



**AGPPA**  
Australian Government  
Primary Principals  
Association

Promoting and Advocating for Government Primary Schools

18 September 2020

Review Group Secretary  
2020 Review of the Disability Standards for Education 2005  
Emailed to: [DisabilityStrategy@dese.gov.au](mailto:DisabilityStrategy@dese.gov.au)

**2020 Review of the Disability Standards for Education 2005**

Dear Secretary

The Australian Government Primary Principals Association (AGPPA) welcomes the opportunity to provide a submission to this Review. Our submission is based upon the professional opinions of public primary school leaders as well as AGPPA position papers, reports and research projects undertaken on behalf of AGPPA.

AGPPA also looks forward to continued involvement in the ongoing discussion relating to this very important topic.

Ian Anderson

**President**

Australian Government Primary Principals Association.

## **About AGPPA**

### **AGPPA Background**

The Australian Government Primary Principals Association is the national professional association for public primary school principals in Australia. AGPPA represents over 5300 principals in public primary schools in every corner of every state and territory. AGPPA's National Council includes representatives from six states and two territories, with two members from each jurisdiction. This group represents a shared national commitment to both highlight the importance of the primary years and to promote excellence in public primary education in Australia.

Our advocacy is based on the vision of every child attending a school with healthy, high-performing leaders and quality staff, along with the knowledge that primary schools are where Australian children acquire the necessary foundational academic, social and emotional skills to lead fulfilled and enriched lives. It is imperative that our education policy enables this noble intent so that all children can experience such success, both at school and through later life.

AGPPA initiatives, actions and projects are research informed. However, AGPPA cautions that evidence-based practice must be proven to be transferable to all school contexts. It cannot be assumed that the application of a universal solution or the adoption of successful policy from other areas, countries or jurisdictions will be suitable for the diverse range of school settings across our country. AGPPA aims to assist in making Australia's education system a beacon for all.

This aim is perhaps best enunciated using the words of David Gonski, Chair of the Review of Funding for Schooling expert panel, who said:

*"Every child should have access to the best possible education, regardless of where they live, the income of their family or the school they attend."*

Just as importantly, Dr Philip Riley (Chief Investigator of the Australian Principal Occupational Health, Safety and Wellbeing Surveys) reminds us:

*"Today's children are tomorrow's nation builders. We owe it to them and ourselves to give them the best opportunities we can."*

AGPPA's response to the Review is shown below.

### **AGPPA's Expectations**

While AGPPA believes much of the Disability Standards for Education 2005 remains fit for purpose, we believe that there is an opportunity to ensure that the ongoing practical implementation of the standards becomes clearer and more meaningful for all schools, particularly for primary schools. We believe the intent in the existing document remains strong and we reinforce the importance of equity for the wide range of learners in our schools, particularly those in the target groups identified by David Gonski in the Gonski Review of Funding for Schooling (December 2011). The review recommended that schools be funded according to identified needs of their student populations.

The review identified that government schools have the majority of students with high levels of educational need. However, it also recognised that within all sectors there are schools serving very disadvantaged students that will benefit from additional funding. The intent of the Gonski Review was that schools and sectors with the highest level of need should receive the most support.

Support loadings were to be provided for a range of student needs including students with disabilities. The noble intent of the Gonski Review of Funding for Schooling has not yet been fully realised, and will not be achieved until all primary schools have achieved 100% of the Schooling Resource Standard, fully indexed. This requires a commitment from both State and Federal governments to make this a reality. Unless full funding is provided to ensure reasonable adjustments for students with disabilities, then we will not realise the intent of the Disability Standards.

## AGPPA Response to the Review Questions

### Section 2: Experiences of people with disability in education and training

- ***Enrolment and access: What has been your experience of people with disability accessing and enrolling in education and training,***

The length of time taken to go through the process of diagnosing and validating a disability to enable the correct support to be put in place is not timely enough. Children are missing out on valuable support (to their detriment) until the determination is completed.

AGPPA fully supports inclusivity when schools have access to all the resources (physical, human and financial) and expertise required to make the necessary adjustments for students with disabilities. This support is dependent upon the school's capacity to ensure safety of all students and staff and the capacity to provide a positive learning environment for all.

Children should, where possible be able to attend their local school and receive the benefits that belonging to a community brings. There is however, a real need for greater clarification of the terms reasonable and unreasonable adjustments to support both schools and families. This may assist in minimising the occurrence of unreasonable expectations being placed on some schools and help to place children in the very best location to provide the best support for their particular needs.

- ***Participation: Regarding our obligations for making reasonable adjustments to ensure all students with disability can participate in education. This includes participating in courses and programs, the curriculum, and using facilities. Regarding consultation with a students or parents / carers? What are our thoughts and experiences/recommendations regarding making reasonable adjustments?***

Students with significant mental health issues are often not being catered for in our current system, particularly in primary school, as they often don't fit into the prescribed disability groups, and remain undiagnosed because of the lack of mental health support in the primary years.

When we are able to make reasonable adjustments with the support and agreement of families, all students benefit in an inclusive environment. Problems arise when schools do not have adequate resources, parents are unreasonable in their expectations and the student's disability/behaviour impacts on the safety of staff and students.

As mentioned above, there is a clear need for greater clarification of the terms reasonable and unreasonable adjustments to support both schools and families. Some schools are challenged to meet the needs of all students wanting to enrol and all schools need to have a real and visible commitment to supporting students with disabilities.

Consultation with parents and students is important. Facilities can be a real challenge – i.e. installation of ramps. Such projects can have long timelines. Longer lead times into enrolment is preferred but not always possible. Here mutual respect and trust is important.

Educators have been regularly frustrated by the recommendations of allied health professionals that 'suggest' that the child should have x and y which are unmanageable in the classroom environment. This can contribute to conflict as the parent is expecting these recommendations to be implemented. Similar challenges have been created by family advocates encouraging unrealistic expectations leading to disappointment or disagreement.

- ***Supporting students: How do we appropriately support students with disability during their education? This includes the student being able to access supports, including specialist resources. What are our recommendations in this regard?***

It would be beneficial if all jurisdictions provided a system level triage structure that informed parents of the best learning environment options for their child. This would include mainstream settings if appropriate but would remove the unnecessary disappointments, misunderstandings and potential conflicts.

Where appropriate, external agencies are provided access to the child at school if necessary – examples include Occupational Therapy and Speech Therapy. This support is generally not as regular as it should be, but is governed by available funding. These services are particularly important in the formative primary years.

There is a real need for more upskilling of staff, especially for pre-service teachers, in the areas of disability support and effective teaching including learning adjustments, especially for ASD students. This upskilling needs to be provided by real teachers with real experience in these areas, not theoretical gurus.

Student voice, where possible, is important in this space. If students are able to articulate their support needs, this provides practitioners with a greater understanding of their needs. An IEP that is consultative is necessary to set goals and plan support interventions to support those goals.

Working with Allied Health providers is also essential and requires additional personnel to be appointed to service students in our schools, particularly in primary schools. It is also vitally important that these health providers work to support the intent of the IEP at the school level, not contradict it, or make it more difficult to get a shared commitment to the goals.

A child's plan that is cognisant of the context is important as is the child and the teacher having access to the specialist support that enables strategies for growth. Rural and remote locations can be hindered by lack of specialists or by high turnover of staff (i.e. OT).

COVID has increased access to support via online means and this could be enhanced. Specialist reports need to be written in language accessible to educators, providing opportunities for educators to ask questions. More opportunities should be provided to allow educators to increase knowledge through quality professional learning focussed on supporting students with a disability.

- ***Harassment or victimisation: Have you had a situation where one of your students with disability experienced harassment or victimisation? What are our recommendations to address this?***

Primary schools continually focus on the creation of a supportive school environment for all, but at times this can be derailed by interpersonal issues between students, some of which may be considered harassment or victimisation.

While these can sometimes involve students with disability, they are not limited to this group. It is also important to note that on occasions, students with a disability have been the protagonists. In any instance, schools use these circumstances as learning opportunities to work with students to try to eliminate repetitions and to build and maintain a harmonious learning environment.

Positive partnerships and ongoing dialogue with parents is critical in creating a unified message to any students with such tendencies. Positive parental modelling is also of great value in such situations but not always evident.

- ***Compliance with the Standards by education providers:***

Primary schools have been working hard to establish clear processes and structures aligned with disability standards, other relevant legislation and department policy.

Sometimes, when schools are challenged about compliance, it becomes apparent that it is really to do with the unrealistic expectations of parents/carers. Working on respectful relationships with parent/carers, teachers, paediatricians/allied health workers is imperative, so all are on focussed on the same intent.

Often, compromise can be reached, and the child has a successful school experience. If the school is not able to meet the child's requirements, then schools work on supporting the parent to transition to a site that is suitable. A parent should feel that their child belongs to the 'system' and be supported in the journey to a successful school placement.

### **Section 3: Awareness of the Standards**

- ***Transition: How do we assist a student with disability to transition from one education sector to another; for example, from school to further education. Any recommendations?***

An effective transition requires effective communication, including the sharing of safety plans, risk management plans, behaviour plans and IEPs.

It is important that there is a close liaison between key staff at current and future placement sites, including outreach opportunities both ways, to begin to develop new relational contexts, and to de-mystify the new setting via focussed visits. This also allows staff at the new setting to begin to understand how the child's needs have been met in the past, what strategies have worked and what may best work in the new setting.

Child and family need support to do this well and to establish positive relationships at the new site - a transition 'coach' is needed to ensure that voices are heard, needs are addressed, and that data is shared. Connecting parents and kids through a buddy system is advantageous. Relationships are key to success so placing emphasis on this is vital. It's not so much where a child is going to, but 'who' they are going to, that makes a difference in feelings of comfort and belonging.

- ***Aboriginal and Torres Strait Islander students with disability: What are our experiences supporting Aboriginal and Torres Strait Islander students with disability. How do we help them to access and participate in education? How do we consult with them and their families and carers? Recommendations/thoughts.***

Relationships once again are key here and communicating in a manner that is effective and suitable for the family involved. Key school contacts need to be available to advise and liaise with families, providing a case-management approach for all indigenous students. It's all about developing a trusted relationship with the family but this can be difficult at times. Access to ATSI staff or community people helps to build connection and lines of advocacy.

- ***Specific experiences: Access and participation in education for students with disability may be affected by other circumstances such as age, sex, gender, gender identity, sexual orientation, intersex status, ethnic origin or race, and culturally and linguistically diverse background. How do we support students with disability who were affected by other circumstances, how have we helped them to access and participate in education? Recommendations.***

Schools need to continually work towards a cultural norm that insists that every student matters, every moment counts, and everyone belongs. A sense of belonging is a critical for all children, including those with a disability.

Co-morbidity is common. Schools consider each child as an individual in planning to meet their needs as well as they possibly can. Recognition and acceptance are the key for educators and the child. All stakeholders need to be involved in planning and addressing any challenges identified. Schools need to ensure that, in developing a child's plan, there are effective conversations to build the full picture of who the child is.

EALD students to be closely monitored to identify if issues are a disability rather than a language issue.

The cultural diversity of the workforce needs to be considered in this space. What is the knowledge and understanding we believe staff should have? Access to professional learning is important as are key contacts in each site to build capacity.

#### **Section 4: Improving the Standards**

- ***COVID 19: Has COVID-19 impacted the experience of your students with disability in participating in education? Have their experiences ever been impacted by other major events, such as natural disasters.***

COVID 19 has had an enormous impact on health-compromised students and their families. Some families have been withholding their child from school because of their compromised health, whilst other families who can't cope with their child at home are sending them to school, but anxious for their health and safety. Routines are overturned, and anxiety levels are heightened because of this.

Educators have struggled with how to keep students with a disability safe, engaged and learning in these tricky times. They have adapted as best as they can, but any success has been due to teacher innovation and agility rather than an effective system response. Use of technology has great possibilities but needs to be inclusive of all student needs. Teacher knowledge should be shared widely across the nation, so we can capture this great work and share it.

- ***How do you think the Standards could be improved to help overcome barriers for students with disability in accessing or participating in education?***

Define a continuum outlining the level of support required given the disability. System level and allied agency support to be clearly articulated and resourced.

The Standards need to be used by education systems, state and federal - to shape policy and ensure adequate resources (human, physical and financial) are provided to schools, to proactively ensure effective inclusion and best practice, ensuring students' needs can be met.

- ***Do the Standards need changing? If so, please let us know how you would change them.***

Definition of reasonable adjustments needs further clarity, so that parents and schools have clarity about what is possible, and what is not so that a concerted focus on the way forward is self-evident.

Facilities play a big part in how we can support students with a range of needs. In many primary schools, the 'footprint' does not allow for quiet spaces or nurture spaces and as a result, much of the contemporary education theory that can support students with disabilities is not able to be actioned. If we believe something is best practice, let's create the environment to enable it to happen. This requires a re-think of the industrial model of classroom education and requires state and federal government commitment to best practice in education for all – including students with disabilities.

- ***What should be done to improve awareness of the Standards?***

A greater emphasis on visibility and promotion of the Standards is required, as well as a commitment to simple English interpretations of the Standards to ensure clear understanding by all stakeholders.

A real commitment to pre-service teacher training on the practical implementation of the Disability Standards is needed and is the responsibility of state and federal educational authorities. A further commitment to ongoing professional learning for educators supporting effective implementation at the school level is needed. Hope is not a strategy.

- ***Do we need more or different support to help you to understand and apply the Standards? What kind of support would be useful?***

Practical, easy to understand professional learning opportunities for teachers and support staff should be the norm and should be freely available and on-going.

Clarity on what schools are expected to do to cater for all local intake students regardless of disability, including practical ways to support classroom teachers in meeting the needs of the child is more important.

Systemic liaison officers could be provided to assist parents to understand the realities in school settings and minimise misunderstandings.

- ***Do you find the Guidance Notes for the Standards useful? If not, why not?***

While some schools consider the notes useful, others believe they are not explicit enough and can be interpreted differently according to the audience. This ambiguity needs to be addressed to ensure a clear and cogent understanding of the standards, ensuring a more effective implementation.

There also needs to be an acceptance some mainstream sites will never be able to meet the needs of all students. Such a goal is simply not attainable.

- ***What would you change to make the Standards work better for Aboriginal and Torres Strait Islander students with disability and their families and carers?***

An ongoing focus on effective liaison with students and their carers is vital to ensure social justice and cultural needs are considered at all times. This, coupled with an ongoing focus on ongoing staff professional learning regarding cultural awareness, will assist greatly.

It is important that indigenous staff are engaged in this process wherever possible. The information provided about the Standards should also be culturally appropriate, wherever possible. To ensure this occurs, indigenous language should be available and used where appropriate.

Finally, consider the physical environment and how it reflects the community and the learner. Sometimes community wants a space or strategy that doesn't align with the Standards – if it builds belonging, should that not be our aim?

## Conclusion

AGPPA appreciates the opportunity to provide this response to the review, and looks forward to an ongoing dialogue relating to the review of the standards. We believe that if we can get the primary years right for all learners (including students with disabilities), that the secondary years and life beyond will take care of itself.

For queries relating to this submission, please contact AGPPA President, Ian Anderson.

Email: [ianderson@wappa.net.au](mailto:ianderson@wappa.net.au) Phone: +61 401 670 502