
Appendix one – Response from entity



Mr Bola Oyetunji
Auditor-General for New South Wales
GPO Box 12
SYDNEY NSW 2001

DGL24/737
RML24/3091

Dear Mr Oyetunji

Thank you for your correspondence of 23 August 2024, seeking the Department of Education response to the final performance audit report on supporting students with disability. I note you also wrote to the Deputy Premier and Minister for Education and Early Learning regarding this audit.

The department has carefully considered the audit report and I am pleased to support two of the recommendations in full (1 and 4), partially support two recommendations (3 and 5), and support recommendation 2 in principle. Please find enclosed the department's detailed response to each recommendation.

I would like to thank the Audit Office of NSW for their professionalism and collaborative approach to working with department representatives and our schools.

Equity is at the heart of public education and Our Plan for NSW Public Education, and the audit process and report will help inform and drive projects that support students with disability and deliver on our strategic goals.

We have already begun acting on the audit's recommendations and are committed to achieving progress within the specified timeframes.

Should you have any questions or concerns, please contact

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Murat Dizdar'.

Murat Dizdar
SECRETARY
DEPARTMENT OF EDUCATION
20 September 2024

Encl.

NSW Department of Education response to the NSW Auditor General’s Report to Parliament on the supporting students with disability performance audit 2023

Audit recommendation	Department position	Explanatory notes
<p>1. At least annually, monitor the experiences and outcomes of students with disability to:</p> <ul style="list-style-type: none"> a) identify and address emerging issues b) identify and promote good practice c) take effective steps where there is a need to improve longer-term student outcomes, and d) consider the impacts of intersectionality. 	<p>Support</p>	<p>Our Plan for NSW Public Education outlines how the department will create an equitable and outstanding education system.</p> <p>The department commenced monitoring and reporting on Our Plan for NSW Public Education in 2024. The Plan includes student success measures that tell us about the experiences and outcomes of students.</p> <p>The department identifies students with disability as a cohort using the Nationally Consistent Collection of Data on Students with Disability which is collected annually.</p> <p>Complementary to the Plan and specific to students with disability, the department is progressing work to track and monitor the experiences and outcomes of students with disability to drive evidence-based policy, programs and initiatives to improve experiences and outcomes for students with disability. It is intended that this will include insights to identify need, emerging issues and good practice and target supports to schools and students with disability across key intersectionality groups (Aboriginal and/or Torres Strait Islander students, students in rural, remote and regional locations, students who speak English as an additional language or dialect, by gender and socio-educational advantage).</p>

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		<p>The measures to track and monitor outcomes for students with disability were identified, among a broader range of measures, in consultations the department conducted with students with disability, their families, educators, experts and other stakeholders and partners.</p> <p>The department will commence monitoring measures for students with disability and using these insights to improve outcomes for students with disability from 2025/26.</p> <p>Given data development requirements, some measures are still being finalised and will feature in monitoring as they become available.</p>
<p>2. Continue to expand the use of NCCD data to support the allocation of funding in accordance with the needs of students of disability.</p>	<p>Support in principle</p>	<p>As noted in the audit report, the department continues to undertake work to reform how funding for students with disability is allocated to schools so that it better reflects the needs of students with disability. This has involved exploring how the NCCD can be used to inform funding allocations as well as ongoing work to improve the quality of NCCD data.</p> <p>Students have diverse needs and disability specific funding allocations are not the only source of funding schools use to support students with disability.</p> <p>Schools are funded to support all their students. In addition to base funding, they receive equity loadings (one of which is for disability) and may also receive additional targeted funding for disability and other student needs such as refugee status. Some students will</p>

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		<p>attract more than one equity loading in terms of their school's budget.</p> <p>Neither the Low Level Adjustment for Disability equity loading, nor disability targeted funding are designed to meet all of the needs of every student with disability in isolation of the school's broader budget. They are enhancements to the school budget that support the principal to flexibly use their whole of their budget to support all students enrolled in the school.</p> <p>The review of the funding models has been designed to move the department to provide disability-specific funding in accordance with disability need as identified by the school through the NCCD. As the NCCD reflects the effort of schools to support students with disability, this approach allows for the funding to better reflect that effort.</p> <p>In 2022, the allocation methodology for the Low Level Adjustment for Disability equity loading was reviewed to incorporate the NCCD. The funding reform work has now moved on to exploring how NCCD might be used to inform the allocation of targeted disability funding.</p>
<p>3. Work with the Australian Government on reviews of the disability loading settings to ensure NSW public schools are adequately funded to support students with disability.</p>	<p>Partially support</p>	<p>The Students with Disability Loading which is paid from the Commonwealth and State Government to the department as part of the Schooling Resource Standard is supposed to represent a benchmark for the additional funding required</p>

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		<p>above base funding to support students with disability. It does not entirely represent the way in which students with disability are funded in NSW Public Schools.</p> <p>Funding itself is not a disability adjustment and not all disability adjustments require funding. The adjustments students need are dependent on context and can change over time. Further, individual students who have the same disability can have very different support needs. Given this, it is difficult to determine what is 'adequate' in terms of resourcing.</p> <p>Work has been undertaken by the Commonwealth Government on more than one occasion to determine if the loading is sufficient, but this has been a challenging question to answer. The department has participated in the reviews noting that the most recent one was conducted during COVID, which added to the complexity of this work and impacted on its reliability.</p> <p>The Department will continue to work with other States and Territories and the Commonwealth to determine a loading that best meets the needs of students with disability.</p>
<p>4. Work with stakeholders to enhance guidance and practical support to public schools and families on reasonable adjustments for students with disability, including ways to resolve conflicting views in a timely manner.</p>	<p>Support</p>	<p>The department is committed to ensuring school staff have access to support and expertise to build the capability they need to implement personalised learning and support including providing adjustments. The department acknowledges the important role parents and carers play in the personalised learning and support planning</p>

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		process. We also acknowledge our responsibilities under the Disability Standards for Education 2005.
<p>5. Improve the planning and delivery of targeted supports by:</p> <ul style="list-style-type: none"> a) obtaining a clear and timely picture of the supply and demand of targeted supports at a more specific level than statewide to be able to identify and address constraints b) monitoring the time taken for targeted supports to be provided to eligible students, and addressing delays so that adequate support is put in place once need is identified c) reducing the administrative burden for schools in applying for targeted supports, and d) making the basis for decisions transparent to schools and families. 	Partially support	<p>As referenced in the Audit report targeted supports include <i>'integration funding support for students with diagnosed disability in mainstream classes who have moderate or high support needs, student placement in support classes in mainstream schools or in Schools for Specific Purposes, distance education and support from itinerant (visiting) teachers for vision or hearing impairment.'</i></p> <p>The department partially supports this recommendation with several relevant initiatives already underway to improve the way targeted supports are planned for and received by students with disability.</p> <p>The delivery of targeted supports at a local level are managed by schools with system-level policy advice and support provided as required. A broad system level picture of targeted supports is provided each year.</p> <p>The implementation approach to these recommendations, particularly as to capturing picture of supply and demand of targeted supports at a more specific level than statewide will need to consider any additional administration burden on schools.</p>