



Tasmanian Council of Social Service Inc.

School Levies and Charges Review November 2018



INTEGRITY
COMPASSION
INFLUENCE

About TasCOSS

TasCOSS is the peak body for the community services sector in Tasmania. Our membership includes individuals and organisations active in the provision of community services to low-income Tasmanians living in vulnerable and disadvantaged circumstances. TasCOSS represents the interests of its members and their clients to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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Introduction

Thank you for the opportunity to make a submission to the *School Levies and Charges Review*.

TasCOSS advocates on behalf of low-income Tasmanians who often live in vulnerable and disadvantaged circumstances. Our submissions and advocacy are strongly informed by the expertise of our members and the lived experiences of the Tasmanians we represent. To inform this submission, TasCOSS consulted with education-focused member organisations and with a sample of families with children in government schools.

TasCOSS believes that every child is equally entitled to an education in a system that strives for excellence, and that allows each student to realise her or his full potential—intellectual, economic, social, physical and emotional. As a consequence, family means should have no bearing on the scope or quality of educational experiences and resources in any Tasmanian government school.

TasCOSS strongly supports the principle informing this review that “all students should be able to make subject choices based on their needs, interests and aspirations for work and life rather than the cost of the course.” However, even seemingly free choices may be subtly or not-so-subtly influenced by background issues related to cost. We therefore encourage this review to take a proactive stance towards eliminating all potential points of cost-related discrimination and self-limitation. We further encourage the Department of Education to expand the scope of its investigations beyond school levies and charges to examine additional costs that may affect the educational choices of students from families on lower incomes.

What people said

In our consultations, we asked what costs of schooling were the greatest financial stressors for families. Our conversations revealed four key areas.

School levies themselves. School levies vary widely across Tasmanian schools: the gap between the Jordan River Learning Federation Senior School and Taroona High School, for example, is in the area of \$700 a year.¹ While families on the lowest incomes are exempt from levies through the Student Assistance Scheme (STAS), parents on incomes just above the STAS cut-off, especially those with several children, can face substantial levy-related costs in certain schools.² Some parents specifically asked that families be permitted to pay levies on payment plans lasting the full school year, especially in cases of hardship.

Additional education-related costs not falling under STAS, including additional subject fees, excursions, and books. According to the Department of Education, school levies are supposed to cover:

¹ <https://www.myschool.edu.au/>

² <https://www.examiner.com.au/story/4881185/school-levies-under-scrutiny/>

- Items your child uses during the school year such as learning materials and stationery.
- Services, such as school excursions, attending performances and school camps that are part of your child's educational program.³

Some parents said that their school levies covered all of these costs. However, many schools appear to take a less inclusive view. For example, Taroona High School's \$700 p.a. levy does not cover stationery, in-state, interstate and international excursions, musical instrument hire or music camps, marine science camps, or some aspects of language instruction.⁴ Subjects attracting additional fees of \$15 to \$120 at Elizabeth College include music, drama, personal health and wellbeing, cooking and nutrition, a wide range of mathematics courses, six Certificate I/II subjects, and all VET subjects.⁵ There appears to be little consistency as to whether these additional costs are covered by STAS or not; furthermore, as with levies themselves, parents on low-to-middle incomes do not receive relief, putting pressure on family finances and leaving children at risk of exclusion.

Co-curricular activities such as excursions and camps are a particularly common area of additional expense: some parents suggested that their schools' excursions and camps were always treated as an additional cost. To some extent, this situation appears to reflect a lack of adequate funding of schools for transport (which makes up the largest proportion of excursion costs); to some degree, however, it appears to reflect the theory that these are "optional." However, the cost to students both of being excluded from a group activity and of missing out on enrichment opportunities is substantial.

Books are another area cited by parents as a significant cost. Many Year 10, 11, and 12 subjects have textbook and supplementary material costs of upwards of \$100 per subject, particularly noticeably in academic-track subjects. For one secondary college, for example, a French 2 or textbook costs \$210, with the additional expectation of a \$30 dictionary; Mathematics Methods Foundation 3 requires an \$86 textbook and a \$240 calculator. By contrast, lower-level maths subjects such as Workplace Mathematics 2 only require a \$43 calculator, and none of the VET certificates on the booklist have set textbooks, with students only required to purchase basic stationery.⁶ Beyond the direct impost of cost, the visible gulf in prices between academic and non-academic subjects runs the risk of sending the message that academic subjects are not for low-income families.

Uniforms. The price of uniforms was the first thing many parents nominated when asked about the major costs of government schooling. For example, Ogilvie High School, 45% of whose students experience significant socio-demographic disadvantage,⁷ prescribes

- A \$95 summer dress,

³ <https://www.education.tas.gov.au/parents-carers/parent-fact-sheets/fees-levies/>

⁴ <https://taroonahigh.education.tas.edu.au/levy-stationery>

⁵ <https://elizabethcollege.tas.edu.au/wp-content/uploads/2016/11/elizabeth-college-levy-sheet-2018.pdf>

⁶ <http://www.elizabethcollege.tas.edu.au/wp-content/uploads/2018/01/Elizabeth-College-Booklist-2018-18Jan18.pdf>

⁷ MySchool

- A \$105-\$120 winter skirt
- Jumpers and cardigans ranging from \$75-\$95
- A \$70 branded school backpack.⁸

For families on tight budgets whose children may be growing fast, these prices are generally unaffordable, and contrast strongly with the prices of generic clothing.

Fundraising. Outside the issue of direct imposts, school fundraising initiatives such as free dress and novelty days were raised by parents as a largely unacknowledged source of financial stress. Although the sums involved are seemingly minor—a gold coin here, a gold coin there—participants stressed that these unpredictable costs can add up, particularly for families with several school-aged children, and are difficult to anticipate and budget for. Although nominally optional, participants noted that families face social pressure to contribute, and that children fear exclusion if a donation is not provided.

STAS

Our consultations made it clear that it is not possible to address levies without addressing the Student Assistance Scheme (STAS). STAS enrolments (22,627 as of March 2018) have been in slow decline in recent years,⁹ even as the number of children in low-income families on income support in Tasmania has increased by 45% (from 7,084 to 10,274) between 2006 and 2016.¹⁰ From comments by parents, this may be because some working families on low incomes do not apply, for instance because they are not aware that Family Tax Benefit payments are not included in the income eligibility test. An easy way to simplify access would be to extend STAS eligibility to all families on Health Care Cards, while retaining a means of extending eligibility to larger families on the basis of tax summaries. To the maximum extent possible, the Department of Education should use its existing authorisation to request information from Centrelink indefinitely¹¹ to automatically re-confirm STAS eligibility for families each year, while adhering to privacy principles, and to remove expectations for parents to re-document their financial status and/or sign and return forms. The Department should also investigate policies to encourage schools to assist eligible parents to enroll in STAS.

Proposed levy models and related costs

Option 1: All items and services that are part of the 'core curriculum' to be included in levies.

This option would protect low income families on STAS from additional costs. However, the 'core curriculum' should be considered in an expansive sense, to include social and enrichment opportunities such as excursions and camps. 'Items and services' should explicitly include

⁸ <https://ogilviehighschooltasorg.files.wordpress.com/2018/03/uniform-shop-price-list-20182.pdf> ; MySchools

⁹ Ibid.

¹⁰ PHIDU. Monitoring Inequality in Australia: Time Series - Tasmania, 2018. http://phidu.torrens.edu.au/current/data/sha-aust/quintiles-time-series/phidu_data_time_series_quintiles_tas.xls

¹¹ Page 4, under 'Declaration and Authorisation': [https://documentcentre.education.tas.gov.au/Documents/Student-Assistance-Scheme-\(STAS\)-Application-Form2018.pdf](https://documentcentre.education.tas.gov.au/Documents/Student-Assistance-Scheme-(STAS)-Application-Form2018.pdf)

textbooks, or even school uniforms (see above for policy ideas). In line with policy initiatives such as *Ticket to Play* sports vouchers, funding should also be available for co-curricular activities for students not eligible for STAS but facing hardship.

Meanwhile, there is a risk that all-inclusive, upfront levies may present as a problematic lump sum cost to low- and middle-income families not eligible for STAS. TasCOSS supports options for families to pay levies on payment plans lasting the full school year, especially in cases of hardship. Information regarding flexible payment options, accommodations for hardship, and STAS should accompany all school communication regarding levies and charges, including direct requests for payment, any notices for non-payment, and public communications such as school newsletters.

If, as indicated, some schools have pursued all-inclusive levies on their own accord, there is an opportunity to evaluate experiences with inclusive levies and unbundled charges while reaching a final policy position for all schools.

Option 2: Placing a cap on compulsory levies

This option was considered by many participants to be problematic. First, although lower-income parents with children in higher-charging schools would be likely to benefit in the short term, the experience of fee caps in the higher education sector in both Australia and the UK suggests that over time all schools could end up raising their fees to meet the cap, putting pressure on low-to-middle income families across the entire school system. Second, schools will face pressure to unbundle charges to parents and increase the use of one-off fees for activities and resources to circumvent the cap, recreating the current situation of additional charges falling outside STAS. If the Department is resolved to pursue this option, it should not be pursued without also implementing all-inclusive levies.

Option 3: Levies to become voluntary parent contributions

While this option would remove any chance of financially stressed low- and middle-income Tasmanian families being pursued for levies they cannot afford to pay, such an approach again could result in the increased use by schools of per-activity or per-item fees and charges. This policy could prove regressive if families whose levies were previously covered by STAS were exposed to these charges. Assuming that STAS would not continue under this scheme, it is not clear how the policy could address the cost of educational resources for low-income families.

Option 4: Levies to become voluntary parent contributions and the creation of a School Resource Scheme

This proposal also would ensure that families who struggle to pay levies but who are not eligible for/do not know how to access STAS will not be pursued for payment. It is not, however, entirely clear what a School Resource Scheme would look like. Any such scheme should include additional costs of schooling, such as expensive uniform items and full coverage of co-curricular activities, and additional funding should be provided for co-curricular activities.

Additional issues

TasCOSS endorses Good Shepherd Australia/New Zealand's checklists for low-income-aware schools,¹² and recommends that the Department of Education:

- Revise departmental policy, including the *School Student Dress Code and Uniform Policy*, to explicitly consider appropriateness for low income students and their families, and establish accountability for schools in uniform choices.
- Develop a policy around parent fundraising, in consultation with parents and schools.
- Take advantage of increased curriculum convergence between states and territories to pursue collaborative opportunities to develop Australian open textbooks and other learning materials for electronic distribution and local printing.

TasCOSS welcomes the opportunity to discuss any aspect of this submission with the Department.

¹²https://www.education.vic.gov.au/Documents/school/principals/spag/management/PP_GS_LowIncomeChecklist.docx