



Isolated Children's Parents' Association of Australia (Inc)

Federal Council

Discussion Paper

for the

Reform of Federation

White Paper

Roles and Responsibilities in Education

Parts A & B

March 2015

Part A:

Child Care and Early Childhood Learning and Schooling

The Isolated Children's Parents' Association (ICPA Aust) has more than forty years' experience of lobbying on behalf of families living in rural and remote Australia, with representation at both Federal and State levels. Our organisation is well positioned to contribute to the discussion (from a user's point of view) on how the current split of roles and responsibilities, and the overlap and duplication inherent in them, is contributing to pressure on the effectiveness of our education systems to address the needs of students being educated in rural and remote locations.

ICPA agrees with the notion that not all of the pressures on child care, early learning, schooling and tertiary education can be attributed to the allocation of roles and responsibilities between levels of governments. Some pressures arise from how jurisdictions exercise their responsibilities and can be resolved by individual governments taking greater responsibility, particularly when rolling out national programs. However, clarifying roles and responsibilities between governments will free up resources to tackle these issues and will make it easier for the community to hold the right level of government to account; ensuring anomalies are resolved without delay.

Remote and isolated locations in Australia provide the greatest challenges for improving provision of education options and pathways for children and families. These challenges are often compounded when considering the needs and aspirations of Indigenous communities, especially those which adhere to traditional cultures and lifestyles. Students living in rural and remote locations are educated in small rural schools or take part in distance education programs on isolated stations for their primary school years. The majority of these students will board away from home in hostels and boarding schools for their secondary schooling.

While all Australian governments recognise the social and economic benefits of a high quality and equitable school education system, ICPA continues to devote an enormous amount of volunteer hours holding relevant governments to account to address inequities. Despite many national programs having been rolled out over recent years, the disparity in educational outcomes for rural and remote students continues to lag behind urban students. Much of this can be attributed to many programs not reaching locations where the programs are costly to administer and jurisdictions not providing additional funding to ensure program objectives are met. Poor communication issues also impact greatly on what is available to students, however ICPA anticipates that this will be less of an issue in the future.

Improving the educational outcomes for rural and remote students requires a national approach that ensures educational delivery of a consistent, high standard no matter where the education is provided. The financial cost to families educating children in rural and remote locations continues to rise and can be attributed to many leaving these areas. There is a strong need for rural and remote education to be placed on a separate register when delivering and funding education for these students.

Looking at the education sector through this lens, ICPA would identify the following as some of the major problems with the current arrangements:

- Accessing affordable child care and early childhood learning that allows flexibility to meet the needs of families.
- High costs to families who have no choice other than distance education for schooling.

- Insufficient funding for the roll out of the delivery of national programs in rural and remote locations.
- Difficulties accessing appropriate education and the unsustainable costs associated with accessing secondary education.
- Limited and costly access to pathways for accessing tertiary study.

CHILD CARE & EARLY CHILDHOOD LEARNING

1.4 Questions for consideration

Accountability

To hold governments to account, members of the public must be able to: (1) identify which government is responsible; (2) access information about government performance; and (3) influence government behaviour.

Overlapping Commonwealth and State and Territory roles (and changing policy emphasis over time) risk obscuring which level of government is ultimately accountable for child care and early learning, especially preschool education.

Questions for discussion

- Does the current allocation of roles and responsibilities between governments provide certainty about which level of government is accountable for child care and early learning? If not, how can this be remedied?
- Does the community have sufficient information to hold governments accountable for outcomes? If not, what changes are needed?

The national focus on child care and early childhood learning in recent years has brought with it many concerns from our members (parents), when it comes to identifying who is accountable for policy decisions, program funding, reporting etc. Different terminology used throughout the country is very confusing when attempting to identify which level of government is responsible for the area of interest or concern. In rural and remote areas identifying which government is responsible may be complicated even further due to Commonwealth funded programs being introduced to address disadvantage.

While a number of jurisdictions have very few issues when it comes to accountability, others struggle with being held accountable for the role they are responsible for in delivering early learning education and engage in buck-passing rather than dealing with issues. This is concerning when all too often these small windows of opportunity to ensure our little ones are prepared for the next stage in education, are lost.

ICPA can see some benefit in the Productivity Commissions draft recommendation (7.9), which suggests including a transition to the provision of preschool at no cost to parents, in dedicated preschools attached to public primary schools. This could work particularly well in small or isolated communities where no services exist to provide a four year old program for the transition to formal schooling, where a school is the sole provider of education.

ICPA considers dedicated preschools a positive step that could reduce unnecessary duplication of many regulations between the National Quality Framework and the State/Territory regulations. While a number of states have addressed this issue and deliver the 4 year old programs in schools, ICPA NSW has identified a number of remote towns which have no programs at all, despite there being vacant facilities at schools. It is claimed this is due to not meeting the NQF requirements.

Subsidiarity

The principle of subsidiarity means responsibility should sit with the lowest level of government practicable. Lower tiers of government usually have the strongest capacity to respond to the specific needs of their constituency. However, subsidiarity is not always inconsistent with Commonwealth involvement. For example, due to economies of scale and equity considerations, the Commonwealth may be the lowest level of government capable of subsidising child care by making payments to families.

Questions for discussion

- Do current arrangements provide sufficient flexibility for States and Territories to meet local needs? Has the overlap of Commonwealth and State and Territory responsibilities hindered this?
- Which level of government, if any, should be responsible for responding to market failure in the child care and early learning sector?

As a national organisation, concerns seem to be concentrated in a few jurisdictions when it comes to issues about the flexibility to meet local needs. ICPA would suggest that the overlap of responsibilities is not the main problem but rather the lines being blurred between responsibilities, particularly in locations where the market fails to meet the needs of small and/or isolated communities.

The In Home Care scheme is the main provider for child care for families living in the more remote regions of Australia. The limitations placed on this scheme by the Commonwealth in meeting the needs of families are causing concerns throughout the country. ICPA suggests that this is due to insufficient flexibility within the scheme rather than any overlap of Commonwealth and State and Territory responsibility.

The current design of the Budget Based Funding Program allocates funding to services which deliver flexible early childhood education and care services where the market fails to meet local needs. No funding however is available for rural and remote families who have to supply a schoolroom and appropriate consumables for their child's education by which to deliver an early childhood program via distance education. The Assistance for Isolated Children Scheme, Distance Education Allowance (a Federal Government allowance), does not extend to this cohort. Rural and remote children who cannot access mainstream services do not choose to do distance education; it is the only education available to them.

While local authorities are best placed to identify areas of market failure, the Commonwealth should be responsible for responding in order to address equity issues and provide the additional funding necessary to fully implement the service.

National Interest

The provision of high quality child care and early learning services is in Australia's national interest. Sometimes the national interest is served through collaboration between governments. Smaller jurisdictions in particular can benefit from cooperative policies, actions and investments. However, this does not necessarily imply that Commonwealth leadership or involvement, or national uniformity, is required. There is an argument that Commonwealth involvement should be limited to where it would engender significant efficiency gains, or where there are extensive spill-overs into other areas of Commonwealth responsibility. For example, the most significant consequence of effective early learning is school readiness, with schooling being a State and Territory responsibility.

Questions for discussion

- Is there a national interest rationale for continued Commonwealth involvement in child care and early learning? If so, in which roles and how should those roles be determined?
- How can national interest goals be pursued without undermining State and Territory responsibilities?
- In what areas, if any, do the benefits of national consistency outweigh the benefits of jurisdictional diversity?

It is in the national interest to ensure that high quality child care and early learning services are accessible no matter where children live. Providing these services can be challenging and expensive in small rural and remote communities, but must be addressed. ICPA would suggest that a collaborative approach is vital to ensure every family is able to access child care and early learning services.

Equity, efficiency and effectiveness of service delivery, with a focus on regions

Cooperation between governments has led to improvements in child care and early learning, and efficiencies in harmonising regulatory regimes. The establishment of the NQF is an example of this. However, ongoing shared roles can lead to reduced equity, efficiency and effectiveness of service delivery. For example, the overlap between the NQF and Commonwealth oversight for the purpose of child care fee assistance may act counter to the efficient delivery of services. Child care services are required to obtain approval from the Commonwealth in addition to the State or Territory. These services are also required to report to both levels of government.

Questions for discussion

- What changes could be made to roles and responsibilities that might improve the equity, efficiency and effectiveness of child care and early learning service delivery for children, families and providers?
- Are there changes that could be made to roles and responsibilities to improve outcomes for vulnerable or disadvantaged children?

Providing access to quality early childhood education for all children including the equitable participation by rural and remote children, should be a priority of every government.

While many schemes and programs have been introduced over recent years to address the needs of disadvantaged children within a community, the needs of those living beyond a community must also be addressed. In order to efficiently and effectively meet the needs of these children inequity issues must be understood. These children are not considered vulnerable or impacted by extreme levels of poverty. Rather, due to isolation from services, their families are expected to cover out of pocket costs not experienced by urban families.

All States and Territories offer early learning programs delivered by distance education. This is the only avenue available for many families living in rural and remote areas to access any early childhood program. Families wanting to access these programs are bearing the costs associated with administering and teaching the daily lessons. Recognition of the issues surrounding an early learning distance education delivered program for four-year-olds, is essential.

Presently the Distance Education Allowance within the Assistance for Isolated Children Scheme (AIC) assists with both the set up and ongoing costs pertaining to the schoolroom as well as enabling access to school activities conducted away from the home schoolroom. Currently, the AIC Scheme does not recognise as eligible for payment, enrolled students undertaking a distance education program for four year olds. The costs associated with setting up, maintaining and resourcing a schoolroom for delivering an early childhood program are the same as those encountered in delivering a distance education program for the formal schooling years. Financial assistance is essential to ensure distance education early learning programs for approximately 280 children throughout Australia, are affordable.

ICPA (Aust) supported the Productivity Commissions Draft recommendation 7.10. ICPA policy supports the introduction of a single, nationally recognised 'working with children check'. This recommendation would assist those working across state boundaries in child related work areas. We have been promoting this for many years as it is detrimental to people working and volunteering across state borders to require several checks. This is time consuming, costly and unproductive in an already stressed system. Streamlining this process across Australia would make sense for already time poor families.

Fiscal Sustainability

Public investment in child care and early learning has grown substantially in recent decades. Total government expenditure has increased by around 80 per cent since 2007-08.¹ It is expected to continue to increase as demand for child care services grows. At the same time, child care fees have risen and accessibility remains a concern. The use of fixed-term NPs for child care and early learning initiatives has created uncertainty for States and Territories, providers and families. It has been suggested that this uncertainty prohibits long-term planning and deters investment.²

Questions for discussion

- How can all governments ensure expenditure on child care and early learning is sustainable?
- What responsibilities should families have in contributing to the costs of child care and early learning, in addition to contributions made through the tax system?

While some of the responsibility for child care and early learning should rest with the family, the out of pocket costs must not hinder them from accessing those services. Due consideration must be afforded to the additional costs to families in rural and remote regions. Child care and early learning access costs incurred by families living in rural and remote Australia should be at no greater rate than for those accessing these same services in metropolitan areas.

SCHOOLING

2.4 Questions for consideration

Accountability

Both levels of government now work together on schooling. However, if shared roles are not combined with clear accountability there is a risk of public confusion about who is responsible for outcomes, and ongoing blame games between governments. The former COAG Reform Council (CRC) noted that, as more education related NPs were introduced between 2008 and 2013, it became less clear which level of government was accountable for outcomes.³

Accountability should not, however, result in unnecessary red-tape. Duplication in administrative and reporting requirements can detract from effective achievement of school education outcomes. For example, some duplication occurs in the non-government schools' financial reporting to state and Commonwealth departments.

Questions for discussion

- Does the current split of roles and responsibilities result in uncertainty about which level of government is accountable for schooling outcomes? If so, can this be remedied?
- What measures are needed to ensure the public can assess delivery of school education and hold the appropriate level of government accountable?

ICPA suggests that the current spilt of roles and responsibilities for schooling are well established and parents have a good understanding about what they encompass. However, for many families living in or near small rural and isolated communities, identifying the relevant authority responsibilities is often complicated by the introduction of programs that focus on specific vulnerable cohorts in order to address the needs of communities with high indigenous populations as outlined on page 30, Part A.

Focus on vulnerable cohorts and youth transitions: all governments have a genuine interest in assisting vulnerable students. This means both levels of government make and deliver policies for the same cohort of students independently of each other. For example, 'inside the gate' services for Indigenous students (including broader responsibility for school attendance) are the responsibility of States and Territories. However, the Commonwealth has become increasingly involved in services delivered 'outside the school gate', particularly in relation to attendance (such as the School Enrolment and Attendance Measure and the Remote Schools Attendance Strategy). Although most of the work for vulnerable cohorts is done in partnership between the States and Territories and Commonwealth, there have been instances where national policies

and agreements are perceived as being too prescriptive to genuinely complement activity by the States or Territories, or have adopted a 'one-size-fits-all' approach, rather than allow for jurisdictional differences. Similarly, while States and Territories are responsible for schooling, the Commonwealth is responsible for employment and welfare programmes, higher education and national job markets. These junctures between governments lead to different programmes being developed by different levels of government that focus on only one end of the student experience.

The Assistance for Isolated Children Scheme: an allowance introduced more than thirty years ago to assist families with boarding students away from home during the secondary years and contributes to the cost of providing distance education programs for those needing to undertake their schooling at home, is as vital today as it was when introduced. Currently however, convincing either State or Federal governments that funding must address the changing needs of the modern family is proving most difficult due it being a federally funded allowance to families to address the costs of State delivered education programs.

The responsibility for the allowance has recently been relocated from the Department of Education to the Department of Social Services, which only adds uncertainty when holding the relevant authority to account.

One of the key factors cited, particularly by professional people, for relocating from rural and remote communities is the lack of affordable education opportunities for children. Our organisation believes measures are needed to ensure families can access an education that meets their children's needs when a community is impacted by a lack of appropriate education on offer. The process of accessing assistance must be clear and predictable in order to avoid the blame game taking place between tiers of governments in communities that support bypassing of the local high school. This again supports the need for a focus on rural and remote education that considers the needs of all students being educated in these locations.

Subsidiarity

The constitutional responsibility of States and Territories for schools and schooling outcomes aligns with the principle of subsidiarity — that is, as far as practical responsibility rests with the level of government closest to the delivery of the service. The Commonwealth has a significant funding role (including its direct funding relationship with non-government systems and independent schools) even though the costs of delivering schooling outcomes are primarily driven by decisions outside of the Commonwealth's influence; for example, reductions in class sizes and negotiations of state-based teacher awards. Although this investment is generally welcomed, States and Territories have argued that conditions or requirements attached to Commonwealth funding constrain their ability to focus on their own priority areas.⁴ Similarly, the States and Territories have argued that, while the Commonwealth has played a catalytic role in some successful national reforms, such as curriculum, national assessment, public reporting, and teacher quality, these reforms could, and should, be driven by them, rather than the Commonwealth.⁵

Questions for discussion

- What benefits, or costs, would arise from assigning full responsibility for school education to the States and Territories?
- If responsibility for school education continues to be shared, what roles should be assigned to which level of government? What roles are truly national and assigned to the Commonwealth?
- In the areas where there is a national approach, is there sufficient flexibility to allow for States and Territories and the non-government sectors to adapt to local conditions and develop innovative approaches?

Our organisation would have concerns if the responsibility for school education did not continue to be shared. While all Australian governments recognise the social and economic benefits of a high quality and equitable school education system, ICPA continues to devote an enormous amount of volunteer hours holding relevant governments to account to address inequities. Despite many national programs having been rolled out over recent years, the educational outcomes for rural and remote students continue to lag behind those of urban students. This can be attributed in the main to many programs not reaching locations where they are costly to administer and jurisdictions not providing additional funding to ensure these program objectives are met. For this reason ICPA (Aust) suggests the need for all levels of government to be involved.

As mentioned in our response to the accountability question, the costs to families not able to access relatively free face to face public education from their home on a daily basis, should also be considered when talking about what the costs to government might be regarding policy changes.

ICPA suggests that in the areas where there is a national approach, there is sufficient flexibility to allow for States and Territories and the non-government sectors to adapt to local conditions and develop innovative approaches. A more fitting question may be: do governments want to work within the flexibilities available to adapt to the needs of local conditions or are they aiming to sidestep responsibilities often for political gain?

National Interest

In general, the national interest will be best served through subsidiarity (discussed above). However, in some cases, economies of scale or spill over effects (where the actions of one government have a disproportionate impact on other governments), or if a necessary function cannot occur unless the Commonwealth does it, could mean it is better to adopt a centralised approach. For example, the Commonwealth has a legitimate interest in the outcomes of school education as there are spill over effects on national productivity and welfare and employment settings which the Commonwealth is responsible for funding. Also, a national curriculum makes moving interstate easier for families, and consistency in Year 12 credentials is likely to deliver some benefits for university entry and national employers who may be comparing potential workers from across the country. The difficulty is assessing the extent of this role and the nature of the Commonwealth's involvement, if any.

While national harmonised approaches can sometimes be more appropriate, efficient and helpful to smaller jurisdictions, they may come at the expense of diversity and competition. The national interest is not the specific remit of the Commonwealth. States and Territories can, and do, work

together in the national interest — neither the Commonwealth’s involvement, nor the participation of all jurisdictions, are necessarily pre-requisites for this. For example, in considering the national education agencies or some of the national architecture (such as national curriculum and NAPLAN), now that the Commonwealth has played its catalytic role, it arguably could be the case that this work continues to be maintained by the States and Territories.

Questions for discussion

- Is there a national interest for Commonwealth involvement in school education? In which roles?
- How can the national interest be pursued without undermining the role of State and Territory governments, or non-government systems or independent schools, in delivering schooling?
- What type of national architecture and processes would best support the delivery of national priorities and objectives? Does the Commonwealth have a role in sustaining these or could States and Territories take these on?

The educational outcomes of rural and remote students would benefit from a national approach that ensures national consistency no matter where education is provided.

Accessing high quality education should not be determined by where you live, influenced by political gain or dependant on the wealth of your State or Territory. Recommendations highlighting the need to focus on inequities in the educational outcomes of rural students that reported them well behind their metropolitan peers, can be found in literature dating back many years. They mention the endemic problems facing rural and remote education, including significant studies providing guidance and directions to those formulating policy. Despite this, not enough has been done to ensure improvement in educational outcomes for all students in rural and remote Australia.

One report suggests the reason for not seeing improvements in educational outcomes may be that the National Framework for Rural and Remote Education was positioned as a supplementary framework rather than a priority area. In all such endeavours there comes a point at which research must give way to action.

Reforms introduced in rural and remote areas generally do require ongoing financial support from the Commonwealth. While progress may be slow, the introduction of a number of National Partnership Agreements have been beneficial and would suggest that a similar architecture be used when considering the needs of rural and remote students.

Equity, efficiency and effectiveness of service delivery, with a focus on regions

Not all schools are funded equitably. The Commonwealth, and the States and Territories use their own funding models to determine the distribution of funding within the sector based on the unique characteristics of their schools (for example, geographic distribution of schools, concentration of disadvantage). Also for historic reasons, within the Commonwealth model, approximately 17 per cent of independent schools are funded above the current resourcing standard, although this is being phased out.⁶

At the moment, service delivery is complicated by both levels of government performing similar functions in certain areas. Commonwealth and State and Territory education departments currently perform similar or related functions around curriculum, national assessment, and teacher standards, as well as in national bodies funded to administer these policies, such as ACARA and AITSL. For example, States and Territories all have curriculum development functions in their governments, while the Commonwealth co-funds ACARA's curriculum development function. Although States and Territories are responsible for teacher standards and accreditation, AITSL also has its own (State and Territory agreed) standards and procedures. Similarly, the regulation of non-government schools occurs at both levels of government, although there is some differentiation in roles. There are also a small number of programmes aimed at similar target groups or outcomes which are delivered by both levels of government. This creates potential inefficiencies for those delivering school services.

There are also considerations around equity of access and student mobility. At present, the Commonwealth's main role in ensuring equity of service delivery, is to provide needs-based funding weighted to the factors that increase the cost of schooling and to ensure minimum levels of service delivery through national standards (for example, Australian curriculum and national teaching standards). For example, prior to the introduction of the schooling resource standard and its planned introduction of a single disability loading, there was large variation in how States and Territories funded students with disability. ACER research in 2011 suggested that the national average additional spending per student with disability was \$13,000. However, in South Australia this amount was around \$5,000 and in the ACT \$26,000. Previously, the Commonwealth had used some aspects of NPs to provide support for equity, including in the regions⁷.

Questions for discussion

- Which level of government is best placed to address equity issues?
- To what extent, if any, do shared roles enhance or detract from the effective achievement of school education outcomes? If shared roles continue, what mechanisms are needed to ensure collaboration is efficient?

While States and Territories may be best placed to identify equity issues, the additional funding and resources are usually not available to overcome them. For this reason ICPA (Aust) would support the continuation of a collaborative approach when addressing equity issues.

A better understanding of educational disadvantage is paramount in order to address it. Much of this information can be obtained through engaging with relevant stakeholders who have an integral understanding of the issue. This would provide a useful mechanism to ensure collaboration is effective.

The need for a more consistent approach to curriculum and schooling has been talked about for many years. Both the National Curriculum and the needs-based school funding are in line with the expectations of the modern day family, who seek consistency in education and outcomes no matter where someone lives or their level of disadvantage. However, if the same agenda is not then replicated by States and Territories, it only adds to the confusion around identifying which government is responsible, as discussed earlier.

Durability

There have been significant changes and reforms to the schooling sector over the last 50 years. The proliferation of time limited projects, or policy specific funding from the Commonwealth, particularly through National Partnerships has added to the sense of flux around roles and responsibilities. Over this period the Commonwealth introduced 10 schools-related National Partnerships which offered almost \$25 billion to States and Territories in return for improved outcomes, matched funding, specified activities and detailed reporting. National Partnerships covered almost all aspects of schooling, including literacy and numeracy, additional support for low socio-economic status schools and teacher quality. National Partnerships also contained a range of inputs and prescriptions that increased the administrative and compliance burden on the states and were seen as inconsistent with the broader Intergovernmental Agreement on Federal Financial Relations.

Schooling arrangements are often strongly contested during Federal and State elections, and are subject to change at both levels of government. For State and Territory governments, this can create disincentives for investment in long-term reform, and to improve efficiency, if there is an expectation of imminent change: improvements take time to realise, and longer-term data are needed to see the impact, especially in education. For schools and school communities it creates uncertainty and limits their ability to plan, continue effective programmes and focus on achieving desired goals. The community's confidence in the capacity of governments to know how to improve student outcomes, and see through changes, also becomes eroded.

Questions for discussion

- What configuration of roles and responsibilities between the Commonwealth and the States and Territories and non-government sector would be most likely provide funding and policy certainty in the long term?

It is concerning that schooling arrangements are strongly contested during Federal and State elections and prove to be of even greater concern for those living in isolated areas where addressing disadvantage does not attract votes. For this reason and all reasons mentioned above around long term planning and certainty, education policy and planning may be better served by an independent statutory authority as we are currently seeing with ACARA.

Fiscal Sustainability

All governments have increased funding to schools by over \$11 billion in real terms over the past ten years. However, as with other important policy areas, governments will need to consider future levels of funding for schooling against other priorities within their current resourcing constraints. Key to this, as with other policy priorities, will be identifying fiscally-sustainable revenue bases for both the Commonwealth and the States and Territories.

Schools funding is projected to continue to increase as the number of students increases over time and also as a result of the existing schools funding arrangements. Much of the additional cost is being borne by the Commonwealth in part because of the funding arrangements negotiated under the previous government and also because enrolments in non-government schools, which are

predominantly funded by the Commonwealth have grown far faster than government schools which are funded by the States. This trend is likely to continue.

Questions for discussion

- How can roles and responsibilities be aligned to ensure the fiscal sustainability of the school education system while maintaining high quality student outcomes?
- What responsibilities should families have in contributing to the costs of their child's schooling in addition to contributions made through the tax system?

With regard the responsibilities families should have in contributing to the costs of their child's schooling in addition to contributions made through the tax system, ICPA advocates the following:

In a wealthy nation such as ours, a family should be able to access affordable education wherever they live. For families living in remote regions the cost of education is proving too high and so this must be addressed.

For families living in rural and remote Australia the rising costs of educating children are proving unsustainable and can be attributed to many families leaving these areas. Not only has the cost of education been on a continual rise for a number of years but so has the duration of a child's education, with education starting in the early years and continuing through to the tertiary years.

For many young people living in remote regions, their only access to education is to study by distance education. While distance education services are well structured and distance education centres ably staffed, it is clear that distance education provision is founded on the assumption that all children have ready access to a person able to teach the program in the geographically isolated classroom. This person is the distance education tutor who must be available and able to provide the practical, day-to-day supervision and support required for the effective delivery of a distance education program.

The entire cost of providing the tutor falls on the family and for the parent who often undertakes the role of distance education tutor, it impacts severely on her (usually the mother's) capacity to earn an income or to participate fully in the rural business. If the position of tutor is unable to be filled from within the family, it is necessary to undertake the employment and subsequent provision of accommodation for anyone filling this role, a role that exists for the entire duration of a child's schooling by distance education.

ICPA remains concerned around any assumptions arising when considering one of the components of the non-government schools' funding. It relates to the school community's capacity to contribute towards high tuition fees charged by many of the non-government boarding schools. For families who must send their children away from home for their secondary education, this decision is one of necessity and not of choice and their ability to fund this education is not an accurate indication of their ability to afford these expenses.

Part B:

Vocational Education and Training and Higher Education

VET & Apprenticeships

Governments have worked to improve the quality and regulation of the VET system, but users need better information to help them decide which qualifications will best suit their needs and help them get a job.

Common grievances raised by students taking part in VET in school, VET courses and apprenticeships include:

- Difficulty accessing information about VETIS courses and families receiving bills for high course fees in addition to full school fees.
- High costs of finding short term accommodation while attending TAFE away from home
- Lack of co-ordination between local providers and Apprentice Australia to ensure students have the appropriate paperwork in place that recognises their training or qualifications.

While Commonwealth involvement promotes national interest, and benefits all Australians through nationally harmonised or uniform approaches, it should not come at the expense of diversity, innovation and competition, and sometimes choice, among and within the States and Territories.

ICPA looks forward to the changes recently introduced or soon to be introduced, mentioned throughout the Issues paper - Roles and responsibilities in education, PART B: VOCATIONAL EDUCATION AND TRAINING AND HIGHER EDUCATION. The changes listed below should assist with subsidiarity and lead to a system that is durable and fiscally sustainable.

- Introduction of the national *MySkills* website to support student and learners' choices across jurisdictions. Though this website has brought some of the necessary information together for the first time, it is still limited in terms of providing comparable data on a range of factors such as the quality of providers, prices, government support (including subsidies) and labour market information across jurisdictions. This kind of information is especially important in contestable markets as it allows users to make informed choices between the training being offered by different providers.
- States and Territories have been working with the Commonwealth to resolve a number of issues and develop a one-stop arrangement where AACs can deliver both Commonwealth and State functions. In the Northern Territory there is a joint Northern Territory-Commonwealth contract for the provision of apprenticeship and traineeship support services. These arrangements provide a one-stop-shop for all employers and apprentices/trainees for both Northern Territory and Commonwealth services.
- The Commonwealth announced in September 2014 that it would establish a new Australian Apprenticeship Support Network to commence on 1 July 2015. Service providers in the new network will be required to work collaboratively with jurisdictions to reduce duplication with existing State and Territory programmes or services and ensure that the services are tailored to meet local demand.
- Stakeholders have also argued for a harmonised national system of apprenticeship and traineeship legislation based on a single legislative instrument, to achieve consistency and

clarity for users.⁸ This would include clarification of the rationale for which level of government funds apply to which aspects of apprenticeships (including incentives and support services) and resolving jurisdictional differences in relation to the declaration and regulation of apprenticeships. There has been significant progress in this area. For instance, legislative reforms in Queensland have harmonised Queensland regulation with other jurisdictions and updated the regulatory framework to reflect current practice. Western Australia has commenced a statutory review of the *WA Vocational Education and Training Act 1996* (to be concluded in late May 2015) which includes a focus on the coordination, regulation and implementation of the apprenticeship and traineeship system. This is in recognition of the overlap and duplication between the Commonwealth and the States in this area.

VET in schools

VET provided to school students can play an important role in helping young people prepare for work, and the vast majority of VET in schools' enrolments are in entry-level VET (Certificate I and II), which increasingly need to be followed up by further education and training to achieve good employment outcomes.

ICPA welcomes the endorsement by the Education Ministers in December 2014, for the new framework (*Preparing Secondary Students for Work – A framework for vocational learning and VET delivered to secondary students*) to guide the delivery of vocational learning and VET delivered to secondary students in Australia.

Changes noted - the need for a new national framework is clear. *Preparing Secondary Students for Work* unpacks the current issues, identifies the underlying causes, and provides guidance on how to resolve them. It creates shared understanding by clearly distinguishing between **vocational learning** and **VET**, and noting that the VET delivered to secondary students is the same as all other VET.

With vocational learning to be delivered within the broader curriculum, it will assist secondary students explore the world of work, identify career options and pathways, and build career development skills. With this knowledge, students considering the option to commence VET while still at school, will have sound information to help them decide which qualifications will best suit their needs and help them get a job.

Higher Education

Engaging in training and tertiary education should be an option for all young Australians. However, for many students living in rural and remote areas it is proving difficult due to their inability to meet relocation, tuition and living expenses. ICPA believes the added costs inflicted on rural students in their quest to access a tertiary education are depriving Australia of a wealth of independent and innovative young Australians.

The Reform of the Federation offers a once in a lifetime opportunity to review the roles and responsibilities of the Commonwealth and the States and Territories in providing education from early childhood through tertiary education into the future. While it is important to identify Australia's strengths and address duplication and overlap between the different levels of government which results in waste and inefficiency, it is also vital that service accessibility is addressed.

As indicated in PART B, Higher Education section, *the roles and responsibilities between the Commonwealth and the States and Territories are clear and generally uncontested, but there remains a small area of overlap in relation to governance and reporting. As such, rather than assess the sector against each of the principles outlined in the Federation White Paper's Terms of Reference, the questions focus on accountability and efficiency of government roles and responsibilities in the sector.*

Addressing the roles and responsibilities in relation to governance and reporting does not consider accountability when it comes to accessing higher education. ICPA would like to see some discussion around the roles and accountabilities in relation to the equity and market failure regarding the number of students from rural and remote Australia, accessing tertiary studies, which would be within the scope of terms of reference.

Market failure and equity is addressed in the early childhood learning years, schooling and training. Yet students not able to access their tertiary course from their home are subjected to meeting welfare criteria or rely on the generosity of scholarship providers, both of which are unpredictable. Affordable access to higher education plays a significant role in the decision about taking up tertiary studies.

While we are not purporting to provide a solution at this stage, a reasonable question would be:

What responsibilities should the Commonwealth and rural and remote students have in contributing to the cost of relocation to access higher education?

Prospective students from rural and remote areas should not have to rely on meeting welfare criteria to ensure access to a tertiary institution. The assumption appears to be that rural students can generally afford to access an institution once they qualify for tertiary entrance, no matter where they live. For as long as access to tertiary studies for rural students stays reliant on and tied to welfare payments, we will fail to see satisfactory increases to the number of these students taking up tertiary studies. Just as access to early childhood, primary and secondary education is deemed critical, so too is access to a higher education critical to the continued economic development of Australia. It will never be feasible to place institutions offering higher education in most towns as currently happens with schooling. To provide affordable access however to students at the tertiary level, consideration needs to be given to the assigning of financial responsibilities to ensure equitable access for all rural students.