



Tuesday, 8 March 2011

**Copy of a letter sent to**

*Hon. Verity Firth, Minister for Education (ALP)*

*Mr Adrian Piccoli, Shadow Minister for education (Liberal/National Coalition)*

*Hon Rev Fred Nile (Christian Democratic Party)*

*Hon Rev Dr Gordon Moyes (Family First)*

*Hon Dr John Kaye (the Greens)*

Dear

As you know Christian Schools Australia is a peak group representing its members nationally. We have 54 member schools in New South Wales, and it is on their behalf that I write.

## Background to CSA and its members

CSA member schools are geographically, culturally and educationally diverse and serve predominantly lower socio economic communities.

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.

CSA member schools have attracted very strong community support as evidenced by their growth, particularly in the urban growth corridors of our major cities.

## Particular 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 issues that represent particular concerns based on the nature of our membership as described above.

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Following a brief discussion of each issue we have asked for a specific commitment. We would appreciate your responses by 16<sup>th</sup> March in order that we can circulate the responses to our membership.

## Funding for students with a disability

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

Today, two students with the same disability living in the same street yet attending different schools do not qualify for the same funding if one is in a government school and other a ~~g~~overnment school. The difference is the result of both Federal and State funding practices.

As you know, MCEEDYA has commenced work on common definitions of disability across states, which we applaud. You also are aware that the Federal Government has recently asked for submissions regarding funding for students with disabilities. While this is evidence of some movement, you will understand that many inquiries have come and gone, with no commitment to action.

### Commitments sought

1. Will you participate in and support the efforts to achieve nationally consistent definitions for disability?
2. Do 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?
3. Will you support and enact policies that ensure that the additional funding available to a student with a disability from all sources is the same, regardless of the school the student attends?
4. Will you commit to fund specialist services on a non-sectoral basis, so that all schools can access disability learning support services on an equitable basis?

## Fair and certain funding

The method of determining funding for non-government schools in NSW has not changed for some decades. The percentage share of the NSW education budget allocated to non-government schools has not changed in more than two decades, despite continuing increases in the proportion of these schools as part of the schooling 'mix' in NSW.

Neither has the list of categories changed, which determine a school's relative funding within the pool, despite being based on a resource index (ERI) that has not been in use for more than a decade.

Legislation currently provides that 25% of the equivalent cost of educating a student in a government school is set aside for non-government schools as a whole. As enrolments in this sector grow, the amount available per student shrinks. This works as a structural impediment to the growth of non-government schools and hence limits parental choice. While this may suit the agenda of certain ideologically-driven groups it is not a fair and reasonable basis for a funding policy in 2011.

As a bare minimum, and until any reforms flow from the Gonski process, our submission is that the proportion should grow with enrolments.

We also want to see the ERI method withdrawn, to be replaced by an SES-style 'needs based' index, which should include capacity to pay (income levels of parents), prevailing community capacity (prevailing socio-

economic factors in the school's drawing area), and factors relating to educational advantage/disadvantage (parent education levels, indigenous background, NESB, remoteness, etc).

We are seeking a commitment that in any review of funding in NSW, no school will be disadvantaged.

We have also recently highlighted a number of schools where their state funding is consequently considerably lower than schools serving similar communities, because of the dated and immovable category system. Appeals are either not dealt with, or dealt with at glacial speed. A fair and objective appeals mechanism must be introduced as a matter of urgency and certainly incorporated into any future funding system in NSW.

As you are aware a significant review of funding for all schools is currently underway at a federal level. The Terms of Reference of the Gonski Review are however broad, and not limited to federal funding alone.

It is our submission that funding for non-government schools should be based on the following principles:

- The right of every child to have an education based on the choice of their parents, and for that choice to be supported by public funding. There should be a minimum provision guaranteed for all students.
- Fairness and equity: that choice of a faith-based education should not disadvantage students or their parents through ideologically-driven funding policies.
- Certainty and transparency: funding for non-government schools should be legislated by quadrennium, in advance, to provide certainty and confidence for future development. Ongoing provision of non-government schooling as part of the 'mix' is critical to the overall provision of education services to NSW's children.
- Benchmarked against best practice: related to the cost of providing a quality education, rather than a number calculated on the basis of some (but not all) government school equivalents.
  - Our submission to the Gonski Review is that it should identify an appropriate benchmark for quality educational provision, and then relate all funding to this benchmark. Base funding should relate to that which is required to do a good job, and all schools and sectors should be measured for their efficiency in achieving defined quality educational and social outcomes.
  - The funding basis, once established, should be subjected to automatic indexation annually, in line with genuine movements in cost.
- Funding for individual schools should relate to the benchmark by a needs-based formula that is transparent and takes into account individual capacity to pay, prevailing community capacity (broad socio-economic factors in the school's drawing area), as well as a measurement of educational advantage/disadvantage.

#### **Commitments sought**

1. Will you ensure a funding policy that supports and enables genuine choice?
2. Will you ensure that funding is equitably distributed according to a transparent needs-based formula that incorporates a fair and objective appeals mechanism?
3. Will you guarantee that no school will be worse off [in dollar terms] as a result of any change in funding in NSW?
4. Please provide details of your approach to the Gonski review.

- Please provide details of your plans for the state component of funding for non-government schools.

## New partnerships towards meeting growth needs

Christian school enrolments have been growing at a faster rate than other sectors, and there is a demand for new schools in growth areas. Our model is one of locally-governed, community educational facilities, financed in a partnership between government, parents and churches, with a fee structure that endeavours to be affordable and accessible to local families.

Analysis of the recent MySchool data for recurrent income shows that CSA member schools are effective and efficient in delivering quality educational services.

<b>Funding sources</b>	<b>Catholic</b>	<b>CSA schools</b>	<b>Govt schools</b>	<b>Independent (inc. CSA schools)</b>
Government (state and federal)	\$7,700	\$7,034	\$10,600	\$6,200
Parents: fees and contributions	\$2,600	\$3,493	\$400	\$8,200
Other income	\$600	\$457	\$200	\$900
Less money allocated to capital	-\$900	-\$982	-\$100	-\$1,600
<b>Recurrent income</b>	<b>\$10,000</b>	<b>\$10,002</b>	<b>\$11,170</b>	<b>\$13,700</b>

Source, ACARA. Australia-wide data (NSW breakdown not yet available)

With the projected level of need, 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.

We believe there is great scope for government policy to further encourage this form of educational provision. Capital funding remains the biggest hurdle for the start up of new low-fee independent schools. The state should immediately remove the unfair burden of the special infrastructure levy that applies to non-government, but not government schools, in Western Sydney growth areas. The NSW government also should reinstate the interest subsidy scheme that provided tangible assistance for developing schools.

Beyond these, there is scope to consider new forms of partnership between government and faith-based independent schools such as those we represent, and we would welcome your willingness to hold discussions about future opportunities.

### Commitments sought

- Will you exempt all schools (not just government schools) from the special infrastructure levy?
- Will you reinstate the interest subsidy scheme?
- Will you commit to open inquiry and consultation about new models for partnership between the state and non-government schools to meet the need for current and future school educational provision?

## Ensuring freedom of choice and expression

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. If schools do not have the genuine ability to operate in such a way, there is no real choice.

The existing protections under NSW legislation must be retained, to ensure:

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

The exemptions provided in the NSW Anti-Discrimination Act are a sensible way of ensuring choice based on genuine religious conviction. We believe they should be retained.

### **Commitments sought**

1. Will you commit to retaining the exemptions currently contained in the Anti-Discrimination Act relating to schools operated by religious organisations?
2. Will you commit not to alter the existing accreditation principles that ensure that religious faith-based schools are genuinely able to integrate the beliefs and values of their faith into mainstream classes?

Once again these are not an exhaustive list, but issues of particular importance to our members due to their special character.

Your answers by 16<sup>th</sup> March will allow us to inform our members and their communities of your policies for the next term.

With regards

Stephen O'Doherty

**Chief Executive Officer**