

Productivity Commission Issues Paper: Reforms to Human Services

Submission by

The Independent Schools Council of Australia (ISCA)

Introduction: About the Independent sector

The Independent Schools Council of Australia (ISCA) is the peak national body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISCA represents a sector with 1,104 schools and just over 594,200 students, accounting for nearly 16 per cent of Australian school enrolments.

Independent schools are a diverse group of non-government schools serving a wide range of different communities. Many Independent schools provide a religious or values-based education. Others promote a particular educational philosophy or interpretation of mainstream education. Independent schools include:

- Schools affiliated with Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Seventh Day Adventist and Presbyterian schools
- Non-denominational Christian schools
- Islamic schools
- Jewish schools
- Montessori schools
- Rudolf Steiner schools
- Schools constituted under specific Acts of Parliament, such as grammar schools in some states
- Community schools
- Indigenous community schools
- Schools that specialise in meeting the needs of students with disabilities
- Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other risk factors.

Independent schools are not-for-profit institutions founded by religious or other groups in the community and are registered with the relevant state or territory education authority. Most Independent schools are set up and governed independently on an individual school basis.

However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example the Lutheran system. Systemic schools account for 18 per cent of schools in the Independent sector. Independent Catholic schools are a significant part of the sector, accounting for 8 per cent of the Independent sector's enrolments.

The Associations of Independent Schools (AISs) in each state and territory directly represent and support Independent schools in their jurisdiction. While almost all Independent schools choose to

become members of their State or Territory Association of Independent Schools (AIS), the AIS does not act as a 'system authority' for the sector.

AISs provide a range of professional services directly to schools, as well as providing educational support such as learning opportunities, advice and information. Many AISs also offer industrial relations services, child protection services, and implement government programs, for example the Australian Government Capital Grants Program. In addition, AISs represent the views of the Independent school sector at the state and territory level.

The autonomy of Independent schools enables them to respond flexibly, effectively and creatively as professional educational organisations to meet the needs of their school community and to develop, innovate and improve the school to enhance outcomes for students.

There is a common perception, encouraged by media portrayal, that Independent schools are large, urban schools which only cater to high income families. In fact, ninety percent of Independent schools are low to medium fee establishments, and they cater to the full spectrum of Australian society.

Independent schools also cater to specific groups of disadvantaged students including: Indigenous students attending remote 100 per cent Indigenous schools in Western Australia and the Northern Territory; high needs students with disability attending special schools; and highly disadvantaged youth who have been excluded from both government and non-government schools and who are now attending Independent special assistance schools.

The range of tuition fees paid varies greatly from school to school reflecting the diversity of the sector. The spectrum of fees range from schools serving highly disadvantaged communities which charge no fees, through to schools which charge in excess of \$20,000 per year. It should be noted that schools charging in excess of \$20,000 per year only represent five per cent of Independent schools. The median fees charged per student in Independent schools are \$4,200 per year¹. Boarding schools charge additional fees for boarding.

Independent Schools and Indigenous Education

The Independent Schools Council of Australia (ISCA) welcomes the opportunity to provide a submission in response to the Productivity Commission's Reforms to Human Services Issues Paper.

This submission focuses particularly on the provision of educational services by Independent schools for students from remote Indigenous communities, either living in those communities or furthering their education away from home at an Independent boarding school.

It is ISCA's view that neither Australian Government nor state and territory government funding arrangements for non-government schools adequately address the very substantial cost differential in school provision for Indigenous students in and from remote locations. Indigenous students attending Independent schools in remote communities should be supported to the same level as Indigenous students in similar government schools.

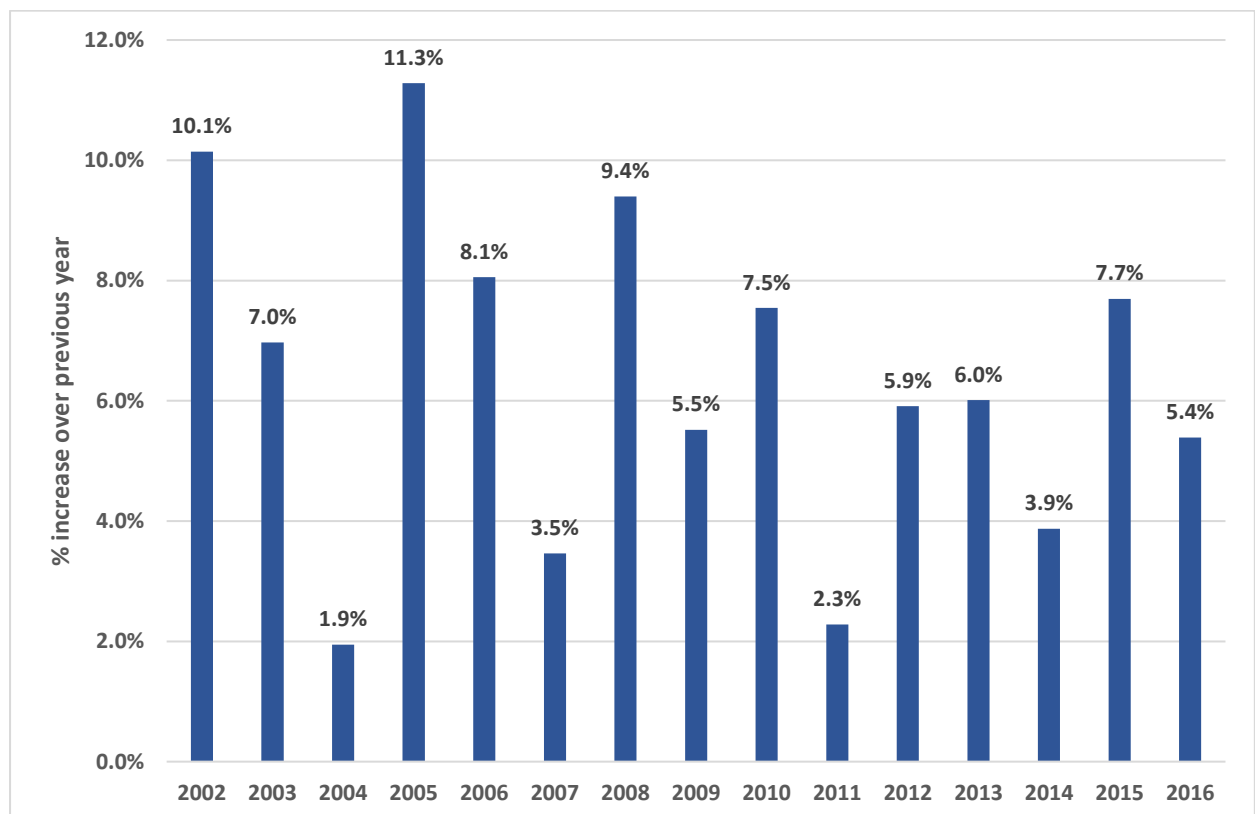
Independent schools serve a broad range of students, reflecting the diversity of Australian society and have a long standing commitment to supporting quality education for Indigenous students across

¹ Excludes full fee paying overseas students

Australia. As a group, Indigenous students face significant barriers to educational achievement and in order to overcome these barriers many Indigenous parents enrol their children in Independent schools.

Indigenous student enrolments are dispersed broadly across the Independent sector and in 2016 there were over 12,600 Indigenous students enrolled in 832 independent schools. Seventy-five per cent of Independent schools in Australia enrolled Indigenous students in 2016. Enrolments of Indigenous students in Independent schools have grown at an average rate of more than 6 per cent per year over the last two decades. ABS data released in February 2017 confirmed the Independent sector as experiencing the largest growth of Aboriginal and Torres Strait Islander enrolments, exceeding the national average growth of 3.7 per cent.

Chart 1: Growth in Indigenous Students at Independent Schools 2002 to 2016



Indigenous students are educated across a range of settings and in different types of schools in the Independent sector. There are some Independent schools that provide education to significant populations of Indigenous students and some schools are entirely Indigenous. Thirty-nine schools in the Independent sector have an Indigenous enrolment of more than 50 per cent. A significant number of these schools are located in rural or remote areas.

The needs of all Indigenous students, particularly those from remote communities, have similarities in that their educational levels are often behind those of their non-Indigenous peers, many students have significant social and health issues and many have disruptive home lives and disrupted educational journeys. The context and educational environment means that the needs of Indigenous students, and thus of the schools, teachers and support staff, vary by the educational environment.

Remote Independent community schools and early childhood providers

There are a number of Independent schools in remote Indigenous communities which either are entirely Indigenous or very close to 100 per cent Indigenous enrolments. It is often the case that these

Independent schools in remote Indigenous communities are the sole providers of education for these communities. There are 21 remote or very remote Independent schools across WA, NT and SA which have Indigenous enrolments of more than 90 per cent. In WA, some of these schools are over seven hours drive from the nearest small regional centre and during the wet season, the only way in or out is by air.

Students in these schools generally have good attendance when in the community but often have long absences due to cultural business or they may move between a few schools, sometimes across state/territory borders. Both of these factors result in disrupted education and they may be subject to inconsistent intervention strategies as different schools have different approaches.

In some remote communities Independent schools are often the only service providers of Early Childhood Education and Care (ECEC). Children may be located in small communities and not have access to a dedicated service thus relying on mobile services. These services may also include programs for visiting three year olds in remotes communities and are provided free of charge or at a low cost to allow children's equity of access to quality ECEC services.

These schools and ECEC service providers need to have quality teachers who are trained to work with Indigenous students for whom English may be a second or third language and who may not receive strong support at home for their education. To achieve this, schools need to have high quality facilities, including teacher housing and internet access, to support student learning but also to support teachers' professional learning and social connectedness.

The costs of delivering school education and early childhood services in remote Indigenous communities are significantly greater than delivering education services in urban environments. It is not uncommon for these services to provide children with an extended range of non-educational services such as buses to pick up students, health care, meals, clothing and family support services. These services are always provided free of charge to the children and almost always funded from the school community. For many students, without these additional services, access to school ECEC or school would not be possible.

Indigenous education in Independent boarding schools

The Independent sector is the major provider of boarding school education for Indigenous students and Independent schools are frequently the only option for Indigenous students from remote communities who choose to board to further their education.

One hundred and twenty two Independent boarding schools enrol Indigenous boarders. Of the nearly 2,400 Indigenous boarders in the Independent sector, half attend schools with either very large numbers or a high concentration of Indigenous boarders. Many of these students come from remote communities where primary level education is the only schooling locally available and they have to leave their communities in order to undertake secondary studies.

These schools frequently need to provide a range of services beyond those required to provide a quality day and boarding education in order to address a range of health, wellbeing and pastoral care issues before students are in a position to learn.

It should also be noted that these issues are not 'one-off's' but need to be constantly addressed. For example, for boarding students commencing boarding or returning to school at the beginning of term, many students need significant health and social and emotional support in order to be school ready.

Education funding starts at the school gate and is designed to achieve educational outcomes. The additional support Indigenous students need to actually get to school, stay at school and be ready to learn is not part of standard educational funding.

Schools are not currently resourced to provide the broad range of services that are critical to ensure students are 'school ready'. Many schools divert funds from learning to fund these ancillary services or are unable to provide more than the most rudimentary services in these areas. It is widely acknowledged that students cannot learn if they are hungry, tired, distressed.

The challenges of Indigenous education

Indigenous students as a group tend to face greater barriers to educational achievement than most Australian children. Students from remote Indigenous communities are the most educationally disadvantaged in Australia.

This fact has been established beyond doubt by a number of reviews and inquiries with direct relevance to any consideration of educational opportunities for Indigenous students. These include the Review of Funding for Schooling ('Gonski Review'), the 2013 Wilson Review of Indigenous Education in the Northern Territory, the 2013 Australian Government Department of Education, Employment and Workplace Relations (DEEWR) Review Funding of Selected Indigenous Boarding Schools conducted by Deloitte Touche Tohmatsu ('Project Vale'), the 2015 House of Representatives Standing Committee on Indigenous Affairs Inquiry into Educational Opportunities for Aboriginal and Torres Strait Islander Students, and the 2016 KPMG Non-government Indigenous Boarding Schools Review of funding arrangements for the Northern Territory Department of Education.

The provision of education to Indigenous students, particularly in remote areas of Australia, can be challenging and expensive. Improving the educational outcomes for Indigenous students requires both resourcing levels which recognise the particular circumstances of these students and innovative and flexible approaches to support students. The Independent sector has longstanding concerns about the funding circumstances of Independent schools which cater predominantly for Indigenous students. These schools frequently need to provide a range of services beyond those required to provide a quality education. Before these students are in a position to learn, schools frequently need to address many health, wellbeing and pastoral care issues.

As noted earlier, the capacity of these Independent schools to charge fees or raise private contributions, is very limited or in some cases non-existent. Many of these schools face high costs due to their remoteness and/or distance from large population centres. It is also important to recognise that Indigenous students attending schools in urban or regional areas may need additional support due to their specific circumstances if they are from remote areas.

As noted earlier in this submission, many Independent schools in remote Indigenous communities are the sole providers of education for these communities. These schools have severely limited capacity to raise private income and rely heavily on government assistance to maintain their operations. All of these schools operate at resourcing levels significantly lower than government schools serving similar populations as sole providers.

My School financial data for schools in the Northern Territory clearly demonstrates that non-government schools are operating at less than half the net recurrent income per student in government schools. The *My School* data for Western Australia shows remote government schools servicing similar populations to remote Independent schools are receiving up to \$40,000 per student more in recurrent funding. Similar data in relation to funding for remote Indigenous students in boarding facilities show

that Independent schools are providing services for half the cost of boarding services provided by government facilities.

Non-government providers of schooling for Indigenous students whether through remote schools, boarding or as sole providers of education to often significantly disadvantaged communities, should receive at least similar levels of support as government schools. The Emerging Issues Paper prepared as part of the Gonski Review of Funding for Schooling noted the high delivery costs in rural and remote schools and that non-government schools serving these populations “did not appear to benefit from the level of funding provided to government schools servicing communities on a sole provider basis.”²

Recommendation 18 of the Final Report of the Gonski Review also recognised that:

“Australian governments should fully publicly fund the recurrent costs of schooling for non-government schools as measured by the resource standard per student amounts and loadings where the school:

- does not charge compulsory fees and has no real capacity to do so, or
- provides education to students with very high needs, such that without full public funding of the school’s resource standard those needs would not be met.”

Among the non-government schools the Report identified as meeting these criteria included

- “majority Indigenous student schools comprised of those with 80 per cent or more Indigenous enrolments, or a very remote school with 50 per cent or more Indigenous enrolments
- sole provider schools in remote locations that are effectively offering a universally accessible service equivalent to a government school.”

The Report envisaged that majority Indigenous schools would be fully publicly funded. It further envisaged that sole provider schools in remote locations would be fully publicly funded.

These recommendations were not implemented.

It is ISCA’s view that neither Australian Government nor state and territory government funding arrangements for non-government schools adequately address the very substantial cost differential in school provision for Indigenous students in and from remote locations. Indigenous students attending Independent schools in remote communities should be supported to the same level as Indigenous students in similar government schools.

Government funding needs to acknowledge the special needs of Indigenous students, particularly those from remote areas. While it is acknowledged that the attendance of some Indigenous students can be erratic current funding arrangements can result in schools being penalised at a time when they need all possible resources to ensure they are in a position to attract and retain these high needs students. Funding models need to acknowledge the unique circumstances of schools serving large numbers of Indigenous students and their often fluctuating student numbers.

The current Commonwealth funding model relies on student enrolment numbers determined at a single census point present significant difficulties to schools catering to large numbers of Indigenous students, notably those from remote areas. This is further exacerbated by funding models that also introduce an attendance criteria such as that used by the NT Department of Education.

² Review of Funding for Schooling – Emerging issues Paper – December 2010

Schools need to provide a high level of support services to encourage and support school attendance for students however the funding fluctuations that can result from student non-attendance are counterproductive to providing this support. In recognition of the special services schools need to provide to attract, support and retain their Indigenous students, particularly those from remote areas, schools catering for these students should be provided with a base level of funding not wholly linked to per capita enrolment. This stable source of supplementary funding would allow schools to provide those support services so vital to attract and retain Indigenous students in school education. These services include additional educational, pastoral, recreational, health and community services.

Other costs are associated with provision of transport to ensure children can reach their school and strategies to ensure that students who need to be away from their home communities can maintain personal and cultural links with their communities. These additional costs can be incurred by schools located in remote areas as well as in regional and urban schools catering for Indigenous students including boarding schools. It is critical that governments recognise that these schools are in a unique position to access and assist these students and that this opportunity can be missed or not fully utilised due to lack of resources and a lack of recognition of the way resources should be applied.

As well as providing additional support for pastoral care, many Indigenous students regardless of the location of the school, are not achieving literacy and numeracy outcomes similar to their non-Indigenous peers. These students need innovative strategies and significant additional support to assist them in improving achievement levels in literacy and numeracy. Schools need reliable and stable sources of additional funding clearly targeted to improving Indigenous educational outcomes in order to address these specific learning needs.

Independent schools providing education to students from remote Indigenous communities are also seeking to ensure that their teachers and any other staff are appropriately skilled to deal with the distinct educational and social issues they may encounter with their Indigenous students, including cultural, educational, social, emotional and mental health issues. Providing funding to support professional learning is challenging for these schools, especially if they are located in remote areas or are small schools. Targeted professional learning funding to support teachers, schools and communities is essential to ensure staff are appropriately skilled.

Independent schools that cater predominantly for Indigenous students also require special consideration in relation to their capital needs, recognising their very limited capacity to raise private funds. The difficulty of providing for new or improved capital infrastructure is compounded in remote areas by the significant additional costs of building in these areas with costs doubled or tripled due to issues such as transport costs, access to construction expertise and delays due to weather.

Funding for Indigenous students

Commonwealth Funding

With the introduction of the new SRS Funding model from 2014, the Commonwealth funding arrangements have significantly changed for Independent schools.

Under the previous socio-economic status (SES) funding model, schools received general recurrent grants directly from the Commonwealth. Additional funding for Indigenous students was provided under the Indigenous Supplementary Allowance (ISA) which replaced a suite of programs with a single per-capita payment in 2009. There was an additional Indigenous Funding Guarantee (IFG) to compensate those schools that suffered an 'unintended' funding cut on implementation of the ISA designed to maintain their funding at 2008 levels until ISA funding 'caught up'. In recognition of the

impact on non-remote boarding schools from 2011 schools with students from remote and very remote communities boarding at a non-remote campus received an additional boarding supplement.

The implementation of the ISA, while providing increased funding to urban schools with Indigenous students significantly negatively impacted on schools in regional and remote communities, a situation from which they are still recovering.

The new SRS funding model theoretically provides base funding and loadings for disadvantage directly to schools. In practice however, school systems, such as government and Catholic systems, receive the SRS funding for all their schools and are able to redistribute their schools' funding entitlements within the system according to their own needs-based methodologies.

This means that the SRS funding entitlements and allocations only apply to the 900 non-systemic Independent schools. Most schools in Australia (90%) will not be funded according to the model, but according to their own jurisdictional or system priorities.

The SRS funding model

The SRS funding model was originally envisaged to include a transition period of 6 years from 2014 to 2019 to enable the full implementation of the new model. Most systems and schools, including the vast majority of Independent schools are transitioning to the SRS arrangements over time.

The SRS funding model has two main components.

1. Base funding

The base funding in the SRS funding model is a per student amount which aims to measure the cost of effective and efficient provision of schooling. The base amount is indexed annually by 3.6% to reflect estimated increases in the costs of all schools. In 2017, the base funding amounts are:

Primary - \$10,310

Secondary - \$13,559

The amount of base funding a non-government school receives is reduced by the school community's 'capacity to contribute', measured using the previous funding model's SES scores. Some Independent schools are entitled to as little as \$1,990 per student, and others up to \$11,778 per student, depending on the school's 'capacity to contribute'.

Majority Indigenous schools and remote 'sole provider' schools are exempt from the 'capacity to contribute' requirement and are entitled to receive the full SRS base per student amount, if and when the full transition occurs.

2. Loadings for disadvantage

There are six loadings designed to address different areas of disadvantage. These are school size, school location, Low SES, English Language Proficiency, Students with Disability and a loading for Indigenous students. Any given student could fall into multiple categories and attract multiple loadings to address disadvantage. The loadings are intended to be fully publicly funded.

Once a school's SRS funding entitlement is calculated³, the total is split into the Commonwealth share and the state share based on historical Commonwealth / state funding proportions. However, only new

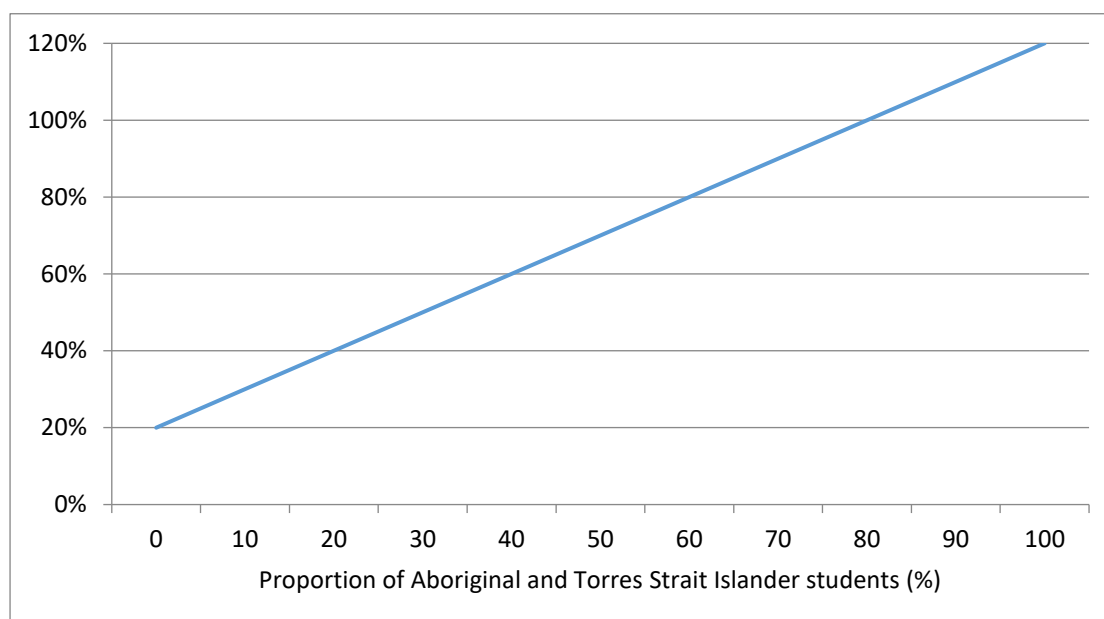
³ Under the Australian Education Act 2013 funding is calculated for an Approved Authority which may be one or more schools. For the purposes of this submission, 'school funding' is funding for an Approved Authority.

schools will be immediately funded under the new funding model. Funding for all pre-existing schools will transition from the previous funding model to the SRS funding model.

The loading for Indigenous students

The Indigenous loading is a per capita loading which also increases with concentration. The loading starts at 20 per cent of the per student SRS amount for the first Indigenous student in a school and increases up to 120 per cent per student for schools which have 100 per cent Indigenous students.

Chart 2: Indigenous Loading Parameters



Transition arrangements

While the SRS funding model has been introduced, it is not fully implemented.

- From 2014, schools with a higher SRS entitlement than their previous funding entitlement are transitioning up to their SRS entitlement. They are considered to be 'below the SRS'
- Schools with a lower SRS entitlement than their previous funding entitlement are transitioning down to their SRS entitlement. They are considered to be 'above the SRS'

Transition funding is not a reflection of a school's SRS funding entitlement. In general terms, schools 'below the SRS' receive their previous year's funding plus 4.7% indexation⁴ plus a proportion of additional SRS funding to move them towards their SRS funding entitlement.⁵

Schools 'above the SRS' receive their previous year's funding plus 3% indexation. As the indexation rate for schools above the model is lower than the indexation rate for the SRS, over time these schools transition to their SRS entitlement.

The impact of these transition arrangements means that Independent schools that are in transition are still receiving funding largely on the basis of the previous funding model.

Most Independent schools are in transition. According to the Department of Education and Training, only 138 Independent schools, many being new schools, are expected to be 'on the SRS' in 2017; that is

⁴ 4.7% is the indexation rate for the Commonwealth share from 2015.

⁵ All SRS funding is calculated on a per capita basis.

actually receiving their SRS funding entitlement. Almost seventy-two per cent of Independent schools are below the SRS in 2017 and are transitioning up to their SES entitlement.

Independent schools which serve remote Indigenous communities have been assessed as being 'below the SRS'. This means that they are regarded as having a funding shortfall. Twenty Majority Indigenous Student Schools (MISS) across several states and territories are currently receiving less than 75% of their SRS entitlement.

While the transition was originally intended to take six years and to achieve 95% of SRS funding⁶, currently only the first four years of the transition have been guaranteed by the Commonwealth Government. At this point in time, it is unclear whether most schools will ever achieve full SRS funding.

Commonwealth Special Boarding School Funding Payment 2014-16

In recognition of the shortfall in funding of remote Indigenous students at boarding schools, the Australian Government provided an interim special payment of \$12.3 million over 2014-16 to non-government schools with Indigenous boarding students.

In order to be eligible for this funding a school had to have either:

- more than 50 Indigenous boarding students from remote or very remote areas, or
- 50 per cent or more of their boarding students being Indigenous students from remote or very remote areas.

While this recognition of the additional costs was welcome, the short term assistance provided by the Australian Government did not provide a long term solution to a structural problem of insufficient resources to ensure the ongoing viability of these schools. As of 2017 these schools no longer have access to any additional funding to cover the costs of educating these students. This situation is already a source of grave concern for these schools' financial viability.

Long term sustainability

Under the current SRS funding model's transitional arrangements, funding is not growing at a rate that will ensure the long term viability of many Indigenous boarding schools. The quantum of funding available is not sufficient to support the tuition and additional needs of such educationally disadvantaged students. Further, with uncertainty around Commonwealth school funding beyond 2017, it is unclear whether these high-needs schools will ever receive the full loadings to which they would be entitled under the current funding model. ISCA's analysis shows that these schools are amongst those furthest away from their SRS and therefore are amongst the most disadvantaged by an early end to transition.

On-going additional funding is needed for these schools. In ISCA's submission to the House of Representatives Standing Committee on Indigenous Affairs' *Inquiry into Educational Opportunities for Aboriginal and Torres Strait Islanders*, ISCA recommended the following as options for providing additional funding for Indigenous boarding schools.

- a. Implement the full Indigenous loading immediately and bring all boarding school students from remote areas up to the full 120% level (irrespective of the schools current transition arrangements) as provided for in the current funding model.

⁶ Except for the ACT where the projected transition path reaches 100% of SRS in 2019.

- b. Consider the implementation of a “bed maintenance rate” in order to help schools maintain serviceable infrastructure to allow for a simpler process for the expansion of enrolments.

The sector is seeking continued recognition of the particular circumstances of these schools both in the short and longer-term. In the short-term, a resumption of the Commonwealth Special Boarding School Funding Payment at a level which can usefully assist these schools to function would be appreciated, until sustainable longer-term arrangements can be put in place.

State and Territory funding and supplementary payments

All states and territories provide general recurrent funding to non-government schools for students who attend these schools. The level of funding provided varies significantly between states and territories.

The most recent data shows that the average per student state or territory government recurrent funding for a student in an Independent school varied from \$2,192 to \$3,727.

Some state and territory governments also provide supplementary payments to schools for the purposes of supporting the needs of Indigenous students.

ABSTUDY

The purpose of the ABSTUDY scheme is to address the distinct educational disadvantages faced by Aboriginal and Torres Strait Islander students by improving educational outcomes to a level commensurate with the Australian population in general. ABSTUDY payments are designed to encourage eligible Indigenous students and apprentices to take full advantage of available educational opportunities and improve their employment opportunities.

ABSTUDY payments are generally designed to cover school student costs including living expenses, accommodation expenses (rent, boarding fees, residential costs, Remote Area Allowance), education expenses (school fees, books and equipment, incidentals), and fares (such as travel to study each term or semester if studying away from home)

Payment rates vary for the different components of ABSTUDY, changing each year and subject to means testing. However, rates per student per annum can range from around \$7,900 to around \$20,000, depending on parental income and other circumstances.

While Indigenous students are eligible for ABSTUDY payments to be made directly to schools for boarding costs, the application, qualification and payment structures are extremely complex and it is difficult for school staff and families to comply with the regulations and processes required to ensure accurate payments.

Where Indigenous parents are successful in obtaining paid employment, even minimal income can significantly affect the level of their ABSTUDY payments for their children. This means that a successful outcome of employment results in parents no longer being able to fund the boarding education of their children – or alternatively the boarding school no longer receiving any income to cover the costs of the children’s education.

Further, the quantum of ABSTUDY is not sufficient to cover the reasonable costs of meeting the accommodation and day-to-day needs of Indigenous boarding students. As noted above, schools are often meeting all the basic and more complex health and social/emotional needs of Indigenous students at significant cost. As students’ families can make little or no contribution to their ongoing care, these

costs must be met by schools. When compared to the cost of boarding provision in government facilities, the current ABSTUDY payment only covers half the cost, leaving a significant funding gap.

Conclusion

The provision of quality educational services either to Indigenous students in remote communities or to those students who have had to leave their communities to access education is extremely complex. The students' level of need is high and the available funding is limited. These students generally come from backgrounds with high levels of disadvantage and their needs go beyond the educational, often encompassing social, health and other related issues. As shown in this submission, several recent reviews and inquiries have demonstrated that Independent schools educating these students are currently not receiving adequate levels of resourcing for these students

For those Independent boarding schools enrolling significant numbers of Indigenous students from remote communities, the full cost of enrolling these high needs students is not being met by the available combination of Australian Government school education funding, state or territory government funding or ABSTUDY. As noted, the capacity for these schools to obtain funds via fees or parental contributions is limited or none. The lack of adequate and stable resourcing is a significant factor in the ongoing financial viability of many of these schools. If these schools are forced to close or reduce their Indigenous enrolments, the future prospects for these Indigenous students are unclear with the chances of their re-engaging in education significantly reduced.

It is ISCA's view that the Australian Government should take a leading role in facilitating the development of a long-term policy framework with the support of the state and territory governments to ensure that Independent schools educating Indigenous students serving remote Indigenous communities and schools enrolling students from these communities receive adequate resourcing.

Without such leadership, it is possible that these highly-valued schools will no longer be able to continue operating, thus significantly reducing the educational opportunities available to children in remote Indigenous communities.

The Independent school sector supports the Commission's emphasis on the need for a high quality human services sector that delivers social and economic benefits to the community as a whole through the attributes of quality, equity, efficiency, accountability and responsiveness. By addressing the issues raised in this submission, governments can develop an environment which helps to overcome the current limits and barriers to Independent schools further providing user choice in support of this outcome.

Colette Colman
Executive Director
Independent Schools Council of Australia
Canberra

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