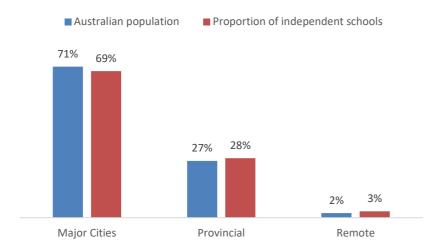
Map 1: Independent Schools in Regional, Rural and Remote Areas 2016



Source: MCYEETA Geographic location database plus additional geolocation. Includes school campuses.

As demonstrated in Chart 3 below, the distribution of Independent schools is reflective of the distribution of the Australian population as a whole. While 69 per cent of Independent schools are located in metropolitan areas, 28 per cent are in regional areas, and three per cent of Independent schools are located in remote areas.

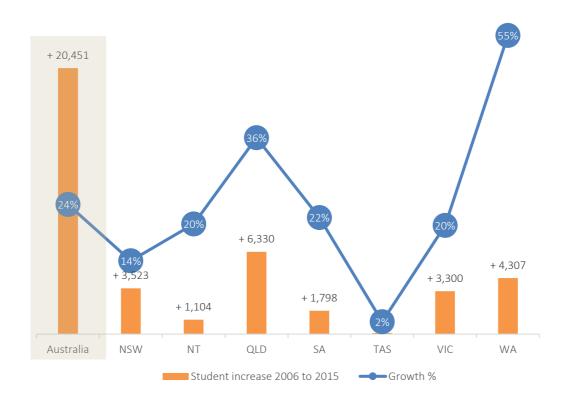
Chart 3: Independent School Location 2016



Source: ACARA My School Dataset and ABS Regional Population Growth Australia, 2015-2016

It is important to note that in a number of remote locations, particularly remote Indigenous communities, Independent schools are the sole providers of school education. There are 15 Independent schools recognised in the current Commonwealth funding model as being remote sole providers; that is, they are the only available school in that location.

Chart 4: Enrolment Growth in Regional, Rural and Remote Independent Schools 2006 to 2015



Source: DET Non-Government Schools Census 2006, 2015.

Similar to distribution patterns in other sectors, more than 50 per cent of Independent schools located in regional, rural, and remote areas have enrolments of fewer than 200 students.

Independent schools in regional and remote locations assist in creating real schooling choice for families in these areas. They include for example Anglican, Lutheran, Christian, Montessori and Steiner schools. Student enrolments in Independent schools located in rural, regional, and remote areas have grown by 24 per cent over the decade 2006 to 2015 (see Chart 4 above). This compares with 16 per cent over the same decade in Independent schools Australia wide. The greatest percentage growth was in Independent schools located in rural and remote Western Australia, Queensland, and South Australia.

Indigenous students

As a group, Indigenous students face significant barriers to educational achievement and many Indigenous parents enrol their children in Independent schools.

Indigenous student enrolments are dispersed broadly across the Independent sector and in 2016 there were over 12,600 Indigenous students enrolled in 832 independent schools. Seventy-five per cent of Independent schools in Australia enrolled Indigenous students in 2016.

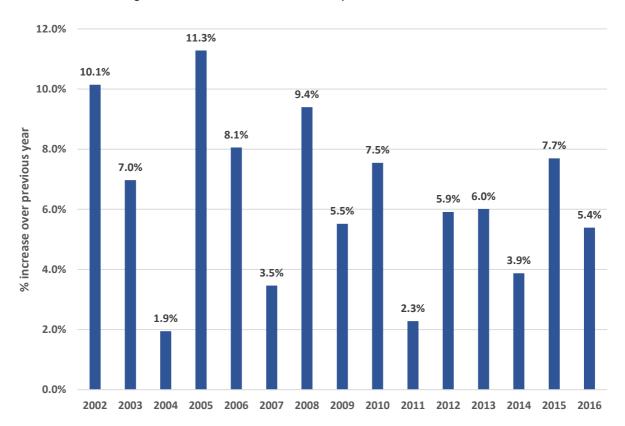


Chart 5: Growth in Indigenous Student Enrolments at Independent Schools 2002 to 2016

Source: DET Non-Government Schools Census 2016.

Enrolments of Indigenous students in Independent schools have grown at an average rate of more than 6 per cent per year over the last two decades. ABS data released in February 2017 confirmed the Independent sector as experiencing the largest growth of Aboriginal and Torres Strait Islander enrolments, exceeding the national average growth of 3.7 per cent.

Indigenous students are educated across a range of settings and in different types of schools in the Independent sector. There are some Independent schools that provide education to significant populations of Indigenous students and some schools are entirely Indigenous. Thirty-nine schools in the Independent sector have an Indigenous enrolment of more than 50 per cent. A significant number of these schools are located in rural or remote areas.

Many Indigenous students, particularly those from remote and regional communities face comparable educational challenges including that their educational levels are often behind those of their non-Indigenous peers, many students have significant social and health issues, and many have disruptive home lives and disrupted educational journeys. The context and educational setting means that the needs of Indigenous students, and thus of the schools, teachers and support staff, vary according their educational circumstances.

Currently neither Australian Government nor state and territory government funding arrangements for non-government schools adequately address the very substantial cost differential in school provision for Indigenous students in and from remote locations. Indigenous students attending Independent schools in remote communities should be supported to the same level as Indigenous students in similar government schools.

Remote Indigenous students attending boarding schools also require substantial additional financial assistance, over and above general education expenses, to meet the additional costs of supporting their participation in education. This issue will be further addressed below when discussing Indigenous boarding students and the particular challenges of Indigenous education.

Boarding schools

The Independent sector includes 152 schools which enrol almost 16,500 boarding students. The Independent sector is by far the largest provider of boarding school education for Australian school students. A significant number of Independent school boarders are from regional, rural, and remote areas. Independent boarding schools provide these students with pastoral and emotional support while they access an education. Independent boarding schools are frequently the only option for students from remote and regional communities who must board away from home in order to further their education.

The actual social profile of boarding school students challenges the perceived stereotype of a boarding school student. Boarders in Independent schools represent a diverse group of students from a range of backgrounds, and often from a diverse range of countries. Students board full-time, on a daily or weekly basis, or on an 'as required' basis, depending on their individual circumstances. This wide range brings flexibility and diversity of experience and culture into school communities as a whole.

Due to issues of remoteness, for many parents there is little choice but to enrol their children in a boarding school. Many of these parents are acutely aware that an emphasis on access to education underpins their children's future success, and that boarding helps alleviate issues connected with isolation in Australia's rural and remote areas.

Given the significant number of regionally based, particularly farming families, that use boarding schools, conditions such as low commodity prices, low economic growth or downturns, drought, and other natural disasters, can leave these families and therefore their children's schools vulnerable. For many families who enrol their children at a boarding school, tuition and boarding fees are a critical factor in their selection of school. These families have concerns about the rising cost of schools and naturally are interested in boarding school affordability. These families need to have a degree of certainty regarding school funding which has an impact on the ongoing costs of tuition and boarding fees, as well as other associated costs of their children's schooling.

Boarding schools play a unique role in the provision of schooling for families in special circumstances, such as those in Australia's rural and remote communities, or those living and working overseas. Independent schools which are located in regional, rural, and remote areas often have an important economic role in the communities in which they are situated. Secondary and tertiary educational institutions are often the lifeblood of rural economies. Direct employment at the school, and indirect employment opportunities for associated businesses created by the provision of services such as maintenance, and locally sourced food and other supplies, often make a significant economic contribution to the local community.

Indigenous boarding students

Many Independent schools provide scholarships which enable Indigenous and other students from remote areas access to a high-quality education. The Independent sector is the largest provider of boarding services to Indigenous students. One hundred and twenty-two Independent boarding schools enrol Indigenous boarders. Of the nearly 2,400 Indigenous boarders in the Independent sector, half attend schools with either very large numbers or a high concentration of Indigenous boarders. Many of these students come from remote communities where primary level education is the only schooling locally available and they have to leave their communities in order to undertake secondary studies.

These boarding schools frequently need to provide a range of services beyond those required to provide a quality day and boarding education in order to address a range of health, wellbeing and pastoral care issues before students are in a position to learn. Boarding is not the same as living at home and the cost of providing adequate emotional and physical support to students who are living away from home is high. Often these schools serve communities with limited capacity to contribute to the costs of their children's educational and boarding needs. Government funding, including ABSTUDY payments play a central role in funding these services.

Education funding starts at the school gate and is designed to achieve educational outcomes. The additional support Indigenous students need to actually get to school, stay at school and be

ready to learn is not part of standard educational funding. It is widely acknowledged that students cannot learn if they are hungry, tired, distressed.

It should also be noted that these issues are not 'one-off's' but need to be constantly addressed. For example, for boarding students commencing boarding or returning to school at the beginning of term, many students need significant health and social and emotional support in order to be school ready.

Schools are not currently resourced to provide the broad range of services that are critical to ensure students are 'school ready'. Many schools divert funds from learning to fund these ancillary services or are unable to provide more than the most rudimentary services in these areas.

The Gap in Educational Achievement

There is no doubt that many students living in rural, remote and regional areas have outstanding educational experiences which enable them embrace opportunities, achieve excellence, reach their personal goals, and provide substantial benefits to the communities in which they live and work.

However, it has long been established that educational outcomes show that students from rural and regional areas tend, on average, to not do as well as students from metropolitan areas. This trend is seen across a range of measures as recorded by national and international tests, assessments and results.

Examples of recent research, outcomes and results that are indicative of the gap in educational achievement between regional, rural and remote students, and metropolitan students include:

- The Mitchell Institute's Educational Opportunity in Australia 2015: Who succeeds and who misses out which demonstrated that "there is a consistent link between where Australians live and their educational outcomes at all stages of education, with those living in rural and remote communities doing worse that students in urban areas."
- The Grattan Institute's 2016 Widening Gaps: what NAPLAN tells us about student progress, which used mainly Victorian school NAPLAN results to highlight that "many regional and rural students make up to two years less progress than students in inner city areas between Year 3 and 9."
- The Australian Bureau of Statistics (ABS) *Education and Work, Australia, May 2016* showed that while 85.7 per cent of 20 24 year old's in metropolitan areas attained a Year 12 or equivalent qualification, only 63.8 per cent in Outer Regional and 44.6 per cent in Remote and Very Remote areas had attained such a qualification.
- In 2013 the Organisation for Economic Co-operation and Development (OECD) used Programme for International Student Assessment (PISA) data to describe an "urban advantage" in school performance that was evident in nearly every country which undertook the assessment, including Australia.

There is no doubt that there is a gap in Australia between the educational achievement of students from rural and regional areas and those from metropolitan areas. The Mitchell Institute research notes that "to date, many of the policies in place to address this have been ineffective". The Productivity Commission also notes, in relation to the provision of human services in Indigenous communities, that "(d)espite goodwill and significant resources, initiatives aimed at improving outcomes for Indigenous Australians have often fallen short at the implementation stage."

It is likely that the inability of various policies to effectively address this gap is partly because the reasons underlying and contributing to the gap in outcomes are complex and multi-faceted. The OECD's *What makes urban schools different?* PISA in Focus paper states that "socio-economic status explains only part of the performance difference between students who attend urban schools and other students". The paper goes on to identify school size, responsibility of the school for resource allocation, and staffing issues such as teacher shortages and staff qualifications as relevant differences and challenges for rural and regional schools.

Also of relevance is the Australian Government's *Review to Achieve Educational Excellence in Australian Schools*, the Terms of Reference for which state that "the Review will focus on the effective and efficient use of funding to:

- Improve student outcomes and Australia's national performance, as measured by national and international assessments of student achievement.
- Improve the preparedness of school leavers to succeed in employment, further training or higher education.
- Improve outcomes across all cohorts of students, including disadvantaged and vulnerable students and academically-advanced students ('gifted' students)."

Whilst the Reviews are running concurrently it is anticipated that the *Review to Achieve Educational Excellence in Australian Schools* will also examine issues related to regional, rural, and remote students and make recommendations to support the access and educational achievements of these students.

Key Barriers and Challenges

Rural and remote students often experience a range of barriers and challenges to their education which impact on their results and outcomes. These barriers and challenges are often different from those experienced by metropolitan students and have an impact both on students' access to educational opportunities and on their experiences while participating in education.

Such barriers and challenges can range from the adequacy of funding and resource allocation for the school to challenges related to school staffing and the employment of teachers.

In its Draft Report on *Introducing Competition and Informed User Choice into Human Services:* Reforms to Human Services, the Productivity Commission recognized that regionality and

remoteness increases the cost of delivering human services such as schooling. The relative location and population of rural and remote communities may also be "an impediment to effective service delivery and in some cases, prevent services from being delivered at all. Communities...may not be able to support fulltime services. There can be a lack of fit-for-purpose infrastructure... travel can be difficult (and) time-consuming." The cost of running remote schools is determined not only by substantial factors such as the expense and difficulty of transporting people and resources to and from the school location but also by something as seemingly simple as a slight rise in the cost of diesel to power generators, an issue that can have a significant impact on the school's budget and subsequent operations.

School Funding and Related Issues

ISCA notes the Australian Government's Budget commitment to supporting students and schools in regional and remote areas by committing an estimated \$57.5 billion to these students and schools from 2018 to 2027. The Government's commitment to increase the annual funding invested by the Commonwealth for students in regional and remote areas from \$3.9 billion in 2017 to \$7.2 billion in 2027 is welcomed by the Independent school sector.

One way to overcome the barriers of distance is the use of online learning materials. However, access to these materials is not guaranteed. For many years, Independent schools have had access to educational resources developed and provided through the National Online Learning Services (NOLS). The Australian Government's decision to cease its funding contribution for the development of the National Online Learning Services (NOLS) will have consequential impact on Independent schools, particularly those in rural, regional, and remote areas.

Educations Services Australia's proposed solution to this funding shortfall suggests that government schools will continue to have access to the NOLS on a no-cost basis, while non-government schools will only have access to the NOLS on a user-pays basis. Individual Independent schools will now be required to pay a subscription in order to continue to access these educational resources.

This requirement will result in a significant new, added cost impost to Independent schools, with the greatest impact being on the leaning opportunities and experiences of students and communities located in rural, regional, and remote areas.

It is unclear why non-government schools should be excluded from accessing resources developed with public funds utilising taxes paid from parents across all schooling sectors. It is ISCA's view that there is no justification for the exclusion of non-government schools from access to publicly funded school resources due to the withdrawal of Australian Government funding for the initiative.

Other issues related to the funding of some schools and students in regional, rural and remote areas also pose significant barriers and challenges to the educational outcomes of students in these areas. In particular, the concerns that schools in the Independent sector experience in relation to ABSTUDY, are outlined further in this paper.

Demographics

Australian Bureau of Statistics data (*Education and Work, Australia, May 2016, ABS Household Income and Wealth, Australia, 2013-14*) demonstrates that non-metropolitan communities in Australia, on average, have lower levels of education attainment and lower levels of household income and wealth than households in capital cities. Both higher parental educational attainment and greater household income are considered to be two among a range of factors that can influence and contribute to higher educational aspirations for students, as well as better outcomes and achievements.

The small size of many rural, regional and remote communities and schools may also present a challenge to educational outcomes of students. As noted above, more than 50 per cent of Independent schools that are located in rural and remote communities have student enrolments of less than 200. The small size of these schools may mean that many classrooms are multi-age with students from more than one year level together in a room with the same teacher. This necessity can be challenging even for experienced teachers, especially given the Australian Curriculum has year level achievement standards in the core subjects of English, Mathematics, Science, and Humanities and Social Sciences.

The small size of communities and/or the small size of schools within regional and remote communities makes provision of educational, social and other support services more expensive than such provision would likely be in major population centres. Due to their size, these communities and schools are often unable to access the economies of scale that could otherwise be available in locations where there is a larger population.

Distance

Rural and remote students are often disadvantaged because of the difficulty or lack of access to educational choice and learning opportunities such as cultural institutions and social experiences. Access or lack of access to educational opportunities for students and families has a flow-on effect to the rest of the community.

Meeting the educational needs of rural and regional students often means arranging for students to travel long distances in order to get to school, or from the school to access educational opportunities and experiences.

The financial and time cost factors involved in providing these types of opportunities to their students are unique to rural and regional schools. Transport costs, travel times and time taken from other curriculum areas are all costs imposed on school communities to provide a broad range of educational opportunities.

Schools in the Independent sector are using a variety of means to address these issues and overcome the disadvantage students in rural, regional, and remote areas may face due to distance.

For example, Groves Christian College provides Online Learning via Distance Education to students in rural and remote areas. Queensland students are enrolled, either directly through

Groves Christian College if they are Home-based or through a local school if they are School-based, but 'attend' classes at the metropolitan based 'sister' school through an online platform such as Skype. Students who are at a distance can see the classroom, hear the teacher explaining the topic, listen to and ask clarifying questions, participate in discussions, and submit assessment tasks across the internet in the same way that the in-situ students do. Providing and accessing this sort of online distance learning relies on a suitable and dependable internet connection. Unfortunately, as yet, not all rural, regional, or remote communities are able to be sure of such as service.

Other Independent schools located in regional, rural, and remote areas are working to pool their resources so that they can offer a wider range of subject choices to their students. For example, one school might employ a specific Languages teacher and another an Ancient History teacher. The students would be enrolled in their home school but would travel to the host school for their particular subject choice. This is a particularly attractive option for students in senior classes, and for other subjects of a specialist nature.

Staffing

The expense associated with recruiting and retaining quality long-term and temporary staff and providing them with high quality professional development and learning opportunities requires major financial and time resources.

A lack of locally available and/or qualified applicants means that schools must search widely for staff. Attracting staff to non-metropolitan areas may be a challenge as the location of the school can mean that employees would be isolated or away from family and friends. This may especially be the case for younger or less experienced Early Career Teachers. Schools also often find that the limited opportunities for partners to also find appropriate work in the local area can inhibit recruitment of more experienced staff.

Some Independent schools in rural, regional, and remote locations are offering longer informal placements outside of university term time to give Initial Teacher Education students the opportunity to experience working and living in a non-metropolitan community. Initial indications suggest that such opportunities are meeting with some success for teacher recruitment.

The process of advertising for and attracting potential staff, and the relocation of successful applicants add a substantial cost to schools which is paid for directly by the school community. Unlike government or other school systems, the stand alone nature of most Independent schools means that they do not have the resources to offer financial or other incentives above a standard award-based salary to attract staff.

The costs of attracting and moving staff to schools in regional and remote areas are often multiplied due to other factors including costs related to: a relatively high turnover of staff, provision of stable and secure ongoing housing for staff, retaining existing staff, the higher

proportion of younger and/ or inexperienced staff employed, and the provision of professional learning and other support for staff.

Given the often difficult and limited nature of the rental housing market in regional and remote towns and communities, it is not unusual for schools to be required to lease under a long term contract or purchase and maintain properties for relocating staff to live in while working at the school. Independent schools do not receive any funding or financial support to provide this basic requirement for relocating staff; it is a further cost that is directly borne by the school community.

As regional and remote schools often employ a higher proportion of relocated and younger and/or inexperienced staff, these schools may experience heightened staffing costs connected with a relatively high turnover of staff and to the retaining, upskilling, developing and nurturing of new staff through professional learning and other related opportunities. Such schools may also be a challenging working environment for Early Career Teachers as they may not have suitable experienced staff to mentor and nurture these new staff.

Even for experienced staff, a lack of specialised locally available professional learning and appropriate professional networks to provide connectedness and support, opportunities for cooperation and collaboration, and development of their knowledge and skills can be a challenge. Similarly, it can be difficult for principals and other school leaders to have the opportunity to interact with and learn from other similarly placed leaders. Travel to access such opportunities may mean that the school leader is out of their school for a significant period of time.

Often only a small percentage of staff professional learning and development can be provided locally. While staff are increasingly able to undertake online professional learning, for non-systemic Independent schools finding and accessing relevant and appropriate online opportunities can be difficult. Consequently, staff frequently must travel, often long distances, to gain access to most professional learning opportunities. These factors contribute to the challenge of, not only ongoing professional learning, but also leadership development in rural, regional, and remote school communities. Costs to rural and regional schools for travel, accommodation and qualified replacement teachers to ensure appropriate student learning continues while regular teachers are absent undertaking professional learning, are significant.

State and Territory Associations of Independent Schools work with rural, regional, and remote schools to support them address and overcome these kinds of challenges.

For example, the Association of Independent Schools of Western Australia (AISWA) has used the Student First Support Fund, which has been provided directly from the Australian Government to implement national reforms, to heavily subsidise an annual four day professional learning conference for teachers and Indigenous teacher aides from remote communities. While a half day professional learning opportunity may not warrant the time and expense involved for staff to attend, AISWA has found that a multi-day meeting is an effective method of delivery and

goes some way to overcome time and cost issues; the conference is always well attended. The professional learning provided at the conference is followed up by visits from the dedicated AISWA professional learning team and support from other AISWA staff.

Independent Schools Queensland (ISQ) developed a project from 2014 to 2017 for teachers in regional and remote schools to learn a subsequent language and teach it at their school. Maintaining a language program is particularly challenging in regional schools where languages swap and change to suit whatever language teacher can be acquired at the time of need. The intent of the project is to support schools who could not otherwise find or keep a language teacher due to their regional or remote location or because they had a small cohort of students and therefore not enough teaching hours to entice a teacher to the school.

Participating schools provided teachers with an 'in-country' experience to learn in an intensive immersion course or they could choose to do an online Diploma of Languages. The ISQ project has resulted in ten language programs in regional schools that would otherwise not have had any and one regional school with an expanded program.

Parents were surveyed as part of the project with very positive feedback. As one Townsville parent commented, "The provision of this program by the school enabled my child to experience a language she has fallen in love with and wants to continue in Secondary School."

Associations of Independent Schools across the country also provide online professional learning opportunities for teachers and other staff in the form of webinars, courses, online communities, and social media. The ability of teachers in rural, regional, and remote schools to access these opportunities can depend on the quality and reliability of the communication infrastructure in their community.

A number of non-metropolitan Independent schools have suggested that the work of AISs to support schools' professional learning requirements could be aided by the major, national education organisations such as the Early Childhood Teachers' Association, Australian College of Educators, and Australian College of Educational Leadership. These, and other professional organisations, could be encouraged to make a concerted effort to hold professional learning events in rural locations. People in country areas are known for the large distances that they are prepared to drive in order to access services or attend regional events. If a professional association held a half day event in conjunction with some of these major regional events, teachers would welcome the chance to develop their professional knowledge and expertise.

Limited Educational & Social Services

Students in rural and remote areas may find that the school or the local community is not able to provide appropriately focused or specialised services that they require or desire. This may be due to the location of the school, the characteristics and attributes of the community in which it is located, the financial or other resources available to the school, or the skills and training of the teachers employed.

These challenges and barriers to students' learning may be directly schooling related, such as the inability of the school to offer the full range of subjects on their curriculum, or even just a particular subject in which a single student is interested and wants to pursue. Other challenges and barriers, while having an impact of the student's schooling and education, may be due to a lack of social, emotional, health, and other support services available in the local community. The lack of these kinds of support services can be particularly challenging for students with disability and/or learning difficulties living in regional, rural, and remote areas.

These barriers and challenges may result in students and their families having to choose to leave their local community in order to access the educational or social services that they require or forgo the opportunity to continue their schooling and further education.

The Australian Curriculum

Many of the issues identified and discussed above associated with being educated in a regional, rural or remote location, such as inexperienced teachers; lack of access to many public institutions; poor access to resources; and families experiencing social disadvantage, will have an impact on the quality of curriculum or interpretations of Australian Curriculum being offered to regional, rural, and remote students.

Anecdotally, there has been strong feedback from schools in rural, regional, and remote locations that the Australian Curriculum has been developed by writers with a metropolitan or city based focus, simply because that is their lived knowledge and experience. There are few references to regional, rural or remote contexts within the curriculum, simply because the writers did not have those frames of reference. Therefore regional, rural and remote students will not 'see themselves' within the Australian Curriculum and will not be able to as easily relate to the content.

A further complicating factor is that many rural and remote classrooms are multi-age with students from more than one year level together in the one classroom. Such a scenario can be challenging even for experienced teachers, especially give the construct of the Australian Curriculum which has year level achievement standards in the core subjects of English, Mathematics, Science, and Humanities and Social Sciences. Even highly experienced and capable teachers can struggle with the tensions of trying to support the differing educational needs of younger learners and older students in the same learning space.

In order to support schools with multi-age classrooms to deliver the Australian Curriculum in flexible ways, Independent Schools Queensland (ISQ) has developed Progression Points for a number of learning areas. These Progressions unpack the achievement standards and provide explicit, concrete examples of the sorts of things that students would demonstrate to indicate they have achieved a specific (A – E or equivalent) grade. Teachers in multi-age settings have found these Progressions very helpful. It is important to stress that the Progressions do not provide any new content for the teacher – they are a very accurate representation of the ACARA achievement standards. However, because the philosophy is one of growth and development, the Progressions are ideal for teachers in schools using multi-age classroom settings.

The Challenges of Indigenous education

Indigenous students as a group tend to face greater barriers to educational achievement than most Australian children. Students from remote Indigenous communities are the most educationally disadvantaged in Australia. This fact has been well established by a number of reviews and inquiries with direct relevance to considering the particular educational challenges for Indigenous students.¹

The provision of education to Indigenous students, particularly in remote areas of Australia, can be challenging and expensive. Improving the educational outcomes for Indigenous students requires both resourcing levels which recognise the particular circumstances of these students and innovative and flexible approaches to support students. The Independent sector has longstanding concerns about the adequacy of funding for Independent schools which cater predominantly for Indigenous students. These schools frequently need to provide a range of services beyond those required to provide a quality education. Before these students are in a position to learn, schools frequently need to address many health, wellbeing and pastoral care issues.

As noted earlier, the capacity of these Independent schools to charge fees or raise private contributions, is very limited or in some cases non-existent. Many of these schools face high costs due to their remoteness and/or distance from large population centres. It is also important to recognise that Indigenous students attending schools in urban or regional areas may need additional support.

As also noted earlier in this submission, many Independent schools in remote Indigenous communities are the sole providers of education for these communities. These schools have severely limited capacity to raise private income and rely heavily on government assistance to maintain their operations. All of these schools operate at resourcing levels significantly lower than government schools serving similar populations as sole providers.

My School financial data for schools in the Northern Territory clearly demonstrates that non-government schools are operating at less than half the net recurrent income per student of government schools. The My School data for Western Australia shows remote government schools servicing similar populations to remote Independent schools are receiving up to \$40,000 per student more in recurrent funding. Similar data in relation to funding for remote Indigenous students in boarding facilities show that Independent schools are providing services for half the cost of boarding services provided by government facilities.

Non-government providers of schooling for Indigenous students whether through remote schools, boarding or as sole providers of education to often significantly disadvantaged

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¹ These include the Review of Funding for Schooling ('Gonski Review'), the 2013 Wilson Review of Indigenous Education in the Northern Territory, the 2013 Australian Government Department of Education, Employment and Workplace Relations (DEEWR) Review Funding of Selected Indigenous Boarding Schools conducted by Deloitte Touche Tohmatsu ('Project Vale'), the 2015 House of Representatives Standing Committee on Indigenous Affairs Inquiry into Educational Opportunities for Aboriginal and Torres Strait Islander Students, and the 2016 KPMG Non-government Indigenous Boarding Schools Review of funding arrangements for the Northern Territory Department of Education.

communities, should receive at least similar levels of support as government schools. The Emerging Issues Paper prepared as part of the Gonski Review of Funding for Schooling noted the high delivery costs in rural and remote schools and that non-government schools serving these populations "did not appear to benefit from the level of funding provided to government schools servicing communities on a sole provider basis."

Recommendation 18 of the Final Report of the Gonski Review also recognised that:

"Australian governments should fully publicly fund the recurrent costs of schooling for nongovernment schools as measured by the resource standard per student amounts and loadings where the school:

- does not charge compulsory fees and has no real capacity to do so, or
- provides education to students with very high needs, such that without full public funding of the school's resource standard those needs would not be met."

Among the non-government schools, the Report identified as meeting these criteria were

- "majority Indigenous student schools comprised of those with 80 per cent or more Indigenous enrolments, or a very remote school with 50 per cent or more Indigenous enrolments
- sole provider schools in remote locations that are effectively offering a universally accessible service equivalent to a government school."

The Report envisaged that majority Indigenous schools would be fully publicly funded. It further envisaged that sole provider schools in remote locations would be fully publicly funded.

These recommendations were not implemented.

Therefore, currently neither Australian Government nor state and territory government funding arrangements for non-government schools adequately address the very substantial cost differential in school provision for Indigenous students in and from remote locations. Indigenous students attending Independent schools in remote communities should be supported to the same level as Indigenous students in similar government schools.

Government funding needs to acknowledge the special needs of Indigenous students, particularly those from remote areas. While it is the case that the attendance of some Indigenous students can be erratic, current funding arrangements can result in schools being penalised at a time when they need all possible resources to ensure they are in a position to attract and retain these high needs students. Funding models need to acknowledge the unique circumstances of schools serving large numbers of Indigenous students and their often fluctuating student numbers.

The current Australian Government funding model which relies on student enrolment numbers determined at a single census point present significant difficulties to schools catering to large numbers of Indigenous students, particularly those from remote areas. This is further exacerbated by other funding models that also utilise attendance criteria such as that used by the NT Department of Education.

Schools need to provide a high level of support services to encourage and support school attendance, however the funding fluctuations that can result from student non-attendance are counterproductive to providing this support. In recognition of the special services schools need to provide to attract, support and retain their Indigenous students, particularly those from remote areas, schools catering for these students should be provided with a base level of funding not wholly linked to per capita enrolment. This stable source of supplementary funding would allow schools to provide those support services so vital to attract and retain Indigenous students in school education. These services include additional educational, pastoral, recreational, health and community services.

Other costs are associated with provision of transport to ensure students can reach their school and strategies to ensure that students who need to be away from their home communities can maintain personal and cultural links with their communities. These additional costs can be incurred by schools located in remote areas as well as in regional and urban schools catering for Indigenous students including boarding schools. It is critical that governments recognise that these schools are in a unique position to access and assist these students and that this opportunity can be lost due to a lack of resources and a lack of recognition of the way resources should be applied.

As well as providing additional support for pastoral care, many Indigenous students regardless of the location of the school, are not achieving literacy and numeracy outcomes similar to their non-Indigenous peers. These students need innovative strategies and significant additional support to assist them in improving achievement levels in literacy and numeracy. Schools need reliable and stable sources of additional funding clearly targeted to improving Indigenous educational outcomes in order to address these specific learning needs.

Independent schools providing education to students from remote Indigenous communities are also seeking to ensure that their teachers and any other staff are appropriately skilled to deal with the distinct educational and social issues they may encounter with their Indigenous students, including cultural, educational, social, emotional and mental health issues. Providing funding to support professional learning is challenging for these schools, especially if they are located in remote areas or are small schools. Targeted professional learning funding to support teachers, schools and communities is essential to ensure staff are appropriately skilled.

Independent schools that cater predominantly for Indigenous students also require special consideration in relation to their capital needs. On average, parents and donors in Independent school communities contribute ninety per cent of funds for capital developments. Independent schools that cater predominantly for Indigenous students have very limited capacity to raise private income in order to meet their capital needs. The difficulty of providing for new or improved capital infrastructure is compounded in remote areas by the significant additional costs of building in these areas with costs doubled or tripled due to issues such as transport costs, access to construction expertise and delays due to weather.

The role of Associations of Independent Schools in Indigenous Education

Associations of Independent Schools support Independent schools that educate Indigenous students in a range of ways. The Association of Independent Schools Western Australia (AISWA) employs a team of dedicated consultants who work to support staff in remote Indigenous

schools. Having a dedicated team means the four consultants are able to develop strong relationships with the school community as well as the local Indigenous community. This level of trust is very important to supporting these communities.

The team not only gets to know teachers, Indigenous workers and students well in order to provide educational support, but is also able to support the wellbeing of staff. Staff in remote communities can feel very isolated and may not want to open up to the few other staff they work with each day, but they may find comfort in talking with known and trusted consultants.

Having a dedicated team employed through AISWA means that groups of small schools can benefit from economies of scale not otherwise available to them. Having the AISWA consultants working across schools provides a more efficient and cost-effective support mechanism than if these schools were to seek their own individual assistance. In addition, having a team which knows the schools and staff well enables current and future work to build upon existing work rather than a "fly in, fly out" approach from consultants who may not know the school or the community. Appropriate funding for AISs is imperative to ensure that this type of meaningful assistance to remote schools is able to continue.

AISWA has also developed their Future Footprints program in which members of the Indigenous community are employed to work across boarding schools to support over 300 Indigenous boarding students in those schools. The program provides mentoring for students, facilitates events across schools so community members can see each other and share their experiences, organises camps on exeat weekends when students have nowhere to be billeted, and so on. In addition to the resources provided by schools, AISWA staff work across schools and with the school liaison officers to support students. The Future Footprints program helps the students remain connected to their culture and community while at boarding school.

Many graduates of the Future Footprints program have returned to the Indigenous boarding school after graduation as volunteer mentors for current students. Many schools credit the Future Footprints program for the retention of these students through to the end of Year 12. In 2017 sixty-five Indigenous students involved with the program will graduate from Year 12. This program is currently funded in part by an Indigenous Advancement Strategy grant, but funding beyond the end of 2017 is currently not guaranteed.

The Association of Independent Schools of New South Wales is currently implementing pilot projects within three Independent boarding schools in Sydney which provide scholarships to Aboriginal and Torres Strait Islander students from rural, remote and very remote communities. These schools prioritise the engagement of parent and carers, families and home communities in developing ongoing sustainable and supportive strategies for their students.

The schools focus on being innovative and flexible in offering support to their Aboriginal and Torres Strait Islander boarding students to ensure they are able to reach their full potential to be the next generation of Aboriginal and Torres Strait Islander leaders. The following strategies are being used to culturally support, maintain connection, engage and build high educational expectations for the indigenous students within the individual school contexts:

Extended and culturally connected transition programs

Extended and culturally connected transition programs that encompass the individual student, the extended family, the primary school, the home community, and the teaching and support staff from the boarding school is a key strategy to ensure a successful transition for the student.

- Commences within the student's home community in the year prior to their start at the new school. Teachers, boarding staff and cultural mentors spend time meeting with the student and the significant adults to the student.
- Allows for the development of an authentic connection between the school and community, which is continued throughout the student's educational journey with the school.

Pastoral care and academic mentoring

Pastoral care and academic mentoring is provided throughout the student's educational journey with the boarding school.

Local Cultural Mentor

The pilot project has included the ongoing engagement of a local Cultural Mentor at each of the boarding schools which:

- Provides students off-country cultural connection and support, allowing students to continue to feel culturally connected while attending school away from their home community.
- Increases Aboriginal and Torres Strait Islander employment within the school, along with providing staff with additional support and professional learning opportunities.

Maintaining Connection and Communication with each student's extended family

Maintaining connection and communication with student's extended family is an important aspect to engaging Aboriginal and Torres Strait Islander students from rural, remote and very remote areas. This provides:

- Extended families with supported accommodation, located on the school campus to enable families to travel to Sydney with the knowledge that accommodation and meals are provided at a minimal cost.
- Opportunities for families and students to spend additional time together. In one school, students stay with their families while they are visiting and families have reported that this support mechanism has been invaluable to maintaining links with the school and feeling part of their child's education and their relationship with their child.

Professional Learning

All schools engaged with the pilot project are provided with additional professional leaning from the AISNSW Aboriginal Education Consultant.

This support enables all school staff to increase their engagement with Aboriginal and Torres Strait Islander histories and cultures within curriculum delivery, Cultural Competence training and supporting Aboriginal and Torres Strait Islander learners within the classroom.

Transition from School to Further Study & Work

A Sydney boarding school in the pilot provides a residential house within the school campus which provides supported accommodation for students in the year after school to assist them to transition to further study, training and full or part time employment. In some circumstances, the school assists the recently graduated students with obtaining part or full time employment by reaching out to the school's alumni network whilst providing residential accommodation to support the young person's move back to the city in the first year post school from their community.

The residential house is also used by families when visiting these students and is made available to family members if other circumstances arise such as a medical emergency treatment. Mentoring and support to the Indigenous students in the residential house is provided by the school's Indigenous Cultural Officer.

ABSTUDY

The purpose of the ABSTUDY scheme is to address the distinct educational disadvantages faced by Aboriginal and Torres Strait Islander students by improving educational outcomes to a level commensurate with the Australian population in general. ABSTUDY payments are designed to encourage eligible Indigenous students and apprentices to take full advantage of available educational opportunities and improve their employment opportunities.

ABSTUDY payments are generally designed to cover school student costs including living expenses, accommodation expenses (rent, boarding fees, residential costs, Remote Area Allowance), education expenses (school fees, books and equipment, incidentals), and fares (such as travel to study each term or semester if studying away from home)

Payment rates vary for the different components of ABSTUDY, changing each year and subject to means testing. Rates per student per annum can range from around \$7,900 to around \$20,000, depending on parental income and other circumstances.

While Indigenous students are eligible for ABSTUDY payments to be made directly to schools for boarding costs, the application, qualification and payment structures are extremely complex and it is difficult for school staff and families to comply with the regulations and processes required to ensure accurate payments.

Where Indigenous parents are successful in obtaining paid employment, even minimal income can significantly affect the level of their ABSTUDY payments for their children. This means that a successful outcome of employment results in parents no longer being able to fund the boarding education of their children — or alternatively the boarding school no longer receiving any income to cover the costs of the children's education.

Further, the quantum of ABSTUDY is not sufficient to cover the reasonable costs of meeting the accommodation and day-to-day needs of Indigenous boarding students. As noted above, schools are often meeting all the basic and more complex health and social/emotional needs of Indigenous students at significant cost. As students' families can make little or no contribution to their ongoing care, these costs must be met by schools. When compared to the cost of boarding provision in government facilities, the current ABSTUDY payment only covers half the

cost, leaving a significant funding gap. It is not appropriate that this funding gap be crosssubsidised by the re-direction of funding properly provided to meet students' academic needs.

Conclusion

Independent schools serve a broad range of students, reflecting the diversity of Australian society, and have a long-standing commitment to supporting quality education for students across Australia. This diversity has long been considered a major strength of the Australian schooling system, serving well the needs of a geographically dispersed, socially mixed, multicultural and multi-faith population.

The Independent school sector makes a significant contribution to educating students from Australia's regional, rural, and remote areas. Independent schools in regional, rural, and remote locations assist in creating real schooling choice for families in these areas and access to education for families in remote areas.

Students from regional, rural and remote areas face a range of barriers which contribute to a gap in educational achievement between these students and metropolitan students. This is particularly so for Indigenous students from regional, rural and remote areas.

Currently neither Australian Government nor state and territory government funding arrangements for non-government schools adequately address the very substantial cost differential in school provision for Indigenous students in and from remote locations.

Many Independent schools in remote Indigenous communities are the sole providers of education for these communities. These schools operate at resourcing levels significantly lower than government schools serving similar populations as sole providers, have severely limited capacity to raise private income, and rely heavily on government assistance to maintain their operations.

Independent schools which provide boarding facilities for Indigenous students in remote communities operate at half the expense of boarding services provided by government facilities. While Government funding, including ABSTUDY payments play a central role in funding these services, the current ABSTUDY payment only covers half the cost. This situation leaves a significant funding gap.

Non-government providers of schooling for Indigenous students whether through remote schools, boarding or as sole providers of education to often significantly disadvantaged communities, should receive at least similar levels of support as government schools.

Access to schooling and choice of schooling should not be limited or restricted to students, families, and communities only in major cities but should also be available to Australians living in regional, rural, and remote locations.

Relationships built and nurtured between families, communities, and the school are at the core of Independent schools which are located in regional, rural, and remote areas. It must be

recognised that it is these parents, families and school communities who are the primary funders of schools in the Independent sector.

It is the partnerships which are developed between the school, parents, students, families, and the wider community that enable Independent schools to create learning environments in which education can happen in innovative and diverse ways in order to meet the needs of the school community.

ISCA notes the Australian Government's Budget commitment to support students and schools in regional and remote areas by committing an estimated \$57.5 billion to these students and schools from 2018 to 2027. The government's commitment to increase the annual funding invested by the Commonwealth for students in regional and remote areas is welcomed by the Independent school sector.

ISCA also acknowledges the Australian Government's ongoing recognition of the higher cost of schooling in regional and remote areas through the 'location loading'.

Independent schools, supported by State and Territory Associations of Independent Schools, are employing a range of strategies and interventions, across a variety of areas to address the gap in learning opportunities and outcomes experienced by students from regional, rural and remote areas.

Associations of Independent Schools provide online and face to face professional learning services which support teachers to maintain their subject area knowledge, as well as opportunities to extend their knowledge and skills into new and in demand teaching and learning areas.

Whether it be offering Online Distance Education Learning programs or working collaboratively with other local schools to share teachers and other resources, Independent schools are finding locally appropriate, innovative ways to address and overcome the disadvantage students in rural, regional, and remote areas may face.

Associations of Independent Schools also work with Independent boarding schools which provide scholarships, to deliver support and mentoring for Aboriginal and Torres Strait Islander students from rural, remote and very remote communities who are living away from home.

The Independent sector welcomes the Government's focus on the barriers faced by students from rural, regional, and remote areas, and methods to address them, through this Review and the concurrent Review to Achieve Educational Excellence in Australian Schools.

Colette Colman Executive Director Independent Schools Council of Australia Canberra 29 August 2017

Appendix: Funding of Independent Schools

Commonwealth Funding

With the introduction of the SRS Funding model from 2014, Commonwealth funding arrangements significantly changed for Independent schools.

Under the previous socio-economic status (SES) funding model, schools received general recurrent grants directly from the Commonwealth. Additional funding for disadvantaged students was provided via Targeted Programs which were administered by state and territory Associations of Independent Schools (AISs). Some additional funding was provided directly to schools by the Commonwealth, including additional support for Indigenous students.

The SRS funding model comprises base funding and loadings for disadvantage which are paid directly to schools. School systems, such as government and Catholic systems, receive the SRS funding for all their schools and are able to redistribute their schools' funding entitlements within the system according to their own needs-based methodologies.

This means that the SRS funding entitlements and allocations only apply to the 900 non-systemic Independent schools. Most schools in Australia (90%) are not funded according to the model, but according to their own jurisdictional or system priorities.

The SRS funding model

The SRS funding model has two main components.

Base funding

The base funding in the SRS funding model is a per student amount which aims to measure the cost of effective and efficient provision of schooling. The base amount is indexed annually by 3.6% to reflect estimated increases in the costs of all schools. In 2017, the base funding amounts are:

Primary - \$10,310

Secondary - \$13,559

The amount of base funding a non-government school receives is reduced by the school community's 'capacity to contribute', measured using the previous funding model's SES scores. Some Independent schools are entitled to as little as \$1,990 per student, and others up to \$11,778 per student, depending on the school's 'capacity to contribute'.

Non-government special schools, special assistance schools, majority Indigenous student schools and remote sole provider schools are exempt from the 'capacity to contribute' requirement and are entitled to receive the full SRS base per student amount.

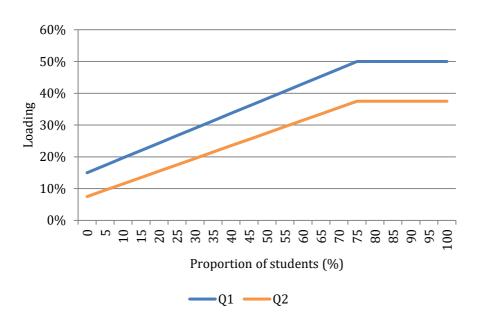
2. Loadings for disadvantage

There are six loadings designed to address different areas of disadvantage. These are students with low socioeconomic, school location, students with low English language proficiency, Students with Disability, Aboriginal and Torres Strait Islander students, and school size. Students may fall into

multiple categories and attract multiple loadings to address disadvantage. The loadings are fully publicly funded.

Students with low socioeconomic status (SES)

The Low SES loading applies to the lowest 50% of students as measured by the Australian Curriculum, Assessment and Reporting Authority (ACARA) using the Socio-Educational Advantage (SEA) quartiles used in the calculation of the Index of Community Socio-Educational Advantage (ICSEA). Students in Quartile 1 receive a loading of between 15% and 50% of SRS depending on the total percentage of students in the quartile. Students in Quartile 2 receive a loading of between 7.5% and 37.5% of SRS depending on the total percentage of students in the quartile.



School location

The location loading is based on Accessibility/Remote Index of Australia (ARIA).

Inner Regional schools:	Up to 10% of the per student amount
Outer Regional schools:	Between 10% and 30% of the per student amount
Remote schools:	Between 30% and 70% of the per student amount
Very Remote schools:	Between 70% and the maximum loading amount of 80% of the per student amount

Students with low English language proficiency (ELP)

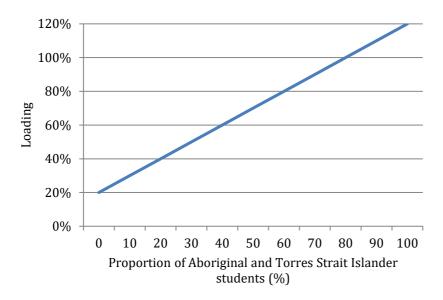
The interim loading for ELP is based on a proxy measure which looks at disadvantaged students from a language background other than English. The loading is calculated at 10% of SRS per student.

Students with Disability (SWD)

The interim loading for SWD is set at 186% of SRS. Additionally, non-government special schools are eligible for a higher loading rate of 223% of SRS per student with disability.

Aboriginal and Torres Strait Islander students

Every Aboriginal and Torres Strait Islander student in every school attracts a loading. The loading starts at 20% of the per student amount for the first Aboriginal or Torres Strait Islander student in a school, increasing up to 120% for schools with 100% Aboriginal and Torres Strait Islander students.



School size

The size loading is based on the number of primary or secondary enrolments at an individual school. The loading for combined schools is based on the school's proportion of primary and secondary enrolments.

Small schools	Primary – 15 to 200 students	\$150,000
	Secondary – 100 to 500 students	\$240,00
Medium schools	Primary – 200 to 300 students	\$150,000 reducing to zero
	Secondary – 500 to 700 students	\$240,000 reducing to zero
Large schools	Primary – 300 plus students	No loading
	Secondary – 700 plus students	No loading

For very small schools, geographic location is also taken into account. Very small schools with an Accessibility/Remoteness Index of Australia (ARIA) Index score of 10 or more receive the maximum size loading. Very small schools with an ARIA Index score of less than 10 will attract a prorated loading which is dependent on both their enrolments and ARIA score.

Transition arrangements

Once a school's SRS funding entitlement is calculated², the total is split into the Commonwealth share and the state share based on historical Commonwealth / state funding proportions. However, only new schools are immediately funded under the SRS funding model. Funding for all pre-existing schools is transitioning to the SRS funding model. Currently only a small number of schools have transitioned to their full SRS entitlement.

- Schools with a higher SRS entitlement than their previous SES funding entitlement are transitioning up to their SRS entitlement. They are considered to be 'below the SRS'
- Schools with a lower SRS entitlement than their previous SES funding entitlement are transitioning down to their SRS entitlement. They are considered to be 'above the SRS'

Future Commonwealth Funding Arrangements

In June 2017, legislation was passed which amended the Australian Education Act 2013 to introduce new funding arrangements from 2018. The new funding model aims to transition all schools to the same amount of Commonwealth funding for the same students.

For government schools, the Commonwealth share has been set at 20% of SRS and for non-government schools the Commonwealth share has been set at 80% of SRS.

Independent schools currently funded below 80% Commonwealth share will transition up to 80% of their SRS over six years. Each year they will receive 16.7% of the 'gap' between the current Commonwealth share of their SRS entitlement and 80% of their SRS entitlement.

Independent schools which are currently above 80% Commonwealth share will transition down to 80% of their SRS entitlement over ten years. Unlike the current funding model which has no school losing funding in real terms, under this model a small number of Independent schools currently receiving more than of 80% of their public funding entitlement from the Commonwealth will lose funding in real terms over the course of their transition.

The Government has announced the creation of a Transition Adjustment Fund to assist these schools maintain their financial viability over the course of the transition.

The calculation of each school's SRS funding entitlement will remain very similar to the current methodology although there will be some parameter changes which will come into effect from 2018.

² Under the Australian Education Act 2013 funding is calculated for an Approved Authority which may be one or more schools. For the purposes of this submission, 'school funding' is funding for an Approved Authority.