



Independent
Schools Victoria

Meeting the needs of all students

Students with disability
An ISV research report



Support, not stigma

The Nationally Consistent Collection of Data on Students with Disability (NCCD) is an important measure to ensure students requiring additional support in their education are properly identified and their needs are met. It aims to ensure that students with disability can fully participate in their education, on the same basis as other students.

Piloted in 2014 and implemented in 2015, it was linked to Australian Government funding in 2018 so that support for these students is better targeted and nationally consistent.

This report details how Independent Schools Victoria (ISV) has supported its Member Schools in implementing the complex processes involved in the NCCD, based on their longstanding commitment to meet the needs of all their students.

The NCCD has improved schools' awareness of the needs of students with disability, reducing the risk that some might fall through the cracks. It recognises the professional knowledge and judgment of teachers. Importantly, it has removed much of the stigma that can be associated with the word 'disability'.

But as this report shows, the NCCD has had unintended consequences, imposing an onerous administrative burden on school staff, including in the documentation required, even for those students whose level of disability does not attract funding. It calls on the Australian Government to improve processes, cut red tape and provide better information and resources. It disproves partisan claims that Independent schools have deliberately inflated the number of students with disability.

This report is based on research undertaken by ISV staff - including highly experienced educators - as we prepared a submission to the National School Resourcing Board, which has been asked by the Australian Government to review funding loadings for students with disability.

In researching this report, ISV staff held detailed consultations with 12 diverse Independent schools in Victoria, conducted a costings survey with 40 Independent schools in Victoria and Tasmania, and reviewed data from a wide range of sources on the extent of disability in the community.

While the report focusses on Independent schools, we believe its findings will resonate with schools in the government and Catholic education sectors.

We hope it will inform discussion on this important area, among policy makers, educators and the wider community.



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EXECUTIVE SUMMARY

This report details the work of ISV and its Member Schools to ensure students with disability can participate in education on the same basis as their peers. It shows the impact on schools and students of the recently introduced method of identifying and documenting those students, the NCCD. The definition of disability in the NCCD is much wider than the narrow definition previously used and more accurately reflects the true extent of disability among students in Independent schools.

Drawing on published data and research conducted by ISV with schools, it finds that the proportion of students with disability in ISV Member Schools reflects the extent of disability among school-aged children in the wider community.

Analysis of the incidence of students with disability (SWD) in Member Schools clearly disproves politically motivated claims by sectional interests that Independent schools have artificially inflated data on disability to attract government funding. There was no significant increase in the proportion of students at the levels attracting funding once the NCCD was linked to funding.

ISV has supported Member Schools to help them implement the NCCD, starting with the pilot program in 2014 and full implementation the following year, when there was no indication that it would be linked to funding. This has been in line with the longstanding commitment of ISV and its Member Schools to meeting the needs of students with disability and ISV's advocacy for government support to match student need, regardless of school or sector.

Staff in Independent schools believe the NCCD has improved their processes and enhanced their awareness of the needs of students with disability, thereby reducing the risk that they will 'fall through the cracks'. It has removed much of the stigma attached to the word 'disability' and helped teachers better meet their needs. At the same time, implementing the NCCD has been highly complex and in many cases, stressful for schools.

This report finds that the cost of supporting students with disability generally exceeds the notional financial support these students receive from the Australian Government. It calls for changes to the NCCD to ease the massive administrative burden it imposes on staff in all schools, and to ensure the process can fully perform its stated aim of enabling schools and governments to better understand and support these students.

The report calls for a central body to oversee all aspects of the NCCD to ensure schools have clear, consistent and current information, with schools expressing frustration about the lack of such information on the NCCD website. This body would also ensure auditors appointed by the government to review schools' NCCD data are properly trained to understand the NCCD and the education of students with disability.

It urges measures to cut the paperwork imposed on schools by the NCCD, described by some staff as overwhelming and onerous. One measure would be to reduce the documentation required for students whose level of disability does not attract additional funding (about 50 per cent of the students recorded in the NCCD).

With the cost to schools of implementing NCCD clearly exceeding the notional disability funding levels, this report recommends that the Australian Government commission a comprehensive research project to assess all the costs involved in meeting the NCCD's requirements.

It also calls for a greater focus on the needs of students with disability in pre-service teacher education courses in tertiary institutions, and for continuing professional learning for teachers throughout their careers.



The report calls for a central body to oversee all aspects of the NCCD to ensure schools have clear, consistent and current information, with schools expressing frustration about the lack of such information on the NCCD website.

ISV's role

ISV was established in 1949 and today represents, promotes the interests of, and provides services to more than 220 Member Schools. These schools educate more than 145,000 students on more than 300 campuses across metropolitan Melbourne and in regional and rural Victoria, and employ more than 18,000 teachers and other staff.

ISV promotes choice in education and champions the values and autonomy of Member Schools. It does not manage schools – it represents, supports and provides services to them so they can provide the best possible education. ISV advocates for excellence in education for all students and for the right of parents to choose how and where their children are educated. It has always advocated that funding for schools should be based on the needs of the child.

ISV and its Member Schools have a longstanding commitment to the education of students with disability, despite the prior lack of adequate government support for them in the Independent sector. Member Schools have strongly supported ISV's lobbying for 'sector blind' funding for students with disability according to their needs, irrespective of the school they attend. This long predates the introduction of the NCCD^[1] and the subsequent link to funding.

Equitable funding for students with individual needs, including disabilities, is essential to enable parents to have choice as to where and how their children are educated. ISV's long-held position is that it is wrong that students with a disability can receive less government funding just because of the schools they attend^[2].

Defining disability

Prior to the introduction of the NCCD, the definition of students with disability that was used for both Australian and Victorian government funding purposes, based on the Australian Government's School Census, was effectively a government construct.

It was extremely narrow and was not related to the Disability Discrimination Act 1992^[3] (DDA) definition of disability or the Disability Standards for Education^[4] (DSE). Consequently, prior to the introduction of the NCCD, many students in ISV Member Schools were not officially recognised by government as having a disability and so were not counted in the census.

Previously, to be included in the census:

- the student required a diagnosis of a disability from an appropriately qualified health practitioner
- the disability had to be included in the fundable category in the relevant state/territory
- the student had to be sufficiently disabled to meet the eligibility criteria for funding in the relevant state/territory.

Not all disabilities were in a fundable category and not all students in each category were sufficiently disabled to access funding. In addition, different criteria existed in the different jurisdictions, so students could move in and out of eligibility for funding when moving states/territories.

Within schools, students who actually met the government's former criteria for disability were often considered as 'funded students' to distinguish them from other students with disability, as there were many more such students enrolled in each school, all of whom required additional support for their learning. Despite having a disability and requiring adjustments in their education, these students did not meet the existing narrow eligibility criteria.

1 <https://www.nccd.edu.au/> (accessed 3 October 2019)

2 Independent Schools Victoria 2011 Review of Funding for Schooling Fair Funding for Independent School Students. Submission to the National School Resourcing Board.

3 Disability Discrimination Act 1992

4 Disability Standards for Education 2005

The previous requirements for funding required detailed external assessment of a student's disability that many parents were often reluctant to undertake or could not afford. Some parents were not prepared to accept the possibility that their child might have a disability, did not wish to have their child labelled as having a 'disability', or were not prepared to put their child through the stress of undertaking a formal assessment. As a result, they chose not to have their child externally assessed for funding eligibility, especially for the very low levels of government funding available. Consequently, the number of students with disability recorded in the school census prior to 2017 was below the actual number who met the narrow criteria then used.

The NCCD was piloted in 2014 and implemented from 2015. It is based on the definition of disability used in the DDA and includes:

- A** total or partial loss of the person's bodily or mental functions
- B** total or partial loss of a part of the body
- C** the presence in the body of organisms causing disease or illness
- D** the presence in the body of organisms capable of causing disease or illness
- E** the malfunction, malformation or disfigurement of a part of the person's body
- F** a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction
- G** a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour
- H** and includes a disability that:
 - presently exists; or
 - previously existed but no longer exists; or
 - may exist in the future (including because of a genetic predisposition to that disability); or
 - is imputed to a person.

To avoid doubt, a **disability** that is otherwise covered by this definition includes behaviour that is a symptom or manifestation of the disability.

The DDA definition is much broader than any previously used for funding. It is also significantly broader than that in common use in the community and possibly also broader than that used by other agencies. As a result, the incidence of students with disability identified under the NCCD would be expected to be significantly greater than under the former definition.

Following the introduction of the NCCD, all students with a disability were able to be identified and recorded on the census, which assists schools to identify them and meet their learning needs.

The NCCD identifies four different levels of adjustment to learning that might be required to enable a student with disability to access education. They are:

- Support provided within quality differentiated teaching practice (WQDTP): students are supported through active mentoring and adjustments that are not greater than those used to meet the needs of diverse learners. These adjustments are provided through usual school processes, without drawing on additional resources, and by meeting proficient-level Teaching Standards⁵. Students with a medical condition whose learning and support needs are met through usual processes (e.g. whole-school professional learning) and active monitoring by school staff are included in this category.
- Supplementary adjustments: students are provided with adjustments that are supplementary to the strategies and resources available for all students in the school. Adjustments might include adapted or additional instruction in some or many learning areas, such as additional literacy/ numeracy support; personalised communication structures, such as hearing/writing support; and additional safety/supervision/support to access buildings and facilities.

- Substantial adjustments: students who have more substantial support needs are provided with essential adjustments and considerable adult assistance. Adjustments to the usual educational program occur at most times on most days. Such adjustments might include additional support or individualised instruction in a highly structured manner, including adjustments to most courses, curriculum areas, activities and assessments.
- Extensive adjustments: students with very high support needs are provided with extensive targeted measures and sustained levels of support. These adjustments are highly individualised, comprehensive and continuing. Adjustments to the regular educational program occur at all times and might include intensive, individualised instruction or support in a highly structured or specialised manner for all courses and curricula, activities and assessments.

Additional funding is provided to schools for the upper three levels of adjustment: supplementary, substantial and extensive. No additional funding is provided to schools for students whose disabilities are catered for within quality differentiated teaching practice.

In addition, students in each of these upper levels of adjustment are categorised as to the type of disability they have (which represents the major contributor to their need for learning adjustment) as either:

PHYSICAL, which includes:

- total or partial loss of a part of the body
- the malfunction, malformation or disfigurement of a part of the person's body
- the presence in the body of organisms causing disease or illness
- the presence in the body of organisms capable of causing disease or illness.

COGNITIVE, which includes:

- total or partial loss of the person's bodily or mental functions
- a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction.

SENSORY, which includes:

- total or partial loss of the person's bodily or mental functions
- the malfunction, malformation or disfigurement of a part of a person's body.

SOCIAL/EMOTIONAL, which includes:

- a disorder, illness or disease that affects the person's thought processes, perceptions of reality, emotions or judgement, or that results in disturbed behaviour.

One of the major strengths of the NCCD, based on the DDA definition of disability, is that it is broader and encompasses all students with disability in each school. It also includes disabilities that are often hard to detect, such as dyslexia and dyscalculia. The NCCD identification process uses teacher judgements to assess a student's disability, which enables these students to be included and removes the stigma associated with having a disability. This overcomes some parental objections and does not pathologise disability.



One of the major strengths of the NCCD, based on the DDA definition of disability, is that it is broader and encompasses all students with disability in each school.



Under the DDA, severe disabilities as well as more common conditions, such as asthma, anaphylaxis, autism spectrum disorder, dyslexia and mental health conditions, are all identified as disabilities and students with these are required to be identified under the NCCD.

Supporting schools with the NCCD

From the outset, ISV supported Member Schools to introduce and implement the NCCD, assisting them to identify and support relevant students. This was before any indication that government funding might be associated with the NCCD.

ISV ran significant professional learning for school staff on the identification and assessment of the adjustments for students with disability. ISV's Student Assessment Project assisted schools to identify students experiencing difficulty. A multidisciplinary team of psychologists, speech pathologists, occupational therapists and special education specialists supported schools to identify individual needs of students and recommended targeted classroom strategies. Schools received individual reports for each student, providing an analysis of screening assessment data and targeted intervention strategies. Between 2013 and 2015, over 1150 students were referred to the Student Assessment Project team.

To complement this project, since 2016 ISV has run teacher professional learning days to increase their knowledge and expertise in identifying and supporting students with specific areas of need. Each professional learning day included the use of detailed teacher observation forms that considered each student's physical, intellectual, emotional, hearing, communication and vision characteristics, as well as behaviour observations. Students identified through this process then underwent additional observation and screening assessments by teachers in individual schools. Between 2016-2019, approximately 400 participants attended a seminar in this series.

As dyslexia has a profound effect on a student's learning, yet is one of the most difficult disabilities to detect, ISV ran a detailed program to enable educators to better identify and support the learning needs of students with dyslexia. A core, one-day program targeted classroom teachers and learning assistants, while an advanced, three-day program supported individual needs teachers working in individual or small group settings for students with disability outside the regular classroom. A five-day specialist course was run for individual needs coordinators. Between 2014 and 2017, 783 participants completed the core program, 346 completed the advanced course and 59 completed the specialist course.

In addition, 158 staff from 105 schools undertook a two-day training course in the administration of specialised testing to identify students with dyslexia between 2014 and 2016, with further training provided in 2019.

ISV has also provided professional learning to support educators in catering for the needs of students with disability in:

- developing an individual learning plan
- reviewing learning adjustments
- distinguishing between language difference and language impairment
- dyscalculia and its identification
- working with learning support assistants.

Since 2014, ISV has run regular network meetings for staff working with students with disability throughout regional Victoria and metropolitan Melbourne, which have played a vital role in supporting schools' introduction of the NCCD. In 2019 alone, between January and August, a total of 22 network meetings were held involving 300 educators from over 150 Member Schools.

As a result of this work, Member Schools led the way, commencing with documenting students and collecting data from the NCCD's introduction in 2015 – even though no funding was attached, nor was any expected.

As with any new process, schools have improved their implementation of the NCCD with practice, resulting in changes in the numbers of students in subsequent years. By the time it was announced that funding for students with disability would be linked to the NCCD in 2018, at the supplementary, substantial and extensive levels^[6], Member Schools had already undertaken three years of data collection and were well versed in the NCCD identification processes and the levels of adjustment required to support students.

ISV's review of NCCD

In 2019, with NCCD funding of students with disability in its second year, ISV undertook a review of the operation of NCCD in Member Schools, to further support schools and to provide feedback to governments and policy makers.

- The ISV review, which forms the basis for this report, encompassed four areas:
- a literature review of the incidence of major disabilities in the community
- an analysis of the data regarding the NCCD in Member Schools to determine whether it reflects the incidence of disability in the wider community
- a program of visits to a diverse range of schools to listen to their experiences with the NCCD
- a survey to attempt to quantify the costs incurred by Member Schools in supporting students with disability and implementing the NCCD.

Disability among school-aged children

Analysis of Australian Bureau of Statistics (ABS) data on the incidence of disability under the DDA definition, together with a review of the educational literature, suggest that the incidence of disability among school-aged students would be expected to be significantly higher than that documented under the Australian Government's previous definition of disability.

Under the DDA, severe disabilities as well as more common conditions, such as asthma, anaphylaxis, autism spectrum disorder, dyslexia and mental health conditions, are all identified as disabilities and students with these are required to be identified under the NCCD.

Currently, asthma^[7] is estimated to affect 11.4 per cent of school-aged children and allergic reactions affect 20 per cent of the Australian population. In 2013, 10 per cent of infants had an immediate anaphylactic food allergy^[8] – and by 2019, these children would be enrolled at school.

Much has also been written about the rising incidence of mental health conditions, especially among the young. The Australian Government's 2015 Report, *The Mental Health of Children and Young Adolescents*^[9], said that 1 in 7 or 13.9 per cent of children aged 4-17 years were assessed as having mental health disorders in the previous 12 months. The first results of the 2017-2018 National Health Survey released by the ABS in December 2018^[10] indicate the incidence of mental and behavioural conditions in the population to be 20.1 per cent, up from 17.5 per cent in 2014-2015^[11]. The incidence of anxiety-related conditions also increased to 13.1 per cent from 11.2 per cent, while the incidence of depression or feelings of depression was 10.4 per cent, up from 8.9 per cent in 2014-2015.

6 <https://www.malcolmturnbull.com.au/media/press-conference-with-the-minister-for-education-and-mr-david-gonksi-ac-syd> (accessed 3 October 2019)

7 Asthma Australia 2018 Asthma in Australia

8 ASCIA 2013 Allergy and Immune Diseases in Australia Report

9 Lawrence, D et al 2015 *The Mental Health of Children and Adolescents. Report on the Second Australian Child and Adolescent Survey of Mental Health and Wellbeing*. Australian Government

10 ABS 2019 National Health Survey: First Results, 2017-2018 ABS Cat No: 4364.0.55.001. Canberra:ABS

11 ABS 2016 National Health Survey: First Results, 2014-2015 ABS Cat No: 4364.0.55.001. Canberra:ABS

Victorian data mirrors the national data, with the incidence of mental and behavioural conditions being 20.2 per cent (up from 17.5 per cent in 2014-2015). This is mostly due to an increase in anxiety-related conditions, from 13.0 per cent in 2014-2015 to 16.1 per cent in 2017-2018. Overall mental and behavioural conditions were more common among females than males (23.7 per cent compared with 16.7 per cent). The survey data was broken down to indicate the incidence of these conditions among young people, with 13.7 per cent of males and 8.2 per cent of females aged 0-14 years having a mental or behavioural condition, while 21.3 per cent of males and 30 per cent of females aged 15-24 years had a mental or behavioural condition in the 2017-2018 survey.

The Australian Institute of Health and Welfare Autism Report^[12] stated that in 2015 the incidence of autism among children aged 5-14 years was 2.8 per cent, while it was 1.8 per cent of those aged 15-19 years. It also noted a significant increase in the prevalence of autism from 2009 to 2012 and again from 2012 to 2015, so these 2015 figures are likely to represent an underestimate in 2019.

ABS data^[13] in 2012 indicated that 4 per cent of children aged 0-14 years had a cognitive or intellectual disability, with boys twice as likely as girls to have an intellectual disability. Earlier data from 2003^[14] indicated the prevalence of intellectual disability in the 5-14 year age group as 5.8 per cent and 4.4 per cent in the 15-19 year age group, while 3 per cent of the population as a whole had an intellectual disability. This general pattern of a markedly high rate among children of school age and a lower rate in the adult population is consistent nationally and internationally^[15]. Many people with an intellectual disability have multiple impairments or disabilities, with psychiatric conditions being the most commonly associated disability, although speech problems, asthma, attention deficit hyperactivity disorder and autism are also common¹⁵.

School students with an intellectual disability typically need additional support in order to learn and successfully participate in school. This is reflected in their lower participation rate in ordinary classes compared to students with other disabilities. In 2003, 45 per cent of school-aged students (aged 5-20 years) with an intellectual disability were attending an ordinary class compared to 95 per cent of students with a physical or diverse disability.

This data regarding an intellectual disability, however, does not include the incidence of learning difficulties (also recognised as a disability under the DDA), such as dyslexia, dysgraphia and dyscalculia. The Australian Dyslexia Association^[16] estimates that dyslexia affects 10 per cent of the Australian population, while data from other English speaking countries^[17] estimates the prevalence of dyslexia to be up to 20 per cent.

Taken together, the data regarding the incidence of disability among young people in the community suggest that the total proportion of school students with a disability in any mainstream schools could be up to 30-40 per cent of the student population. All of this data leads to the conclusion that the use of the DDA definition of a disability in the NCCD must of necessity lead to a significant documented increase in the number of SWD in all schools, including ISV Member Schools.

Disability among students in Independent schools

As outlined, ISV Member Schools started collecting data according to the NCCD requirements in 2014 as a pilot year and have reported their data since 2015, even though no funding was attached.

By the time it was announced in May 2017 that funding would be linked to the NCCD from 2018 at the supplementary, substantial and extensive levels, these schools had already undertaken three years of NCCD data collection and were well versed in the NCCD identification process.

12 Australian Institute of Health and Welfare 2017 Autism in Australia Web Report <https://www.aihw.gov.au/reports/disability/autism-in-australia/contents/autism> (accessed 3 October 2019)

13 ABS 2012 Intellectual Disability Australia, 2012 ABS Cat No: 4433.0.55.003 Canberra: ABS

14 Australian Institute of Health and Welfare 2008 Bulletin 67

15 ABS 2016 Microdata: Disability, Aging and Carers, Australia, 2015. ABS cat.no. 4430.0.30.002

16 <https://dyslexiaassociation.org.au/what-is-dyslexia/> (accessed 3 October 2019)

17 <https://www.dyslexiacanada.org/dyslexia-basics> (accessed 3 October 2019)

The early work undertaken by Independent schools to understand and implement the NCCD led, in 2017-2018, to false claims that Independent schools were ‘gaming’ the system to gain extra funding. These claims were made in the context of an aggressive political campaign, waged by sectional interests in an attempt to pressure the Australian Government to change the funding system for non-government schools^[18]. These claims are at odds with the facts.

Census data from ISV Member Schools shows that the total proportion of students with disability has remained relatively constant over the period 2015-2018. However, as would be anticipated as schools became familiar with the introduction of new processes and with the reassessment of the adjustments required for each individual student, there has been a small variation in the NCCD data from year to year. This would also reflect some student movement into and out of the Independent school sector.

TABLE 1 INCIDENCE OF SWD IN ISV MEMBER SCHOOLS 2015-2018

YEAR	TOTAL ENROLMENTS	TOTAL NCCD NUMBERS	NCCD AS A PROPORTION OF TOTAL ENROLMENTS
2015	131,496.5	33,328.0	25.35%
2016	134,383.6	34,925.0	25.99%
2017	138,060.3	36,725.0	26.60%
2018	143,675.0	35,026.8	24.38%

The overall incidence of students with disability in ISV Member Schools is actually less than might be anticipated in light of the published levels of the prevalence of various forms of disability in the community. The incidence of students with disability in Victorian Independent schools should be considered to be more reflective, but possibly still an under-estimate, rather than any over-estimate of that in the general community.

A more detailed analysis of the NCCD data from ISV Member Schools clearly disproves any suggestion of schools reporting unusually large numbers to gain increased funding. The introduction of funding linked to the three NCCD higher levels of adjustment in 2018 did not result in any increase in either the total proportion of students (Table 1) or at the funded levels of adjustment (Table 2). In fact, a comparison of the data prior to funding from 2014-2017 to that following the link to funding in 2018 in Table 2 shows no increase whatsoever in the percentage of students with disability in Victorian Independent schools at the three funded levels of adjustment. There is, however, a small variation from year to year, as would be expected.

TABLE 2 INCIDENCE OF SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE LEVELS OF NCCD IN ISV MEMBER SCHOOLS 2015 – 2018

YEAR	TOTAL ENROLMENTS	TOTAL NCCD SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF TOTAL ENROLMENTS
2015	131,496.5	15,897	12.09%
2016	134,383.6	17,187	12.79%
2017	138,060.3	17,725	12.84%
2018	143,675.0	17,533.9	12.20%



In 2003, 45 per cent of school-aged students (aged 5-20 years) with an intellectual disability were attending an ordinary class compared to 95 per cent of students with a physical or diverse disability.

18 See, for example, 'Private schools accused of "gaming the system" to double disability funding', *The Age*, 9 October 2017



The introduction of the NCCD appears to have raised awareness more broadly in the educational community regarding the needs of students with disability, as several schools commented that more quality resources are now becoming commercially available to support such students.

This data also illustrates that Member Schools have effectively implemented the NCCD based on the DDA definition of disability from the beginning, rather than any ‘gaming’ of the system. The data more accurately reflects the true incidence of disability in these schools. That Member Schools have effectively implemented the NCCD from its outset is a reflection of the support Member Schools received from ISV professional learning staff.

This view was supported by a senior official from the Catholic Education Commission of Victoria, Mr Bruce Phillips, in evidence to a Senate Select Committee in October 2018. Mr Phillips denied that Independent schools were ‘gaming’ the system. Instead, he said changes in the data on the incidence of disability in Independent schools was likely due to the fact that these schools were ‘...more diligent with the data collection from day one than some of the other systems...’^[19]

Comparison of the data between tables 1 and 2 indicates that approximately 50 per cent of the students with disability identified in Victorian Independent schools are in the with quality differentiated teaching practice (WQDTP) level of adjustment which attracts no funding. In addition, while there has also been an increase in the number of students at the WQDTP level of adjustment over the 2014-2018 period, there has been no increase in the funded levels between 2016 and 2018.

A more detailed analysis of the NCCD data in ISV Member Schools is attached as Appendix 1. This also demonstrates that the incidence of students in the cognitive category of disability is higher in the primary years than in the secondary years. This is as predicted by the ABS report that stated that students with an intellectual disability and severe or profound limitations are more likely to start school life in an ordinary class and remain in ordinary classes for at least five years. Some, however, move between different school environments. The most common transition was to start off in an ordinary class, then move to a special class or special school (a move made by 29 per cent of a 5-year age cohort of students with severe disability), as is reflected in the ISV NCCD data.

The Member School data over 2015-2018 reflects the societal increase in mental health issues in young people. While the data does not show an increase in the proportion of social/emotional disability among primary students, there is an increase in secondary years. This increase is in both the total number of students with a social/emotional disability and in the funded levels of adjustment, as would be predicted by the National Health Survey 2017-2018.

It is important to note that, unlike schools in other sectors, each ISV Member School is individually responsible for submitting and authorising their data to the Australian Government each year in the August Census, with the principal of each school being the approved authority in most cases.

What Member Schools are saying

As part of ISV’s review of the implementation of the NCCD and the adjustments that schools are making to support students with disability, 12 schools reflecting the diversity of ISV’s membership were visited to obtain feedback from the team involved in implementing the NCCD, including the principal or deputy principal and individual needs coordinator. Schools visited included a number of faith-based schools, including Christian, Islamic and Jewish; schools in metropolitan, outer urban and rural areas; and small, medium and large schools. The vast majority were Prep to Year 12 mainstream schools, although stand-alone primary, secondary and special schools were also visited.

The NCCD’s strengths

Every school visited was, and always has been, committed to providing the best possible learning for students with disability. They believe the introduction of the NCCD has improved their processes and practices and enhanced teachers’ awareness of the needs of students with disability and their skills in catering for them. Everyone, especially school leaders and teachers, was committed to implementing the NCCD as accurately as possible and was focused on providing the learning adjustments reflecting best practice, that enabled students to flourish.

The broader definition of disability outlined by the DDA has enabled the learning needs of all students with disabilities to be identified and met. Some of these students might not have had a formal diagnosis or their diagnosis was not previously eligible for funding, but they had a well-documented disability and required significant learning adjustments.

Schools reported that the detailed processes required by the NCCD have ensured that every student is carefully reviewed and assessed, meaning there is no longer the risk of some students 'falling through the cracks'. The use of teacher judgements to assess whether a student has a disability removes the cost burden from schools and parents who no longer have to pay for an external assessment, and reduces the stigma associated with a 'disability', and the reluctance of some parents to undertake such testing and to accept that their child might have a disability. The NCCD does not pathologise disability.

As shown above, the number of students in Member Schools identified by the NCCD appears to more accurately reflect the actual incidence of disability in schools and the broader community. Several schools reported that the incidence of students with disability in their school increased through the NCCD, as they became better at detecting and identifying students' disabilities, with resultant benefits to the students through the learning adjustments that were then made.

All schools highlighted that one of the major benefits of the NCCD was a significant increase in the detailed understanding of the needs of students with disability by all staff and their professional obligations to meet those needs, even though this has always been their legal requirement under the DDA and DSE.

The involvement of classroom teachers in the NCCD assessment process has meant they are much more aware of students' needs, and how to identify and cater for those needs. Teachers better understand their legal requirements under the DDA and DSE and their moral responsibility to the students. They are now taking greater responsibility for the learning of students with disability, instead of considering them to be primarily the responsibility of schools' individual needs departments. The introduction of the NCCD has assisted schools to change the language they use, from one focused on 'funded students' to a much more inclusive language about differentiation of the curriculum and catering for the needs of each individual student.

In addition, each student now receives targeted adjustments to support their learning and which form the basis of communication with their parents/guardians. The adjustments are regularly updated to reflect what the student needs to flourish. There is much more effective communication with parents regarding their child and their learning progress. This has led to positive parental comments regarding the process in many schools and is seen as a real bonus of the NCCD.

Schools commented on the greater accountability, improved record keeping, enhanced collaboration and communication, both within the school and with parents, through the NCCD requirements. All schools visited considered that national and cross-sectoral nature of the NCCD as a strength and as a means to achieving as much consistency as possible, although this could still be enhanced. It is clear that the introduction of the NCCD will continue to improve schools' practices in supporting the needs of students with disability.

The introduction of funding linked to the NCCD at the three higher levels of adjustment has made a difference financially to all the schools visited, with the difference being significant in a number of schools. This is particularly marked in some small schools that appear to be attracting a larger proportion of students with disability and which, prior to the introduction of NCCD-linked funding, were struggling financially to meet their needs.

The introduction of the NCCD appears to have raised awareness more broadly in the educational community regarding the needs of students with disability, as several schools commented that more quality resources are now becoming commercially available to support such students.

The NCCD's challenges

As with the introduction of all new processes, Member Schools identified a number of major challenges and areas for improvement with the NCCD.

Process and documentation workload

Schools reported that the NCCD processes are hugely demanding of time and resources. The impact of the NCCD on teachers' workloads, especially those of individual needs teachers, has been significant (described by some schools as 'massive') and the pressure this is causing is a significant issue for all the schools visited.

This workload includes: determining whether a student has a disability and documenting the evidence of the disability; the level of adjustment provided to the student's learning; the category of disability; documenting all the NCCD requirements for a SWD, including development, implementation and regular modification of the individual learning plan; providing learning adjustments; moderation meetings; parent meetings and documentation of them; and other documentation as required.

All the schools visited find this level of documentation to be overwhelming and onerous. The cost of record keeping for NCCD compliance in terms of personnel, money and time is significant. As a result, some schools are employing administrative assistants to support teachers with their documentation and record keeping. Some schools also reported concerns that the massive administrative burden of the NCCD is actually taking time away from supporting the students.

This is particularly true for students with the WQDTP level of adjustment, who represent the largest proportion of schools' enrolments of students with disability, for whom no funding is provided, and yet who require the same level of documentation.

While it is important that the disabilities of these students are recognised, and their learning needs met, the documentation required is onerous. It is exceptionally onerous where a number of students categorised as WQDTP are in the one class, with a single teacher being responsible for undertaking all the adjustments, parent meetings, documentation and record keeping required. While teachers struggle to manage one or two WQDTP students, in addition to other students with disability (who are receiving additional support), five or six in an individual class present a teacher with an unmanageable workload. The majority of schools visited favoured a reduction in the documentation required for WQDTP, but some suggested some funding should be provided to support these students, especially for administrative support.

Regrettably, some schools still find some parents will not attend support meetings regarding their child, while other parents are still refusing interventions and adjustments for their child with disability, to the detriment of the child's education.

Consistency

All schools, but especially large and multi-campus ones, are finding it challenging to ensure consistency in their NCCD processes. It is especially difficult in determining whether a student has a disability and then determining the levels of adjustment required, implementing teaching and learning adjustments across the school and between generalist and specialist teachers. An added complication is when allied health professionals are involved.

The most consistent approach is achieved where there is a team method, involving individual needs teachers, classroom teachers (as appropriate), allied health professionals, and school leaders. Regrettably in some schools a single person is overseeing most of the NCCD processes, especially for students with a cognitive disability, leading to inconsistency and loss of knowledge when personnel change.

Many schools also feel that there is a lack of clarity about the benchmark that the learning adjustments should meet. Is it simply to enable the student to access education but not necessarily succeed? Or is it best practice to enable the student to flourish?

Teacher skills

Anecdotally schools that have employed recent graduate teachers, primary and secondary, have found that they appear to have gained little or no understanding about how to cater for the needs of students with disability from their preservice education (although one tertiary institution appeared to be the exception, receiving praise for the skills of its graduates in curriculum differentiation).

With classroom teachers taking greater responsibility for identifying and catering for the needs of these students, affordable professional learning to support teachers is a significant issue for all schools. This is especially true for rural and outer urban schools. Some schools highlighted autism and dyslexia as areas of need for professional learning.

Costs

All the schools visited catered for students with disability before the introduction of the NCCD and before funding was linked to it. While Australian Government funding through the NCCD aims to cover 80 per cent of the estimated cost associated with enabling students with disability to access education, the majority of schools reported that they (as legally required) were working to meet the students' needs. The funding did not, however, nearly meet 80 per cent of the costs, with significantly more resources being provided to support the learning needs of the students than the funding level would indicate.

NCCD website

From the schools visited, there was a general consensus that schools need more clarity regarding the guidelines, to help them to achieve greater consistency. Schools believe the resources and case studies on the NCCD website^[20] do not represent the complexity of the needs of students and do not provide as much assistance and guidance as schools require. Schools want 'line-ball'/borderline case studies to assist them when they are attempting to classify cases that are not clear cut. A number of schools indicated that making a judgement on whether a student has disability was the most challenging part of the process.

One group of schools reported it was hard to distinguish between a high level of supplementary assistance and a substantial level. Some schools reported that the evidence required to classify a student as one with disability has caused confusion, as the lack of an 'official diagnosis' by a health professional did not rule the student out, but rather was dependent on the assessment of the educational professionals. At least one school felt that too much was being left to professional discretion.

The definition of 'extensive', being one that is requiring support all the time, is challenging for schools, especially regarding whether this requires support during break times, such as recess and lunchtime. There are students who would be classified by schools as having extensive learning needs and having a totally individual curriculum and/or a full-time aide, but who do not need support during all breaks. Consequently, it is unclear under the current guidelines whether these students should be classified as substantial or extensive, yet their learning needs are truly extensive and the costs to schools in meeting these needs are often \$50,000 or more per annum. Schools believe they ought to be classified as extensive. Greater clarity as to what level of adjustment is classified as extensive in a mainstream school is required.

The video case studies on the NCCD website for the extensive adjustment appear relevant only to special development schools and not to mainstream schools or other special schools. Mainstream schools might not have much comparison against students with very significant needs, as most students in this category attend a special school/special developmental school. As a result, some mainstream schools feel that a student with disability might have extensive needs, but it is possible that, when compared with a student in a special school, this categorisation might not be appropriate. Even some special schools believe that there ought to be a category for students who are so severely disabled that they cannot attend a 'regular' special school.



With classroom teachers taking greater responsibility for identifying and catering for the needs of these students, affordable professional learning to support teachers is a significant issue for all schools.

20 <https://www.nccd.edu.au/#case-studies> (accessed 3 October 2019)



Schools, and especially individual needs teachers, are extremely nervous regarding what exactly is required for the quality assurance and accountability process to achieve a satisfactory outcome.

Schools also requested greater clarity on the level of evidence and documentation required by the NCCD. Proformas, templates and checklists, downloadable from the website, are essential for schools to effectively and consistently implement the NCCD. Schools would also like clarification as to what is required in an individual learning plan, with proformas urgently needed. Provision of checklists to ensure all the required steps are followed and supporting documents are provided, would also be extremely valuable.

The timeliness of information is critical, with schools finding it difficult to accept that such templates had been promised but were not available on the website, given that the NCCD processes were now in their fifth year of full implementation. In addition, given that the NCCD year runs from August Census date to the following census date, it is important that all information is updated prior to the commencement of the new 'NCCD year'. Regrettably, the 2019 guidelines for the NCCD were only made available on the website in Term 2, 2019, after more than half the 'NCCD year' had passed.

Clarity on quality assurance process and documentation

Schools, and especially individual needs teachers, are extremely nervous regarding what exactly is required for the quality assurance and accountability process to achieve a satisfactory outcome. The lack of clear guidance on the NCCD website as to what documents auditors will require is of significant concern to schools. All schools requested greater clarity on the level of evidence and the documentation required. Proformas, templates and checklists, downloadable from the website, are essential for schools to effectively implement the NCCD on a consistent basis and for schools to feel confident that they meet accountability requirements.

Psychological services

Given the increasing incidence of mental health issues in the community, schools are indicating anecdotally that there is a significant increase in the number of students with significant social/emotional (psychological) issues that have a significant impact on their education. A recent media report outlined analysis by the Grattan Institute that found that where students have significant mental health (social/emotional) needs, these severely hamper a student's progress^[21].

Schools with a registered psychologist on staff, in addition to seeing students, also usually act as a contact for any external psychology service agency so the school is able to support students' learning with an appropriate level of adjustment. In contrast, schools without a registered psychologist on staff find they are often not informed of a student's serious mental health (social/emotional) issues and while they may be supporting these students, often with significant adjustments and at a significant cost to the school, they are not always aware of the student's disability and they may not be included in their NCCD data.

In some schools, there is also an issue with registered psychologist staff members not being prepared to share information regarding students, due to the confidentiality requirement of their Psychology Board of Australia registration. In at least one school visited, the registered psychologist on staff was so concerned about student privacy that they did not share any information regarding the students they were seeing so no learning adjustments were made, nor were the learning needs of these students met and they were not classified under the NCCD.

The 10-week period of adjustment

A number of special and special assistance schools have identified that the requirement for schools to have evidence of 10 weeks of adjustments in order to include students in the NCCD in the August Census has created a perverse disadvantage for some of the neediest students. Many special schools act as 'withdrawal' schools. They enrol students who are not able to cope in mainstream schooling, and who frequently have long histories of non-engagement with schooling. It is common for these special schools to receive referrals and enrolments throughout the year.

Where a student enrolls at one of these schools within 10 weeks of the August Census date, it can be extremely difficult for the school to obtain evidence from the student's previous school – particularly where the student has a history of school refusal, and has not been attending school in order to receive adjustments. As a consequence, the school is not able to include the student in the NCCD, nor receive funding.

Given the high cost per student of running special schools, and the typically low levels or no private income the schools receive, they can be faced with little option but to refuse enrolment to students within 10 weeks of the August Census date, since the schools are completely reliant on government funding to provide the necessary support.

Costs associated with NCCD

PricewaterhouseCoopers (PwC) undertook work in 2016^[22] to develop costings for schools to educate students with disability, which led to the development of the Australian Government's funding levels. Following this work, ISV commissioned PwC to undertake a similar exercise in Victorian Independent schools in 2017. This research was based on a similar methodology to that previously undertaken for the government. The aim was to determine whether the loadings applied to schools mirrored the cost structures in our Member Schools. Twenty-three schools participated in this research.

In 2019, following feedback from schools regarding the significant costs associated with the NCCD, ISV undertook a more detailed costing survey, to try to obtain more clarity on this issue. The survey aimed to cover a wider range of costs borne by schools, and to provide more detail about the extent to which these costs were borne for different groups of students. Forty Independent schools in Victoria and Tasmania participated in the costings survey, which was based on schools' 2018 data.

ISV asked schools to report the amount of time staff spent providing assistance to students with disability in 2018, including:

- senior leadership (principals, deputy principals, business managers, heads of campus, heads of curriculum, heads of wellbeing)
- middle management (heads of year level, heads of house, faculty heads)
- individual needs coordinators
- individual needs and specialist support teachers
- classroom teachers
- teachers' aides and learning support assistants
- specialist staff (including psychologists, speech therapists, counsellors, but excluding external providers)
- school nurses
- school administrative support.

The survey also asked schools to attempt to quantify their resource costs, capital expenditure over the past 10 years, and their maintenance costs in 2018.

The number of schools that participated in the survey was not large enough to obtain a statistically significant answer to the cost of educating students with disability. Nonetheless, the survey provided the following indicative information:

- Victorian and Tasmanian Independent schools spend considerably more to support students with disability than they receive in government funding. For the schools that responded to the survey and based on a deliberately low estimate of staff costs, the notional proportion of the Schooling Resource Standard (SRS) allocated for students with disability²³ in 2018 accounted for 59 per cent of the staffing costs incurred in meeting their needs. This was before resource and capital costs had been factored into the equation. In practice, the Australian Government only provides a proportion of this notional allocation in funding to schools. Thus the NCCD funding should, in reality, be more realistically considered a contribution towards the costs of the learning adjustments required to support students with disability.
- The cost to schools of providing adjustments to support students increased as students' level of disability increased.
- Schools spent significant staffing resources on students whose disability needs are catered for by quality differentiated teaching practice and for whom no funding is received. The median staffing cost, calculated at a low estimate, for students in the WQDTP level of adjustment in 2018 was \$6267.
- The staffing costs associated with students receiving a supplementary level of adjustment was higher than that of those at the WQDTP level, but not significantly so, with the median staffing cost in the survey being \$7669.
- There were significant increases in the staffing costs for students associated with the higher levels of adjustment, with the median staffing cost for the substantial level being \$14,606 and \$39,012 at the extensive level.
- The cost of educating students in special schools was similar to the cost of educating students with extensive adjustments in mainstream schools, regardless of the level of adjustment provided to the students in special schools.
- Students with cognitive and social/emotional disabilities tended to incur higher staffing costs than other students with disability, but lower resource and capital costs.
- Schools incurred significantly higher capital costs to provide adjustments for students with physical and sensory disabilities. However, schools typically incurred significantly lower staffing and resource costs for these students. Excluding the capital costs for students with physical and sensory disabilities would significantly underestimate the cost of educating these students.
- The actual cost of educating individual students with disability is highly variable and will depend on the particular needs of the student, and the capacity and expertise of the school in addressing those needs. Schools identified a range of factors affecting the cost, including:
 - the age of the student
 - the length of time at school before the student's condition was diagnosed
 - the student's home environment
 - the extent of co-morbidity of disabilities
 - the existence of economies of scale for students with similar needs
 - the need to access specialist health practitioners vs those students whose needs can be met through teachers and teachers' aides.
- The cost of educating the students with the most extensive adjustments can be extremely high, particularly in mainstream schools which, in part, are unable to benefit from economies of scale, and in part are not set up to deal with students with the most extensive needs. In one instance, a school reported in the ISV costings survey that it cost more than \$125,000 in staff costs alone to educate one student who required extensive adjustment.

23 The relatively low levels of funding provided by the Victorian Government for students with disability means that most Victorian schools would receive less than the total value of the loadings from both levels of government

Despite the survey being more detailed than any other surveys of schools, participants reported that they found it very difficult and time consuming to complete the survey accurately. Schools traditionally have not regarded students with disability as a cost centre to be measured, and a lot of information had to be estimated. Schools also reported that a lot of the costs of educating students with disability are invisible, so most of the responses to the survey were estimates.

In addition, one school that participated in the survey attempted to measure the time taken by staff just to plan and write documentation for students, in order to share this with parents. The school estimated that its teachers allocated 1588.5 hours per annum – almost five hours per student – just to undertake this paperwork, before any teaching and learning activities took place. Another school reported that they found the staffing categories included in the survey very valuable in assisting the school to quantify their costs associated with supporting these students. Yet another school indicated that a significant invisible cost was in replacing staff who became ‘burned out’ by the emotional toll of their job.

Conclusion and recommendations

Since its full introduction in 2015, ISV Member Schools have implemented the NCCD effectively based on the DDA definitions of disability. They always have and will continue to support the learning of students with disability to enable them to flourish.

The use of the DDA definition of disability in the NCCD must lead to a significant increase in the number of students identified in all schools, given the relative incidence of disability among young people in the community.

The incidence of students with disability in Member Schools under the NCCD is in line with or is even a slight under-estimate of the incidence of disability in school-aged children in the community. Victorian Independent schools have not manipulated their NCCD figures; rather, they are an accurate representation of the proportion of students with disability enrolled in Member Schools.

It is worth noting that a higher proportion of students is identified as requiring the extensive level of adjustment in primary schools than in secondary schools, which may reflect a move by such students to a more specialised educational setting for secondary students. In addition, an increased incidence of students with social/emotional disabilities was noted at secondary levels, which is in line with the increased incidence of mental health issues amongst adolescents in the general community.

When the NCCD was linked to funding, there was no significant change in the proportion of students with disability in Member Schools, either in total proportion or as a proportion of enrolments at the three high levels of adjustment. The data disproves any suggestion that Member Schools have artificially inflated their NCCD figures to attract additional funding.

The introduction of the NCCD based on the DDA definition has enhanced schools’ processes and practices to cater for their students. It has further enhanced teachers’ awareness of their professional responsibility to support these students, their ability to identify the needs of these students, and their skills in providing adjustments and differentiation. Schools have also reported that the NCCD has enhanced their consultation with parents and guardians.

Schools welcomed the provision of funding in 2018 linked to the three higher levels of adjustment. This has made a difference financially to all the schools visited, with the difference being significant in a number of schools. This is particularly marked in some small schools that appear to be attracting a larger proportion of students with disability and which, prior to the introduction of NCCD-linked funding, were struggling financially to meet the needs of these students.



The introduction of the NCCD based on the DDA definition has enhanced schools’ processes and practices to cater for their students.



Schools reported that the NCCD imposed a massive and overwhelming assessment and administrative burden.

As with any new processes, however, feedback from schools has identified a number of significant areas for improvement.

1. NCCD website materials

- Schools are frustrated by the lack of appropriate and timely information on the NCCD website. No templates are currently available for schools on the site, despite being promised. The 2019 amended criteria for assessing adjustment levels were only available early in the year, yet the 'NCCD year' commenced from the census date in August 2018. Timely information is critical for schools to effectively implement the NCCD and support their students.
- The case studies to assist schools with determining the appropriate level of adjustment appear clear cut and do not include ones where the level of adjustment is unclear. Such information would greatly assist schools that are struggling with the classification of some students for whom the level of adjustment required appears to fall between levels. The website case studies for students who require extensive adjustment are more akin to students in a special school and/or special development school, and do not reflect students who require an extensive level of adjustment to access education in a mainstream school.

2. Documentation required

- Schools reported that the NCCD imposed a massive and overwhelming assessment and administrative burden. Some have had to hire administrative staff to deal with the paperwork. Documentation processes are hugely demanding of time and resources, especially given the lack of clarity regarding what is required to meet schools' obligations. The lack of clarity may mean that schools are over-documenting their practices and processes. It is important that the documentation required for quality assurance processes is consistent with that required for best practice education of students with disability.

3. Australian Government quality assurance processes

- There is considerable anxiety in schools regarding the quality assurance process, in particular regarding the level of documentation required, especially given the lack of the promised templates.
- Anecdotal feedback from schools who were audited regarding their 2018 data indicated that the audit was most effective when the auditors had an educational background. Consequently, it is recommended that auditors be appropriately trained.

RECOMMENDATION To address the issues raised in 1 to 3 above, it is recommended that:

A central body be established to oversee all aspects of the NCCD and to provide timely, consistent and appropriate information to schools. Such a body should be given the authority to identify areas of uncertainty and inconsistency in the implementation of the NCCD, including templates and case studies, and to resolve these issues. This would help to remove ambiguity and significantly assist schools in their quality assurance in implementing the NCCD.

Secondly, auditors engaged by the Australian Government to review schools' NCCD data should be appropriately trained to understand both the NCCD and the education of students with disability.

4. Moderation

- All schools are finding it challenging to achieve consistency in their NCCD processes and assessments, and recommend greater moderation between schools and school sectors. ISV, following feedback from schools, has instituted a significant program of moderation among groups of Member Schools, expanded to cover almost all Member Schools in metropolitan, regional and rural areas. ISV schools would also value cross-sectoral moderation.

RECOMMENDATION *In addition to moderation within ISV Member Schools, currently led by ISV, greater cross-sectoral moderation should be introduced.*

5. Documentation

- The documentation burden is especially relevant for students under the WQDTP level of adjustment, for which no funding is received, yet NCCD requirements are the same as for higher and funded levels of adjustment. The level of documentation is significantly in excess of that required to support the education of these students. This was also reflected in the costing survey that found that schools were expending significant resources in terms of staff time for students with disability in the WQDTP level of adjustment, with a median expenditure of \$6267 per student.

RECOMMENDATION *The documentation and record keeping requirements for students in the WQDTP level of adjustment be significantly reduced or alternatively funding provided to assist with this category.*

6. Teacher skills

- While teachers' skills in supporting students with disability have improved, schools identified the skills of recent graduates in this area as a matter of significant concern. Pre-service teacher education should be enhanced to assist graduates to fulfil their responsibility to differentiate the curriculum and provide necessary adjustments to support students with disability. Further professional learning for all teachers to support these students would also be very beneficial.
- ISV has provided significant professional learning in this area, which has assisted teachers in our sector to effectively identify SWD and their learning needs.

RECOMMENDATION *Teacher professional learning in the provision of educational adjustments for students with individual needs should be enhanced, particularly for recent graduates and in pre-service education courses.*

7. Costs

- Anecdotal information from the schools visited and the limited data obtained by ISV in its costing survey show that the costs of implementing the NCCD significantly exceed the notional funding levels.
- The time and effort required to document costs is considerable. Further well-resourced work is required to obtain an accurate measure of the average cost of educating students with disability. This research would be time-consuming and burdensome for participating schools, while such research would only be able to establish ranges and average costs, given the wide range of student needs.
- Schools require more accurate financial information, including detailed and financially supported costings of NCCD categories, to enable the level of support to more accurately reflect the costs experienced by schools.

RECOMMENDATION *A properly resourced, comprehensive research project be commissioned to consider all of the direct and indirect costs, including the costs of meeting the NCCD evidentiary requirements, to accurately determine the cost of educating students with disability. In addition, government messages should recognise that government funding for students with disability does not meet the full cost of educating students and should recognise the additional resources that schools allocate to meet students' needs.*

8. Special schools

- The requirement for a minimum of 10 weeks of adjustment prior to the census date effectively makes it exceptionally difficult for schools to enrol students with disability midyear, as they will not receive any funding for such students. This is particularly relevant to Independent special schools that cater for disengaged students and do not receive fee income. Many special schools act as 'withdrawal' schools, enrolling students who are not able to cope in mainstream schooling and who frequently have histories of non-engagement with schooling. It is common for these special schools to receive referrals and enrolments throughout the year.

RECOMMENDATION *Where a special school can provide evidence that a student meets all of the other criteria for the NCCD, the requirement for schools to have at least 10 weeks of evidence to include a student in the NCCD should be relaxed for special schools that act as 'withdrawal' services for mainstream schools.*

Appendix 1: Analysis of ISV NCCD data from 2015 – 2018

With the advent of the NCCD, ISV strongly supported its Member Schools to participate in the collections of data for three years (2015-2017), when the data was not linked to funding, prior to the introduction of NCCD-linked funding at the upper three levels of adjustment in 2018.

The census data regarding the number of students with disability in Member Schools from 2015-2018, enables comparisons to be made regarding the incidence prior to and following the introduction of NCCD-linked funding. It is also possible to compare 2015 and 2016 with 2017 and 2018, following the announcement that funding would be based on NCCD data.

Overall incidence of disability

As shown in Table 3 below, there has been no significant increase in the proportion of students with disability in Member Schools over 2015-2018. In fact, 2018 recorded the lowest incidence of these students in these schools over the four-year period. The slight increase in the actual numbers over 2015-2018 merely reflects the increase in total enrolments in the sector over the period.

As would be anticipated as schools became familiar with the introduction of new processes, there is a small variation in the NCCD data from year to year, which would also reflect some student movement into and out of the sector.

TABLE 3 INCIDENCE OF STUDENTS WITH DISABILITY IN MEMBER SCHOOLS 2015-2018

YEAR	TOTAL ENROLMENTS	TOTAL NCCD NUMBERS	NCCD AS A PROPORTION OF TOTAL ENROLMENTS
2015	131,496.5	33,328.0	25.35%
2016	134,383.6	34,925.0	25.99%
2017	138,060.3	36,725.0	26.60%
2018	143,675.0	35,026.8	24.38%

Similarly, when the data is broken down to primary and secondary enrolments, there has been no significant increase in the incidence of students with disability among primary (Table 4) or secondary (Table 5) students in Member Schools.

TABLE 4 INCIDENCE OF PRIMARY STUDENTS WITH DISABILITY IN MEMBER SCHOOLS 2015-2018

YEAR	TOTAL PRIMARY ENROLMENTS	TOTAL PRIMARY NCCD NUMBERS	NCCD PRIMARY AS A PROPORTION OF ENROLMENTS
2015	54,605.2	15,233.0	27.90%
2016	56,091.6	16,075.0	28.66%
2017	57,505.8	16,760.0	29.14%
2018	60,349.7	15,900.7	26.35%

TABLE 5 INCIDENCE OF SECONDARY STUDENTS WITH DISABILITY IN ISV MEMBER SCHOOLS 2015-2018

YEAR	TOTAL SECONDARY ENROLMENTS	TOTAL SECONDARY NCCD NUMBERS	NCCD SECONDARY AS A PROPORTION OF ENROLMENTS
2015	76,891.3	18,095.0	23.53%
2016	78,292.0	18,850.0	24.08%
2017	80,554.5	19,965.9	24.78%
2018	83,325.3	19,126.1	22.95%



Many special schools act as ‘withdrawal’ schools, enrolling students who are not able to cope in mainstream schooling and who frequently have histories on non-engagement with schooling. It is common for these special schools to receive referrals and enrolments throughout the year.



It is also possible that an improved awareness of disability, particularly in primary schools where an individual classroom teacher works more closely with individual students, is leading to more effective identification of students.

Incidence of NCCD funded levels of disability

With the introduction of NCCD-linked funding for students with disability in 2018, Table 6 compares the number of students in the upper three levels of adjustment over 2015-2018.

TABLE 6 INCIDENCE OF SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE LEVELS OF NCCD IN MEMBER SCHOOLS 2015-2018

YEAR	TOTAL ENROLMENT	TOTAL NCCD SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF TOTAL ENROLMENTS
2015	131,496.5	15,897	12.09%
2016	134,383.6	17,187	12.79%
2017	138,060.3	17,725	12.84%
2018	143,675.0	17,533.9	12.20%

Again, the introduction of funding saw no increase in the proportion of total students enrolled at the three upper NCCD levels over 2015-2018. There is, however, again a small variation from year to year as would be expected as schools become more familiar with the new processes.

TABLE 7 INCIDENCE OF SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE LEVELS OF NCCD IN PRIMARY STUDENTS IN MEMBER SCHOOLS 2015-2018

YEAR	TOTAL PRIMARY ENROLMENT	TOTAL PRIMARY NCCD SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD PRIMARY SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION ENROLMENTS
2015	54,605.2	8,063	14.77%
2016	56,091.6	8,700	15.51%
2017	57,505.8	8,419	14.64%
2018	60,349.7	8,288.7	13.73%

TABLE 8 INCIDENCE OF SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE LEVELS OF NCCD IN SECONDARY STUDENTS IN ISV MEMBER SCHOOLS 2015-2018

YEAR	TOTAL SECONDARY ENROLMENT	TOTAL SECONDARY NCCD SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD SECONDARY SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF ENROLMENTS
2015	76,891.3	7,834	10.19%
2016	78,292.0	8,487	10.84%
2017	80,554.5	9,306	11.55%
2018	83,325.3	9,245.2	11.10%

When the figures at the upper three levels of adjustment under the NCCD are broken down into primary (Table 7) and secondary (Table 8) students, again the slight variation from year to year is evident. In addition, while there is a slight decrease in the proportion of primary students who attract funding in 2018 as compared with 2015-2017, there is also a small increase in the upper three levels of adjustment of secondary students overall, although again there was a slight decrease in 2018, the year of the introduction of NCCD-linked funding.

As anticipated with the broader definition of disability under the NCCD, as outlined by the DDA, which includes such conditions as asthma and anaphylaxis, approximately 50 per cent of all students counted under the NCCD require only the lowest level of adjustment, WQDTP, who do not attract additional funding.

It is interesting to note, from a comparison of the data in Tables 4 and 5, that the incidence of disability among primary students in Member Schools is slightly higher than that in secondary students. It is possible that the support offered to some students during their primary years enables them to develop strategies to cope with their disability such that they might not be considered as having a disability in their secondary years. This higher primary figure is also as predicted by the literature, which shows a significantly higher incidence of anaphylaxis among younger children who are likely to be in primary school than somewhat older students who are likely to be in secondary school. In addition, ABS data regarding students with an intellectual disability indicates that while most students commence their primary education in a regular class, a number subsequently move to a special class or special school.

Finally, it is also possible that an improved awareness of disability, particularly in primary schools where an individual classroom teacher works more closely with individual students, is leading to more effective identification of students.

Cognitive disability

Given the ABS data regarding the schooling of students with a cognitive disability, with students attending a mainstream school for their earlier years of schooling but often moving to a specialised setting for their later years, a similar pattern might be anticipated in ISV Member Schools.

TABLE 9 INCIDENCE OF COGNITIVE DISABILITY AMONG PRIMARY STUDENTS IN MEMBER SCHOOLS 2015-2018

YEAR	TOTAL NCCD PRIMARY COGNITIVE	NCCD PRIMARY COGNITIVE AS A PROPORTION OF TOTAL PRIMARY ENROLMENTS	TOTAL NCCD PRIMARY COGNITIVE SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD COGNITIVE SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF ENROLMENTS
2015	7622.0	13.96%	5468	10.01%
2016	8577.0	15.29%	5803	10.35%
2017	8767.0	15.25%	5829	10.14%
2018	8234.7	13.64%	5782.7	9.58%

TABLE 10 INCIDENCE OF COGNITIVE DISABILITY AMONG SECONDARY STUDENTS IN MEMBER SCHOOLS 2015-2018

YEAR	TOTAL NCCD SECONDARY COGNITIVE	NCCD SECONDARY COGNITIVE AS A PROPORTION OF TOTAL SECONDARY ENROLMENTS	TOTAL NCCD SECONDARY COGNITIVE SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD SECONDARY COGNITIVE SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF ENROLMENTS
2015	6877	8.94%	4458	5.80%
2016	7569	9.67%	4727	6.04%
2017	7638	9.48%	4807	5.97%
2018	7536	9.04%	4992.6	5.99%

As shown in Tables 9 and 10, the total incidence of students with a cognitive disability is higher in primary years than secondary years (Table 9) as is the incidence of students with a cognitive disability at the funded levels of adjustment (Table 10).

Social/emotional disability

Given the marked increase in the community of behavioural and mental health conditions among young people, this is reflected in the social/emotional category of the NCCD data over the 2015-2018 period.

TABLE 11 INCIDENCE OF SOCIAL/EMOTIONAL DISABILITY AMONG PRIMARY STUDENTS IN MEMBER SCHOOLS 2015-18

YEAR	TOTAL NCCD PRIMARY SOCIAL/EMOTIONAL	NCCD PRIMARY SOCIAL/EMOTIONAL AS A PROPORTION OF ENROLMENTS	TOTAL NCCD PRIMARY SOCIAL/EMOTIONAL SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD PRIMARY SOCIAL/EMOTIONAL SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF ENROLMENTS
2015	2620.0	4.80%	1,623.0	2.97%
2016	2812.0	5.01%	1,724.0	3.07%
2017	3119.0	5.42%	1,834.0	3.19%
2018	3005.2	4.95%	1,789.3	2.96%

TABLE 12 INCIDENCE OF SOCIAL/EMOTIONAL DISABILITY AMONG SECONDARY STUDENTS IN MEMBER SCHOOLS 2015-18

YEAR	TOTAL SECONDARY SOCIAL/EMOTIONAL NCCD	NCCD SECONDARY SOCIAL/EMOTIONAL AS A PROPORTION OF ENROLMENTS	TOTAL NCCD SECONDARY SOCIAL/EMOTIONAL SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE	NCCD SECONDARY SOCIAL/EMOTIONAL SUPPLEMENTARY, SUBSTANTIAL AND EXTENSIVE AS A PROPORTION OF ENROLMENTS
2015	4186.0	5.44%	2,371.0	3.08%
2016	4506.0	5.76%	2,510.0	3.21%
2017	5493.0	6.82%	3,535.0	4.39%
2018	5172.1	6.21%	3,350.8	4.02%

The data in Table 11 regarding the incidence of social/emotional category of NCCD among primary students does not show an increase in the proportion of social/emotional disability. In contrast, Table 12 indicates that there is an increase among secondary students. This increase is in both the total number of students with a social/emotional disability and in the Supplementary, Substantial or Extensive levels of adjustment to cater for a social/emotional disability which attract additional funding, as would be predicted by the National Health Survey 2017-2018.

Independent Schools Victoria

ISV was established in 1949 and today represents, promotes the interests of, and provides services to more than 220 Member Schools. These schools educate more than 145,000 students on more than 300 campuses across metropolitan Melbourne and in regional and rural Victoria, and employ more than 18,000 teachers and other staff.

ISV promotes choice in education and champions the values and autonomy of Member Schools. It does not manage schools – it represents, supports and provides services to them so they can provide the best possible education.

ISV advocates for excellence in education for all students and for the right of parents to choose how and where their children are educated. It has always advocated that funding for schools should be based on the needs of the child.

The Independent Schools Victoria Vision:

‘A strong Independent education sector demonstrating best practice, providing excellent outcomes for students and choice for families’.

To realise this, we:

- advocate for excellence in education
- champion Member Schools
- support quality education
- protect the right of parents to choose where and how their children are educated.

ISV will assist our diverse Member Schools to continue providing the best possible education outcomes for the citizens of tomorrow.

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