

**Responses from Robert Johnston, Executive Officer, AACS to Additional Questions
raised by Senator McKenzie.**

1. What is your opinion of the funding detail in the Bill?
It is almost entirely absent. Even the so-called 'funding framework' which the Bill purports to embody is more a collection of aspirational ideas. There is no detail of proposed distributive mechanisms and values; no detail of funding conditions associated with the NSIP; and no detail of the proportion of funds that would be protected for the non-government sectors.
2. Does it provide certainty for Christian schools?
Far from it. Until the details are much more substantive, AACS could only say that it broadly supports many of the findings of the Gonski Report.
3. What does the Australian Government's modelling show you about the impact of funding for Christian schools?
AACS has only had access to very early modelling based on 2009 and 2010 data. These were very early indicative models and left more questions than answers. We have not seen any modelling since about September last year.
4. Will the Australian Government's model expect parents sending their children to Christian schools to pay more fees?
Potentially. Though the Government has indicated that no school will lose in real terms, it has been silent so far on whether that includes the first year, the transition period, the medium to long term or whether it would constitute a new Funding Guarantee regime. Unless all schools can confidently know that their funding will be annually indexed against a realistic cost for school education, our schools parents will end up paying higher fees – and that within just a few years of the government's original promises.
5. How many of your schools would you expect to increase their fees if the new funding model was brought in?
It is too hard to predict without detailed modelling available. There are simply far too many unknowns and too many variables in the formulae to be applied, all of which are still being adjusted behind closed doors.
6. Would you support the retention of the existing funding model for your schools, either as an interim measure, or permanently?
If the details of a fully funded, sustainable funding model cannot be guaranteed before the 2013 Budget, AACS would favour the extension of the current model for a further 12 months while details are stabilized and certainly for the long-term future firmed up under the scrutiny of all peak bodies and jurisdictions. AACS is very concerned that it will, once again, be rushed into ill-considered, last-minute funding agreements without the opportunity to undertake due diligence and prudential planning.
7. How would you describe the level of consultation your sector had with the government in developing the bill?
What consultation? The only consultation of which we are aware was with the Independent Schools Council of Australia and the National Catholic Education Commission under strict confidentiality agreements. This is totally unsatisfactory as ISCA is unable to speak with confidence on behalf of about 30% of independent non-government schools that do not belong to its membership.
8. Do you think that the Bill recognises the contribution of Christian education providers to Australia over its history?

No. It is the responsibility of Governments to ensure that the provisions under the ICCPR and other similar covenants inform legislative reform. In our view, this should not be taken for granted, especially when it comes to legislation involving choice in schooling that could be compromised by the finer detail of the full Bill which we may not see until it has been tabled in Parliament.

9. How confident are you that right for parents to choose a school will be protected in the Bill?

I don't believe that the Government will be so foolish as to actively remove choice in schooling. However, the fine detail of a Bill is capable of eroding choice by increments and by stealth by virtue of the outworking of legislative mechanics. Until we see this and have opportunity to do our due diligence, we will not fully know the answer to this question.

10. Will the role of systems change under the Bill?

Again, we do not know.

11. How are the needs of low-SES students dealt with in the Bill?

Aspirationally only at this stage and certainly not in the detail of the Bill.

12. Does the Christian school sector support the Australian Government's proposed funding model based on the Gonski review?

The Government's initial response to the Gonski Review in September 2012 certainly had enough in it to encourage our schools to believe that a single, fairer and adequate funding arrangement could come from it. Since that time, our hopes have been somewhat undermined by media releases, leaked figures and significant contributions from well-credentialed researchers and commentators. We would like to think that the promises that came from the Gonski Report would materialise into a much better funding model. We certainly don't think that the potential of the Gonski model should be swept aside by the Coalition. However, we are very concerned that the distributive mechanisms and the quantum of funds will give rise to the same sink holes of waste and ill-considered administrative arrangements.

13. Would you support the retention of the existing funding model for your schools, either as an interim measure, or permanently?

The existing mechanism clearly has serious flaws that must be addressed. It would be a seriously irresponsible outcome to simply retain the status quo. As indicated in our answer to Question 6 above, we would support an interim extension of the present funding model to ensure a thoroughly tested and transparently considered model was on the table before final legislation was drafted. We would not favour a permanent return to the existing model.

14. Would it be accurate to suggest that the Christian sector has had some frustrations with the Australian Government over the negotiations on the Gonski model?

Yes. We have been frustrated with the very limited and secretive negotiations with ISCA and the NCEC that have closed out meaningful dialogue with something like 30 very well-informed and experienced peak bodies. We have made our views known to the Minister, but to no avail.

15. Can you describe in broad terms, as you currently understand it, the expected impact of the Gonski model on different types of Christian schools – primary/secondary/combined and metropolitan/country?

It would be very difficult to generalise or be confident until we have access to the fine detail of the distributive mechanisms that are yet to be written into the Bill. In theory, all our schools should benefit from a fairer and substantive share of the funding for Students with Disabilities. In theory, smaller, isolated schools should receive more appropriate loadings to deal with their disadvantages. In theory, most of our schools

being in low SES locations should receive continued stable funding indexed to reflect real costs in the Education sector. In theory, our remote indigenous schools should be more adequately funded. However, some of these positive impacts will be dependent on parallel policy development that does not see the left hand taking from the right hand – eg Indigenous Boarding allowances for remote students being forced to undertake secondary education away from their homelands. This has been seriously eroded in recent policy decisions of the present Government.

16. What will the impact on Christian schools be if you do not sign up to the new funding model?

This is, as yet, an untested and unknown scenario. It would seem that, in all probability, those schools that do not sign the new agreements will either be destined to remain on current funding arrangements or, worse still, have funding cut altogether. The latter is a definite possibility as current funding agreements are for a defined period that expires at the end of 2013. Schools that face a funding freeze or loss would, in very short time, be forced to close. None of our schools carry large cash reserves.

17. When do you anticipate the last school will come off transition arrangements under this model?

Impossible to know until the detailed modelling is available. Early indications suggest that, for some schools, it could be many years.

18. Do you have a view on how the proposed might be changed to satisfy the Christian sector?

The proposed model only becomes a model when we have the details of the distributive mechanisms, the apportionment of funds to sectors, the transition arrangements, the indexation arrangements, the capital funding details and numerous other variables. It also depends on the conditions that will be imposed under the NSIP. AACCS would hope that, if fairness prevails and the apportionment is appropriate to the size of sectors and the needs of schools and school students in each sector, that not a great deal would need to change. However, if the money is channelled through State bureaucracies without serious accountabilities (as with the National Partnership arrangements), the States will, once again, take financial advantage of this arrangement. States must be very tightly reined in.

19. What arrangements for capital funding are included in the Bill?

Nothing of which I am aware.

20. What comments would the Christian sector have on the level of additional administration of funding model at a system wide and individual school level?

Once again, it is difficult to answer until we see the terms of actual funding agreements and accountability requirements. The acquittal of requirements under the proposed NSIP conditions; the treatment of data collection; the reporting requirements, are all potential areas of added administrative pressure. This would have impacts at a school level and at a system level.

21. How do you view the contents of the National Plan for School Improvement (NPSI) as they are included in this Bill?

Are they not still under discussion and development. We only have the six broad directions of those conditions – not the detail. Until we see the fine print and can assess its implications for operations and costs, it is impossible to form an informed view.

22. Specifically, possible future considerations for the National Plan for School Improvement include provision of students with access to one of 4 Asian languages study, can you comment on the capacity of your members to deliver on the wide

number of announcements made by the government regarding future considerations in terms of cost, administration and autonomy to the Independent school sector

While not antagonistic to this aspiration of the Government, it is not new; it has been extraordinarily difficult to get traction on this idea in the past; it has huge logistical implications in getting it implementation; it has serious resourcing implications, especially for small and isolated schools. We believe all but the most well-resourced schools will struggle to see this implemented beyond the most tokenistic levels. Most Asian languages are very difficult to learn and there are few people trained to teach them. To add to those challenges the goal of making such a language mandatory for all students is a tall order.

23. What will be the implication for staff workload?

In theory, this should not be a serious challenge for most schools. School leaders will inevitably face challenges in realigning priorities and shifting resources around. That's normal in the non-government sector. Much depends on the final shape of requirements for 'quality teaching', 'accountability regimes', etc.

24. In your opinion, has enough money been allocated to ensure implementation?

AACS accepts the fact that this is a six year plan and that the current Government and its successors will need to mount a very careful plan to ensure that the additional \$1b per year is directed to where it can do the most benefit without producing waste and mismanagement. In theory, well apportioned and well directed funding with sensible and meaningful accountabilities should be effective for a very large majority of needy schools. This is, however, a function of State bureaucracies, school leadership, community consultation, research and evidence-based strategies and numerous other variables. AACS believes that a great deal could be accomplished with the proposed allocation over the next 6 years.