



Wednesday, August 04, 2010

Hon Christopher Pyne MP
Shadow Minister for Education, Apprenticeships and Training
429 Magill Road, St Morris SA 5068

Dear Mr Pyne,

I write in behalf of 130 schools in membership of Christian Schools Australia to seek the Liberal/National Coalition's position on issues of great importance to our membership and their communities.

Section one: background to CSA and its members

CSA member schools educate 45,000 students across Australia, are geographically, culturally and educationally diverse and serve predominantly lower socio economic communities. The average ICSEA score of CSA member schools is 997 —lower than the definitional mean and very close to the average ICSEA of public schools. In fact, based on our research, CSA member schools serve the neediest communities of any national grouping of non-government schools.

These schools are locally governed, community-based, not for profit organisations. They are closely aligned with one or more Christian churches in their communities, either as a ministry of a local church, or in partnership with Christians from a number of local churches.

Our members are fully accountable to state and national education authorities and to their local communities.

As Christian faith-based schools, our members are overt and particular about the beliefs and values that underpin the school's culture and practice.

CSA schools have a strong culture of mission and service, locally and internationally. They educate students to be locally and globally active citizens, concerned about the welfare of others and about using their gifts to serve.

Finally, CSA member schools have attracted very strong community support as evidenced by their growth, particularly in the urban growth corridors of our major cities. The average annual growth rate of CSA schools since 2002 has been just under 10 per cent.

Key Policy Concerns

CSA members share many of the concerns of other non-government schools. We actively participate in policy discussions with other independent school colleagues and with colleagues in the Catholic and other systems.

Rather than repeat concerns that have been raised with you by others, the purpose of this letter is to obtain your responses to a number of specific issues that represent particular concerns based on the nature of our membership as described above.

Following a brief discussion of the issues we have attached a list of related questions. We would appreciate your brief answers by **Thursday 12 August** in order that we can circulate the responses to our membership.

Section two: election issues

1. Funding for students with a disability

We consider the most urgent funding need is to end the discriminatory funding which denies students with disabilities real choice, and causes heartache and hardship for their families.

Leaders from our movement greatly appreciated your response to our question on this issue at the Christian Schools National Policy Forum on May 26 2010:

"that if the Coalition is elected, our commitment would be that students with disability should have exactly the same support, from government, whether it is state or federal government or a combination of both, and whether they choose a non-government or government school."

We noted well your announcement of an Education Card for students with disability, starting with students in the severe category in 2012, and phasing in for other students. This is very much in line with our previous policy requests, and is genuinely good news for students with disabilities and their families.

We would however encourage you towards every effort to bring forward the timetable for full implementation of this policy. We also urge that, if elected to Government, you initiate processes within COAG and MCEEDYA to ensure that full equity of funding for students with disabilities also becomes a priority at a state level.

2. Fair and certain recurrent funding

We acknowledge with appreciation the Coalition's role in implementing the current funding system for non-government schools. The Christian school sector was fully engaged in development of the SES model as a needs-based funding formula. We remain committed to its underlying principles.

We recognise there are anomalies in the current system, and have enthusiastically participated in the opportunities afforded to input into the Review of Funding now underway. Our current position on funding reflects recent submissions to that process.

One of our concerns is to ensure fairness in the distribution method of future funding.

In section three below we have asked for your responses to some of these principles.

3. Capital Funding for Growth

Christian schools are growing at a much greater rate than other sectors, and there is a demand for new schools in growth areas. We have demonstrated that we can help government to meet its obligations for school choice in growth areas.

We are concerned about what will become of capital funding following the BER programme which, while very welcome and certainly meeting many local needs, by definition doesn't meet the continuing need for growth, especially for new schools.

The willingness of parents, churches and other community members to invest in quality infrastructure in order to provide for the education of Australian children is an essential adjunct to direct government investment if Australia's education needs are to be met. It is particularly necessary in an environment of sustainable population growth.

We believe there is great scope for government policy to further encourage this form of educational provision. Interest subsidies or concessional tax arrangements are just two possibilities.

4. Ensuring freedom of choice and expression

No issue is felt more deeply to our members than preserving the right to operate schools in a way consistent with our religious beliefs. We regard as a basic right in a pluralistic democracy the ability for parents to choose for their children a school which is operated in accordance with their faith. Of course if schools do not have the genuine ability to operate in such a way, there is no real choice.

In practical terms this means that existing protections under Commonwealth and State laws and regulations need to be retained. This includes in particular:

- The ability to integrate a world view based on our beliefs and values into curriculum and school practice
- The ability to choose staff on the basis that they are genuine adherents, in belief and practice, to the Christian faith.

These principles have come under challenge in recent years in several states and federally. Indeed in Queensland, South Australia and Victoria legislative amendments were proposed that would overturn these legislative protections. In each case discussion has eventually brought a more conciliatory position. We remain greatly concerned by these developments.

We have always appreciated the support of the Coalition parties to maintaining exemptions for religious schools under the various anti-discrimination, equal opportunities and human rights acts in each jurisdiction. We understand this support to be a matter of policy. It was therefore disappointing, and somewhat surprising, that the Liberal parliamentary party in SA deemed the issue a conscience vote during Equal Opportunity amendments before the SA parliament in 2008/09. This decision caused great concern among our members in that state. While recognising the separation between divisions of the Liberal party in terms of policy, we would however be very concerned if the same approach was to be adopted at a federal parliamentary level.

We are aware of a proposal to streamline federal anti-discrimination legislation into one single comprehensive law and for the development of harmonised State and Territory anti-discrimination laws which is currently being progressed through the Standing Committee of Attorneys-General (SCAG).

We have no 'in-principle' objection to the consolidation of Commonwealth anti-discrimination legislation and can see some potential benefits in harmonisation across jurisdictions. However, we are apprehensive about the potential for any legislative change in this area to have unintended consequences and for existing exemptions to be curtailed.

We are seeking your assurance that this would not be supported by a future Coalition government.

5. School chaplains

Member schools and their communities continue to benefit from the School Chaplaincy Programme, initiated by the former Coalition Government. We appreciate undertakings given by the Coalition about future support for the programme.

Section three: Commitments sought

In order that we can inform our members prior to the election, your response by **Wednesday 11 August** would be appreciated.

1. Funding for students with a disability

Commitments sought

We are seeking a commitment to additional funding to address this funding injustice, commencing in the next term of Government.

- a) Can you commit to the principle that for students with disabilities, it is the level of their need that should determine the funding available to them, not their choice of school?
- b) Will you commit to implementing policy based on this principle, so that Commonwealth funding (recurrent and targeted) provided for students with disabilities will be equitably distributed according to the need of the individual student and irrespective of sector or state?
- c) By what date would equitable funding commence?
- d) Will you commit that in Government your party will work, through COAG and Ministerial Council processes, to see the same principle applying to state funding for students with disabilities?
- e) We consider that the following framework for policy would go a long way to eliminating the injustices of the current arrangements. We would welcome your commitment to, or comment on, the following:
 - i. A nationally agreed set of definitions and classifications should be established as the basis of funding for students with disabilities across all jurisdictions and sectors.
 - ii. Nationally agreed levels of funding should be identified based on the support required to achieve beneficial outcomes for students in each classification.
 - iii. Students with disability should be assessed against the national criteria and funded accordingly.
 - iv. Funding to meet the particular needs of students with disability should be regarded as a basic entitlement for that child, and therefore portable.
- f) Additional funding should be provided to groups of clusters of schools enabling the establishment of locally-based support services to strengthen practice in the inclusion of students with disabilities through teacher development in targeted areas of need, such as the education of students with Autism Spectrum Disorders.

2. Fair and certain recurrent funding

Commitments sought

We note that legislation for the next quadrennium was promised by Julia Gillard (in the speech referred to above) for 2011. Notwithstanding the review currently underway it is reasonable in the context of an election to ask for commitments to the policy to be pursued should the Government be re-elected.

Therefore we are asking for a commitment to the following:

- a) that funding policy will recognise and support the right of parents to choose an education for their children consistent with their beliefs and values;
- b) funding for schools should be fair and equitable across all sectors, not determined by ideology, sector or governance;
- c) in any future needs-based formula for non-government school funding, a nexus should remain between the basis of funding and the full costs of providing an education consistent with the full scope of the Melbourne Declaration on Educational Goals for Young Australians;
- d) funding will be indexed annually, with the basis of indexation being the same for all schools, and at a level which reflects the growth in education specific costs;
- e) each child will be considered to have a basic minimum entitlement for government support;
- f) the funding model adopted will be based on transparent distribution mechanisms and reliable, objective and independent data, open to scrutiny and subject to appeal; and that
- g) schools will be provided with certainty in any funding model, in particular through legislated four year agreements.

3. Capital Funding for Growth

Commitments sought

We believe there is great scope for government policy to further encourage private investment in community-based education infrastructure.

- a) Will you support measures to stimulate the further investment of private funds into capital school facilities?
- b) Will you support government tax incentives or other concessional arrangements to provide incentive for such investment?
- c) Will you support a national interest subsidy scheme to assist schools in raising funds from banks and other financial institutions in support of their building programmes?

4. Ensuring freedom of choice and expression

Commitments sought

- a) Will you give an unequivocal commitment not to support amendments that would remove the current ability of religious schools to:
 - i. hire and retain staff on the basis that they are genuine adherents, in belief and practice, to the Christian or other faith basis of the school; and
 - ii. integrate a world view based on religious beliefs and values into curriculum and school practice including enrolment.

5. School Chaplaincy Programme

Commitments sought

- a) What commitment can you give to the continuation of funding of this programme?

Conclusion

As indicated to you and the Leader of the Opposition during the recent Christian Schools national Policy Forum we recognise and acknowledge the support traditionally provided to Christian schools by the Liberal/National Coalition.

We look forward to continuing to work with you and your colleagues during the next Parliament, with the aim of achieving positive outcomes for the students attending our schools and the wider Australian community.

Sincerely



Stephen O'Doherty
Chief Executive Officer