

# **THE INEQUITY OF THE COMMONWEALTH'S LEGISLATED UNDERFUNDING OF NON-GOVERNMENT DISTANCE EDUCATION**

**A Submission presented to the  
Senate Select Committee on School Funding**

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## Executive Summary

This submission highlights the chronic underfunding of Australia's least resourced school students – those enrolled in distance education in the non-government sector. This gross educational inequity is entrenched in the *Australian Education Act 2013*, carrying on from where prior legislation left off. The Act caps non-government distance education (NGDE) SRS funding at 35%. There is no justification for this form of legislated educational deprivation.

The submission notes, with reference to the Committee's brief, that:

- non-government distance education (NGDE) students are not funded according to needs-based funding arrangements, despite their needs of appropriate numbers of teachers and educational resourcing (a);
- NGDE Funding distribution is not transparent to practitioners (a)(i);
- this policy creates educational inequity between various types of schools and different categories of students (a)(iv);
- NGDE students and their schools will never attain to the appropriate Schooling Resource Standard under current legislation (a)(v);
- current arrangements do not meet the needs of schools providing NGDE nor the individual needs of their students. In particular they discriminate against and disadvantage NGDE students (1) who are Indigenous, (2) who have disabilities, (3) who live remotely and (4) who are economically disadvantaged (b);
- the Government has not given any indication that it will change this policy (c) and
- the Government has not appropriately, nor equitably responded to multiple approaches, reports and submissions on this matter (e).

As a pioneer and expert in the field of NGDE, I request that the Committee meet with me, so that this shocking educational deprivation, targeting a cohort of 5,000 students, may be understood and redressed appropriately once and for all.

## Brief Historical Background

- Government distance education has been well established in Australian states for around 100 years. It is well funded.
- Non-government distance education (NGDE) is relatively new. It first emerged in the late 1990s and was recognised in Commonwealth law in 2000. Since then, NGDE has been funded by the Commonwealth at the lowest possible level (Harding, 2012a & b).
- The *Australian Education Act 2013* continues this policy of minimalist funding of NGDE students. This policy renders them to be the least-resourced school students in Australia.
- This legislated deprivation of educational funding targeting NGDE students has no pedagogical or sociological justification. It has been arbitrarily assigned to Australia's cohort of NGDE school students.

For further information on the background to NGDE see Appendix 1 *Background to NGDE*. Greater detail is documented in Harding (2012a).

## Terms of Reference Relevant to NGDE Underfunding

### **Term of Reference (a) The implementation of needs-based funding arrangements, from 1 January 2014, for all schools and school systems.**

Section 33 of the *Australian Education Act 2013* imposes a 35% cap on the SRS funding of non-government distance education (NGDE) students. This arbitrarily imposed funding cap can in no way be viewed as a “needs-based funding arrangement”.

In terms of being a “needs-based” funding arrangement, this funding cap has no relation to the educational needs of NGDE schools and students. Further, it is unjustified as it is not mentioned or explained in either the Regulations or the Draft Guide to the Act. This funding cap is unjustifiable, as it has no relation to either

- the educational needs or
- the socioeconomic circumstances

of NGDE students, their schools and their families.

The “funding arrangements” for NGDE students amount to legislated educational deprivation of resources. Section 33(4) of the Act robs the “needs-based” component from NGDE student funding, because it arbitrarily caps these students’ SRS base funding amount at a mere 35% of the available amount. The arbitrary nature of these arrangements excludes NGDE students from the needs-based funding criteria, which are linked to the SES funding determinants. Such an extraordinary policy of underfunding arrangements, which targets a specific student cohort, has no reference to any “needs” of NGDE pedagogy.

This is why the discriminatory references to NGDE in the *Australian Education Act 2013* must be deleted.

For greater detail about the needs of NGDE see

- Appendix 2 *The Needs of NGDE Schools – Teachers*
- Appendix 3 *The Needs of NGDE Schools – Educational Resourcing* and
- Harding (2012a) chapters 4 - 6.

### **Term of Reference (a)(i) Methods of Distribution and Transparency**

#### **Measures**

When NGDE providers received their funding in 2014, there was no clear distinction between the funding of their day school students and NGDE student funding. School principals and their bursars have no way to discern how the funding has been allocated in a day school / distance education split and thus they have no way of determining if it has been accurately determined. The implementation of NGDE's funding is not transparent and this is confusing to NGDE providers.

From the point of view of the distribution methods and transparency of NGDE funding, the current "Better Schools" practices need reform.

### **Term of Reference (a)(iv) The consequential equity of educational opportunity between ... schools and students may be examined in two dimensions, that of school-to-school equity and that of student-to-student equity.**

#### **Term of Reference (a)(iv) – Dimension 1. Equity of Educational Opportunity Between Schools**

The *Australian Education Act 2013* implies that school funding will be allocated to all school students, in an equitable manner, appropriate to the provision of high quality education. The Bill's Preamble states:

"All students in all schools are entitled to an excellent education, allowing each student to reach his or her full potential"

Part 2-Section 9 School funding (b) states that:

"base recurrent funding will be allocated according to a formula that calculates an appropriate amount for every school in recognition of the costs of providing a high quality education;"

For NGDE students and their schools, there is no sense of equity or fairness in the Act. This may be demonstrated by the vast discrepancy between the per-student distance education recurrent funding in the government and non-government sectors.

Students in government schools of distance education are well resourced. Figure 1 indicates from the most recent My School Website reports that in Queensland, government distance education schools were funded between \$13,764 (Brisbane) and \$24,612 (Cairns) per student. However, NGDE students, in that state, were allocated around \$3,361 for the same period. NGDE students were educated on a mere 17% of the averaged government DE per-student funding.

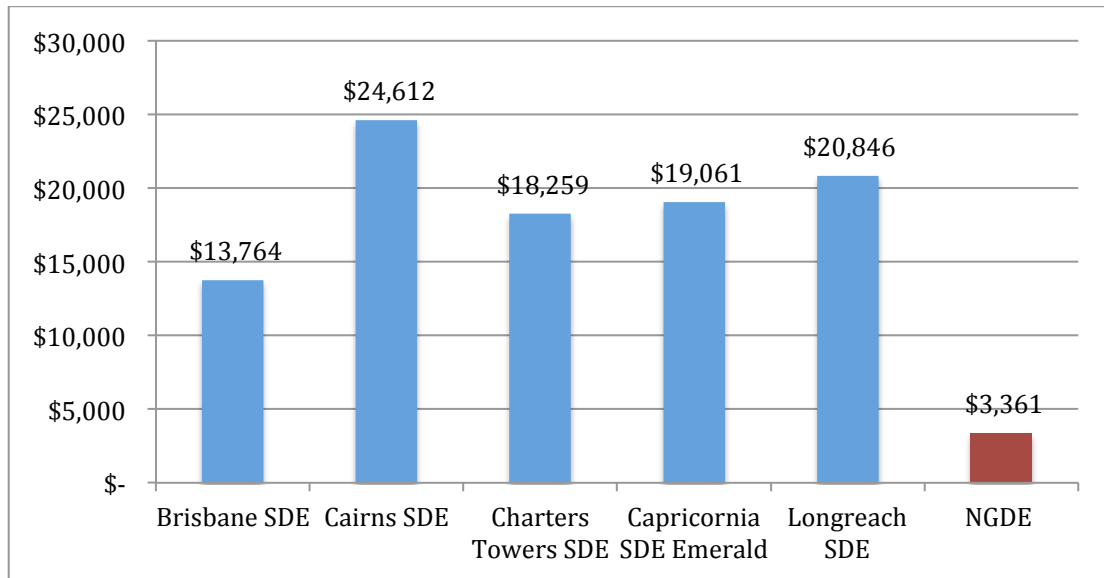


Figure 1. Comparison of Government and Non-Government DE Funding per Student – Queensland

Sources: My School Website and Actual figures from Australian Christian College Moreton DE

Similarly, Figure 2 shows that in Western Australia, government DE students averaged \$30,660 each, whilst the non-government DE students were allocated an average of \$4,002, or 13% of their government school counterparts.

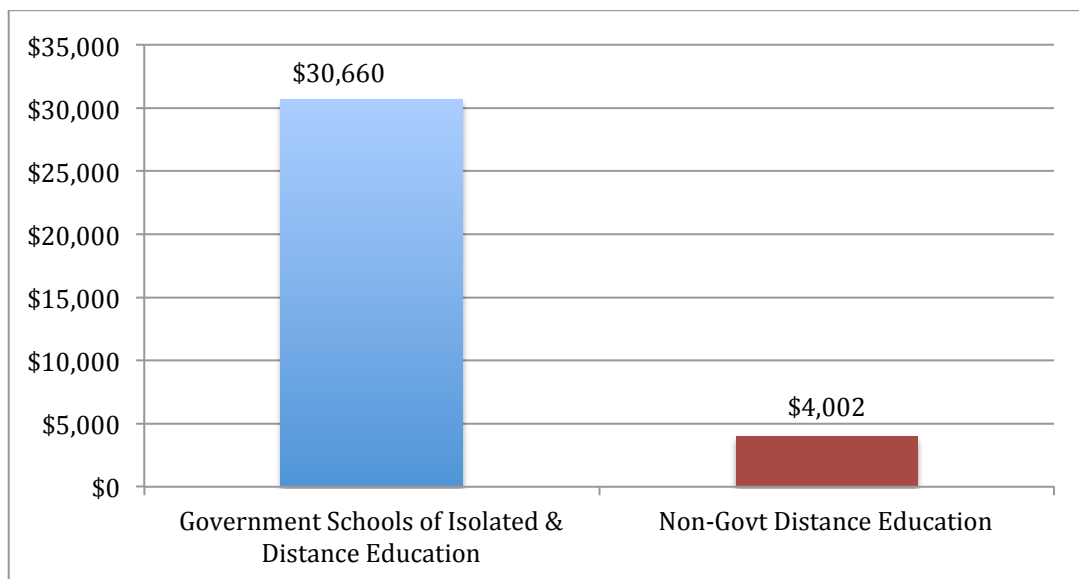


Figure 2. Comparison of Government and Non-Government DE Funding per Student – Western Australia

Sources: My School Website and Actual figures from Australian Christian College Southlands DE

It is clear that when one compares government funding of students in distance education schools in both the government and non-government sectors, there is no “equity of educational opportunity” between these schools, even though they provide the same mode of pedagogy and teach the same state syllabus. The Commonwealth’s *Australian Education Act 2013* entrenches inequity between students who attend NGDE schools in different sectors.

This is why the discriminatory references to NGDE in the *Australian Education Act 2013* must be deleted.

**Term of Reference (a)(iv) – Dimension 2.1 - Equity of Educational Opportunity  
Between Students Enrolled in the Same School**

The Commonwealth's underfunding of NGDE students stands in stark contrast to not only the students who are enrolled in government distance education, but to students who are enrolled in the same non-government school, who attend its on-campus day school (NGDS) classes. Thus students enrolled in the same school are funded at markedly different amounts.

Figure 3 demonstrates the Commonwealth funding discrepancy between on-campus students and distance education students enrolled in the same school, for three schools in three states:

- the Australian Christian College - Moreton in Queensland,
- the Australian Christian College – Marsden Park in New South Wales and
- the Australian Christian College – Southlands in Western Australia.

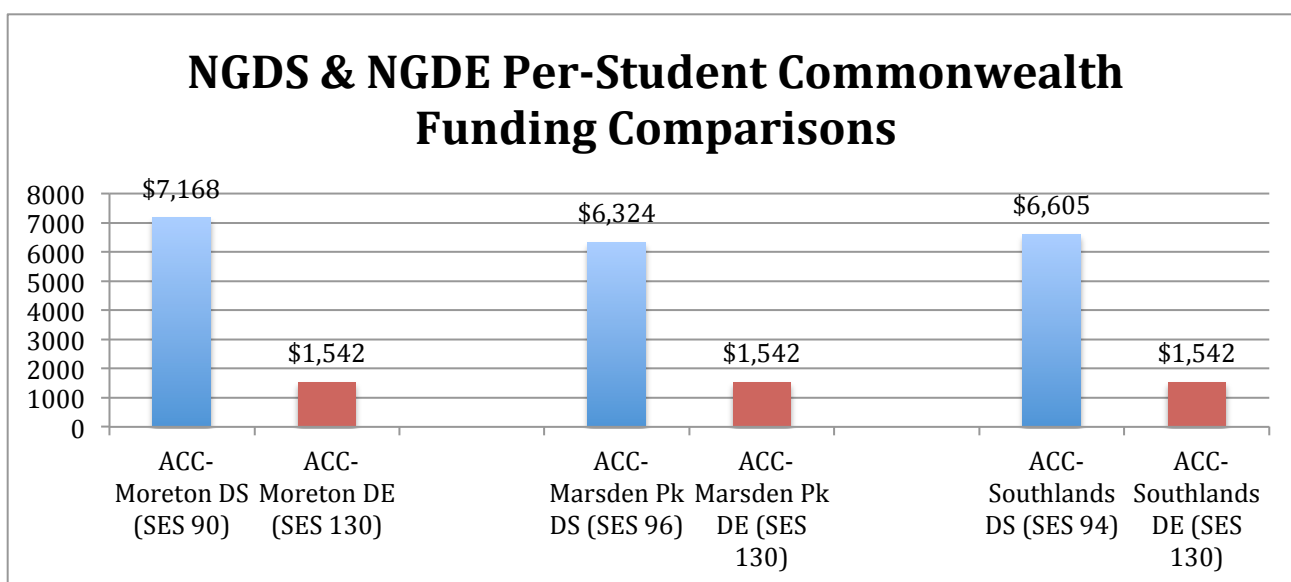


Figure 3 Comparison of 2012 Commonwealth Funding of Non-Government Day School (NGDS) and Non-Government Distance Education (NGDE) Students enrolled in the same school, for 3 Schools in 3 States. Source: The schools' actual financial figures.

It is important to note that in each of the three examples, the students are enrolled in the same school and are engaged in achieving the same academic goals, according to their state educational syllabus requirements.

It is ironic to note, that if a NGDE student transfers to the on-campus day school department of their school, that student's Commonwealth funding allocation will be increased to the on-campus amount after the next student census, and conversely, if a student transfers from the day school department to the distance education department of their school, the funding allocation will be reduced to the NGDE amount.

There is no “equity of educational opportunity” between NGDE students and their day school classmates, who are enrolled in the same school.

This is why the discriminatory references to NGDE in the *Australian Education Act 2013* must be deleted.

**Term of Reference (a)(iv) – Dimension 2.2 - Equity of Educational Opportunity  
Between NGDE Students and Students Enrolled in Australia’s Elite Private Schools**

It is shameful to note that the Commonwealth per-student recurrent funding for Australia’s most elite private schools, is greater than that of NGDE students.

Figure 4 demonstrates that NGDE students are funded at a lower level than students enrolled in some of Australia’s most elite private schools.

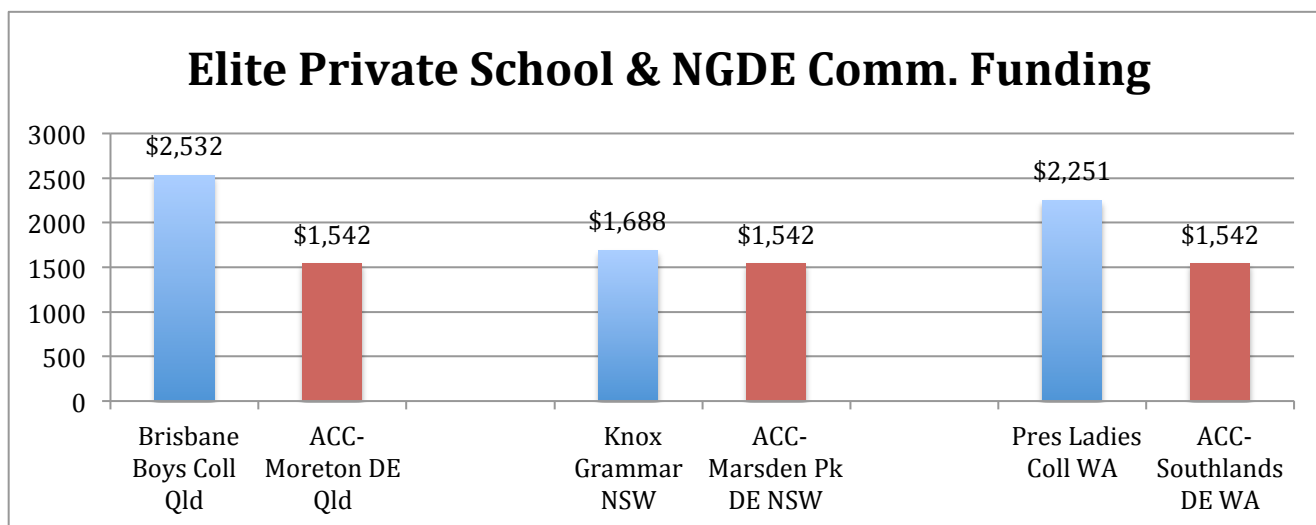


Figure 4. Comparison of 2012 Commonwealth Funding of Students Enrolled in Elite Private Schools and in NGDE in Three States.

Sources: My School Website & Actual figures from Australian Christian Colleges’ DE Departments.

Figure 4 demonstrates that NGDE students receive less Commonwealth support than the students of Australia’s most elite private schools. The key difference between the funding allocations is that the private schools receive their needs-based appropriate funding allocation, because they were included in the SES needs-based funding schedule, whereas, NGDE students were arbitrarily allocated the lowest possible level of funding in the SES system, having been excluded from the needs-based SES determination processes.

There has never been any educational or sociological justification for excluding NGDE from the SES processes, nor for arbitrarily allocating to these students the lowest possible level of funding in Australian schooling. Neither the Act’s Regulations, nor the Draft Guide provide any justification for such educational funding minimisation.

Further, the irony of this funding comparison is that NGDE students come from single-income families, as, by definition, one NGDE parent must refrain from employment in order to facilitate their child’s distance education. NGDE families are neither among Australia’s financial elite, nor are they able to be dual-income

families, yet their children are funded by the Commonwealth, at levels lower than students enrolled in Australia's most elite private schools.

In terms of need, low funding from the Commonwealth implies a low level of need for a student or a school. For NGDE students to be allocated less funding than students in Australia's most elite private schools implies that they and their schools have less need than those elite schools. This is an absurd and cruel outcome of an outrageous Commonwealth policy, as clearly, NGDE does not have less need than Australia's most elite private schools.

There is no "equity of educational opportunity" between NGDE students and students enrolled in Australia's most elite private schools.

This is why the discriminatory references to NGDE in the *Australian Education Act 2013* must be deleted.

**Term of Reference (a)(v) Progress towards the Schooling Resource Standard**

Under the *Australian Education Act 2013*, as it presently stands, NGDE will never achieve their school's Schooling Resource Standard amount.

Section 33 (3) and (4) state that NGDE student SRS recurrent funding must be capped at 35% of the SRS. As mentioned above, there is no justification for such funding deprivation. This legislated funding minimization is a continuation of the minimalist funding of NGDE in prior years.

The 35% cap on recurrent funding is, in effect, equivalent to a Capacity to Contribute percentage (CTC%) of 65%, which according to the schedule in Section 54 of the Act allocates a new pseudo SES score of 122 for primary students and 118 for secondary students.

The hypocrisy of the Act, however, is that it states in Section 54 that the CTC% for NGDE is 0%. A CTC% of zero would only be accurately stated if NGDE was permitted to have the full SRS base funding amount of \$9,271 for primary students and \$12,193 for secondary students as per Section 35 of the Act.

The current Act intentionally precludes NGDE students from ever being advanced towards the Schooling Resource Standard, in the same manner as their traditionally-schooled peers.

This is why the discriminatory references to NGDE in the *Australian Education Act 2013* must be deleted.

**Term of Reference (b) How funding arrangements will meet the needs of all schools and individual students, including Indigenous students, students with disability, small schools, remote schools, students with limited English and students from socially and economically disadvantaged backgrounds.**

In the case of NGDE funding, there is no reference to any form of need, whatsoever. There is no reference to the needs of students or to the needs of NGDE schools. NGDE's funding arrangements are based upon arbitrary decisions,

made by those who are uninitiated to NGDE, which have resulted in the imposition of minimal resourcing to NGDE.

The Act's capping of NGDE's base funding to 35% will not meet the needs of NGDE pedagogy because this funding allocation is in no way aligned with any needs-based mechanism extant in Australian schooling.

Nonetheless, NGDE students, schools and families do have needs.

### **Term of Reference (b) – 1 The Needs of Schools Providing NGDE**

Distance education is a very different mode of education compared to traditional on-campus day schooling. Thus the needs of distance education are vastly different to traditional day schooling. This is true irrespective of whether government or non-government schools provide distance education. Below are the major distinctives of distance education, which schools must provide.

#### **(b) 1.1 The Needs of NGDE Schools - Resourcing**

The provision of distance education involves constructing and maintaining an "at-distance" teaching, learning and administration environment. This includes:

- Creation and maintenance of DE-specific curriculum
- Syllabus compliance
- Educational teaching
- Educational and social activities,
- DE-trained staffing (both academic and administrative)
- DE-infrastructure and protocols (both educational and administrative)
- DE-specific learning management systems
- DE-specific communication systems between (i) teachers, (ii) students, (iii) parents and (iv) school administration, including:
  - Information Communications Technology (ICT)
  - Various electronic and postal communications systems
- State and Commonwealth compliance

Appendix 2 *The Needs of NGDE Schools – Educational Resourcing* and Harding (2012a) provide greater detail of the resourcing needs of NGDE schools.

#### **(b) 1.2 The Needs of NGDE schools - Teachers**

NGDE Schools are unable to provide teacher-to-student ratios comparable to traditional non-government schools or comparable to government distance education schools. Yet they must deal with workloads that are equivalent to, if not greater than classroom teachers.

For example, whilst a classroom teacher can communicate instantly with large groups and receive immediate feedback, much of the distance education teacher's work is done by dealing with individuals on a case-by case basis. One senior history teacher stated that in her day school classes, students handed in assignments directly to her and all at once. However, her distance education students sent them to her drop box, she then downloaded and printed them, (a time consuming exercise in itself) marked them and then responded to each



student. She said that for her, teaching by distance education, whilst very rewarding personally, was very labour intensive.

Limited numbers of teachers in NGDE creates the problematic issues for NGDE schools including:

- NGDE school departments have very high teacher-to-student ratios.
- Thus NGDE teachers have very high workloads and high stress levels.
- Over time, high workloads abnormally intrude into the private lives of NGDE teachers and the stress levels impact their well-being.
- Principals of NGDE schools are restricted in the numbers and quality of experienced staff they can hire.
- NGDE teachers have little opportunity for career advancement and significant salary increases, in a manner similar to that of classroom-based teachers.

It is also important to note that whilst NGDE teachers must have the skills of an ordinary teacher, they must also acquire DE-specific skills, which are not required of classroom teachers. It is true to say that DE teachers are specialists in their field.

Appendix 3 *The Needs of NGDE Schools – Teachers* provides greater detail of the need for more teachers in NGDE schools. Appendix 3 also refers to the problems that underfunding creates for NGDE schools in areas of

- training NGDE teachers,
- ongoing professional development of NGDE teachers,
- career progression of NGDE teachers and
- retention of NGDE teachers.

#### **Term of Reference (b) – 2 The Needs of Individual NGDE Students**

The Commonwealth's policy of underfunding NGDE students creates problems for those students including:

- NGDE students have limited access to teachers.
- NGDE students have limited access to educational resources.

NGDE Students need access to teachers for instruction, guidance, correction, assessment, feedback and encouragement in the same way that students in traditional day schooling need these aspects of teaching and learning. The difference between the two pedagogies is how the teacher-to-student connection is made.

NGDE students have high expectations of their schools and their schooling. Oliver, Osborne and Brady (2009) examined the expectations that high school distance education students have with respect to their distance education courses. They found that these high expectations include, "detailed and interactive content, peer-to-peer collaborative activities and speedy feedback" (Oliver, Osborne, & Brady, 2009, p. 42), all of which require adequate communication tools and resourcing.

Whilst current NGDE practice in Australia connects teachers to students, it is not done at an optimal level, when compared to government distance education resourcing and practices. Current Commonwealth underfunding of NGDE, precludes NGDE students from an optimal experience of DE-appropriate educational practices. Underfunding also limits student access to educational resources.

### **Term of Reference (b) – 3 The Needs of Indigenous NGDE Students**

#### ***The 35% SRS Cap***

Indigenous NGDE students are subject to the 35% cap to the SRS base funding, in the same way that all NGDE students are subject to that funding cap.

#### ***Pre-2014 Funding Discrimination Towards Indigenous NGDE students***

However, there are additional discriminatory aspects, which, in the past have been directed towards Indigenous NGDE students. The Commonwealth's previous Education Act the *Schools Assistance Act 2008* placed Indigenous students at the lowest level of funding, along with all NGDE students. In addition to that underfunding policy, indigenous NGDE students were also precluded from Indigenous Supplementary Assistance (Section 65, *Schools Assistance Act 2008*). This funding deprivation was not directed towards Indigenous students who were enrolled in traditional classroom-based day schooling.

Whilst the post-Gonski funding protocols are still unclear, at the time of writing, given the discriminatory aspect of former Education Acts towards Indigenous NGDE students and the current Act's ongoing discrimination towards all NGDE students, there is no reason to consider that Indigenous NGDE students will be any better off under the new Act, than they were under the former Acts. The new funding arrangements continue and entrench the educational discrimination towards Indigenous NGDE students.

#### ***The Paradox of the Aboriginal and Torres Strait Islander Loading – When a “35% Student” Qualifies for a 100% Loading***

Whilst all full-time NGDE Indigenous students will be subject to the 35% cap on the SRS funding amount, it is paradoxical that NGDE students will attract 100% of the loadings in the “Better Schools” regime.

Thus NGDE Indigenous students are capped at 35% of the SRS funding amount, yet the text of the Act states that they are eligible for 100% of the Aboriginal and Torres Strait Islander loading (Section 33 (4) Note 2; Section 37). Indigenous NGDE students are allocated only 35% of the larger SRS funding amount and 100% of the lesser, loading amount.

In effect, Indigenous NGDE full-time students are deemed by the funding mechanisms to be 35% of a full-time NGDE student and 100% of an Indigenous student, who needs extra funding. This is a ludicrous and contradictory funding atrocity.

**Term of Reference (b) – 4 The Paradox of the Needs of NGDE Students With Disability - When a “35% Student” Qualifies for a 100% Loading**

Whilst all full-time NGDE students with disability will be subject to the 35% cap on the SRS funding amount, it is paradoxical that NGDE students with disability will attract 100% of the loading for students with disability.

Thus NGDE students with disabilities are capped at 35% of the SRS funding amount, yet the text of the Act states that they are eligible for 100% of the loadings in the “Better Schools” regime (See section 33 (4), Note 2). Students with disabilities are allocated only 35% of the larger SRS funding amount and 100% of the lesser, loading amount.

In effect, full-time NGDE students with a disability are deemed by the funding mechanisms to be 35% of a full-time NGDE student and 100% of a student with a disability, who needs extra funding. This is a ludicrous and contradictory funding atrocity. (See sections 33 (4) and 36 of the Act).

**Term of Reference (b) – 5 The Needs of NGDE Students Residing in Remote Locations**

Whilst there is a funding provision in the Act for schools in remote locations, there is no provision for NGDE students residing in remote locations. Prior policy allowed for CAP funding which enabled NGDE students, residing in remote locations to have a teacher visit the student’s home, where possible and for the student to travel to NGDE centres for school camps, Awards Evenings, activity days and workshops etc. Provision for NGDE students who reside remotely, is not included in current legislation.

**Term of Reference (b) – 6 The Needs of Economically Disadvantaged NGDE Students**

***Economic Disadvantage 1. DE Families are Single-Income Families***

NGDE students are, by definition, from single income families (Harding, 2011, 2012). This is because one parent or guardian must forego paid employment in order to facilitate their child’s education, as a home tutor. Thus, these students are generally from a lower socioeconomic status than students who are from dual income families. This is one level of economic disadvantage of NGDE students due to the family’s choice of pedagogy.

***Economic Disadvantage 2. Former SES and Current SRS Underfunding Policy***

The key message of this submission is that NGDE students are severely economically disadvantaged by the Commonwealth’s policy of underfunding them. This disadvantage is legislated and outside of their family’s control. NGDE students are currently economically disadvantaged by Commonwealth policy, irrespective of their family background, SES or ICSEA ranking, before one even considers the traditionally defined, Commonwealth-approved definition of social and economic disadvantage.

### **Economic Disadvantage 3. The Paradox of the Low Socioeconomic Status Student Loading - When a “35% Student” Qualifies for a 100% Loading**

All full-time NGDE students, who are officially defined by the Commonwealth, as socially and economically disadvantaged, will be disadvantaged by the 35% cap on the NGDE SRS funding amount

NGDE students, who meet the Commonwealth’s official definition as socially and or economically disadvantaged are capped at 35% of the SRS funding amount, yet, strangely enough, the text of the Act states that they are eligible for 100% of loadings in the “Better Schools” regime (Section 33(4), Note 2). NGDE students who are defined as having low socioeconomic status are allocated only 35% of the larger SRS funding amount and 100% of the lesser, loading amount.

In effect, full-time NGDE students in social and or economic disadvantage are deemed by the funding mechanisms to be 35% of a full-time NGDE student and 100% of a socioeconomically disadvantaged student, who needs extra funding. This is a ludicrous and contradictory funding atrocity. (See sections 33 (4) and 38 of the Act).

Clearly, NGDE families are at financial disadvantage due to many factors, irrespective of whether they fit the government-defined category of socioeconomic disadvantage as defined in the Act.

For NGDE, the Current funding arrangements do not meet the needs of:

- NGDE schools in terms of appropriate resourcing;
- NGDE schools in terms of appropriate numbers of NGDE teachers and administrative staff;
- Individual NGDE students;
- Indigenous NGDE students;
- NGDE students with disabilities;
- Remotely located NGDE students and
- NGDE students who are socially or economically disadvantaged.

This is why the discriminatory references to NGDE in the *Australian Education Act 2013* must be deleted.

### **Term of Reference (c) The Government’s Proposed Changes to the *Australian Education Act 2013***

I am unaware that the Government has any proposed changes to the Act, which will redress the educational injustice that the Act imposes upon NGDE students and schools.

I despair that the Government intends to maintain this disgracefully undemocratic and unfair policy and that the underfunding of these students will continue unless the Government has the political will to propose fair and just amendments to the Act.

I request that the Government delete any sections or clauses in the Act, which discriminate against or disadvantage NGDE students in any way.

## **Term of Reference (d) The economic impacts of school education policy.**

### **1. Staff Employment**

One economic impact of the Commonwealth's current policy of underfunding NGDE schools is the schools' inability to employ appropriate numbers of teachers, administration and ancillary staff. Because NGDE schools are underfunded, they are understaffed compared with the rest of Australia's schools. Thus, underemployment in the community is one aspect of the collateral damage of Commonwealth underfunding policy.

However, should the Government provide appropriate funding to NGDE, this would immediately enable the 13 schools, which provide NGDE in the states of New South Wales, Queensland, Tasmania and Western Australia, to employ a significant number of new teachers, administration and ancillary staff.

### **2. Savings to the Public Purse**

Distance education delivers tremendous savings to Commonwealth, State and Territorial budgets. For the Commonwealth to provide appropriate recurrent funding for NGDE students, there would be economic benefits despite some up front costs.

#### **2.1 Capital Savings**

Whilst schools of distance education require similar annual recurrent funding to that of traditional schooling (see Figures 5 & 6), they allow for significant savings to the public purse in terms of capital expenditure and infrastructure. Distance education significantly reduces the need for schools to purchase large parcels of land in various localities, to build many buildings on those large parcels of land and to maintain these costly assets.

#### **2.2 Recurrent Savings**

NGDE also produces significant recurrent expenditure savings in that it saves the taxpayer the cost of educating a student in a government school or in a government school of distance education.

Figure 5 demonstrates that the cost to educate a student in government schools of distance education (the darker coloured columns) in Queensland, in 2012 ranged between \$13,764 and \$24,612, whilst the cost to the taxpayer for government on-campus, day schooling (the lighter coloured columns) ranged between \$8,277 and \$20,846.

Current underfunding of NGDE means that in Queensland, NGDE costs the public purse around \$3,361 per student. However, if those students were to be funded equitably, to the same amount as their on-campus day school classmates in the non-government sector, they would only cost around \$7,168. This figure is a significant saving to the public purse when compared to government schooling costs for government distance education and on-campus day schooled students.

Further, should NGDE students return to government schools in Queensland, the treasury would be taxed to a greater extent than if they remained in NGDE which was funded equitably.

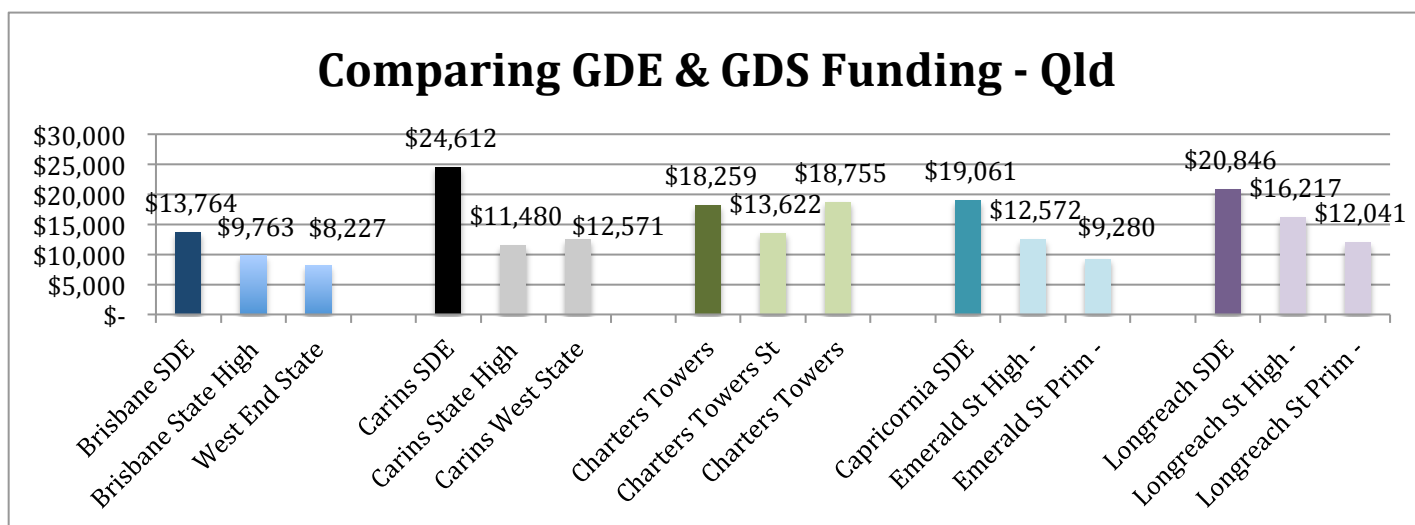


Figure 5. Government Per-Student Distance Education (GDE) and Government Day Schooling (GDS) costs in Queensland, 2012. Source: My School Website.

Figure 6 demonstrates that the average cost to educate a student in government distance education (the dark blue coloured column) in Western Australia, in 2012 was \$30,660, whilst the cost to the taxpayer for government on-campus, day schooling (the lighter coloured columns) ranged between \$9,171 and \$27,649.

Current underfunding of NGDE means that in Western Australia, NGDE costs the public purse around \$4,002 per student. However, if those students were to be funded equitably, to the same amount as their on-campus day school classmates in the non-government sector, they would only cost around \$6,605. This figure is a significant saving to the public purse when compared to government schooling costs for government distance education and on-campus day schooled students.

Further, should NGDE students return to government schools in Western Australia, the treasury would be taxed to a greater extent than if they remained in NGDE which was funded equitably.

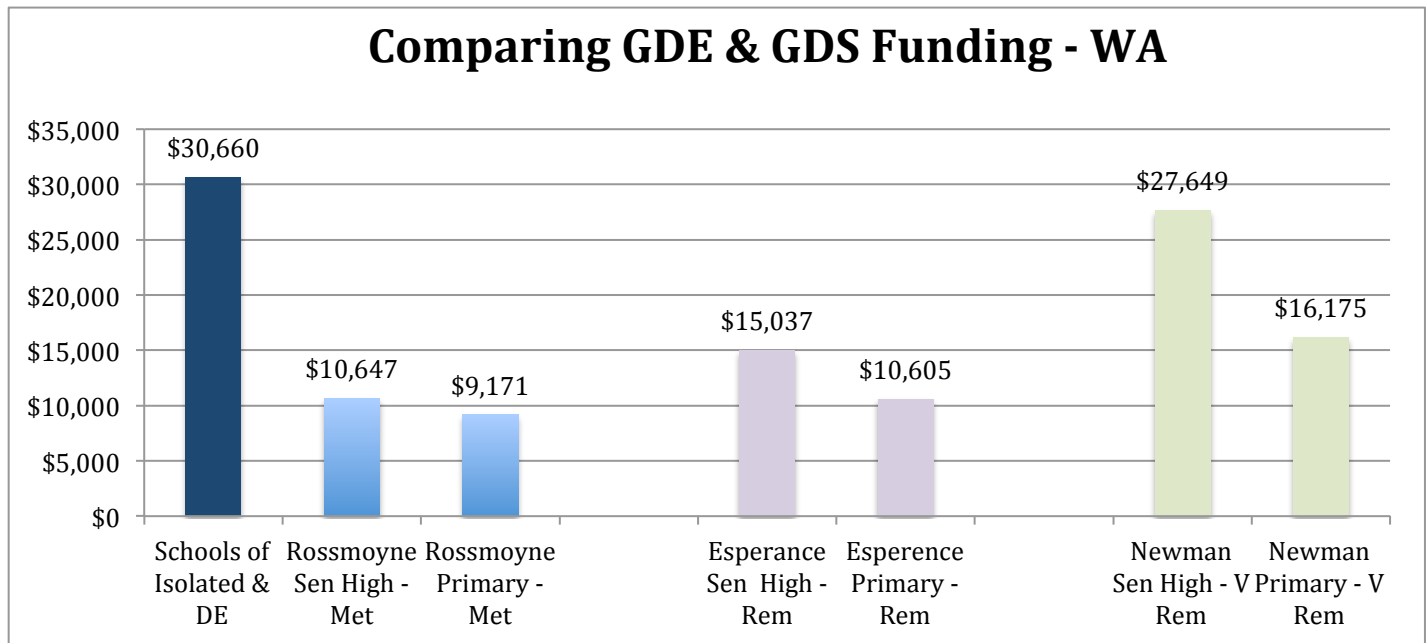


Figure 6. Government Per-Student Distance Education and Government Day Schooling costs in Western Australia, 2012. Source: My School Website.

**Term of Reference (e) The Government’s consideration of expert findings, research, public consultation and reports in the development and implementation of school policy, including the selection of experts to provide advice on educational policy**

The Government has practiced a “no-response” policy to the many requests, consultations, expert findings and reports from the NGDE school community, concerning funding equity for NGDE students. For example, I have communicated with the Commonwealth on this matter on many occasions, since 2003, with little success.

The most discouraging denial to these students, in my experience, occurred during former Minister Garrett’s tenure. I met with the Minister in 2011 requesting that he deal with NGDE students fairly and with equity. The Minister requested that I do a national study of the 13 NGDE-providing schools, so that he would have data to assist his decision-making. I presented the study (Harding, 2012a) a 135 page report, in person to the Minister, in September 2012. The report presented 41 findings regarding NGDE, including details of the Commonwealth’s policy of grossly underfunding NGDE students.

The Minister responded in person and in writing (Personal correspondence, Minister Garrett to T. Harding, 28 November, 2012) by indicating that he had no mind to change the current conditions and that the study provided no evidence for him to do so. The Minister then delivered the ultimate insult to these students in the form of the unjustified and unjustifiable discriminatory references to NGDE underfunding, in the current *Australian Act 2013*.

Thus the government has ignored my submissions to the Minister, Back Bench Education Committees, House Standing committees, Senate Committees, my personal meetings with Ministers and Gonski panelists and various other presentations etc. All these petitions and the petitions of others have mostly fallen on deaf ears and have resulted in the maintaining of the current inequitable status quo.

I would be considered to be a pioneer of NGDE in Australia for the following reasons:

- I have assisted the establishment of NGDE in three states;
- I have been principal of the largest NGDE provider in Australia;
- I have a PhD (QUT), which researched NGDE in Australia and
- I have produced reports for the Federal Minister and a State Minister, at their requests, regarding NGDE.

However, thus far the plight of NGDE still stands.

Further, many NGDE families have written to their local members requesting that the Commonwealth redress this educational underfunding.

Up to this point, there has been no movement on this matter. The political rhetoric has been “full of sound and fury, signifying nothing” (apologies to Shakespeare). It is my hope that this government will bring equity and justice to these students and their school communities.

NGDE has been dealt with by an educational hegemony, which, one must surmise is uninitiated to NGDE, nor does it have an empathetic attitude to the educational needs of NGDE students and their schools.

I request that the Committee invite me to discuss this educational dilemma with them.

## Conclusion

Because NGDE is new to the Australian educational landscape, it is important that governments genuinely recognize and support it as a bona fide pedagogy and that they allow it to develop in its own context. Marsden (1996) argued that distance education ought not to be deemed as an inferior form of education; rather, that an educational hegemony, mostly uninitiated to distance education, ought to seek to understand and support it. As the emerging participant in distance education delivery, NGDE should be nurtured by Australia’s education system, rather than being admitted to it and then starved by underfunding.

The Commonwealth’s policy of underfunding NGDE clearly contradicts its stated educational policies of resourcing students and their schooling, as, for example, is indicated in the *Melbourne Declaration in Education Goals for Young Australians* (MCEETYA, 2008). NGDE funding policy has become an example of a chronic resource inequity legitimised by legislation, which has entrenched a social injustice on the Australian educational landscape.



By depriving NGDE schools and their students equal access to educational resourcing, current policy excludes these students from what is considered to be essential in our society, that is, what former Prime Minister Gillard described as “a fair chance to a great education” (Christenson, 2010). Thus, unlike the rest of twenty-first-century schooling in Australia, NGDE is restricted to a resourcing level comparable to the minimalist funding of non-government schooling in the 1970s. At that time, the Karmel Report (Karmel, 1973) recommended that governments provide adequate levels of funding for all schools in Australia.

Without redress of the current policy, through amendments to the legislation, NGDE learning communities will continue to be subjected to chronic resourcing disadvantage.

Because of the gross inequality and serious nature of this defective funding policy, the broad extent of its reach and the longevity of the problem, community expectations of educational equity and fairness would warrant a short-term expeditious rectification of the problem of the Commonwealth’s underfunding of NGDE.

This Senate Select Committee on School Funding has the opportunity to correct a policy, which is a disgrace to our nation’s educational reputation and our concept of equity and a “fair go”. I request that the committee recommend, in the strongest terms possible, that the discriminatory references to NGDE be removed from the *Australian Education Act 2013*.

As a pioneer, researcher and advocate of NGDE, I am happy to offer my assistance to any process of such a rectification. Further, I request that I be given an opportunity to address the Committee in order to provide further clarification regarding this legislated educational deprivation of a targeted cohort of school students.

## **Appendix 1 Background to NGDE**

### **Background**

Distance education for school-aged students has been well established in Australia's various government school jurisdictions, for nearly a century (Evans, 1995; Sydney Distance Education High School, 2003). However, distance education is a recent addition to the non-government school sector. In the first study (Harding, 2012a) of NGDE in Australia, Harding found that currently, there are at least 13 non-government schools, which provide distance education for their students. These schools are located in the states of New South Wales, Queensland, Tasmania, and Western Australia. The Commonwealth Government's current funding policy for NGDE is the major reason why these students are among the least-resourced and most poorly-funded school students in Australia (Harding, 2012a, b & c).

### **NGDE is bona fide pedagogy**

In spite of this under-resourcing, NGDE is bona fide education. Schools providing NGDE:

- are registered by their state educational authorities;
- comply with normal school registration requirements;
- comply with additional distance education registration requirements;
- employ registered teachers.

Further, NGDE students in NGDE schools

- are enrolled as full time students in state-registered schools and
- study educational programs in accordance with state and Australian syllabus requirements.

Because NGDE is bona fide education, meeting all pedagogical requirements of Australian educational authorities, the Commonwealth's current minimalist funding regime for NGDE is completely unjustifiable.

## **Appendix 2 The Needs of NGDE Schools – Resourcing**

Like government distance education (GDE), NGDE has pedagogical requirements, which are quite distinct from traditional classroom pedagogy. Distance education (DE) in both the government and non-government sectors requires the construction and maintenance of an at-distance learning environment.

Distance education requires:

- DE-specific curriculum design,
- DE-specific curriculum development,
- DE-specific course management
- DE-specific course delivery
- DE-specific educational infrastructure and
- Specialised DE staff-to-student transactions (McFarlane, 2011).

Distance education also requires DE-specific resourcing. Whilst print and postage is a vital part of the delivery of distance education, Information Communications Technologies (ICT) requirements are an integral part of NGDE.

These requirements include:

- Hardware requirements,
- Software requirements,
- Internet connectivity and
- Extensive use of electronic services such as phone and fax.

Harding's research (Harding, 2012a) cited the many tools and resources, which are required to create an optimal NGDE learning environment. NGDE principals and their staff, from the various NGDE providers around Australia cited (in addition to traditional paper-based educational resources) the following electronic means, as part of the NGDE process for communications between the school and its students.

- Phone tutoring
  - Email
  - Teaching chat rooms
  - On-line learning management systems
  - Skype meetings
  - Forum posts
  - Video conferencing
  - On-line tutorial groups
  - On-line individualised teaching
  - Practical applications
  - Fax
  - Blogs
  - On-line interactive white board
  - Student e-Magazine
- (Harding, 2012a, p.66)

NGDE schools also indicated that they communicated with their students and parents by means of the following activities:

- Teacher visits to the student's home
- Parent-mentor visits to the student's home

- Field trips and camps
- Excursions
- Workshops
- Group activity days
- Paper-based newsletters
- On-campus individualised teaching
- On-campus activities
- On-campus tutorial groups
- Residential programs
- Student Councils
- Awards presentation nights
- Non-NGDE school contact teacher for part time NGDE students
- Concerts (Harding, 2012a, p.66)

When the Commonwealth formally recognized NGDE in 2000 in the *States Grants (Primary and Secondary Education Assistance) Act 2000*, ICT pedagogical requirements were much less at the origins of NGDE, than they are today. In order for NGDE students to have modern, appropriate, educational experiences and outcomes, NGDE schools need appropriate funding to enable NGDE teachers to have adequate tools to create and maintain optimal at-distance learning environments.

### **NGDE Course content**

NGDE teachers are required to develop and manage their academic courses on an ongoing basis. Distance education students researched by Oliver, Osborne and Brady (2009) expected the content of their courses to be

- accurate,
- up-to-date,
- regularly revised,
- containing interesting resources, activities, study guides and quizzes.

These distance educated students wanted their content-related experiences to be embedded with interactive features such as games and simulations which illustrate relevance and connection to the working world, utilizing real world, authentic projects. The development of such course content is critical to the creation and maintenance of an optimal distance education learning environment. Such development requires adequate resourcing, which is, to date, denied to NGDE communities, in Australia.

### **The Commonwealth Denies the Needs of NGDE**

The Commonwealth's denial of adequate funding to NGDE, not only denies NGDE students of adequate teacher numbers, it also significantly restricts the tools and resources necessary to maintain an optimal NGDE learning environment.

The Commonwealth's persistence with this policy highlights its refusal to acknowledge the educational requirements of NGDE pedagogy, in the same way that governments acknowledge the educational requirements of distance education in the government sector around Australia.

## Appendix 3 The Needs of NGDE - Teachers

### Funding Means Teachers

The majority of most non-government schools' public funding comes from Commonwealth recurrent per-student funding. The majority of a non-government school's expenditure is directed toward staff salaries. The Commonwealth's minimal investment in NGDE implies that NGDE students do not need teachers, as it denies these students, the most important educational resource - access to teachers.

Independent Schools Queensland (2011) indicated that non-government schools normally spend between 65% and 72% of their recurrent expenditure on staff salaries. This expenditure, for example, allows a "medium range" non-government day school to have a teacher-to-student ratio of 1:16–18 in primary education and 1:11–13 in secondary education (Independent Schools Queensland, 2011). However, because NGDE students are allocated only around 23% of the Commonwealth funding that on-campus students are allocated (Harding, 2012a), it is impossible for non-government schools to provide similar teacher-to-student ratios for their distance education students, as they do for their on-campus day school students.

Similarly, NGDE funding does not enable NGDE schools to employ the same number of teachers per student as are engaged in government distance education (GDE). Thus the pedagogical practices of NGDE are not comparable to that of distance education schools in the government sector. Chilcott and Cornish (2012) reported in Queensland's Courier Mail, that schools, which provide NGDE operate at a teacher-to-student ratio that is more than twice the teacher-to-student ratio experienced in on-campus day schools.

This denial of human resourcing to NGDE students is a clear educational inequity, which must disadvantage these students when compared to their GDE counterparts. Working with such high teacher-to-student ratios can be a limiting factor upon the effectiveness of pedagogical practices in NGDE. This in turn, can limit the educational experience of NGDE students.

Harding's research (Harding, 2012a) demonstrated that the principals of schools, which provide NGDE, were concerned that the Commonwealth's inadequate NGDE funding policy negatively impacted teachers and their teaching in NGDE schools. Principals cited the following direct negative impacts upon teaching:

- NGDE teachers have to work with very large numbers of students,
- NGDE teachers have to work much longer hours,
- NGDE teachers have limited time to communicate with their students and
- NGDE teachers have limited time to deal with their students' academic and administration needs.

Aside from pedagogical considerations, such abnormal teaching requirements place unnecessary stress upon NGDE schools and their staff.

Given that leading educators (Barber & Mourshed, 2007; Dinham, 2007; Hattie, 2003, 2009; Mulford, 2006; Rowe, 2003) insist that good teachers are critical to

good schooling, Commonwealth NGDE funding policy telegraphs the discordant message that NGDE students do not really need teachers, in that it denies NGDE students fair access to teachers. This is an educational anathema and an attribution of status inequality to an entire segment of Australian school students. It follows that such a policy directly hinders children in their realising of their potential in Australian schools, which provide NGDE.

### **Professional development, career progression, selection and retention of teachers**

Both prominent educators (Brock, 2010; Gilbert, Keddie, Lingard, Mills, & Renshaw, 2011) and the Gonski-commissioned research (Deloitte Access Economics, 2011) have stated that appropriate funding plays a key role in the teaching quality of a school. The inappropriate Commonwealth funding of NGDE negatively impacts upon the selection, training, professional development, career progression and retention of teachers in NGDE.

Principals of schools providing NGDE indicated (Harding, 2012a) that inadequate funding negatively impacted the teacher and teaching cultures in their schools. Low funding hindered NGDE schools in:

- attracting high quality teachers,
- rewarding high calibre teaching,
- shaping the allocation of teachers across and within schools and
- increasing teacher quality over time, via professional development.

The Commonwealth's underfunding policy has created a problematic teaching culture for NGDE schools. These schools are compelled to provide NGDE to their students, on low budgets, which in turn, limit their ability to attract and retain highly experienced teachers. It limits the schools' ability to develop their teachers over time, to outline normal pathways for teacher career progression and higher remuneration opportunities for outstanding NGDE teachers.

### **Teacher training**

Distance education teachers need to be trained beyond the training of traditional classroom teachers. Not only do they need to be knowledgeable of traditional pedagogy and course content, Oliver, Osborne and Brady (2009) demonstrated that distance education teachers need to be

- trained and able to teach online,
- able to use an appropriate range of educational tools, specific to distance education,
- able to use specialised at-distance communication skills,
- able to provide timely feedback,
- actively teaching rather than just moderating courses and
- providing individualised instruction to individual students.

There is currently no serious attempt by teacher training institutions to incorporate the above distance education-specific pedagogical skills into traditional tertiary education training. NGDE providers administer this teacher training from within their own schools. Such provision of on-the-job training means that these schools must resource and fund their own teacher training

processes, at their own costs in time and revenue. Again, this means a further financial impost to be born by these schools, which are the least funded.

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