



Australian Government  
Department of Education

# Schools Guide

2025 Non-government Schools Census Post  
Enumeration Audit



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# Introduction

## Purpose of Census PE Audit

Each year, the Australian Government Department of Education (the department) selects a designated number of non-government schools to participate in the Census Post Enumeration (Census PE) audit. This audit verifies the accuracy of data reported by non-government schools in the [Non-Government Schools Census](#) (Census) and ensures compliance with reporting requirements.

Census data reported by schools, such as total student count and characteristics of these students, is used by the Australian Government to calculate [recurrent funding payments](#), including [loadings](#) which provide funding for student priority cohorts. Because of this, the Census PE audit is an important component of the department's [School Funding Assurance Framework](#). It is the department's measure of accuracy of Australian Government recurrent funding payments, and the outcomes are reported to the Australian National Audit Office (ANAO).

## Census

As well as informing recurrent funding payments to non-government schools, the Census provides the community and the Australian Government with important information about schools and students in Australia.

The Census is conducted annually in August, and collects a range of information including:

- the number of students and staff
- students on visas
- students with disability
- Indigenous Australian students.

The 2025 Census was conducted on 1 August 2025.

## What to expect

Approved authorities for selected schools have been formally notified by the department of their schools' inclusion in the 2025 Census PE audit.

For schools selected to participate in the Censes PE audit, contractors engaged by the department will conduct the audit to assess compliance by verifying the accuracy of Census data reported in the 2025 Census using records and evidence held by the school (more information on the census data contractors will audit for compliance is presented later in this guide).

The contractor allocated to your school will contact the school's representative/s using details listed in the department's records to arrange suitable access for conducting the Census PE audit, either through an onsite visit or as a desktop audit.

School onsite visits and desktop audits are expected to be completed between January and May 2026. Schools are required to have evidence available during the Census PE audit to confirm the accuracy of their reported Census data. The duration of each audit will vary depending on student enrolments.

## Legal obligations

Approved authorities that receive funding for one or more schools must complete the Census annually under the *Australian Education Act 2013* (the Act), unless otherwise directed by the Minister or their delegate. Failure to submit the Census may delay the payment of recurrent funding.

Verification of Census data carried out through the Census PE audit is supported under section 37 of the Australian Education Regulations 2023 (the Regulations), which requires all approved authorities to maintain the records used to complete the Census in an accessible form for seven years. An approved authority is the legal entity the Australian Government holds responsible for the administration of a school.

Providing false or misleading Census information to the Australian Government is a serious offence and may result in prosecution under section 137.1 of the *Criminal Code Act 1995*.

## Authority to access premises and records

Under sections 33, 39, and 39A of the Regulations, the department's contractors will be authorised to access the school premises, information, and records for the purpose of auditing the school's Census reporting information.

The contractor will request assistance from school staff to obtain access to the documents required to verify compliance and confirm the accuracy of the school's Census data. The school must ensure all relevant documentation is readily available prior to the scheduled audit.

## Reference materials

In addition to this Census PE Schools Guide, the following materials should be reviewed by all school staff involved in the Census PE audit:

- [2025 Non-government Schools Census Guide](#)
- [Nationally Consistent Collection of Data on School Students with Disability \(NCCD\) Guidelines](#)
  - [NCCD Quick Guide](#)

# 1. Census PE Audit—Process Overview

## Onsite school visits

Multi-campus schools are required to make all requested documentation available at the main (or agreed) campus to complete the Census PE audit on the day(s) of the visit. Schools can supply these records in either paper-based or electronic format or use a combination. Documents in electronic format do not need to be printed for the audit. Schools are not expected to reproduce, reformat or create additional evidentiary documentation for the Census PE audit.

On the day(s) of the visit, a staff member should assist the contractor in locating the school records required for the Census PE audit. The level of support required will depend on how readily the documents needed to demonstrate compliance can be accessed.

The duration of the onsite Census PE audit will depend on the enrolment size and the number of students reported in the NCCD.

## Desktop audit process

Some Census PE audits are conducted virtually via GovTEAMS. If your school is selected for a desktop audit, you will receive an invitation to join a GovTEAMS community that will be hosted by the contractor allocated to your school. The contractor will contact you via email to schedule a series of videoconference meetings through GovTEAMS.

The desktop audit process can include:

- an initial set-up meeting with the contractor to confirm readiness for the Census PE audit
- participation in the desktop audit at the scheduled date and time via the MS Teams videocall function within GovTEAMS
- screen sharing with the contractor and opening relevant electronic files and documents to support the audit and demonstrate compliance
- holding up hard copy documents to the camera for the contractor to sight as part of the audit process.

**Note:** For the privacy and safety of schools and students, video and phone calls will not be recorded by contractors or the department.

## GovTEAMS

GovTEAMS is an online collaborative service, which will facilitate all desktop audits and the sharing of documents with contractors (if required).

If your school is involved in a desktop audit, or required to supply documentation following an onsite visit, you will be sent an invitation to join the GovTEAMS community hosted by the contractor allocated to your school, and the contractor will add you to a private and secure channel dedicated to your school.

Guidance on how to use GovTEAMS for the desktop audit, and uploading documentation for contractors to audit, will be provided ahead of time.

**Note:** To reduce the administrative burden on schools, contractors have been instructed not to request that schools upload unreasonable amounts of information to GovTEAMS leading up to a desktop audit. Information requested by contractors in the lead up to an audit should generally be limited to student lists and not include evidentiary documents (such as attendance, NCCD or visa evidence), these documents will be reviewed at the time of the audit.

## School Declaration and School Report

At the completion of your school's Census PE audit, the principal or an authorised officer nominated by the principal will be asked to sign a School Declaration form. This declaration serves as an acknowledgment that the contractor has explained the audit process and findings to your school. Importantly, signing the declaration does **not** indicate agreement or disagreement with the findings; it simply confirms that the discussion has taken place. By signing, the school also declares that all reasonable efforts were made to provide the required information during the audit, that the information provided is true and correct, and that you understand providing false or misleading information is a serious offence which may result in compliance action under relevant legislation and policy.

After the declaration is signed, the contractor will provide a School Report summarising the audit outcomes and submit to the department.

The department will then review the report and conduct quality assurance checks on the audit findings. Based on this review, the department may make changes to your school's 2025 Census data where necessary. If the department determines that Census data could not be verified based on records and evidence held by the school, compliance action may follow.

## School evidence

All evidence should be collated and prepared by your school prior to the onsite visit or desktop audit. **This evidence may be kept in a variety of formats**, including online in systems or portals, paper-based records or a combination of both. Records may be centralised in individual or personalised learning plans or located across different kinds of documents. Documents in electronic format do not need to be printed for the audit.

As the department administers the Census PE audit in line with [Australian Privacy Principles](#), your school will be notified that contractors require access to necessary evidence only. Any evidence that is uploaded to GovTEAMS for audit should be **de-identified**.

**Note:** Contractors will not retain printed or electronic copies of any evidence provided by your school and will only provide de-identified data to the department in the School Report.

## 2. Data compliance and assurance checks for Census PE audit

When conducting the Census PE audit, contractors will assess compliance and verify accuracy and completeness of data that your school reported in the 2025 Non-Government Schools Census (Census).

Census data that will be audited includes:

- Student counts
- Student ages, year levels and study load (full time vs part time)
- Indigenous status
- Disability status
- Visa and overseas status
- Boarding status
- Distance education status.

In response to feedback from schools that participated in previous Census PE audits, the following sections provide additional guidance on **some parts** of the [Non-Government Schools Census requirements](#) and the [NCCD Guidelines](#). This guidance is intended to clarify how contractors will assess compliance and accuracy of the Census data. It does not replace or override the requirements outlined in the official Census and the NCCD documents. Schools remain responsible for reviewing those documents thoroughly to ensure full compliance with all obligations related to the Census and the NCCD.

### Student eligibility for inclusion in the Census

Contractors will audit the eligibility of all students reported in the school's total student count. This will involve auditing enrolment information, attendance data and other supporting records which must be made available to contractors during the onsite visit or desktop audit.

Contractors will verify that students reported in the school's total student count meet the following key criteria:

- The student was enrolled at the school on Census Day (1 August 2025)
- The student was enrolled in a year level the school is approved to provide at that location
- The student attended the school for at least one day during the Census reference period
- The student has a pattern of regular attendance at the school, or at school generally, throughout the year.

### Census reference period

The Census reference period is the 20 school days leading up to, and including, Census Day. To be included in a school's total student count, each student must have attended the school for at least **one day** during this period.

School holidays, public holidays, weekends and staff development/pupil-free days are not included within the 20-day Census reference period. For example, if one pupil-free day falls within what would otherwise be the 20-day Census reference period, this period is extended by one day.

Contractors will check whether students included in the school's total student count were absent for the entire Census reference period. For students included in the total count who were absent for the entire Census reference period, the contractor will verify whether the department approved a special circumstances application which allows those students to be included in the school's total student count (see below for more information on special circumstances).

For all schools (excluding distance education providers), attendance means the student must physically attend and receive education at an approved school location.

## Pattern of regular attendance

In cases where a student who is included in the total student count attended the school for at least one day during the Census reference period but was absent for period(s) throughout the year, the school will need to demonstrate why it considers the student to have a pattern of attendance commensurate with their enrolment type (full time/part time). This will include providing class attendance records as evidence to the contractor.

The requirement that a student has a regular pattern of attendance will be assessed from the start of the calendar year to Census day. Attendance at other schools in the same calendar year will be included.

## Special Circumstances

The school may have students included in the total student count who did not attend school during the Census reference period and/or do not have a pattern of regular attendance, but who otherwise meet the eligibility requirements to be included in the school's total student count.

In such cases, the school should have applied to the department to have these students individually considered for inclusion in the Census through a special circumstance's application. This process should have been undertaken in August 2025.

It is not the contractor's role to consider special circumstances, or to submit information to the department on behalf of the school for consideration of special circumstances.

Please refer to the [Census special circumstances handbook](#) on SchoolsHub for more information.

## Nationally Consistent Collection of Data on School Students with Disability (NCCD)

As part of the Census, schools are required to report students with disability as part of the NCCD. The Census PE audit will include compliance checks of supporting evidence for students reported in the NCCD.

As outlined in the [NCCD Guidelines](#), to be included in the NCCD a student must have a **disability** (diagnosed or imputed) according to the definition of disability in the *Disability Discrimination Act 1992* (reproduced in Appendix 4 of the NCCD Guidelines), and the school must be providing adjustments to address the functional impact of this disability in relation to education.

### Disability: diagnosed or imputed

A medical or allied health professional's diagnosis of disability may exist but is not required for a student to be included in the NCCD. The school team may impute disability. However, by imputing disability to a student, the school team must consider (on reasonable and documented grounds) that the student has an undiagnosed disability based on the definition of disability in Appendix 4 of the NCCD Guidelines.

Adjustments being provided **for reasons other than disability** are not sufficient for inclusion in the NCCD. There are a range of reasons for why a student might require additional support. Adjustments made under the NCCD are adjustments for diagnosed or imputed disability, and do not include adjustments for factors such as English as a second language, disruptive home or school environments, socio-economic disadvantage, refugee background, or the effects of trauma. (Trauma itself is not a disability that can be diagnosed/imputed under the NCCD, but it may have triggered a

disability which must be diagnosed or imputed separately from the trauma. This is stated in section C.4.3 of the NCCD Guidelines).

This connects with the idea that the school team must have **reasonable grounds** to impute a disability, and **evidence** to support these grounds. For instance, it is not reasonable to impute a disability based solely on below-average assessment results. This is because below-average results could be caused by any number of factors, such as those stated above, or simply variation in individual academic aptitude, interest, and/or attitude.

## NCCD evidence-keeping requirements

Section C.5 of the NCCD Guidelines sets out evidence-keeping requirements. For all students included in the NCCD, the school must have sufficient documented evidence in each of the following **four general evidence areas**:

1. Assessed individual needs of the student.
2. Consultation and collaboration with the student, or parents, guardians, carers or associates.
3. That at least 10 weeks of adjustment(s) (cumulative) have been provided to the student (in the 12 months preceding Census day) to address their assessed individual needs associated with disability and evidence to justify the level reported.
4. Ongoing monitoring and review of the adjustment(s).

### Assessed individual needs of the student

The school must retain evidence that it has assessed the functional impact of the student's diagnosed or imputed disability. This assessment ensures that the adjustments being provided to the student have been calibrated to the disability. For example, the school may have assessed that the student requires changes to curriculum and teaching practices, methods of communicating or conveying information, ways of interacting with and participating with peers, or changes to hygiene and/or dietary routines.

The documented delivery of adjustments alone does not constitute evidence of assessed needs. Adjustments must be determined before being delivered, and this determination must be *based on* the assessment of need (as set out in sections C.2.1 and C.2.2 of the NCCD Guidelines). Assessment of need could (but is not required to) occur as part of the diagnosis/imputation process.

### Consultation and collaboration

All schools are generally expected to consult with a student's parents, guardians or carers before implementing NCCD adjustments (as per section C.2.3 of the NCCD Guidelines). As a result, the school should retain evidence of **personalised communications** with parents, guardians or carers about the individual student's NCCD adjustments – not just generic information about the NCCD (nor simply routine correspondence about the student's behaviour, attendance pattern, homework etc.). A single email sent to a parent/guardian/carer, without acknowledgement or engagement, is not sufficient evidence of consultation and collaboration.

In a minority of cases, it may be more appropriate to consult only with the student themselves or with an associate. For example, if the parents/guardians push back against their child being classed as having disability. If this is the case, the school should clearly have documented the reasons it has not consulted with parents, guardians or carers.

### At least 10 weeks of adjustment(s)

As set out in section C.3.1 of the NCCD Guidelines, the school must possess evidence showing that adjustments have been provided to a student to address the functional impact of a disability for at least 10-weeks (cumulative) in the 12 months leading up to Census date. More specifically:

- These adjustments need not take place each and every day over a 10-week period

- Where a student receives adjustments for any amount of time within a school week, that constitutes a 'week' for the purposes of the 10-week rule
- The provision of adjustments over the 10 weeks may comprise weeks that are not consecutive and may be split across school terms.

Where a student's level of adjustment has changed, the school should have recorded the higher level of adjustment. For example, if there is evidence of a student receiving a supplementary level of adjustment for 9 weeks and substantial level for a further 1 week, the student should be recorded in the substantial level.

### Evidence to justify reported level of adjustment

The school is required to classify each student receiving adjustments in accordance with the NCCD Guidelines and retain clear, and sufficient documentation to support the level of adjustment reported in the Census.

The four levels of NCCD adjustment(s) are described in section C.3 of the NCCD Guidelines:

- **Quality Differentiated Teaching Practice (QDTP):** Student receives minor adjustments reasonably expected as part of quality teaching/school practice. These adjustments are provided through usual school processes, without drawing on additional resources.
- **Supplementary:** Students receive adjustments supplementary to the strategies and resources already available for all students within the school for particular activities at specific times throughout the week.
- **Substantial:** Students have substantial support needs and receive essential adjustments and require considerable assistance to the usual educational program at most times, on most days.
- **Extensive:** Students have very high support needs and are provided with extensive targeted measures and sustained levels of intensive support at all times.

Contractors **will verify that sufficient evidence exists to justify the reported level of adjustment.** This includes reviewing documentation that demonstrates the adjustments have been implemented as per the level of adjustment descriptors in the NCCD Guidelines. For example, if a student is reported as receiving adjustments at the extensive level, contractors will confirm that the evidence demonstrates that sustained and intensive support was delivered at all times.

### Ongoing monitoring and review of adjustments

The school must possess evidence that the adjustments provided to an NCCD student have been subject to ongoing monitoring and review to ensure their effectiveness.

- Documentation of academic performance (i.e. assessment results or school reports) and/or behaviour (i.e. observational notes) is not, by itself, evidence of both monitoring and review of adjustments. It may be evidence of monitoring only. There must also be some kind of evidence that adjustments have been reviewed.
- A record noting the date of a parent/teacher interview, by itself, is not evidence that adjustments have been reviewed, unless the record includes reference to the adjustments having been reviewed and adjusted in response to the parent's insights and feedback, for example.
- Consultation and collaboration should generally occur before adjustments are implemented (i.e. the consultation and collaboration with parents/guardians/carers/associates should *inform* the setting of adjustments), while monitoring and review should occur after adjustments have been in place to ensure they are appropriate and effective. For example, evidence of a parent-teacher interview, where a parent was consulted on adjustments that had not at that point in time been implemented, cannot also serve as evidence of monitoring and review. Separate evidence would need to be provided for the latter, as monitoring and review occur *after* adjustments have been made.

## How many student records will be audited

The department's contractors are required to validate a random sample of 100 students reported in the NCCD supplementary, substantial, and extensive levels of adjustment. Contractors must select students in the sample, not the school.

- If any reporting errors (excluding incorrect disability categorisation) are identified in this sample, the contractors will validate all remaining students reported in these categories.
- Schools with fewer than 100 students will be required to have records of all students reported in the NCCD supplementary, substantial, and extensive levels of adjustment validated.
- For those students reported in the Quality Differentiated Teaching Practice (QDTP) level of adjustment, the contractors will validate a 5% random sample. The contractor will advise on the student records within the QDTP sample to be validated.

## NCCD evidence format

NCCD documentation may vary between students, schools and systems. Schools are not required to maintain NCCD evidence in any one format. Some schools may choose to include their NCCD evidence in centralised documents such as individualised or personalised learning plans. In other cases, NCCD evidence may be spread out across different files for each student. Contractors have been advised to expect variation in how NCCD evidence is collected and presented.

**Note:** Records to support information provided under the NCCD must be retained for seven years and provided to the department upon request. For further information, refer to the [NCCD Guidelines](#).

## Indigenous students

Indigenous students are defined in the Census as students of Aboriginal or Torres Strait Islander descent, who self-identify as, and are acknowledged by the community in which they live, as being of that descent.

Some schools will not hold records of students who identify as Indigenous in their enrolment records as this is not a requirement of all states and territories.

If an enrolment record does not include Indigenous status, other evidence of self-identification by the student or parent/guardian will need to be provided by the school and sighted by the contractor.

Other forms of evidence may include:

- ABSTUDY eligibility
- A statement from an Indigenous community organisation.

In situations where the school either does not have sufficient evidence to confirm a student is an 'Indigenous student' or where parents may have chosen not to identify a student as Indigenous or non-Indigenous, these students must be reported as Indigenous non-stated in the Census.

Contractors will ensure the school/campus has recorded Indigenous students as a subset of the total student count.

## Students on visa and overseas students

The Census draws a distinction between 'students on visas' and 'overseas students'. While all overseas students hold a visa, the department uses these categories to differentiate between two groups of students on visa, with 'overseas students' forming a subset of 'students in visas':

- ‘Overseas students’ are students on subclasses of visas that permit them to travel to Australia for the primary purpose of receiving education: subclasses 500, 570, 571, 572, 573, 574 and 575, or a bridging visa attached to one of those subclasses.
- ‘Students on visas’ are students who are not Australian citizens and who are in Australia for a host of reasons.

In addition to funding implications, contractors will verify that students reported under the ‘students on visas’ or ‘overseas students’ categories have the appropriate residential status to study in Australia.

This will involve contractors verifying that each student reported in either category was accurately reported based on evidence held by the school. If valid visa documentation for a student is not available, then it may be obtained through the Department of Home Affairs website (VEVO: [Visa Entitlement Verification Online check](#)) or by contacting the student’s parent or guardian.

Other issues related to visas that contractors will consider include the following:

- Permanent residents and New Zealand citizens should have been reported in the school’s students on visas count, and the school should retain documented evidence of their visas. For a student holding a New Zealand Passport, a copy of the passport is sufficient as evidence.
- For Australian-born children of New Zealand citizens, the school must provide direct evidence that the student held a valid visa on Census day. This is because children born in Australia to parents holding a Special Category Visa (SCV) on or before 30 June 2022 do not automatically acquire New Zealand citizenship or inherit their parent’s SCV.
- Possession of an Australian birth certificate does not necessarily indicate a student is an Australian citizen if the student’s parents were born overseas. The student may still require a visa and thus visa documentation should be available for the audit.
- Where a student has a bridging visa, the contractor will verify whether their previous substantive visa was still valid at Census day (1 August 2025). If so, the student should have been reported in the Census according to the substantive visa. If not, and if the substantive visa is no longer valid, the student should have been reported according to the subclass of their bridging visa.

## Students without visas

The school’s total student count may include students who are not Australian citizens and do not hold a visa (for example if the student has entered Australia unlawfully or whose visa has expired or been cancelled).

Contractors are aware that such students are eligible to be included in the school’s student on visa count, provided:

- the student meets all other eligibility requirements (see the section on student eligibility for inclusion in the Census, above); and
- the school can provide some evidence that the student genuinely does not have a visa (as opposed to simply being unable to locate evidence for the student’s visa).

Evidence that a student should be considered as not holding a visa may include:

- A letter or email from parents or guardians advising of the student’s current visa status (i.e. expired, and the family has not yet applied for a new visa).
- Information from the Department of Home Affairs.
- Information from the Status Resolution Support Services service provider working with the family.

If the school cannot provide evidence that the student held a visa on Census day, or evidence the student does not have a visa, then if the student is not an Australian citizen the contractor may recommend to the department that the student be removed from the school’s total student count, because they should not have been reported in the Census.

## Mid-year intake for foundation year

If the school offers a mid-year intake for foundation year students, contractors will audit the school records for these students.

### What is a foundation year?

The Regulations define foundation as 'the year of schooling immediately before year one.' For Australian Government recurrent funding purposes, foundation is a year or 12 months of schooling. This means that students who participate in a foundation program that goes beyond 12 months can only attract recurrent funding for a single year (which is the year immediately before year one).

Only students who repeat a foundation year of schooling due to lack of educational attainment or development can attract recurrent funding for the repeated year of schooling.

### Reporting foundation year students

Contractors will verify that the school reported foundation year students correctly in the Census, and that foundation year students were only reported as such in the Census for a single year, being the year before year one. See below for examples of student eligibility to attract funding for foundation year:

- A student is enrolled in a mid-year intake foundation program at the start of term 3 and the 18-month program finishes in December the following year. The student should not be reported in the Census for the first 6 months of the foundation program. The student is only eligible to be reported in the Census for the year of attendance immediately before year one (the second year).
- A student is enrolled in foundation at the beginning of the school year in a 12-month 'year' of schooling that finishes in December of the same year. Due to a lack of educational attainment or development, the student will repeat the same year of schooling. This student is eligible to attract a second year of foundation recurrent funding and can be reported in the Census as a foundation student for both years.
- A 4-year-old student is considered ready to start school and is enrolled in a program at a school which offers multi-year learning stages, commencing with pre-primary (such as Montessori Stage 1 ages 3 to 6, or Steiner programs). This student is only eligible to be reported in the Census as a foundation student if they progress to year one the following year.

### Questions

If you have any questions about the Census PE audit, please contact the department at [education-schoolspostenumeration@education.gov.au](mailto:education-schoolspostenumeration@education.gov.au)