

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

Independent Education Union of Australia

Stakeholder type: Peak Body

Jurisdiction: National

Summary

- The current arrangement perpetuates a funding model based on a pre-determined 'value' of the learning adjustments required, not underpinned by any actual measure of the needs of students
- Unsurprisingly the decision to base funding on an arbitrary percentage of the SRS means that SWD funding is inadequate and student learning needs are not being appropriately resourced and supported.
- The work required of teachers and schools to access the funding is unreasonably invasive into teaching-learning resources and not adequately resourced by the current funding arrangements.
- Access to resources and expert support/intervention is patchy, at best, and clearly students in regional, rural and remote areas are often missing out on entitled support.
- The goals of the Melbourne Declaration will not be delivered or resources made available to address undisputed SWD learning needs if current Federal Ministerial and Federal budgetary positions remain as policy for school funding beyond 2019.
- Review and adjustment of the SWD loadings formulations in the context of the data now available through multiple iterations of the NCCD is critical and essential.

Submission

Questions

- 1 The Independent Education Union of Australia (IEUA) is pleased to have the opportunity to make a submission to the National School Resourcing Board Review of the Loading for Students with Disability.
- 2 The IEUA is the federally registered union that represents workers, including teachers, principals, and school support staff, in Catholic, other faith-based and community independent schools across all the states and territories of Australia. While the majority of members of the IEUA are teachers, the membership of the IEUA also consists of workers engaged as teacher aides, administrative staff, gardeners, cleaners and caterers.
- 3 The union currently has a membership of over 75,000.

Student Needs

- 4 School education research and governmental reports continue to illustrate significant unmet needs in school education and the consequent costs to individual learners and society as a whole.
- 5 This remains an indisputable funding and resourcing shortfall in relation to the support for Students with Disability in Australian schools today.
- 6 The OECD Report into Low Performing Students concluded that helping disadvantaged students was essential for society and the economy.
- 7 OECD Director for Education and Skills, Andreas Schleicher said that: "The social and economic gains from tackling low performance dwarf any conceivable cost of improvement".
- 8 The Review of School Funding Report (December 2011) clearly illustrated the collected evidence of the unmet needs in classrooms across Australia and its recommended model took an approach to recognize and fund the demonstrated disadvantage gaps through targeted and calculated loadings.

- 9 It is clear that the Australian Government continues to 'calculate' the SWD loading as a sharing of the total available recurrent funds on an ad hoc basis rather than related to the actual cost of delivering the learning adjustments identified through the Nationally Consistent Collection of Data (NCCD) basis.
- 10 The quantum of overall funding directed to the students with disability loading is not a reflection of the actual costs of educating a student with disability, but rather derived from the actual expenditure of systems on students with disability at the time the loading was developed with the introduction of the SRS funding arrangements.
- 11 The loading therefore represents a proxy measure of costs rather than a loading based on the real costs of education for these students.
- 12 The loading settings should be based on the actual costs of adjustment for each level of adjustment drawing on best practice. A review of costs based on best practice should, as part of its consideration, examine all costs to a school of providing adjustments for students with disability.
- 13 The move to utilise the NCCD to collect data on students with disability has been important in developing in schools an improved understanding of the requirements of the Disability Discrimination Act 1992 and the Disability Standards for Education 2005.
- 14 Whilst the NCCD is only in its second year as a basis for Australian Government funding, there is considerable historic measurement data available to assist in the formulation of a real cost of "learning adjustments"
- 15 Whilst it will take some further time to be embedded in school culture and practice, it is abundantly clear that teachers (and schools) do not currently receive the necessary support and resources to ensure they can adequately undertake the NCCD requirements.
- 16 A school's SRS entitlement is the total of its base funding and loadings. There is no requirement under the Australian Education Act 2013 that the constituent elements of a school's SRS entitlement be considered separately.
- 17 The IEUA notes that while it is not the intention that a particular loading or portion of a loading be attached to a particular student or that the students with disability loading be allocated separately from the school's overall SRS entitlement, this can be challenging for schools and teachers in managing parental expectations.
- 18 Further, it is evident that schools or systems often need to provide expert advice and assistance or support for 'unfunded' students who have learning adjustment needs not funded under the SWD loading. This simply further illustrates the inadequacy of the current resourcing package.
- 19 Submissions by many parties, including representative organisations and school parents to the parliamentary inquiries into Students with Disability funding arrangements, repeatedly and unequivocally demonstrate the continuing and massive unmet need for these students, their families and their schools in ensuring that every one of these children has access to the highest quality education possible. These needs remain unmet.
- 20 The IEUA also notes that in relation to the 2019 NCCD round IEUA Principal members have observed that the criteria for identifying Extensive Adjustments has been made harder in this round, so this will result in fewer students in that category and fewer dollars and of course less support for those students with greatest needs and most at risk.
- 21 It is also abundantly clear that the significant 'red-tape' and quality assurance required of schools in justifying and evidencing their decisions means that considerable resources are directed away from student learning adjustments to meet the administrative demands.
- 22 Further in about one third of all assessments, the work of teachers and schools in collecting, measuring, making decisions, collating and keeping the data, there is no funding provided for students with a disability. [Education Council – 2017 Data on Students in Australian Schools receiving adjustments for Disability]
- 23 Indeed in almost 80% of instances, despite all the activity undertaken the funding is less than \$100 a week per eligible student, which essentially 'buys' less than 6 days teacher-time for the year.

IEUA Principal Member Observations

- 24 IEUA Principal members have provided their observations and expert advice on the 'Specific Focus Questions' provided in the National School Resourcing Board paper. Their comments are provided in dot point form under each of the focus question headings
- 25 The expert advice of our Principal members indicates some improvement in the available funding, but still too many students missing out on either funding or access to specialist and other resources.
- 26 It is evident that the principal and teacher experts in the schools and classrooms should be given a stronger and more deliberative voice in determining the resourcing needs and processes for their students, and greater respect for professional judgement.

Specific Focus Questions

Is the funding provided under the loading for the top three NCCD levels of adjustment appropriate to support students with disability to access and participate in education on the same basis as other students?

- There remain a high proportion of children who need additional assistance.
- The funding does not cater for children who have come from traumatic backgrounds that affects their wellbeing and behavior.
- There is no counseling support for children suffering from anxiety or trauma.
- Having allocated our NCCD funds to a range of resources, our students with disability are still struggling to access and participate in education on the same basis as other students. We require more resources in order to do this.
- Yes for single disability identification. Not where students have multiple disabilities - we can only apply for the most dominant disability and receive funding via that.
- It would seem the government is changing definitions of each level possibly to ensure more severe disabilities cannot attract the highest level of funding - restriction of professional judgments as to levelling.
- At the lower level students attract a lesser amount of funding which is inadequate for their needs, but means we are in a position to 'fund' assistance more children, though insufficiently.

How does the level of resources required to support a student at each level of adjustment differ?

- Each child's needs are different. Many children require one-to-one adult support that is unable to be accommodated with the competing needs of other children.
- There are limited resources to manage and teach a child who is 'legally blind' and has a cognitive impairment; limited resources to support alternative 'lifestyle' programs, limited resources to access speech pathology needs to address severe language, articulation and pragmatics issues.
- Limited spaces for quiet withdrawal for ASD children and insufficient resources to rectify.
- The way the current model works is that those students who require 'extensive' support are allocated the most resources. However, depending on the type of adjustment being made, the cost can vary regardless of the level of adjustment. For example, the resources required to make an adjustment to a child with a sensory disability at a 'supplementary' level may cost more or require more resources than a student with a social/emotional disability at an extensive level.
- As per the old system you are making do the best with what you are allocated.
- The new model just means you have more money that is available to support a wider group of students.
- Extensive/substantial students draw high levels of funding and this has helped address the gap that previously existed.
- Extensive-adjustment-students require intervention support all of the time (whole school day) in addition to the classroom teacher's current work practices. This remains inadequately resourced and supported.

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

- Our school is not the best context for the needs of children from trauma backgrounds or ASD needs. We have large open learning spaces that can be quite noisy. The resources available do not permit rectification of this constraint.
- The slope of the land and therefore building structure can impact very much so on costs and where a student can be placed within that building structure. Therefore can impact on other students and staff.
- There are clearly economies of scale and so smaller schools can be disadvantaged.
- The school setting or context does impact on the cost of adjustments provided. After consultation with many of my principal colleagues who work in a number of remote areas, they are faced with many challenges such as:
 - access to professional support and training for classroom teachers and Learning Support Officers
 - availability of professionals to provide support on a regular basis
 - the size of the school impacts on staff being able to spread the load of responsibilities and work requirements
- As a small rural community, we struggle with accessing external specialists for our families that can impact on the documentation we have to move students from one level or category to another. Although we aren't as reliant on diagnosis as we were under the previous model it does mean we are sometimes inputting more hence requiring more from the school.

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

- Each stage of learning requires a different approach. All levels of schooling require assistance and access for intervention. Our assessment data indicates that we are not meeting the academic needs of the children.
- The cost is greater from grades 3 and up. Testing and referrals often occur in the early years with support and implementation of programs/interventions and other things needed occurring in the years that follow.
- The resources needed are definitely not covered financially through the NCCD, nor does our regional city have all the resources/experts/programs that we need e.g., psychologists/OT recommending research-based intervention programs that we do not have access to or have the money to purchase.
- Whilst we are proactive in identifying and supporting those students who require extra support and adjustments, (especially in the early years of schooling) our current school context makes it challenging for us to keep up with the demand.
- Those students who don't receive the full support they need in the early years can often develop more significant challenges as they grow, resulting in higher needs in the later years of schooling.
- Multiple disability students who arrived in Foundation/Kindergarten, who required physical adjustments to a school immediately, can continue to require human resource adjustments impact for the whole seven years with only one bucket of money largely expended in the initial period.
- In the early years the ratio of adjustments and supports for the children is far higher than in the senior primary years. In the early years, children are not as independent and require more support, supervision and guidance.
- Early intervention is the best intervention, therefore a considerable amount of resourcing is provided in the early years, ranging from: Speech Pathologists, Psychologists and Occupational Therapists being employed in our schools to meet the ever growing needs of our children.

What costs of supporting students with disability (for example, fixed system costs, costs of collection, assurance and management of the NCCD at a school level) should be factored into the loadings?

- Staffing costs for extra meetings around NCCD, teacher costs for extra time in preparation, monitoring and recording adjustments in (often 10 – 13 pages) of a Learning Plan. Staffing time in attending extra support group meetings (around 50 per term!).
- Time in QA moderation with system employer (about 4 hours).
- Lengthy referral process required by system employer.
- Multi-disciplinary meetings – once per term for two hours (system/employer specialist) with all staff who work with the student.
- A ridiculous amount of time goes into the documentation and administration of the NCCD that isn't currently recognized or compensated and this work should be acknowledged and compensated for.
- Management costs for releasing the NCCD team for moderation activities, the NCCD Leaders then assessing all other proposed students, liaising with employer/system team for further moderation of 'appropriate' numbers adds up to many hours (weeks) of time, training ESOs to document in diaries all activities in incredible detail - distraction from student contact and emphasis on improving learning outcomes. Is a separate school cost - not factored in as a program cost.
- Every school must have a key person released to complete the record keeping as well as providing support to teachers who have increased workload.
- The employment of a Learning Diversity Leader and the provision of ongoing professional development and training.
- Ongoing professional development obligations for teaching staff and Learning Support Officers. (Building capabilities)
- Associated costs with data storage management and data collection practices. (additional hours allocated to staff to upload data)
- The administration load is massive. The staffing and resourcing needing to be allocated to our NCCD collection is huge and is impacted by being a small school that already has less resources when compared to larger schools and therefore poorer economies of scale.
Are there any other factors that impact on the level of resources required to provide adjustments?
- Ongoing difficulties in communication with some families, that means children get overlooked because the parents are hard to commit to supporting us and attending meetings. The children therefore do not have access to assessments, can't be included on NCCD because there is no proof of 'imputed disability' and on it goes.
- Accessibility. Being a rural location, often we are unable to get continual and consistent access to a range of services.
- Foundation/Kindergarten students are not eligible for funding in their first year, as funding is assessed in the year prior. This is ridiculous and unfair to staff and students.
- Schools are increasing the workload of teachers and this must be compensated for via meeting requirements / release time / additional classroom support (Not just more Learning Support Officers)
- Again the availability of professional support to staff in order to deliver a comprehensive curriculum that meets the needs of all children.

Are the Australian government assurance processes, undertaken to support the accuracy of information provided to calculate a school's Australian Government funding entitlement relating to students with disability, appropriate and sufficiently robust and how might they be effectively improved?

- Do the 'Bureaucrats' and heads of organisations actually understand what it is like at the 'coal face', in the classroom, trying to teach the majority of students who fit a mainstream profile, as well as 25% of the class on individual learning plans for those with a disability. This is the challenge and the balance, do all children get the education that they deserve?
- The assurance process should allow for a bit more flexibility and leniency. There is a lot of pressure to get things right and often humanity can be lost in this. Part of being human is making mistakes and we can't always be expected to get it right from the get go. Those implementing the NCCD are educators, not trained bookkeepers and we are doing the best we can with what we know. Whilst we understand the importance of funding for our students with disabilities, the current model of the NCCD is having a negative effect on our roles as educators and is greatly impacting on our core business of teaching and learning.
- Assurance processes are carried out by financial auditors (KPMG) who do not have qualifications or experience in education, learning, program assurance.
- The field officers from the system employer are very important and help ensure consistency across schools in the system.
- There needs to be consistency between what the auditors are assessing. Is it in line with the actual requirements? The suggested evidence required is broad and the processes could be better streamlined.
- There needs to be a shift from collating additional information and data for NCCD to a focus on using data to help improve student outcomes
- I do not feel confident we have been provided with enough information and clarity around the collection process. This is an area that requires much attention from the Australian government. In talking to colleagues the implementation across many school is vastly different and dependent on the active role of the principal. I look forward to seeing how this is addressed in the future.

Any other comment you would like to make?

- Whilst I believe we are much better off under this system, the current level of funding must not only be maintained but measured to ensure student learning needs are met. The improvements to student outcomes will be significant in the future if we can continue to grow the learning of this first year of roll out.
- Good support to teachers in the classroom and the time to plan sound learning must be the focus of school leaders.