INDEPENDENT SCHOOLS AND THE NCCD

Caroline Miller is the Director, Policy and Research, at the Independent Schools Council of Australia (ISCA). She explains why the Nationally Consistent Collection of Data on School Students with Disability (NCCD) was established and what it means for independent schools.

THE Nationally Consistent Collection of Data on School Students with Disability (NCCD) was conceived in 2008 by the Council of Australian Governments to improve the national data on students with a disability. When the NCCD was established, it was not intended to be used for funding but rather to provide a consistent national count that was not based on the differing state and territory definitions used for funding purposes. As described in the NCCD Guidelines, "teachers determine the level of adjustment provided to students with disability to access and participate in education on the same basis as other students, consistent with the obligations of all schools under the Disability Discrimination Act (the DDA) and the Disability Standards for Education 2005."

The NCCD allows for school students to be assessed as receiving one of four levels of adjustment across four categories of disability. The levels are Support within Quality Differentiated Teaching Practice (QDTP), Supplementary, Substantial and Extensive. The four broad categories of disability are physical, cognitive, sensory and social/emotional.

This approach to assessing students with disability is a significant departure from the medical diagnosis model currently used for funding. A wide range of resources to assist schools and guide them through the process have been collaboratively developed by the Commonwealth Department of Education and Training, the state and territory Departments of Education and the independent and Catholic sectors. This material is available at http://www.schooldisabilitydatapl.edu.au/.

The NCCD was progressively phased in over three years, from 2012 to 2015. Each year the number of schools participating increased until, in 2015, every school in Australia was required to participate in the collection. This means that in 2017 it will be some schools fifth time doing the collection, while for other schools it will be their third time.

The Education Council report on the 2016 collection, 2016 Emergent Data on Students in Australian Schools Receiving Adjustments for Disability, includes high level results from the collection including a sector split. Table 1, below, shows that contrary to popular misconception, the independent sector is indeed educating its share of students with disability. In 2016 nationally the Independent sector share of enrolments was 14.1 per cent of all FTE enrolments.

From 2013 through to 2016, the Joint Working Group on Students with Disability (the JWG) has commissioned a parallel piece of work from PricewaterhouseCoopers known as the Continuing Quality Improvement Project (CQIP). While based on a sample of schools, this work has provided an ongoing assessment of the data quality of the NCCD.

It is clear that the data quality has improved over the course of the implementation of the collection. In 2016 the CQIP found that the data are of sufficient quality to inform policy at the national level and suitable to be

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**TABLE 1 STUDENTS WITH DISABILITY RECEIVING ADJUSTMENTS BY LEVEL OF ADJUSTMENT AS A PERCENTAGE OF THE TOTAL STUDENT POPULATION IN EACH SECTOR AND NATIONALLY (2016)**

*Includes independent Catholic schools

<table>
<thead>
<tr>
<th>LEVEL OF ADJUSTMENT</th>
<th>GOVERNMENT</th>
<th>CATHOLIC*</th>
<th>INDEPENDENT</th>
<th>NATIONAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support within QDTP</td>
<td>5.9%</td>
<td>3.8%</td>
<td>8.0%</td>
<td>5.7%</td>
</tr>
<tr>
<td>Supplementary</td>
<td>7.9%</td>
<td>8.9%</td>
<td>7.2%</td>
<td>8.0%</td>
</tr>
<tr>
<td>Substantial</td>
<td>3.3%</td>
<td>2.1%</td>
<td>2.2%</td>
<td>2.9%</td>
</tr>
<tr>
<td>Extensive</td>
<td>1.9%</td>
<td>0.4%</td>
<td>0.7%</td>
<td>1.5%</td>
</tr>
<tr>
<td>All Adjustments</td>
<td>19.0%</td>
<td>15.1%</td>
<td>18.1%</td>
<td>18.1%</td>
</tr>
</tbody>
</table>

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2 Excludes independent Catholic schools.
considered as one component among others when developing policy at the jurisdictional and sector level. While the CQIP was unable to state a position on the reliability of the data at the school level due to sample size, it showed that the majority of schools had at least a sound understanding of the NCCD model, although there remained a group which did not.

As part of the report, it was noted that there were a range of factors which impacted on data quality in individual schools. These included: training; processes and systems; roles within the schools; school and environment; and, finally, moderation and understanding. ‘Roles within schools’ translates to school leadership.

As can be seen from the chart below (Figure 1), the CQIP found that the more involved the school leadership, which will vary from the principal to an executive team depending on school context, the higher the level of understanding and application of the NCCD model.

Engagement by school leadership no doubt has a flow on effect to the other areas noted in CQIP as critical factors in data quality. A ‘team approach’ and ‘whole of school engagement’ have been noted anecdotally in a range of forums conducted around the NCCD as being critical to successful implementation of the model in schools. The CQIP noted that leadership support is crucial to creating a culture of inclusivity, ensuring all staff engage with the model and to viewing the NCCD as being a contributor to an inclusive education model.

Earlier this year, the Commonwealth government announced its intention to replace the current single loading amount for students with disability with a differentiated loading based on the top three NCCD adjustment levels. This has become reality with the passing of the Australian Education Act Amendment Bill in June 2017.

Implications for independent schools

The main question then is – what does this mean for independent schools?

First it means that this collection will come under a far higher degree of scrutiny and accountability as it will now be used for funding. What this will look like is currently unclear as those involved try to grapple with the difficulties of applying accountability measures to a collection based on teacher judgement.

Second, there will be a far stronger emphasis placed on quality assurance measures to try to improve the comparability of the data across schools, sectors and jurisdictions. It is likely that moderation at all levels will be a major focus of these efforts.

Several Associations of Independent Schools (AISs) are already running both sector based and cross sectoral moderation exercises for independent schools to participate in and this has proven to be a valuable exercise for participants.

Third, the NCCD will need to be signed off by an approved signatory. This is the same process that is currently in place for the Non-Government Schools Census. The approved signatory will be required to attest that he/she has read and understood the NCCD guidelines.

It is inevitable that the use of this data for funding will have an effect on the NCCD over time. It is unfortunate that at this point in the implementation of the NCCD that all schools do not yet have a sound understanding of the NCCD model. However, there is a clear role for independent school principals and other school leaders to create an environment in their schools which brings the NCCD into everyday school practice and which engages parents, students and teachers alike.

The Independent Schools Council of Australia (ISCA) represents the interests of the independent school sector on a national basis such as in relation to Australian Government funding and representation on national policy making bodies. It works with the support of Associations of Independent Schools (AISs) in all states and territories.