Review of Funding for Schooling
Response to Commissioned Research
Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students
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Executive Summary

The Review of Funding for Schooling Panel released its program of research, which consisted of four research papers. These papers are:

- **Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students**, prepared by the Australian Council for Educational Research
- **Assessing Existing Funding Models for Schooling in Australia**, prepared by Deloitte Access Economics
- **Feasibility of a National Schooling Recurrent Resource Standard**, prepared by the Allen Consulting Group
- **Schooling Challenges and Opportunities**, prepared by the Nous Group consortium.

These papers were intended to provide a greater insight into the existing funding mechanisms for primary and secondary education, across all jurisdictions within Australia.

For the purposes of this response, Independent Schools Victoria will review and respond to the report presented by the Australian Council for Educational Research (ACER). **Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students** was commissioned to review existing programs and definitions of educational needs and disadvantage across all three education sectors.

**Independent Schools Victoria Review Fundamentals**

Independent Schools Victoria is mindful that the Review of Funding for Schooling provides the first opportunity in nearly 40 years to test our understanding about how governments should support all students being educated in Australia.

From the commencement of the Review in April 2010, Independent Schools Victoria has ensured that its responses are informed and directed by its organisational principles. These principles state that Independent Schools Victoria:

- promotes the principle of choice in education
- champions the values of Independent schools
- promotes the development and protects the autonomy of its Member Schools
- works with the Australian and Victorian Governments on issues to achieve more equitable, choice-orientated and efficient means of funding students’ learning
- contributes to the development, implementation and evaluation of education policies to achieve quality education outcomes.

From these principles, Independent Schools Victoria established four funding fundamentals which underpin its response to the Review of Funding for Schooling on behalf of its Member Schools. These fundamentals are:

- that choice in education is defended in legislation
- that a freeze of funding on individual Independent schools is unacceptable
- that funding should be centred on students, not schools
- that personal or private contributions towards a child’s education should have no bearing on the level of funding they receive.

Independent Schools Victoria would need to be satisfied that any future funding model meets these fundamental criteria.
Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students

The ACER report, Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students, is somewhat disappointing in its lack of factual evidence, and is seemingly an ideologically driven tract. The report accurately identifies specific needs that have some merit with reference to students with disabilities, including a new, or larger funding pool to meet student need, as well as funding for one-off (i.e. capital) costs for accommodating students. However, the remaining components of the document consist of ‘cherry-picked’ data, clear absences in understanding of various aspects of the education system, and an overwhelming desire to see student socioeconomic circumstance classed as a special need, when much analysis already exists to suggest that this is overplayed.

Scope and Terms of Reference

ACER was invited by the Review Panel to address the following:

■ Scope
  The scope of the report was to include mapping:
  – The definition of educational need and disadvantage used in Australia by government and non-government schools for funding purposes, including English language proficiency, indigeneity, location, disability and special needs, low socioeconomic status (SES).
  – The programs which seek to address disadvantage and how funding is allocated under them.

It was also to include a high-level evaluation of the effectiveness of these programs and an outline of a range of feasible alternative arrangements.

■ Research Questions
  The report was expected to address a number of specific research questions, broadly placed under the following overarching avenues of query:
  – How do existing programs seeking to address educational disadvantage work?
  – Are existing programs effective?
  – What alternative funding approaches should be considered?

Identified Areas of Education Disadvantage

ACER identified the following groups as being educationally disadvantaged:

■ Students with disabilities
■ Indigenous students
■ Students with limited English language proficiency
■ Low SES background students
■ Students in regional, rural and remote areas.

Whilst these five groups are consistent with the request made by the Review Panel in determining the scope of this research paper, Independent Schools Victoria maintains that low SES background students are not necessarily constrained in their ability to achieve at, or beyond that of students with higher SES background rankings. This will be addressed in further detail later in this response, as will existing funding mechanisms, and accurate data pertaining to the cost of educating educationally disadvantaged students.

Funding for our Future: 2013 and Beyond

In the initial Independent Schools Victoria submission to the Review of Funding for Schooling, two funding models were devised for consideration by the Review Panel:

■ Portable Funding Allowance
  The Portable Funding Allowance (PFA) comprises a base component, topped up with evidence-based loadings for individual special needs. This would be available to government or non-government schools, who would treat all Australian students equally, regardless of their schooling sector.

■ Community Based Funding
  Several concerns have been raised about the operation of the Socioeconomic (SES) Funding Model since its introduction in 2001. Independent Schools Victoria proposes an alternative funding model which aims to retain the key strengths of the existing model, while introducing variations that address some of the key criticisms. This has been labelled the Community Based Funding (CBF) model.

Independent Schools Victoria will also address the four main areas of student diversity in need of attention. These are:

■ Students with a disability
■ Students with a Language Background Other Than English (LBOTE)
■ Indigeneity
■ Rurality and Remoteness.

In addition, this submission will address ACER’s concerns about arrangements for low SES background students.
About Independent Schools Victoria

Established in 1949, Independent Schools Victoria today represents, promotes the interests of, and provides services to 210 Member Schools, educating more than 129,000 students.

More than 99 per cent of all students enrolled in the Independent sector attend an Independent Schools Victoria Member School. Independent Schools Victoria Member Schools are diverse in character, serving a range of different communities. Member Schools may provide religious or values-based education to students, or promote education philosophies or different interpretations of mainstream education.

Independent Schools Victoria celebrates and promotes the diversity of its Member Schools, the inalienable provision of choice in education, and the contribution that Independent schools make to their communities. Independent Schools Victoria continues to underpin all its activities with commonly understood and shared values embracing a commitment to quality outcomes for Victorian students.

Independent Schools Victoria is not a system authority managing schools, but a member association, providing professional services, and working to raise quality standards. Independent Schools Victoria represents the interests of Member Schools to governments and the community on a wide range of issues.

Independent Schools Victoria maintains an active participation in and auspices the management of a number of government programs. These include:

- development of the Australian Curriculum
- Digital Education Revolution program
- National Assessment Program – Literacy and Numeracy (NAPLAN) testing
- My School website
- pursuit of the principles of the Melbourne Declaration.

In recent years, Independent Schools Victoria has emerged and defined itself as a policy leader, underpinned by a strong research agenda, and an evidence-based approach to improvements and developments in the education sector. Independent Schools Victoria has been instrumental in innovative approaches to educational reform, has trialled and piloted several significant projects, and is now recognised as an important contributor to state, national and international educational thinking and practice.
The report was to evaluate the effectiveness of the programs that supported these students, as well as the mechanisms in place to help better define and identify students in need.

The issue of educational disadvantage is important to schools in the Independent sector in Victoria. Educationally disadvantaged students in the Independent sector, those being students identified by ACER as being students with disability, Indigenous students, students with limited English language proficiency, students from low socioeconomic (SES) backgrounds and students in regional, rural and remote areas, are regularly underfunded by state and federal governments, and require school communities to make up the significant resourcing gap to meet their needs.

The gap between the ‘haves’ of the government sector, and the ‘have-nots’ of the Independent and Catholic sectors widens with each enrolment of a child with additional needs. This is particularly pertinent when you regard total enrolment growth in the Victorian Independent sector, which has increased by 31.2 per cent over the last 10 years.

Concerns

Unfortunately, the ACER report has turned the issue of students with additional needs into an argument about ‘heavy-lifting’ by government schools, and the failure of non-government schools, particularly Independent schools, to take on more disadvantaged students. This conclusion appears to have derived from limited analysis, and Independent Schools Victoria is concerned that it appears to be ideologically motivated.

Independent Schools Victoria has three major concerns with the report presented by ACER:

- **Lack of empirically-based research**

  Of most frustration is the absence of data in the report, and a proper explanation regarding the presentation of data that is included in the report. Without delving too deeply into the limitations of data collection by ACER, it is disappointing to note that following responses by 24 state-based sector agencies and one federal agency to ACER’s questionnaire, there were still data gaps in the data on which the writers based their recommendations. Independent Schools Victoria is concerned that students’ performance on PISA tests was the sole basis for determining student outcomes that was used in the report. Leaving aside the issue of a conflict of interest for ACER, given that they administer the PISA tests for Australian students, no effort was made to examine student outcomes at the completion of schooling. Rich data sets for Victoria include On Track surveys, which show student destinations and post-secondary schooling.

  Even though it appears from the report’s analysis that the authors had access to My School data from the Australian Curriculum and Assessment Reporting Authority (ACARA), there were still data gaps on issues including Students with a Language Background Other Than English (LBOTE) (Table 2, p16).

- **Limited focus**

  The overwhelming presentation of data related to low SES students in Australian schools has been to the detriment of the report’s other four key issues: students with disability, Indigenous students, students with limited English language proficiency and regional, rural and remote students. This is particularly concerning given that the report’s own analysis, despite missing data, shows that approximately 62 per cent of national identified targeted funding is directed towards students with disabilities.

- **Apparent lack of impartiality**

  There is always a level of danger for governments, and government-appointed independent review bodies, when commissioning reports from third parties. Chief amongst those dangers is the issue of impartiality of subject. The ACER report to the Review of Funding for Schooling is a case in point. Independent Schools Victoria accepts the data which demonstrates that the Independent sector carries levels of students below its broader sector share in four of the five identified categories of educational disadvantage. There is, however, financial data which underpins this low sector share. There exists a well-documented and government-sanctioned gulf in funding between government and non-government schools for students in need of overcoming educational disadvantage.

  The ACER report writers have seemingly linked the low enrolment of students with educational needs in Independent schools to the concept of student selection and exclusion policies, as outlined in the project scope and research questions provided by the Review Panel on the commissioning of this work. This is not the case. The dogged focus on the concept of exclusion, with particular focus on students from low SES backgrounds, reflects the ideological drivers that gave rise to its recommendations.
General Comments
It is important to clear up some unexplained points in the ACER report regarding schools’ funding, and more particularly, funding for disadvantaged students.

Global Resourcing and Recurrent Funding
The ACER report presents data relating to the average expenditures per student by schools across school sectors. Global school resourcing data shows the following:

Table 1: Average expenditure per student – recurrent and capital (excl. user cost of capital, 2007-08 (government schools) and 2008 (non-government schools) (p30))

<table>
<thead>
<tr>
<th>Sector</th>
<th>Average Expenditure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government</td>
<td>$10,826</td>
</tr>
<tr>
<td>Catholic</td>
<td>$11,625</td>
</tr>
<tr>
<td>Independent</td>
<td>$15,576</td>
</tr>
</tbody>
</table>

The ACER report concludes correctly in point 120 (p30), that the Independent school sector, on average, provides ‘resources considerably higher than average resourcing levels for the government and Catholic systems’ (p30). However, the ACER report then draws conclusions from this, relying on the assumption that a measure of all public and private funding of schools is a relevant concept. Independent Schools Victoria maintains that this is not the case.

The average expenditure per student is higher for the Independent sector because much of the spending undertaken on behalf of students, and paid for by, parents, can relate to activities that are not directly linked to the public policy goals of education. These extracurricular activities help make Independent schools a popular choice for parents, and include sports, arts, languages, community and science activities, as well as values education. Independent Schools Victoria maintains that the only relevant financial resources for public policy purposes are those provided by both levels of government. Non-government schools are accountable to both levels of government for how they spend public funds, and to parents for how they spend school fees.

With this in mind, the principle changes from average expenditure, to average expenditure by government, including targeted funding, which was excluded in Table 1. The average combined government funding per student is as follows:

Graph 1: Combined Government Funding per Student for Australian Schools (2008-2009)

If you wished to apply the same rationale for Victoria, it would look as follows:

Graph 2: Combined Government Funding per student for Victorian Schools (2008-2009)

The Index of Community Socio-Educational Advantage
Some of the ACER commentary on the Index of Community Socio-Educational Advantage (ICSEA) was regarded positively by Independent Schools Victoria. Recognising the ecological fallacy committed when mapping total school enrolments is crucial when trying to relate the measure to funding (p18) and its failings are compounded when considering the points raised in section 67 (p19) and 359 (p82) of the ACER report.

There was, however, some commentary in the report that spoke positively about the virtues of revisions to ICSEA being modelled by ACARA, ‘with a new method that makes use of direct student-level measures of parent education and occupation status’ (p19). Such comments completely ignore the conclusions of the Review of Government Service Provision Schools Education Working Group’s (SEWG) 2010 paper, Evaluation of Parental Socio-Economic Information on Enrolment Forms – For Information and Discussion. The SWEG paper compared 2009 pilot data used in compiling the ICSEA with ABS 2006 Census data.

1 Combined government funding includes the user cost of capital for government schools and, in the case of non-government schools, government-provided capital grants. Funding allocations for Catholic and Independent schools have been estimated from 2008 data. All estimates in Graphs 1 and 2 are based on data obtained from:

2 The ecological fallacy occurs when inferences about the nature of specific individuals are based solely upon aggregate statistics collected for the group to which those individuals belong. This fallacy assumes that individual members of a group have the average characteristics of the group at large.
It found that major discrepancies between the two data sets at the state level were common. It suggests that enrolment data comprising parental occupation and education data used in ICSEA, does not correspond, even broadly, with census reported information. With respect to the comparison between the data sets, it is important to note that census data is collected by an independent statistics agency according to nationally consistent standards, and has a demonstrably low non-respondent rate. By contrast, the self-reporting of information by parents, as exemplified in ICSEA can be subject to gaps in information, and inaccurate reporting.

Students with Disabilities
The ACER report identified the following key issues relating to students with disabilities (p75):

- Catholic and Independent sectors have substantially fewer funds allocated per student with disabilities.
- Weaker funding within non-government sectors is matched by higher enrolment load in government systems.
- Lumpiness of expenditures for students with disabilities makes it difficult for individual schools to plan and allocate for these students from within their regular school budget.
- Lack of consistency across jurisdictions on the definition of students with disabilities (a national working group has been established to move towards a common national approach).
- Students that are identified as ‘special needs’ but not with disabilities are an expanding group and can be grouped for funding purposes with students with disabilities.
- There is a need to develop management capacity and specialist expertise within the non-government sector. This will support and develop school and teacher capacity to provide for these students.
- There is a high degree of variability in student needs and consequently in the level and types of resources required to meet them.

Disparity in Funding
There were 2294 Victorian Independent school students with disabilities whose schools received funding from the Australian Government in 2010. Proportionally, students with a disability are under-represented in the Independent school sector in Victoria, accounting for 1.8 per cent of the total student population.

This is a result of anomalies between the government and non-government school sectors in the funding of students with disabilities. Funding levels in Victoria differ by as much as $30,000 for students with the most severe levels of disability. Students with a disability in Independent schools are eligible for significantly less public funding than their counterparts in government schools. In addition to the direct funding gap, Independent school students with disabilities are also unable to access some government services (e.g. brailling) that are provided for free to government schools and students.

As the funding for students with a disability does not follow the student, irrespective of the school they attend, choice of schooling for these students is severely restricted. This also raises the serious concern about the impost on individual families and communities of costs that would otherwise be borne by the wider, tax-paying community.

Both the Victorian and the Australian Governments support students with a disability in the non-government sector. However, a funding disparity arises when support from federal and state government agencies are combined. In 2010, the total average funding from the Victorian and the Australian governments for each eligible student with a disability in an Independent school amounted to $7500. ACER has reported that the average funding for students with disability in Victorian government schools is $19,800 (p40). When discussing the degree to which different sectors meet the needs of students with disabilities, it is important to consider the cause, as well as the effect, of these funding arrangements.

Consistent Definitions of Disability
Independent Schools Victoria has been involved in two recent projects seeking to establish common and consistent definitions of disability.

- Victorian Government
  As part of the 2010-13 quadrennial funding agreement between the Victorian Government, and the Independent and the Catholic sectors, work is to be undertaken to find consistent definitions for students with disabilities in order to move towards a common funding approach between the non-government sectors.
  A trial is currently underway that shares unidentified student data between the three sectors, with that data matched up against the three different funding regimes in Victoria. Primarily, the exercise is to identify the areas of commonality between the sectors.

- National Working Group
  Independent schools in Victoria were participants in the work undertaken by the National Working Group to move toward a common national approach.

  Whilst the outcomes will provide some insight into the approaches taken when identifying students with disabilities nationwide, an ongoing concern remains in response to the funding implications for students. When the working group began its study, it was made very clear that funding would not be addressed by this project. This may work in the context of a short-term study, but should governments at both levels look at this as a future framework for students with disabilities, funding will need to be considered.

Recommendations
With the lack of a full data set, Independent Schools Victoria believes that the recommendations made in the ACER report may not be accurate. Consequently, it would not be prudent to provide commentary on these, lest the issue of funding for students with disabilities be confused.

That said, the recognition of the disparity of funding by the report writers is to be commended, as is their recommendation to allocate additional funding to non-government schools to bring them closer towards the average government sector expenditure per student.

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2 There is no indication if this amount incorporates both state and federal funding.
with disabilities. Independent Schools Victoria is comforted by the report’s statement that untied recurrent funding should not be changed, and reallocated for students with disabilities (p77). However, should the Review Panel wish to use these recommendations, Independent Schools Victoria reserves the right to respond to any issues relating specifically to the Independent sector, and to non-government schools in general.

Indigenous Students

ACER identified three key issues relating to Indigenous students (p78):

■ The target group overlaps with other disadvantaged groups (mainly low SES, Regional/Rural/Remote, and an increase in the number of Aboriginal students with a disability).
■ Striking the right balance between distributing funds based on individual targeting (which supports more schools but diffuses funding effect) and concentrating funds in schools with significant numbers of Indigenous students.
■ Assessing the effectiveness of current programs and expenditures in light of sustained weak academic performance and participation in schooling by this group.

In 2010, a total of 375 Indigenous students attended an Independent school in Victoria, accounting for 0.30 per cent of the enrolled population in Independent schools. This is relatively low, compared to the national average for the Independent sector.

A large driver of this gap is the disparity in Indigenous student shares in the Northern Territory and remote parts of Queensland and Western Australia, where there are fewer schooling options.

For Victoria, although there are wide differences in the share of Indigenous students in each sector, these differences are already off a low base.

Recommendations

ACER has reported that it was unable to discern whether programs for Indigenous students were effective.

Independent Schools Victoria does wish to acknowledge the funding that has been allocated through the Indigenous Supplementary Assistance (ISA) program. The additional funding provided through ISA is held by Victorian Independent schools to have helped work towards the delivery of better outcomes for Indigenous students.

In light of an absence of comment from ACER, Independent Schools Victoria maintains that at least the status quo be maintained until work can be undertaken to assess the funding programs currently in place.

English Language Proficiency

ACER identified three key issues relating to students with poor English language proficiency (p79):

■ While there is a range of language related programs, ESL targeted services are the dominant intervention.
■ ESL services targeting new arrivals are impacted by Australian Government decisions on immigration levels and their composition (especially the proportion and origin of the ‘humanitarian’ category). This creates volatility in the number and nature of students in this category.
■ The resource intensity required to meet the needs of individual students ranges over a wide spectrum and this can be predicted through the use of well-established diagnostic assessments.

ACER has missed an opportunity to deliver a sound response on the issue of students with poor English language proficiency. A key finding of the ACER report states that there is ‘insufficient data available to establish to what extent existing programs are effective because few have been evaluated’ (p87).

Ignoring the percentage of student enrolments in the non-government sector with LBOTE reflects poorly on the report’s writers. As identified, ‘non-government schools have a greater share of LBOTE students in six out of the eight jurisdictions across Australia’, but little more is acknowledged (p16).

From available data, there are at least 27,000 LBOTE students in the Victorian Independent sector, making up approximately 25 per cent of the total student population.

Recommendations

As previously acknowledged, ACER was unable to discern whether programs for students with poor English language proficiency were effective.

Without comment from ACER, Independent Schools Victoria maintains that at least the status quo be maintained until work can be undertaken to assess the funding programs currently in place. In addition, an acknowledgement of the percentage of enrolments in the Victorian non-government education sector of LBOTE students should be made by the Review Panel.
Students from Low SES Backgrounds

ACER identified four key issues relating to students from a low SES background (p81):

- Consistent under-performance as a group in academic testing (although it is important not to overemphasise this impact. The 2009 PISA results suggest around 16 per cent of the variation in student achievement is attributable to socio-cultural background).
- Concentrations of low SES students in a school tends to correlate with weaker academic performance of the school.
- Residualisation processes impacting on (i) schools in low SES geographic areas, and (ii) schools within the government sector.
- Current additional targeted investments per student are modest compared to overall average expenditure per student.

Impact of Low SES

Independent Schools Victoria agrees that the impact of low SES on PISA results should not be ‘overemphasised’. However, ACER’s comment here is contradictory to the statement made by its writers in the Executive Summary of the Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students report, which states that ‘there is considerable evidence showing the SES of students to be an important background factor to the participation and performance of children within education systems.’ (pxiv)

The quoted ‘16 per cent impact’ allegedly from the 2009 PISA documentation is not referenced. With over 2000 pages to work through, ACER has failed fundamentally to provide evidence in its approach to its report. In fact, the figure of 12.7 per cent impact for Australia appears in the PISA 2009 document, Challenges for Australian Education: Results from PISA 2009, on page 282, further highlighting the importance of not over-emphasising this impact on student outcomes.

Equity Funding in Existing Recurrent Funding Models

It is important to acknowledge that the Victorian and Australian Governments have already incorporated equity measures into their respective recurrent funding models.

Australian Government Funding – Socioeconomic Status Model

The Socioeconomic Status Funding Model (SES) is derived from student address data linked to a Census Collection District (CCD), and uses data provided through the ABS Census of Population and Housing that is specifically related to family and household income, education and occupation.

Funding is provided as a percentage of the Average Government School Recurrent Cost (AGSRC), with the minimum level rated at 13.7 per cent for schools with an SES score of 130 and above, and the maximum of 70 per cent for schools with an SES score of 85 and below. Graph 3 illustrates the pattern of Australian Government recurrent funding for non-government schools under SES, as well as the number of Victorian Independent schools funded at those levels.4

 Victorin Government Funding – Financial Assistance Model

The Financial Assistance Model (FAM) comprises Core Funding and, of most relevance to the ACER report, Equity Funding, which is divided into various funding elements.

Core Funding comprises two elements: Base Core Funding and Wealth Modified Core Funding. It should be noted that, while the Wealth Modified element has been included in the ‘Core Funding’ section of the model, it is nonetheless not applied equally to all schools, but is targeted according to schools’ financial resources.

Equity Funding comprises five elements: Students with Disabilities Funding, Aboriginal and Torres Strait Islander Funding, Rurality and Isolation Funding, Student Family Background (EMA5) Funding, and Student Family Background (New) Funding. Each of these five elements has been identified by Victorian Department of Education and Early Childhood Development (DEECD) as a measure of educational disadvantage. The vast majority of the Equity Funding is allocated under the Student Family Background (EMA) element.

What should be avoided, as is being witnessed in the creep away from the equal split between Core Funding and Equity Funding under the FAM, is funding for educational disadvantage at the cost of supporting all other students.

4 Note: Special schools, special assistance schools and majority Indigenous student schools have been included at an SES of 70 on Graph 3. Three Victorian Independent schools do not have an SES calculated because they enrol only Full-Fee Paying Overseas Students.

5 Note: EMA stands for Education Maintenance Allowance. The EMA is provided to support Victorian school children from low-income families, whose parents possess a Health Care Card, receive a Veteran’s Affairs pension or are foster parents.

6 Source: ABS, 2006, Cat. No. 4221.0, table 43.a
Residualisation and the Government Sector

Whilst Independent Schools Victoria will reserve much of its commentary on the issue of perceived 'residualisation' in education for its response to The Nous Group Consortium paper, Schooling Challenges and Opportunities, it would be remiss not to take this opportunity to review the percentages of students attending schools across the three sectors.

Whilst points 75-78 of the ACER paper analyse the Australian Bureau of Statistics (ABS) data pertaining to this issue, they have chosen to graph data related to the current sector shares of student enrolment by household family income (p20). The graph is somewhat meaningless, and ignores the actual number of students in schools as a total, and the percentage affected at each income level.

Graph 4 illustrates the percentage of all students in each family income range attending a school in each of the three sectors, reaffirming what should have been the principal points made in sections 75-78 of the ACER report. Whilst it is true that the government sector enrols approximately 77 per cent of students in a family income range designated as low, it is also true that the government sector enrols 53 per cent of students from high income families.

Graph 4: Percentage of all students in each family income range who attend government, Catholic and Independent schools, Australia, 2006

<table>
<thead>
<tr>
<th>Income Range</th>
<th>Government</th>
<th>Catholic</th>
<th>Independent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low (&lt;$1000)</td>
<td>77</td>
<td>15</td>
<td>9</td>
</tr>
<tr>
<td>Medium ($1000-$1699)</td>
<td>68</td>
<td>21</td>
<td>11</td>
</tr>
<tr>
<td>High (&gt; $1700)</td>
<td>53</td>
<td>26</td>
<td>21</td>
</tr>
</tbody>
</table>

It is naturally predictable that the Independent and Catholic sectors would enrol a smaller proportion of low income families; by their very nature, non-government schools are fee-paying schools. That said, between 2001 and 2010, the number of Victorian Independent schools with an SES ranking below 100 grew as follows:

Table 2: Number of low SES schools, 2001 and 2002

<table>
<thead>
<tr>
<th>SES</th>
<th>2001</th>
<th>2010</th>
<th>Total Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Schools</td>
<td>9</td>
<td>11</td>
<td>21</td>
</tr>
<tr>
<td>80-90</td>
<td>12</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>91-100</td>
<td>69</td>
<td>80</td>
<td></td>
</tr>
<tr>
<td>Total Growth</td>
<td>21</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

As Independent schools in Victoria gradually increase their share of low SES students, surely an argument exists for government schools suffering from a residualisation of high SES students (53 per cent of all students in the education sector) to review their own enrolment policies, and move low SES students into these schools.

Lack of Evidence

ACER’s Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students report notes that ‘a key problem in assessing the impact of targeted programs for disadvantaged groups is the absence of any formal evaluation for many of these programs … over 40 per cent of programs did not record any evaluation having been undertaken’ (p59). Just 27 per cent, or just over a quarter of all targeted programs, have been formally evaluated for their effect on learning.

Disappointingly, only 41 per cent of targeted low SES programs in government schools have been evaluated formally. In short, this report provides strong evidence that Australian education policy at all levels, and across all sectors, is not strongly evidence-based. Independent Schools Victoria believes that before committing new funds to carrying out the recommendations of the ACER report, particularly those pertaining to new low SES funding, existing programs need to first be evaluated by both levels of government. Strangely, ACER has not made this recommendation to the Review Panel.

Student Outcomes

The Victorian Independent sector continues to be justifiably proud of its students’ academic performance and their educational outcomes. These outcomes are built on the combined, non-negotiable commitment from schools and parents for every child to achieve to the best of their abilities. Measures of individual student performance indicate that students from Independent schools usually perform better on average than their counterparts in Catholic and government schools.

The Victorian Government’s On Track survey data identifies that a high proportion of Independent school students go on to tertiary study, irrespective of the SES profile of the school. It is also evident that students from across the Independent sector move on to a wide range of post-school destinations.

An example of a low SES school achieving strong educational outcomes is ISIK College, which has several campuses in areas of socioeconomic disadvantage, including Eastmeadows, Keysborough, North Geelong, Sunshine West and Mildura.

Box 1 – ISIK College

ISIK College was established in 1997 on the former Eastmeadows Primary School site with only 28 students. Before the end of the first year, enrolments had more than doubled and ISIK College completed its first year with 60 students. Today, ISIK College has six major campuses across Victoria with over 2000 students from a variety of backgrounds.

On Track Data

According to the On Track data, in 2010, 83 students at ISIK College’s two Broadmeadows campuses completed Year 12 (note that the On Track collection process did not gather sufficient information to include ISIK’s Dandenong Campus). The August census indicated that there were 92 students in Year 12 in total at the two campuses, meaning that there was a 90.2 per cent Year 12 completion rate.
Seventy-four of the 83 students (89 per cent) applied for tertiary education, of which 72 received a university offer, while two received a TAFE offer, meaning that all 74 who applied for tertiary study successfully received an offer. Across all schools, the average was 95.7 per cent.

Of the 83 students who completed Year 12 in 2010, 66 were enrolled in a bachelor degree course, one deferred, 10 were enrolled in TAFE or VET courses, three were in apprenticeships/traineeships, one was in work and three were looking for work. 79.6 per cent of ISIK students were enrolled in bachelor courses and 92.8 per cent were enrolled in a tertiary course or had deferred. By comparison, the average proportion of students who were enrolled in bachelor degrees across all Victorian schools was 49.2 per cent, and the average proportion who were in a bachelor course, had deferred or were in TAFE/VET courses was 69.6 per cent.

**Retention Rates**

In 2010, the school had 113 students enrolled in Year 12 across all campuses. In 2008, the school had 120 students enrolled in Year 10, meaning that there was a 94.2 per cent apparent retention rate from Year 10 to Year 12. The school had 94 students enrolled in Year 7 in 2005, leading to an apparent retention rate from Year 7 to Year 12 and 127.7 per cent from Year 7 to Year 10.

If you focus solely on the Broadmeadows campuses (which were fully established, unlike the Keysborough campus), there were 83 Year 7 students in 2005, 99 Year 10 students in 2008 and 92 Year 12 students in 2010. The apparent retention rates were:
- for Year 7 to Year 10 – 119.3%
- for Year 7 to Year 12 – 110.8%
- for Year 10 to Year 12 – 93.0%

**SES Profile**

The school’s overall SES is 88. It is extremely likely that the SES for the Mildura campus (which closed at the end of 2010) would be much lower, based on the campus’ clientele. The school’s ICSEA is 999 (at the Australian average). However, as the school’s ICSEA score is reflective of its NAPLAN performance, you would expect the school’s reasonably strong NAPLAN performance (see below) to push its ICSEA score higher than its SES. According to the My School website, the school’s quartile distribution of students was 33 per cent in the bottom quartile, 15 per cent in the second quartile, 29 per cent in the third quartile and 23 per cent in the top quartile.

**NAPLAN Data**

NAPLAN Data for ISIK Colleges reporting campuses are represented below:

### ISIK College Eastmeadows

<table>
<thead>
<tr>
<th></th>
<th>Year 3</th>
<th>Year 5</th>
<th>Year 7</th>
<th>Year 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>396</td>
<td>461</td>
<td>541</td>
<td>573</td>
</tr>
<tr>
<td>Writing</td>
<td>422</td>
<td>479</td>
<td>567</td>
<td>589</td>
</tr>
<tr>
<td>Spelling</td>
<td>420</td>
<td>505</td>
<td>590</td>
<td>608</td>
</tr>
<tr>
<td>Grammar</td>
<td>398</td>
<td>485</td>
<td>550</td>
<td>596</td>
</tr>
<tr>
<td>Numeracy</td>
<td>374</td>
<td>480</td>
<td>550</td>
<td>595</td>
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</table>

### ISIK College Mildura

<table>
<thead>
<tr>
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<th>Year 3</th>
<th>Year 5</th>
<th>Year 7</th>
<th>Year 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>N/A</td>
<td>420</td>
<td>N/A</td>
<td>NA</td>
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<tr>
<td>Writing</td>
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<tr>
<td>Spelling</td>
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<td>428</td>
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<tr>
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<td>431</td>
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<td>N/A</td>
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<tr>
<td>Numeracy</td>
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</table>

### National Average

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<th>Year 7</th>
<th>Year 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>414</td>
<td>487</td>
<td>546</td>
<td>574</td>
</tr>
<tr>
<td>Writing</td>
<td>419</td>
<td>485</td>
<td>533</td>
<td>568</td>
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<tr>
<td>Spelling</td>
<td>399</td>
<td>487</td>
<td>545</td>
<td>579</td>
</tr>
<tr>
<td>Grammar</td>
<td>417</td>
<td>500</td>
<td>535</td>
<td>579</td>
</tr>
<tr>
<td>Numeracy</td>
<td>395</td>
<td>489</td>
<td>548</td>
<td>585</td>
</tr>
</tbody>
</table>

### Average of Similar Schools

<table>
<thead>
<tr>
<th></th>
<th>Year 3</th>
<th>Year 5</th>
<th>Year 7</th>
<th>Year 9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>406</td>
<td>481</td>
<td>539</td>
<td>567</td>
</tr>
<tr>
<td>Writing</td>
<td>413</td>
<td>481</td>
<td>530</td>
<td>560</td>
</tr>
<tr>
<td>Spelling</td>
<td>391</td>
<td>481</td>
<td>537</td>
<td>572</td>
</tr>
<tr>
<td>Grammar</td>
<td>407</td>
<td>493</td>
<td>530</td>
<td>572</td>
</tr>
<tr>
<td>Numeracy</td>
<td>388</td>
<td>482</td>
<td>541</td>
<td>576</td>
</tr>
</tbody>
</table>

ISIK College Eastmeadows’ performance in spelling is consistently above both the national average and the average of ‘similar schools’ (bearing in mind that the ‘similar schools’ are at the national average for ICSEA, not necessarily for socioeconomic disadvantage levels). Writing is around the average, but their performance on the other NAPLAN tests at years 3 and 5 are generally poor, compared both to the national average and to similar schools. By contrast, the school’s performance at Years 7 and 9 is much better compared to other schools. In Year 7 and Year 9, reading is just below the national average, and numeracy just above, but spelling, writing and grammar are all well above the national average. They are also above the average of similar schools in Year 7 and Year 9 in all domains.

By contrast, the Mildura campus has particularly poor results across the board. As the campus closed at the end of 2010, however, we could ignore this campus’ performance.

One possible interpretation of these results is that ISIK College is taking low-performing students who need a lot of assistance. By the time that these students reach secondary school, the school’s significant value add has managed to overcome their initial disadvantage.

ISIK College is not an outlier amongst schools with a low SES. A number of other Victorian Independent schools sharing a similar SES have students that consistently achieve above their student cohort attending government and Catholic schools. The performance of students in these schools could be used by the Review Panel to guide other low SES schools to work toward building better practice.

Graph 5 provides a view of where Year 12 school-leavers in 2009 ended up in 2010. It is important to note that:
- in light of the Australian Government’s current disposition to attract low SES students into university study, 70.5 per cent of the lowest ranged SES students attending Victorian Independent schools enrol in university.
in the 91-100 SES Range, whilst only 50 per cent of students enrol in university, a higher proportion of this range either enrols into TAFE/VET studies (16 per cent) or enters into an apprenticeship (7.5 per cent). The proportion of students in these schools categorised as ‘Looking for Work’ is well below the national youth unemployment rate, which currently rests at 9.4 per cent for Australians aged 15-24.

Graph 5: Victorian Independent School Leavers in 2009, by 2010 Destination

Students in Regional/Rural/Remote Areas

ACER identified three key issues relating to students living in regional, rural or remote areas (p84):

- This target group overlaps with others (mainly low SES, Indigenous).
- The key cost driver is the lower than average student-teacher ratios usually determined by population sparsity.
- Attracting and retaining teachers can be harder than in metropolitan areas.

Nearly one third of Independent schools in Victoria are located in regional areas. There are 25,845 students, or approximately 21 per cent of students enrolled in an Independent school, who attend one of these schools. ‘Regional’ students are those who attend a school located outside of the Melbourne metropolitan area.

Remoteness Loading

A new loading was introduced in 2009 for schools with campuses that are located in ‘moderately accessible’, ‘remote’ and ‘very remote’ CCDs, as defined by the ABS Remoteness Structure. Schools receive an additional loading of five per cent of the school’s SES per capita funding rate for each student enrolled at moderately accessible campuses, 10 per cent for students at remote campuses and 20 per cent for very remote campuses. Only a small number of Victorian Independent school campuses are eligible to receive a remoteness loading.

Recommendations

Like many other aspects of the ACER report, there was little-to-no evidence as to the effectiveness for students living in regional, rural or remote areas. In light of an absence of comment from ACER, Independent Schools Victoria maintains that at least the status quo be maintained until work can be undertaken to assess the funding programs currently in place.
Funding for our Future: 2013 and Beyond

In its first submission to the Review of Funding for Schooling, Independent Schools Victoria proposed two alternative funding models, should the existing SES model be removed.

Summary of Independent Schools Victoria Proposed Funding Models

These models were (i) the Portable Funding Allowance (PFA) and (ii) the Community Based Funding model (CBF).

Portable Funding Allowance

The PFA would be available to all students in government and non-government schools.

It comprises a base component, topped-up with evidence-based loadings for individual special needs. This additional funding would be allocated to Indigenous students, students with a disability, LBOTE students and students from remote areas. A student with a disability would receive the same special needs assistance as any other in similar circumstances.

Determining a base cost


It calculated a Public Base Cost (PBC) amount at 2003 prices (including in-school and out-of-school recurrent costs):

- Primary school – $6201 per student
- Secondary school – $8504 per student.

In our initial submission to the Review of Funding for Schooling, Independent Schools Victoria indicated that, with indexation, the PBC for Australian schooling in 2010 was calculated to be $9287 for primary school students and $12,079 for secondary school students. It is these figures on which the PFA was based.

Based on the indexation rates for 2011 that were recently announced by the Department of Education, Employment and Workplace Relations (DEEWR), the publicly funded cost of Australian schools in 2011 would be $9929 for primary school students and $12,665 for secondary school students.

Australian and international evidence indicates that students’ socioeconomic status (SES) is a weak predictor of their performance in testing. Independent Schools Victoria believes that students’ social status does not dictate their scholastic destiny. It would be more effective for governments to target individual students who are failing, regardless of where their family sits on a socioeconomic index.

Community Based Funding Model

The CBF Model could be used as an alternative if the SES Funding Model is to be replaced. The CBF model would retain the key strengths of SES funding introduced in 2001.

SES Key Strengths

When the SES Funding Model was being developed, it was agreed that there was ‘a preference for a transparent funding system … based on reliable data collected independently … For transparency, the relationship between source data, indicators and the relative funding level of a school should be able to be demonstrated, and the data should not be able to be manipulated to affect funding.’

The validation report concluded that ‘a census-based SES measure produces a good proxy for parental income without the intrusiveness and administrative complexity inherent in measuring parent income more directly.’

Reliability of Census Data

Australian Bureau of Statistics (ABS) census data remains the most reliable source of consistently collected socioeconomic data available.

Occupation, education, household income, and family income are appropriate measures of a student’s SES status.

For the 2011 Census, the ABS will introduce mesh blocks that will result in data being reported at a more localised level. This will improve the accuracy and reliability of the socioeconomic data.

The CBF model retains the key strengths of the SES Funding Model but would be more accurate because of the ABS mesh block census data.

Schools would still be able to provide individual parent information in place of mesh block data if they believed that their indexation was inaccurate.

Family size and other socioeconomic indices such as internet and broadband access could be incorporated into the CBF model to provide a more detailed profile.
Funding Educational Disadvantage

As previously indicated, Independent Schools Victoria maintains that there are four main areas of student diversity that need attention as part of the Review of Funding for Schooling. These are:

- Students with a Disability
- Students with a Language Background Other Than English
- Indigeneity
- Rurality and Remoteness.

In all cases, Independent Schools Victoria seeks parity of funding for all students. The notion that a student who is educationally disadvantaged who attends a school in the non-government sector should be funded differently to a student in the same circumstances who is attending a government school is absurd. Some have suggested that this is immoral.

Any future funding model should incorporate nationally-agreed definitions for each of the special needs areas. In the case of LBOTE students, a standardised test to examine the actual learning needs of every student in those circumstances would ensure that government funding is allocated appropriately. Common severity descriptors for students with a disability would work in the same way.

This would, in turn, allow the Australian Government, as well as the state and territory governments, to work towards developing funding parity for students with special needs attending Independent, government and Catholic sector schools.

Students with Low SES Backgrounds

As indicated in this report previously, Independent Schools Victoria has great difficulty in considering students with low SES backgrounds to be in the same circumstances of the other four areas of educational disadvantage. It is felt by Independent Schools Victoria that ACER has placed too much weight on the impact of low SES, despite making the observation that low SES should not be overemphasised.

High-performing, low SES Victorian Independent schools provide evidence that the impact of low SES can be countered through a variety of means.

The Review Panel would need to have further analysis of the circumstances of students with low SES backgrounds before making any definitive recommendations to the Australian Government on this matter.
Conclusions

This response highlights a number of important issues which must be considered by the Review of Funding for Schooling before making any determinations about linking student educational disadvantage to funding outcomes for schools and students.

Independent Schools Victoria has severe reservations about the recommendations provided in the ACER report, Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students.

The absence of data prevalent throughout the report is mystifying. The subsequent recommendations made on the basis of that incomplete information are also concerning, giving the general impression that they have been made with a full consideration of all the facts.

This is reckless given the circumstances in which this report has been presented. The Review of Funding for Schooling represents the first time that education funding in Australia has been reviewed in nearly 40 years.

Should state and federal governments act on flawed recommendations based on flawed information, the consequences would be dire for many Independent schools, with no redress likely in a similar period of time.

The Review Panel should seek to reassure parents of all students in Independent schools of their appreciation of the flaws in Assessment of Current Process for Targeting of Schools Funding to Disadvantaged Students. Before making any decisions on issues relating to educationally disadvantaged students, the Review Panel is invited to further discuss their proposals with Independent Schools Victoria, to ensure that the needs of students in the Independent sector are appropriately catered for.
See below for a number of the acronyms used in this document.

ABS  Australian Bureau of Statistics
ACARA  Australian Curriculum, Assessment and Reporting Authority
ACER  Australian Council for Educational Research
ACJS  Australian Council of Jewish Schools
AGSRC  Average Government School Recurrent Cost
ASIC  Australian Securities and Investments Commission
ATO  Australian Tax Office
CBF  Community Based Funding model
CCD  Census Collection District
CPI  Consumer Price Index
CSE  Civic and Social Engagement
DEECD  Department of Education and Early Childhood Development (Vic)
DEEWR  Department of Education, Employment and Workplace Relations (Cwlth)
EMA  Education Maintenance Allowance
ERI  Educational Resource Index
ESL  English as a Second Language
FAM  Financial Assistance Model
ICSEA  Index of Community Socio-Educational Advantage
ISCA  Independent Schools Council of Australia
ISA  Indigenous Supplementary Assistance program
LBOTE  Language Background Other Than English
LPI  Labour Price Index
MCEETYA  Ministerial Council on Education Employment, Training and Youth Affairs
NAPLAN  National Assessment Program – Literacy and Numeracy
NSRRS  National School Recurrent Resource Standard
OECD  Organisation for Economic Co-operation and Development
PBC  Public Base Cost
PFA  Portable Funding Allowance
PISA  Programme for International Student Assessment
SEIFA  Socioeconomic Indices for Areas
SES  Socioeconomic status
SEWG  Schools Education Working Group
SFO  Student Family Occupation background
VIT  Victorian Institute of Teaching
VRQA  Victorian Registration and Qualifications Authority

For more information on any of the information or issues arising from the Independent Schools Victoria submission to the Review of Funding for Schooling, please contact:
Ms Michelle Green
Chief Executive
Independent Schools Victoria
P: 03 9825 7200
F: 03 9826 6066
E:michelle.green@independentschools.vic.edu.au
### Victorian Schools - by sector

<table>
<thead>
<tr>
<th>Sector</th>
<th>Number of schools</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independent</td>
<td>219</td>
<td>9.7%</td>
</tr>
<tr>
<td>Catholic</td>
<td>489</td>
<td>21.7%</td>
</tr>
<tr>
<td>Government</td>
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<td>68.6%</td>
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<td><strong>Total</strong></td>
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### Victorian Students - by sector

<table>
<thead>
<tr>
<th>Sector</th>
<th>Number of students</th>
<th>Percentage</th>
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</thead>
<tbody>
<tr>
<td>Independent</td>
<td>123,632.1</td>
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<tr>
<td>Catholic</td>
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<td>Government</td>
<td>539,227.1</td>
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<td><strong>Total</strong></td>
<td><strong>853,503.9</strong></td>
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### Australian Schools and Students - by sector

<table>
<thead>
<tr>
<th>Sector</th>
<th>Number of schools</th>
<th>Percentage</th>
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</thead>
<tbody>
<tr>
<td>Independent</td>
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<td>10.8%</td>
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<tr>
<td>Catholic</td>
<td>1708</td>
<td>18.0%</td>
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<tr>
<td>Government</td>
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<td>71.2%</td>
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<tr>
<td><strong>Total</strong></td>
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<td><strong>100.0%</strong></td>
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### Independent Schools Victoria Member Schools

Not all independent schools are members of Independent Schools Victoria but some Catholic schools are members.

### Independent Schools Victoria SES Comparisons

Number of Victorian independent schools in each SES bracket in 2010

<table>
<thead>
<tr>
<th>SES Bracket</th>
<th>Number of independent schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 90</td>
<td>32</td>
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<tr>
<td>91-100</td>
<td>79</td>
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<tr>
<td>101-110</td>
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</tr>
<tr>
<td>111-120</td>
<td>31</td>
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<tr>
<td>Greater than 120</td>
<td>28</td>
</tr>
<tr>
<td>Not applicable*</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
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* These schools do not receive funding from the Australian Government or have not had an SES calculated yet.

### Primary/Secondary

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<tr>
<th>Type</th>
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<tr>
<td>Primary only</td>
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<tr>
<td>Secondary only</td>
<td>21</td>
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<tr>
<td>Combined</td>
<td>152</td>
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<td><strong>Total</strong></td>
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</table>

### Male/Female

<table>
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<tr>
<th>Gender</th>
<th>Number of independent schools</th>
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<tbody>
<tr>
<td>Girls only</td>
<td>19</td>
</tr>
<tr>
<td>Boys only</td>
<td>12</td>
</tr>
<tr>
<td>Coeducational</td>
<td>188</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>219</strong></td>
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</table>

### Melbourne/Regional

<table>
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<tr>
<th>Region</th>
<th>Number of independent students</th>
</tr>
</thead>
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<tr>
<td>Melbourne</td>
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</tr>
<tr>
<td>Regional</td>
<td>71</td>
</tr>
<tr>
<td><strong>Total</strong></td>
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</tbody>
</table>

### SES Comparisons

Number of Victorian independent schools in each SES bracket in 2010

<table>
<thead>
<tr>
<th>SES Bracket</th>
<th>Number of independent schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 90</td>
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<tr>
<td>91-100</td>
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<td>101-110</td>
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<td>111-120</td>
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<tr>
<td>Greater than 120</td>
<td>28</td>
</tr>
<tr>
<td>Not applicable*</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>219</strong></td>
</tr>
</tbody>
</table>

* These schools do not receive funding from the Australian Government or have not had an SES calculated yet.
Fair Funding for Independent Schools
Four messages for the Australian Government’s Review of School Funding:
1. Choice in education must continue to be defended under Victorian and Australian legislation
2. Focus funding on students, not schools
3. Schools’ income from parents or elsewhere must not diminish government funding
4. No funding freeze for individual schools