Submission to the Senate Education and Employment Legislation Committee on the Direct Income Measure Amendment Bill

Save Our Schools

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Key Findings

1. Adjusted taxable income does not fully measure the capacity of families, especially high income families, to contribute because it does not include non-disclosed income held in Australia and in overseas bank accounts and tax havens, non-taxed capital gains, the wealth of families and income and assets held in family trusts. Research by the Australian Taxation Office indicates that high wealth individuals and private companies are understating income by several billion dollars a year. These groups are likely to include families with children in private schools, especially high fee schools.

2. Direct income measures of family capacity to contribute, including adjusted taxable income, also do not fully measure the financial need of schools because they exclude the wealth of schools and private donations to schools.

3. Use of adjusted taxable income as the sole measure of capacity to contribute in private schools under-estimates the capacity to contribute of families, over-estimates the financial need of schools and leads to greater government funding than warranted.

4. The analysis done by the National Schools Resourcing Board did not acknowledge the gaps in ATI as a measure of capacity to contribute and the financial need of schools. Currently, there is no substantive publicly available data or analysis to be able to firmly conclude that adoption of ATI will provide a significantly more accurate measure of the capacity to contribute and the financial need of schools.

5. The additional $3.4 billion in funding for the switch to the direct income measure has all the hallmarks of another special deal for private schools which provides more funding for private schools than warranted. The Commonwealth Government has failed to provide any modelling to justify the $3.4 billion increase.

Recommendations

1. If ATI is to be used to measure the capacity to contribute of families and the financial need of schools, it should be supplemented by other measures.

2. SOS recommends that non-taxed capital gains be included in the measurement of the capacity to contribute of families in private schools.

3. The assets of schools be included in the assessment of financial need.

4. Private donations to schools be included in the assessment of financial need.

5. The Committee investigate whether it is possible to use MADIP to obtain information on donations to schools by families and trusts.

6. The Committee investigate whether the exclusion of other sources of family income from ATI, the exclusion of family and school wealth and private donations to schools significantly reduces the effectiveness of ATI as the measure of capacity to contribute compared with the current approach.

7. The Committee investigate and report on the administrative costs of using ATI as a measure of capacity to contribute.

8. The Committee report on what schools gain funding beyond that projected under the current method of assessing capacity to contribute, what schools receive less funding than projected under the current method and the extent of the gains or losses in each case. It should also publish the funding stream for each school over the transition period for the new method.

9. The Committee compare the amount of Commonwealth funding to be provided to each school under the current SES scale with what each school would receive under the proposed ATI measure with the same scale of payments and report on any differences.

10. The draft Regulation for implementing the direct income measure of the capacity to contribute be examined by the Committee and be published to allow broader public scrutiny and submission.

11. The Committee request the Minister for Education to explain how the initial $3.2 billion increase in funding was estimated before the actual direct income measure to be used was determined.

12. The Committee request the Department of Education provide it with the analysis done for the NSRB report and the Department to estimate the cost of moving to the direct income measure.

13. The Committee request and report on the analysis done by the Department of Education to estimate the increase in funding proposed for ACT private schools.

1. Introduction

Save Our Schools protests the decision of the Senate Education and Employment Legislation Committee to allow only one week for the public to make a submission on the proposed amendments to the Education Act to allow a switch to a direct income measure of the capacity to contribute of private schools. The decision has made it impossible to prepare a fully considered comprehensive submission or to do a thorough examination of the detailed amendments to the Education Act and comment on them. The short time period severely restricts public scrutiny of a major change to how private schools are funded by the Commonwealth Government. In our view, the short time allowed calls into question the seriousness of this inquiry.

Given the short time available, SOS has confined its submission to some broad comments on different ways of assessing the financial need of private schools.

2. Capacity to contribute

A fundamental principle of government recurrent funding of private schools is that funding be distributed on the basis of **financial need**. Under the Australian Education Act, Commonwealth Government funding of schools is allocated on the basis of an estimate of how much government funding each school requires to meet the educational needs of its students.

The principle of ranking schools according to their relative need for resources has been a central feature of Commonwealth Government funding for schools since the 1970s. The Karmel Report said that the needs of schools should be determined in relation to the recurrent resources of schools. It constructed an index of the need of schools based on the resources needed to meet community standards.

Initially, the Schools Recurrent Resources Index (SRRI) was used to measure the need of schools. The SRRI was based on recurrent expenditure from private sources (fees, donations, etc) and excluded capital expenditure. Some schools rorted the system by using the exclusion of capital expenditure to gain a more favourable need rating by diverting funds received for recurrent purposes into capital. This reduced their recurrent expenditure from private sources and created a 'need' for more recurrent funding by the Commonwealth.

This measure was replaced in the mid-1980s by the Education Resources Index (ERI) which determined 'need' based on a 'community standard' of recurrent resources. For private schools, the ERI was based on the level of private income from all sources with an allowance for a reasonable level of expenditure for capital purposes. The ERI measure was used as the basis for Commonwealth funding for private schools from 1985 until 2000. However, it failed to capture the capacity of schools to raise private income because:

- schools providing financial information about their current or projected income were able to obtain a high funding category by setting low fees;
- schools were able to disguise or minimize their level of private income in a way that did not reveal their full capacity to raise private resources;
- government attempts to stop abuses of the scheme resulted in a highly complex and inflexible system that could not respond to genuine changes in school's financial circumstances.

In 2001, the Howard Government introduced the socio-economic status (SES) funding model to overcome the problems of the ERI. Instead of directly assessing the financial need of schools, it used a measure the capacity of families to contribute. In effect, capacity to contribute became a proxy for school income as a measure of school need.

Under the SES-based model, the socio-economic status of ABS collection districts was a proxy measure used to assess the capacity of a student's family to raise private income. The SES scores of each home address were aggregated and averaged to provide an SES score for each school.

A basic flaw of the model, among several others, was that it assumed homogeneity of the SES of collection districts despite the fact there could be considerable variation amongst approximately 200 households per district. This variation could result in over- or under-estimation of the capacity to contribute.

Another significant flaw was that it did not into account sources of private school income other than those sourced from students' families. Income from other private sources continues to be a significant source of income for many wealthy schools who receive donations from past students and others. These donations are also tax deductible.

In 2011, the Gonski Review of Funding for Schooling recommended that "the assessment of a non-government school's need for public funding should be based on the anticipated capacity of the parents enrolling their children in the school to contribute financially towards the school's resource requirements" [p. 79]. It recommended that the SES measure of capacity to contribute be continued until a more direct, precise measure could be developed.

The National Schools Resourcing Board (NSRB) was tasked by the Turnbull Government to review the strengths and weaknesses of the SES measure of capacity to contribute and possible alternative measures. The Board's report stated that the capacity to contribute of a school community should be based on its income and wealth [pp. 7, 32]. It noted that households with the higher wealth in the form of property, bank accounts and shares have a higher capacity to contribute to the costs of schooling than less wealthy households. It recommended that a direct measure of the income of families be used but did not make a recommendation on the actual measure. The Morrison Government referred this issue to a Technical Working Group for consideration.

3. Direct income measures

Several measures of direct income could be considered. They all have advantages and disadvantages.

Total income

In principle, total (gross) income could be used to assess capacity to contribute by families as people on the same level of income pay the same marginal tax rate. The Technical Working Group appointed to work on implementation of a direct income measure of capacity to contribute found that both total income and adjusted taxable income were fit for the purpose [Communique, Meeting 2].

The Technical Working Group did not explain why it did not adopt total income as the measure of capacity to contribute. One possible reason, among others, is that people on the same level of income have differing legitimate deductions before tax which may affect capacity to contribute. For example, families with many dependents will have less capacity to contribute at each level of income than those with one dependent.

Taxable income

Taxable income has the advantage of being directly obtained from individual tax returns. However, it is not a suitable measure of capacity to contribute because it excludes income subject to tax concessions that primarily benefit high income earners. It is subject to tax minimisation strategies. For example, many millionaires pay no or very little tax as a result of tax minimisation as evidenced here. In 2016-17, 69 people who earned more than $1m paid no tax because they were able to reduce their taxable income below the tax-free threshold of $18,200. This was an increase from 62 in 2015-16, and 48 in 2014-15.

Adjusted taxable income (ATI)

Adjusted taxable income is used in other government programs including the Family Tax Benefit and Child Care Subsidy. The Government proposes to use ATI to measure the capacity to contribute.

A significant advantage of ATI is that it includes significant sources of income excluded from taxable income such as employer and personal superannuation contributions, tax-free government pensions and benefits and losses from negative gearing. However, it does not include non-declared income such as cash income, in-kind payments and income hidden by artificial tax avoidance arrangements or held in secret in overseas bank accounts and tax havens. Nor does it include business and investment income that high income earners divert to family trusts or non-taxed capital gains.

The Technical Working Group noted that the use of ATI would require a calculation using several 'fields' and that consideration will need to be given to the additional complexity the measure would introduce. It requires linking the names and addresses of families to personal income tax records in the Multi-Agency Data Integration Project (MADIP). However, the Working Group adopted it as the preferred method.

4. Other measures

Refinement of current area-based approach

The NSRB report canvassed ways of refining the current area-based approach. It considered using a more targeted population within statistical areas and household income drawn from Census data. It concluded that the flaws with area-based measures cannot be overcome by refining the measure. SOS has not reviewed these approaches for this submission.

Index of Community Socio-Educational Advantage (ICSEA)

ICSEA is compiled from information about education and occupation of parents provided on student enrolment forms. Assessing capacity to contribute from the education and occupation of parents could be a reasonable proxy for income. However, using this measure hands back control to private schools and could enable them to manipulate the information provided on enrolment forms to minimise their capacity to contribute. There are other problems such as enrolment forms only being filled out on enrolment and are not usually updated. As a result, they may not reflect changes in family circumstances during the years at school.

5. ATI is a flawed method of assessing capacity to contribute

The ATI may be the more preferred measure of direct income of the measures considered above but it is a severely flawed indicator of the capacity to contribute because it under-estimates the income of higher income families and it ignores family wealth and private donations to schools in assessing their financial need. As a result, the capacity to contribute of families is under-estimated and the financial need of schools is over-estimated by using ATI as the sole measure and therefore will lead to more government funding than warranted. **SOS recommends that if ATI is to be used to measure the capacity to contribute of families and the financial need of schools, it should be supplemented by other measures.**

As with other measures of direct income, ATI can significantly under-estimate the capacity to contribute of families who have the facility to direct business and investment income into family trusts. This issue was not addressed by the NSRB report in concluding that a direct income measure should be used to determine capacity to contribute.

Similarly, ATI also under-estimates the total disposable income of families who receive a capital gain because only 50 per cent of the gain is recorded as taxable income. The 2019 Tax Benchmarks and

Variations Statement (formerly known as the Tax Expenditure Statement) shows that the revenue forgone from the capital gains tax discount for individuals and trusts was $10.4 billion in 2018-19. This is estimated to increase to $11.18 billion by 2022-23. These are huge amounts of under-stated income. The benefits go mostly to the very wealthy. The National Centre for Social and Economic Modelling (NATSEM) estimated that the top 10% of income earners accounted for 73% of the benefit flowing from the capital gains discount in 2014-15 while the top 20% of income earners accounted for 82% of the benefit. This issue of non-taxed capital gain was also not addressed by the NSRB report in concluding that a direct income measure should be used to determine capacity to contribute. **SOS recommends that the non-taxed component of capital gains be included in the measurement of the capacity to contribute of families in private schools.**

The ATI also does not include non-disclosed income in Australia and held in overseas bank accounts and tax havens. The use of overseas bank accounts and tax havens to hide income are mainly used by high income earners and is likely to be significant in under-estimating the capacity to pay in elite private schools. The ATO has highlighted this as an issue. For example, in December 2015, the ATO announced that that it is investigating more than 100 Australian parents with children at 60 elite private schools who paid school fees of $100,000 a year from overseas bank accounts. The ATO was concerned that the offshore accounts that are being used to pay the private school fees may be concealing much larger amounts of money amounting to millions of dollars. The ATO continues to chase wealthy individuals holding income in offshore bank accounts. Despite this, the Business Insider has reported that tax-avoidance schemes that include creating offshore accounts in tax-free countries are being offered to the wealthy like holiday packages.

The ATO has just revealed that the tax gap for high wealth groups was $772 million in 2016-17 and has been increasing in recent years. The high wealth group includes individuals and companies linked to a high wealth private group with group net wealth greater than $50 million and ownership greater than 40%. Assuming an average tax rate of about 30 per cent, the tax gap suggests that these individuals and companies are understating their income by about $2 billion a year or more. The ATO said that these groups were engaging in artificial and non-commercial arrangements that are intentionally designed to hide income and avoid paying tax.

The ATO benchmark for high wealth groups is quite restrictive. There will be many more such groups with a net wealth of less than $50 million and some of these are very likely to be engaging in similar behaviour to understate income and avoid paying tax. Both groups are likely to include families with children in private schools, especially high fee schools.

This issue of undisclosed income was not addressed by the NSRB report in its analysis of the direct income method of assessing capacity to contribute. It remains a serious flaw in using direct income measures to assess the financial need of schools, particularly the higher fee schools.

The ATI also ignores the wealth of families which is a significant factor in capacity to contribute. The NSRB recommended that 'capacity to contribute' be defined as "the school community's income and wealth" [Recommendation 1, p. 7]. Assets such as shares, securities and other investments are just as much part of capacity to contribute as direct income. As the report noted, family wealth contributes to capacity to contribute.

> The key factors affecting a family's capacity to contribute to the costs of a child's education are income and wealth. Income can be used to support consumption of goods and services, including investing in education. Income can also be saved and invested to increase wealth, which can be used to support consumption at a later date. [p. 8]

Family trusts are also used by the wealthy to hold assets. According to a study by The Australia Institute, virtually all wealth held in all private trusts is by the 20 per cent wealthiest households. The top 20 per cent account for 95 per cent of the value of all wealth held in trusts [p. 9].
While the NSRB report said that the failure to measure wealth was a weakness of a direct income measures, it also noted that measuring the wealth of families in private schools is not possible because wealth data for individuals is only available from surveys [p. 34]. This could be overcome by directly measuring the wealth of schools. The assets of schools can be readily measured and are reported in the audited financial statements of schools. **SOS recommends that the assets of schools be included in the assessment of financial need.**

In addition, reliance on the concept of capacity to contribute as an indicator of the financial need of schools ignores income of schools sourced from other than the families of students at the school. Private donations are a significant source of income for private schools, especially high fee schools. For example, Terry Snow, the billionaire owner of Canberra Airport, recently donated $20 million to Canberra Grammar School. He had previously provided an $8 million gift to the school. Cranbrook School has raised over $17 million in recent years from donations from supporters of the school. Brighton Grammar raises nearly $2 million annually in donations. Loreto Kirribilli recently invited families to donate $1 million each in a campaign to raise $100 million [Daily Telegraph, 10 September 2019]. Excluding such donations from assessment of the financial need of schools significantly under-estimates school income, over-states need and results in greater government funding than warranted. **SOS recommends that private donations to schools be included in the assessment of financial need.**

SOS acknowledges that it is difficult to obtain lists of donors and schools will have an incentive not to report donations as they did when the ERI was used to measure the financial need of schools. The Committee should investigate whether it is possible to use MADIP to also obtain information on donations by families. In many cases, large donations to private schools are made through charitable trusts as in the case of the Snow donation to Canberra Grammar School. **SOS recommends that the Committee investigate whether it is possible to use MADIP to obtain information on donations to schools by families and trusts.**

The exclusion of other sources of family income from ATI and the failure to include school wealth and private donations to schools in the measure of the financial need of schools raises the issue of whether the ATI is actually a better measure of the financial need of schools than the current approach. It remains uncertain whether it is a better measure because NSRB report failed to address these flaws in ATI and the exclusion of school wealth and private donations in its comparative analysis of the ATI and the current approach to assessing capacity to contribute. At this stage, there is no substantive publicly available data or analysis to be able to firmly conclude that adoption of ATI will provide a significantly more accurate measure of the capacity to contribute and the financial need of schools. **SOS recommends that the Committee investigate whether the exclusion of other sources of family income from ATI, the exclusion of family and school wealth and private donations to schools significantly reduces the effectiveness of ATI as the measure of capacity to contribute compared with the current approach.**

6. Further issues

The NRSB report pointed to significant administrative costs associated with using ATI as a measure of capacity to contribute. **SOS recommends that the Committee investigate and report on the administrative costs of using ATI as a measure of capacity to contribute.**

It was recently reported by The Age that adoption of the direct income measure will increase annual recurrent funding of 810 independent schools by 2.5 per cent or more, 133 schools will experience little or no change and 59 schools will lose funding. The schools losing funding include only 20 per cent of the wealthier high-fee private schools. Also, about three-quarters of Catholic schools will be better off or see no change. **SOS recommends that the Committee report on what schools gain funding beyond that projected under the current method of assessing capacity to contribute, what schools receive less funding than projected under the current method and the extent of the gains or losses in each case. It should also publish the funding stream for each school over the transition period for the new method.**

The capacity to contribute payment schedule could be manipulated to deliver a funding increase to private schools beyond that implied by adoption of the direct income measure. There is a history of such manipulation by previous governments. When the SES funding model was introduced, the Howard Government provided a large real increase in funding across the entire SES scale. This was the result of government policy, not the SES index for ranking schools. When the Gonski model developed by the Gillard Government was introduced, the payment schedules were again manipulated to incorporate the very large over-funding of private schools under the SES model so that no school would lose a dollar of funding. **SOS recommends that the Committee compare the amount of Commonwealth funding to be provided to each school under the current SES scale with what each school would receive under the proposed ATI measure with the same scale of payments and report on any differences.**

Draft regulations to implement the ATI measure of capacity to contribute are not published and are subject to secret negotiations with private school organisations. The Amendment Bill raises some issues of serious concern about the new regulations. For example, the Bill will enable the Regulation to alter the way in which the Commonwealth share for a private school is calculated in order to manage any adverse financial impacts arising from the change in capacity to contribute score methodology. The Bill also provides for a 'refined area-based methodology' to be used from 2022 for schools for which the direct income measure is deemed to be unsuitable and this methodology will be set out in the Regulation. This is a highly questionable addition. The Explanatory Memorandum of the Bill mentions small or very small schools to which this regulation could apply. It seems designed to provide another funding increase to these schools despite the fact that such schools are already provided with a funding loading under the Education Act. However, if not, the public should have the opportunity to examine the draft Regulation and submit comments. **SOS recommends that the draft Regulation for implementing the ATI measure of capacity to contribute be examined by the Committee and be published to allow broader public scrutiny and submission.**

7. The additional $3.4 billion funding appears to be another special deal for private schools

The additional $3.4 billion (revised upwards from $3.2 billion originally announced) to be distributed to Catholic and Independent schools for the switch to the direct income measure has all the hallmarks of another special deal which provides more funding for private schools than warranted. There are several reasons and some evidence to suggest this.

First, the Prime Minister announced the increase in funding for private schools before the actual direct income measure to be used was decided. The NSRB report recommended that a direct income measure be used but did not recommend which actual measure should be used. It said that further work was needed to implement its recommended approach and that it would impact the overall cost to government and the potential impact on individual schools and systems [p. 38]. The Prime Minister announced the increase of $3.2 billion on 20 September 2018. The Government's response to the NSRB report was published on the same date and stated that a working group of private school representatives and experts would be appointed to advise on what measure of direct income should be used and related matters [p. 7]. The question is how the Prime Minister knew what the new direct income measure would cost before it had been determined. **SOS recommends that the**

Committee request the Minister for Education to explain how the initial $3.2 billion increase in funding was estimated before the actual direct income measure to be used was determined.

Second, no information is publicly available on how the original $3.2 billion amount was estimated. It appears to be much larger than that implied by the NSRB report which found that there would be no or little change in the SES score of the large majority of private schools. It said that preliminary modelling showed that that there would be a relatively small percentage reduction in funding for the Independent sector compared to the current funding model and a comparable increase for the Catholic sector [p. 38].

Analysis by the Grattan Institute found that Independent schools are equally likely to see their effective score go up or down while for every eight Catholic schools with scores that go down, five schools have scores that go up. It estimated that a direct income measure would increase Catholic schools funding by somewhere from $50 million to $150 million a year with Independent schools funding ranging from a decrease of $100 million or more to even a slight increase in funding. In contrast, figures released under FOI by the Department of Education show that Catholic schools will gain an average of $342 million per year over ten years and Independent schools will lose an average of $22 million per year (see table attached).

SOS recommends that the Committee request the Department of Education provide it with the analysis done for the NSRB report and the Department to estimate the cost of moving to the direct income measure.

Third, the $3.2 billion increase was originally announced in conjunction with a new $1.2 billion Choice and Affordability Fund. Under this fund, Catholic schools receive an additional $719 million over ten years and Independent schools are more than compensated for the loss projected by switch to the direct income measure with an increase of $485 million. It has all the hallmarks of a bribe to accept the new method of assessing capacity to contribute.

Fourth, the increased funding of $388 million proposed for private schools in the ACT as the result of the switch to the direct income measure also suggests that overall funding increase is highly questionable. The fact that Catholic schools in the ACT will receive increased funding of $216 million and Independent schools $172 million is very surprising and difficult to understand (see attached table). In addition, ACT private schools will receive another $20 million in funding from the Choice and Affordability Fund.

ACT private schools have long been massively over-funded. In 2018, ACT private schools were over-funded by $69.9 million, including $56.7 million by the Commonwealth. Catholic systemic schools were over-funded by $38.6 million, including $36.2 million by the Commonwealth and Independent schools were over-funded by $31.3 million, including $20.5 million by the Commonwealth.

It is inconceivable that the switch to a direct income measure would generate a further increase in funding for ACT private schools given their generally high SES composition and the high average income in the ACT. **SOS recommends that the Committee request and report on the analysis done by the Department of Education to estimate the increase in funding proposed for ACT private schools.**

8. Recommendations

Save Our Schools recommends that:

1. If ATI is to be used to measure the capacity to contribute of families and the financial need of schools, it should be supplemented by other measures.

2. The non-taxed component of capital gains be included in the measurement of the capacity to contribute of families in private schools.

3. The assets of schools be included in the assessment of financial need.

4. Private donations to schools be included in the assessment of financial need.

5. The Committee investigate whether it is possible to use MADIP to obtain information on donations to schools by families and trusts.

6. The Committee report on what schools gain funding beyond that projected under the current method of assessing capacity to contribute, what schools receive less funding than projected under the current method and the extent of the gains or losses in each case. It should also publish the funding stream for each school over the transition period for the new method.

7. The Committee investigate and report on the administrative costs of using ATI as a measure of capacity to contribute.

8. The Committee report what schools gain funding, what schools lose funding and the extent of the gains or losses in each case. It should also publish the funding stream for each school over the transition period for the new direct income method.

9. The Committee compare the amount of Commonwealth funding to be provided to each school under the current SES scale with what each school would receive under the proposed ATI measure with the same scale of payments and report on any differences.

10. The draft Regulation for implementing the direct income measure of the capacity to contribute be examined by the Committee and be published to allow broader public scrutiny and submission.

11. The Committee request the Minister for Education to explain how the initial $3.2 billion increase in funding was estimated before the actual direct income measure to be used was determined.

12. The Committee request the Department of Education provide it with the analysis done for the NSRB report and the Department to estimate the cost of moving to the direct income measure.

13. The Committee request and report on the analysis done by the Department of Education to estimate the increase in funding proposed for ACT private schools.

Distribution of Morrison Government Fund for Private Schools

Released under FOI by the Commonwealth Department of Education, 23 January 2019

		2019 Additional (Part 1) $(m)	Transition to direct income (Part 2) $(m)	Choice and Affordability (Part 3) $(m)	TOTAL $(m)
NSW	Catholic	37.9	1091.2	234.2	1,363.3
	Independent	10.4	-86.4	170.3	94.3
VIC	Catholic	31.6	1,176.5	210.4	1,229.5
	Independent	5.3	-30.6	92.4	67.1
QLD	Catholic	31.7	571	129.5	732.2
	Independent	6.8	-146.1	87.3	-52
SA	Catholic	7.9	139.6	41.3	188.8
	Independent	4.4	50.2	43.9	98.5
WA	Catholic	17.8	212.1	66.9	296.8
	Independent	5.6	-142.1	61.7	-74.8
TAS	Catholic	4.5	24.4	16.2	45.1
	Independent	0.4	7.8	13.2	21.4
ACT	Catholic	3.2	216.3	12.3	231.8
	Independent	2.5	171.9	7.7	182.1
NT	Catholic	0.4	-6.2	7.7	5.5
	Independent	0.3	-46.3	8.1	-37.9
AUS	Catholic	135.1	3,424.9	718.5	4,278.5
	Independent	35.8	-221.6	484.6	298.8
TOTAL		**170.8**	**3,203.3**	**1,203.1**	**4,577.2**