



NSWSPC Third Submission to the School Funding Review

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Preamble

NSW secondary schools, central schools and schools for special purposes are part of a government system delivering high quality, inclusive education and our natural loyalty is first and foremost to the government sector. We must continue to remind governments that they, and only they, have the obligation and the capacity to ensure that quality education is delivered as a universal entitlement of every Australian child.

That paragraph started the first and second submissions from the New South Wales Secondary Principals' Council (NSWSPC) and reflected the desire of more than 500 secondary, central and school for special purposes principals¹ who are members of the NSWSPC to provide a considered response to the original terms of reference.

This third submission responds to the recommendations of the research commissioned by the Funding Review in the four papers released for comment on 31 August 2011. At the outset, the NSWSPC commends the Review Committee for commissioning the research. Overall, the four reports effectively describe the current settings but the NSWSPC would not be balanced in its response if we did not note some disappointment with the level of analysis, the assumptions made and the conservative recommendations in a range of areas.

The NSWSPC presented a very detailed analysis of its position in the previous two submissions. It is not the intention of this submission to repeat those positions. However, in presenting this submission, the NSWSPC needs to establish some critical positions in relation to all four reports that underpin the specific responses below.

1. The NSWSPC expects government (federal and state) to recognise its role in setting broad goals for the improvement of Australian education, setting the broad benchmarks that will measure the achievement of Australian education and funding schools based on "inputs" (student and community demographic data). The patterns of performance of Australian students and schools

¹ For the purposes of this submission referred to as "secondary principals".

(especially in national testing and PISA data) are highly correlated with the background of students and, in secondary education, the school that they attend. The NSWSPC is concerned that governments in this country, often want to require schools to implement national and state strategies.² Only some of these strategies have been “tested” in research and a number have been rejected in international best practice studies.³ The NSWSPC would like to see both levels of government articulate clear, broad goals so that secondary schools actually know what they are expected to achieve. The NSWSPC also wants a greater emphasis on evidence based decision making about targeted funding and consultation about funding priorities using the expertise that resides in schools and the teaching profession.

2. The NSWSPC is committed to a funding regime that places equity of opportunity as its guiding principle; a principle that acknowledges that what the student “brings to school” is unequal even in schools of similar ICSEA or other measures. However, the evidence of NAPLAN trends and other student performance data suggests that a large number of secondary schools, most of them in the public sector have a compounding disadvantage, when the majority of student enrolments are drawn from Quadrant 1 and 2 in the *MySchool* ICSEA calculations. Many of these schools are not recognised in definitions of “low socio-economic disadvantage”. Many of these schools are in outer metropolitan, regional and rural communities and they offer great opportunity to lift the overall results in NSW if they have the funding and authority to address the demography of the particular school community. As a result the NSWSPC wants any new funding model to recognise and incorporate the presence of large numbers of students from low SES backgrounds (as measured by the number & percentage of students drawn from Quadrant 1) in many public comprehensive schools that are identified as being “just above the cut-off”.⁴
3. Highly successful education systems in the OECD engage in deep research and draw on the expertise of academic/university partners in ways that have created greater improvement in shorter periods of time than has happened in Australia. There appears to be an absence of high quality university engagement in contributing to the development and evaluating the proposed reforms, including the impact of the Melbourne Declaration and the National Education Agreement. The NSWSPC would like to see academic educational research receive significantly more attention and funding.
4. The NSWSPC is concerned that the percentage of GDP spent on school education (and especially public school education) in Australia is below the

² Examples of this are shown on Page 30 of the Allen report where agreed political priorities become required school outcomes and actions. The confusion of language and purpose does not help schools identify what they are being asked to do with outcomes, priorities and action areas described as strategies and actions, “aspirational goals” and standards.

³ In particular, the role of each school and its teachers in translating and designing curriculum and assessment and then strategically resourcing that design for particular school contexts is identified as key lever for systems improvement in PISA research, especially where systems are responding to diverse student populations. The example studied most closely by NSWSPC is Ontario – where the economic, linguistic and cultural diversity of the student and community is similar to NSW.

⁴ The NSWSPC has a list of public secondary schools in outer metropolitan Sydney where 50% of the student population (up to 500 students in the larger schools) is drawn from Quadrant 1 ICSEA backgrounds. Using current formulas these schools are among the “cheapest” in terms of total government recurrent funding.

OECD average. Although a decision to lift the percentage of GDP spent on education is outside the initial brief of the review, the economic imperative to do so must be communicated to government.

5. If a higher proportion of secondary public schools in NSW are to meet the proposed federal and NSW state targets for Year 12 completion (graduation), university entry and academic achievement, the funding calibration will need to be sensitive enough to respond to the fact that secondary schooling is, as a result of demographic change and previous federal and state policy decisions, much more highly differentiated than primary education. Further, it is in the secondary years that Australia most steeply falls below the OECD averages in performance, retention and completion. While the causes may lie in the earlier years of schooling, the solutions must be found in the secondary schools attended by these students...the high stakes end of the measurement spectrum. It is almost redundant to point out that the majority of these schools are in the public sector when all four of the published reports highlight the same thing.
6. In NSW the previous Department of Education and Training and government were unable to respond to the increasing differentiation of secondary public schools in terms of funding, resourcing and staffing due to agreed formulas that were (and are) “broad banded” and allowed for only a small number of categories of schools. Schools were either “in” or “out” of these categories often with only small differences in enrolment characteristics. This was compounded by the application of the federal formula used for non-government funding allocations to the targeting of national partnership, BER, Trade Training Centre and cadetship programs. The new NSW state government needs to review its own funding and resourcing models for public schools, acknowledging in new allocations the complexity and differentiation of secondary schools.
7. The NSWSPC believes there should be a review of the federal funding model every five years to ensure equity principles continue to be applied consistently and fairly. In between, there should be a form of indexation for funding based on the federal funding of all schools from all sectors, not just government schools. If the majority of those students who are most expensive to educate continue to attend public schools (as outlined in all reports), it would be unfair to fund those schools that design their enrolment profile to exclude (for example) many rural, remote and disabled students based on the average cost of funding government schools and students. The NSRRS⁵ should be calculated based on the income and funding of all schools.

⁵ NSRRS – national school recurrent resource standard

Response to Allen Consulting Group Recommendations - Feasibility of a National Schooling Recurrent Resource Standard (Allen report)

The NSWSPC position on a student resource package was explained in detail in the second submission. In summary, the position is that: There should be recurrent resourcing benchmarks for all secondary schools that recognise the complexity of public secondary education, the special needs of adolescents, the transition and equity demands made on public secondary education and the priority of funding the public purposes of secondary education.

The NSWSPC supports the starting point definition reported on Page 7 of the Allen Report. The application of this definition would require a higher level of transparency from government, and would allow all schools to access recurrent federal funding. In the implementation, the NSWSPC is uncertain that the formula on page 8 will deliver a NSRRS as proposed by the definition. Rather than considering the NSRRS as being based on schools that have achieved 80% of students above minimum benchmarks (actually quite a low standard in a country that wishes to raise its overall performance and a standard that will include a large number of schools, perhaps for reasons of keeping costs low), the NSWSPC would prefer the Review Committee to establish the broad goals, outcomes and standards that have to be achieved and then allocate funding based on the enrolment profile of the school – see below including Footnote 7.

The NSWSPC supports the use of both federal recurrent and federal targeted program funding to ensure certainty, sustainability and the ability to respond to emerging opportunities.⁶

We ask the Funding Review Committee to ensure that the new NSRRS will require that:

- There is a transparent commitment to improving the overall performance of Australian education through a greater use of equity based funding, with the base funding including information based on the actual numbers of students in each ICSEA quadrant.⁷
- All sources of school income are publicly declared for every school, including income from parent and community sources.
- All sources of government funding to all schools in all sectors (federal and state) are publicly declared.
- A “transparent” national system of school accounting and financial reporting is developed to enable consistent funding and expenditure comparisons between sectors and jurisdictions as well as schools.

⁶ The second NSWSPC submission argued that jurisdictions and individual schools should be responsible for capital programs including the development and maintenance of assets and major infrastructure. This position is based on evidence that federal capital funding was not allocated fairly in recent years, with most public secondary schools in NSW receiving less than \$500000 in the last 8 years.

⁷ One model that has been used effectively in some regions in NSW public education to distribute equity funds has been to use the ICSEA quadrant data with students in Quadrant 1 ranked as 1.00, Quadrant 2 0.5, Quadrant 3 0.25 and Quadrant 4 0.0.

- The government (federal and state) recognises its responsibility to fund at point of “input” based on the intake enrolment of schools and their communities. The NSWSPC recommends that, in its first iteration the NSRRS be based on the actual enrolment data used for ICSEA calculations and that funding is calibrated and allocated for each school based on the number of students enrolled in Quadrant 1, 2, 3 and 4. See footnote 7.
- Funding of the NSRRS will be based on actual student and school enrolments (reviewed every five years) and that in the initial iteration, if federal funding of the most advantaged schools is to be maintained at current levels, there is a transparent and publicly communicated increase in the federal funding for all other schools commensurate with resourcing them to the standard of the most advantaged schools. This is taken further in the response to the NOUS group paper.
- Calculations for loadings based on Aboriginality, LBOTE and other cultural and linguistic factors will be calculated after SES. It would institutionalise discrimination against refugee students, newly arrived non-English speaking students and Aboriginal students from the poorest families if the calculations assumed all students from cultural and linguistic minorities were disadvantaged. There is no evidence to support this and a lot of evidence in NSW that shows the critical importance of SES and parental background in underpinning the performance of students from Aboriginal and LBOTE backgrounds.
- In the initial iteration of the NSRRS, the funding of students with disabilities remains as additional targeted funding (rather than a loading) based on national definitions of disability and the identification of the educational resources needed to achieve legislative and academic targets for individual students and groups of students. The NSWSPC thinks policy makers have much more work to do to define the needs of students with disabilities and fund them equitably.
- The NSRRS develop separate base NSRRSs for primary and secondary schools. The NSWSPC would not support an econometric model applied to all schools because NSWSPC data from a range of sources demonstrates that the complexity and cost of educating adolescents in secondary schools to achieve federal and state targets, especially those students who have not achieved primary school benchmarks at the end of Year 6⁸, is not well understood or applied in macro models. It is in secondary education, especially public secondary education that Australia has to do the most work to improve its overall performance. The gap in Year 9 between the best and worst performing schools is rarely resolved by the end of Year 12. If we are to ask secondary schools, principals and teachers to “close the gap” and achieve federal and state targets, a separate NSRRS is essential.

Student Outcome Standard

The NSWSPC would like make a particular comment on the “student outcome standard” which we think should be reworded as the “student outcomes” standard. In the discussion (page 30), there are a number of outcomes and actions that are required specifically for secondary schools in addition to those for all schools including:

⁸ Please graphs at the end of this submission.

- Social inclusion and the reduction of disadvantage
- Engagement
- Successful transitions from school
- Enhancing middle years development
- Supporting the senior years of schooling and youth transitions.

There are also targets for Year 12 attainment and closing the gap for Aboriginal students.

The current framework has resulted in targeted program funding and the national partnerships. In any new model the NSWSPC would prefer to see the government set the outcomes and then ensure recurrent funding to enable all schools (not just targeted and non-government schools) to act to achieve the outcomes.

The NSWSPC supports the preferred option outlined on page 42, with the proviso that the government commits to a simple, clear statement of what it wants secondary schools to improve and achieve. At present there are so many external programs, targets, strategies and funding sources that public secondary schools and principals are describing feeling overwhelmed. The NSWSPC supports a simple, clear transparent improvement framework matched by certainty of federal recurrent funding for public secondary schools.

The NSWSPC would like to see the government take the vision of and objectives of the Melbourne Declaration and NEA and then identify the key outcomes (3 – 5) that would demonstrate achievement in secondary education. The NSWSPC would then like these outcomes each defined by the standard that would indicate improvement. In NSW there is a lot of information on student performance and improvement held at jurisdiction level that would be an excellent starting point for setting the improvement targets for NSW secondary public schools. The NSWSPC would not like secondary public education to be reduced to simplistic measures based on national testing in Years 7 and 9 when the critical measures are related to Year 12 completion, university entry levels, traineeship program completion, post school destinations and, in NSW performance in the Higher School Certificate.

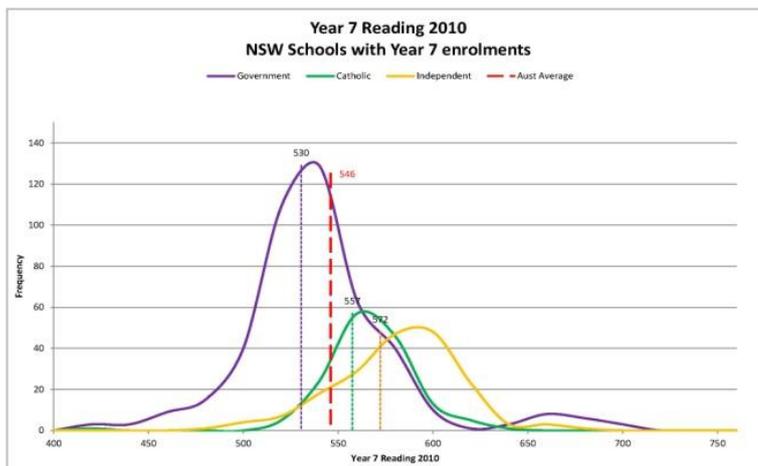
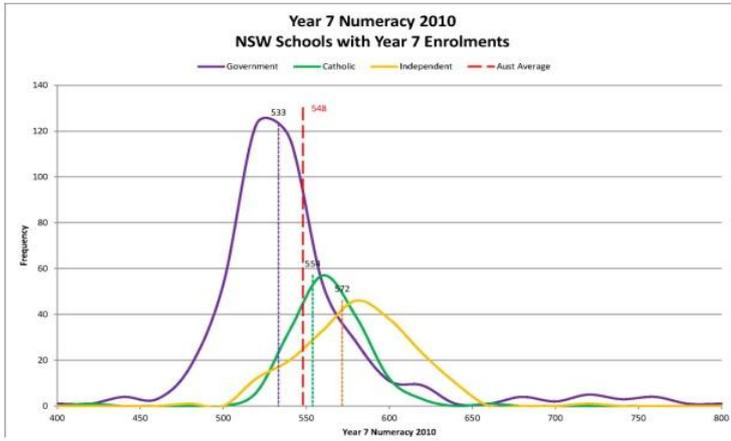
On page 9 and page 32 of the Allen report, there is reference to using NAPLAN data as a proxy for school outcomes and as an initial filter for identifying schools where 80% of students are achieving above the national minimum standard for their grade in reading and numeracy over three years.

There is wide recognition that, for secondary schools, NAPLAN is a poor measure of student and school performance, although it is a reasonable measure for comparing government performance at state, jurisdiction and sector level. For secondary schools, NAPLAN can be a simplistic measure that fails to recognise the complexity of secondary subject based curriculum, the differentiation of the secondary provision and the goals of secondary education⁹.

⁹ One public K-12 school in NSW was ranked third in the state on NAPLAN 2009 (as reported by the Daily Telegraph), based on a NAPLAN enrolment of 5 students. This school would be reported as achieving the 80% benchmark, despite drawing students from some of the most isolated and disadvantaged communities in NSW.

Even in the far less differentiated primary sector, the measurement of grade (or in NSW stage) achievement is more complex than suggested by NAPLAN. In most NSW public high schools, enrolment interviews and transition programs for Year 7 track stage achievement data at the end of Year 6. Information collected by high schools reveals that many students entering high school in comprehensive public schools have not achieved Stage 3 outcomes¹⁰. One proxy measure of this intake information at a state and jurisdiction level is the Year 7 NAPLAN test, which is conducted in May of Year 7 and is, in effect a measure of the performance of students at the end of primary school and the start of high school. The two graphs below, reconstructed from the NSWSPC analysis of the information on the *MySchool* website, show that the starting point for students in public secondary schools in NSW is, on average below the national average and below the intake average for non government schools. It should also be noted that the range of performance for secondary schools shows the high level of differentiation between those schools at the start of high school, a differentiation that is more pronounced by the upper years of secondary schooling. The NSWSPC expects the Funding Review Committee to consider how the funding regime will address (and redress) the embedded differentiation of secondary schools as a critical factor in determining the achievement of Year 12 outcomes and standards.

¹⁰ The NSW Board of Studies Stage 3 learning outcomes are those expected to be achieved by the majority of students by the end of Year 6.



Response to the NOUS Group Recommendations – Schooling Challenges and Opportunities (Nous Report)

The NSWSPC supports many of the findings and recommendations of the Nous Report, especially in relation to the challenges in Australia to achieve the Year 12 attainment levels of better performing OECD nations. This is the day to day challenge faced by principals, teachers and students in secondary public schools, schools that have been relatively under-funded at the federal level for well over a decade.

The concentration of students from low SES and disadvantaged backgrounds in particular schools (page 20 of the report) is also a matter that the NSWSPC has been addressing in its own research and positions in recent years. In the section above the NSWSPC has outlined its key positions to address this which include:

- Addressing the high variability between schools in a more calibrated approach to identifying student background, schools and communities using calculations based on the numbers (and proportions) of students in Quadrant 1 and 2 of the ICSEA data and funding more of those schools currently excluded from federal funding for low SES schools and communities (page 26 of the report).
- A requirement for the NSRRS to take the enrolment performance data of students into account in funding to address the complexity and redress the impact of school differentiation in secondary education.
- Recognition that Australia’s higher level of under-performance is matched by under-funding in terms of total GDP spent on school education, especially public school education compared to successful OECD systems with similar economies.

There were several matters in the Nous Report that the NSWSPC had hoped would be better analysed. The under performance of the government sector is acknowledged (although the national testing results have a very high correlation to ICSEA, much higher than most other high achieving OECD countries). However, when attendance measures are compared (page 24 of the report), it was disappointing that the Nous group was unable to access the PISA data on student health levels. A deeper analysis would have revealed that disability and poor health at age 7 is a critical predictor of student performance in Year 12. The government sector has the greatest proportion of disabled and sick children, especially those from poorer families – a matter that is rarely seen as significant in understanding school and student performance. In future, the NSWSPC would like to see health initiatives included as an educational priority. For secondary public schools in NSW the funding of mental health initiatives is increasingly important in assisting students to complete schooling.

The NSWSPC Position

One aspect of the Nous report that provides direction for the new funding regime is in the feedback from teachers, parents and principals in low SES schools. On page 10 of the report, teachers in “struggling” schools said they needed more time to engage with parents and their peers and they needed non-salary improvements to their work.

The NSWSPC recommends an initial approach to the federal recurrent funding regime that uses “teacher staffing” as a proxy for school funding and allocated

additional “staffing” (as funding for staffing that could also be redirected to other resources) to schools on a graduated scale.¹¹ This would allow every school to receive federal funding that was tailored to the particular school and its needs. If the model proposed were used initially, it could be refined as the student outcomes standards, performance measures and an Australian school improvement framework was refined (over the first five years).

If the most advantaged schools (for example, the “top 5%” as defined by the actual enrolments in each of the ICSEA quadrants) were to receive a base federal recurrent funding¹² that was calculated on “teacher increments”, funding for all other schools could be based on a calibrated and graduated scale in “teacher time increments”. If students in Quadrant 1 were given the greatest loading (as shown in the example in Footnote 7), the teacher increments (with a graduated scale for the numbers in Quadrants 2, 3 and 4) the result would be a fair, transparent and effective starting point for federal funding all schools. It uses federal data from ACARA, data that belongs to the federal government and allows the federal government to measure the outcomes and standards against a very finely calibrated funding system, a system that can then be modified and indexed as student enrolment patterns in each school shift over time.

To reiterate, governments should fund inputs and measure outcomes. Schools, with the support of school systems, should have the authority to make key decisions about the strategies they will use the way they allocate resources to achieving school outcomes and standards.

The Identified Levers for Improvement

The final comment above leads to the NSWSPC response to levers recommended in the Nous report. While commenting on the six (grouped into five below) specifically, the NSWSPC considers there are other levers that have also been critical to success in the OECD. They include:

- The development of high trust cultures where system leaders and decision makers trust schools and teachers to achieve what is required.
- Funding high quality pre service education with challenging graduate standards and expectations of higher level studies, including Masters level study.
- Giving schools, principals and teachers greater authority over curriculum development and implementation to reach agreed standards.
- Providing detailed learning information systems and performance data about students and schools to schools to enable learning programs to be more focused.

¹¹ For these purposes, the NSWSPC has defined an average teacher salary as \$100000 and has also considered teacher increments in terms of FTE – with 1.00 being a full teacher (\$100000) and 0.2 being one day per week (\$20000).

¹² Please note that these comments refer only to recurrent federal funding, not to other sources of funding.

Improving the quality of teaching & learning

The NSWSPC would like to see the removal of language that talks about “improving the quality of teachers”. This language implies that there is something wrong with most individual teachers and the NSWSPC is annoyed when this language is used. Critically, the NSWSPC believes the lever should focus on improving the quality of teaching and learning especially given the challenges facing secondary education as outlined on pages 46 – 51 of the report. It is critical that our teaching is achieving the best for our current students and, if the targets planned for NSW secondary schools are to be realised, we need to do more than list the qualities of those who will thrive in the global community. To achieve a target of 44% of NSW secondary students entering university policy makers need to understand the skills that are needed for success in the first year of university, the skills that the top 20% of HSC students (Band 5 and 6 performers) already have and then we need to be able to redesign the curriculum, assessment, teaching and learning for our average students (Bands 3 and 4) so they have these skills. The expertise to do this resides in our secondary schools, in the profession and in the leadership of schools....the ‘glue’ (page 10) is in collaborative, professional practice and standards that lift the quality of the whole profession, rather than focusing on individual teachers. The NSWSPC supports the work and ongoing funding of AITSL, the national standards for teachers and the national standard for principals.

Ensuring the right external standards and governance

This theme has been explored in some detail in previous sections. The NSWSPC would support the development and application of an Australian School Improvement Framework that would set the goals and use a variety of performance measures to measure the broad range of achievements of schools.

Sadly, the embedded notions of parent choice, branding and marketing in schooling in Australia are firmly entrenched and strongly supported politically. The differentiation this has created is felt most keenly in “comprehensive” public secondary education, especially in outer metropolitan and regional communities where low fee paying private schools have been federally funded at the expense of the local public school. Many of these newer schools have results that reflect their enrolment practices; they have not made significant differences to the performance and academic growth of their students once that enrolment profile is taken into account.

Despite the impact of differentiation at the local level, the NSWSPC supports the provision of specialist schools for students who are highly gifted, in particular where technology can allow this provision to extend to students in more isolated communities and students from lower SES backgrounds.

Promoting regional level collaboration and networked schools

One strength of the NSW public education system (which is the most diverse in Australia) for secondary schools has been the ability to share curriculum, technology, assessment practices, professional learning and best practice across the jurisdiction.

The NSWSPC has found the regional model in NSW highly ineffective for secondary school improvement and the NSWSPC does not support cross sectoral networking unless the funding regime and the public obligations of all schools are legislated and

required as a condition of public funding. Please see the second submission to the Funding Review for more detail.

Supporting disadvantaged students and investing in schools where there is a concentration of disadvantage

The NSWSPC has made its commitment to equity principles clear in all submissions to the Funding Review. The NSWSPC supports additional targeted funding to schools with concentrations of students from a background of social and educational disadvantage. However, the funding process proposed above is particularly focused to ensure that students from disadvantaged backgrounds are supported, no matter which school they attend.

As to the notion of the ‘underperforming school’, the identifiers described on page 9 seem to be proxies for underperformance. The NSWSPC would like to see the NOUs group give a more serious consideration as to what constitutes underperformance (given the high correlation between ICSEA and national testing results) and against which standards that is to be measured. One particular group of schools that the NSWSPC would like to see considered is the secondary school “residualised” by the enrolment practices of other schools and the demographic changes to the school community.

Strong leadership to drive school improvement

The NSWSPC would prefer “expert” leadership rather than “strong” leadership (with its implied contrast of weak leadership) be used in defining the professional role of the school leader. The NSWSPC recognises that the leadership of the school is important but also recognises that professional leadership and community leadership are often distributed in the school community while systemic leadership (and management) is often delegated to the principal. The NSWSPC position is to use the evidence of best practice research into the leadership that influences staff and student improvement, much of which is now defined by the national principal standard.

The NSWSPC would also have been pleased to see the Nour report identify those practices that do not work in improving overall performance. There is substantial evidence from the international experience that could have been applied to the Australian experience to help the government and Funding review Committee avoid the strategies, reforms and programs that do not work.

Response to the Deloitte Access Economics Report – Assessing existing funding models for schooling in Australia (Deloitte report)

In responding to this report the NSWSPC would note that the myriad of funding models within and between states, jurisdictions and federal programs is one reason that the Funding Review was so critical. The Deloitte report conclusion that some funding models work better than others is certainly recognised, especially by public secondary schools in NSW who can track the resource shifting away from secondary education in general and away from public secondary schools in particular over the last decade using a variety of input and outcomes measures.

The NSWSPC expects to see a simpler, more equitable and transparent funding model result from the review.

The NSWSPC would also like to acknowledge the importance of funding three determinants of improved student outcomes highlighted on page ii of the report. However the NSWSPC would like to reframe and reorder them in the following ways:

1. Student factors including socio educational disadvantage/advantage combined with individual factors such as disability, mental illness, attitude to learning, aspirations, previous educational history, access to an appropriate curriculum.
2. The quality of teaching and learning that recognises that it is not just the teacher, it is the quality of the teaching and learning, the standards of the profession as a whole, student access to an appropriate and diverse secondary curriculum and the collaborative nature of classroom improvement that makes the difference.
3. Autonomy works best when the decentralised system of management gives principals and schools greater authority (and more flexible funding) in curriculum design and delivery, strategic resourcing of the curriculum, professional learning, the design of the learning environment and staffing.

Response to the ACER Report – Assessment of Current Process for targeting of schools funding to disadvantaged students (ACER Report)

The NSWSPC recognises that the ACER report highlights the nature of broad based funding for disadvantaged students and the potential (damaging) impact of “abrupt changes in the level of some targeted expenditures”.

The NSWSPC suggests that the detailed responses provided in earlier sections suggesting ways the Funding Review Committee could respond, also respond to the issues raised in the ACER report. These include:

- Funding of schools on a finely calibrated scale using the ICSEA quadrant information for each student in each school.
- Targeted funding for students with disabilities based on agreed national definitions.
- Targeted funding for Phase 1 ESL students.
- Funding for students from LBOTE and Aboriginal backgrounds calculated after SES factors to ensure the most disadvantaged students receive the funding they need.

The NSWSPC recommends that the funding model allow federal recurrent funding to be allocated equitably, transparently and with certainty to all Australian schools, with those schools with greatest concentrations of need (as identified by the actual enrolment profile) receiving significantly more than those schools with a comparative and real educational advantage.