

IEUA
Independent Education Union of Australia

**Submission to the Senate Standing Committee on
Education and Employment**

**Inquiry into the Australian Education Amendment Bill
2017**

May 2017



Introduction

1. The Independent Education Union of Australia (IEUA) is pleased to have the opportunity to make a submission to the Senate Standing Committee on Education and Employment inquiry into the Australian Education Amendment Bill 2017.
2. The IEUA is the federally registered union that represents workers, including teachers, principals, and 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 learning support assistants, administrative staff, gardeners, cleaners and caterers. Additionally, the IEUA represents teachers in Early Childhood Education and post-secondary private education and training.
3. Membership of the IEUA is also diverse in respect to the types of workplaces included in its coverage. These range from very large schools with significant resources to extremely small rural schools with very limited resources. The variety of schools represents great diversity with faith-based and non-denominational schools, including, Catholic schools, Independent schools, Islamic schools, Anglican schools, Jewish schools, Steiner schools, Lutheran schools, Montessori schools, community-based and private early childhood education providers and privately run post-secondary providers. The union currently has approximately 75,000 members.

Commentary

4. The IEUA notes with concern the failure of the Turnbull federal government to consult with stakeholders about the new school funding model being proposed in this legislation; an inadequate timeframe for inquiry submissions; the absence of terms of reference for the inquiry; and the failure of the federal government to provide data, modelling, and modelling assumptions to stakeholders to be able to examine the model in appropriate detail.
5. The funding model proposed in this legislation is not a 'needs-based' model and is not a further iteration of the model proposed by the Gonski Review panel. The model fails to measure and fund actual need, but simply to distribute the arbitrary 'bucket' on a relative needs basis. It abandons the calculation of the necessary resources to meet the attainment of measured learning needs of all students.
6. The Turnbull government's funding bucket, though clearly increasing over the decade, is \$22 billion less than schools had reasonably expected over this next decade under the current funding Act and promises.

7. The proposed model has entirely abandoned the programmed and contractual entitlements to the “additionality” funding that is a feature of the current funding arrangements for the years 2018-2019, which essentially means that the commitment to meet the base element of the Schooling Resource Standard has been surrendered.
8. The immediate negative funding changes to ACT Catholic systemic schools is fundamentally unfair given the failure of government to consult and provide adequate notice of change and clear and sustainable transition provisions. An adequate transition package will be essential and it is unclear as to whether the announcement in this regard is in any way adequate, as again there is insufficient data provided in conjunction with the legislation process.
9. The model’s failings:
 - a. First, the model does not actually measure and fund the real cost of providing an education system as proposed in the Gonski review. There will be no genuine base element to the Schooling Resource Standard (SRS) that will continue to provide a reasonable measure of the cost of meeting schooling resource needs.
 - b. Second, the indexation rates proposed do not and will not reflect the historic and actual increased costs in the education sector.
 - c. Third, the model has failed to provide a review of the socio-economic status (SES) measure used to underpin the funding, as was required in the current school funding Act. The Gonski review panel also highlighted the shortcomings of the SES measure, noting that further work to improve such a measure should be undertaken. Consequently the SES distribution process remains unreliable.
 - d. Fourth, schools will not reach the funding benchmark proposed in the current Act, certainly not by 2019 and for virtually no schools over the decade. The ‘additionality’ mechanisms of the current Act, intended to move funding for all schools to 95% of the SRS benchmark by 2019, have been abandoned.
10. In addition to these failings, the IEUA is extremely concerned about the Turnbull government’s stated intention to “tie” school funding to particular policy decisions of the government without any knowledge of the detail of these requirements and to be determined by a review panel conducted by a merchant banker that is not due to report until December of this year. It seems unconscionable that schools and systems will be required to sign on to funding contracts in the absence of detail about the ‘tied’ conditions. These tied conditions will impact on the work of our members in schools, invariably leading to additional workload and further distraction from the core business of schools as more red-tape accountability measures are added.

11. The government's pre-election school education policy and the budget paper documentation suggest that this will include 'performance pay' models, including measurement of student outcomes. The IEUA points to many failed overseas experiments in relation to this approach in school education.
12. The IEUA also notes that the indexation proposals, which not only fail the test of attaining an actual base Schooling Resource Standard that reflects actual resourcing needs by 2019, are significantly less than the indexation rates in the current Act and will involve an arbitrary construct post 2020, involving a calculation based on the Consumer Price and Wage Price indices. These figures do not adequately reflect costs in education and certainly provide no capacity to meet current and emerging needs, including those unmet needs clearly identified by the Gonski review panel such as; students with disabilities, Indigenous students, rural and remote students.
13. We note also the Turnbull government's unilateral decision to use the data from the Nationally Consistent Collection of Data (NCCD) about students with disabilities to determine the SWD loading despite ongoing and grave concerns of employer stakeholders about the alleged reliability of this data. Further, we note the Department of Education and Training review of NCCD undertaken by Pricewaterhouse Coopers Consulting in 2016 that found that they were unable to recommend with statistical confidence reliability of data for utilisation at the school level for purposes such as per student funding.
14. The IEUA notes with considerable concern that it is unclear in unilaterally adopting the NCCD whether there will be actual calculation and therefore resourcing of actual learning adjustment needs as a consequence of this decision or whether it is simply intended to 're-distribute' existing loading funds. If the latter is the case, it is already clear that there is a significant shortfall of funding and resources for these students and a simple re-distribution process will not meet need and would be a further example of this model's failure to be described as 'needs-based'.
15. The IEUA notes that the provision to set a floor of 3% indexation post 2020, while minimising the significant dangers and negative outcomes of the consumer price/wages price index approach, will still unreasonably limit the capacity of the education professionals to improve wages and conditions and to improve the teaching-learning for students.
16. The IEUA notes the failure of the legislation to require States and Territories to maintain their current effort and to realise the expectations of the Gonski Review panel in meeting an equitable co-commitment. Instead, the legislation only requires States and Territories to maintain funding at 2017 levels. This is an inappropriate and inadequate provision.

17. The IEUA is concerned that the legislation for the new funding model appears to abandon the 'in principle' commitment to adequate funding to meet the challenges and resource implications of "Closing the Gap" for indigenous students and their communities.
18. The IEUA notes that, unlike the Gonski review panel's work, there has been no engagement of the profession by the Minister in the development of the new funding model.
19. It is the IEUA's view that the proposed model is NOT Gonski 2.0. Fundamentally it fails to meet the principles of the Gonski review panel and fails to meet the challenges of today's school education environment. It also fails to meet the Union's core funding principles: a benchmark standard that measures actual costs; public transparency; equity (needs-based); indexation that reflects costs in education; and certainty, as outlined in the IEUA's School Funding policy.
20. The government's claim to end the 'school funding wars' has manifested itself as a 'war on schools through funding'. Education professionals and our students expect and deserve better.

Chris Watt
Federal Secretary
Independent Education Union of Australia
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