



2020 Review of the *Disability Standards for Education 2005*

Submission by

Australian Association of Christian Schools (AACCS)

Adventist Schools Australia (ASA)

Christian Schools Australia (CSA)

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Introduction

The Australian Association of Christian Schools (AACCS), Adventist Schools Australia (ASA) and Christian Schools Australia (CSA) are national bodies representing schools, or (in the case of ASA) school systems. Together these schools are educating in excess of 145,000 students across more than 320 locations nationally. Our organisations provide leadership in policy, services and resources for members, and generally work to advance the cause of Christian schooling.

Our schools are geographically, culturally and educationally diverse, serving predominantly middle to lower socio-economic communities. Schools range in size from around 50 students to multi-campus schools of more than 2,000 students. While situated mainly in the metropolitan or outer suburban fringe suburbs of major capital cities a number are located across both regional and remote Australia including some solely indigenous schools.

ASA schools operate on a systemic basis as part of the wider Adventist Church, which educates more than 2 million students globally. Member schools of AACCS and CSA operate as locally governed, community-based, not for profit religious organisations. Some member schools are closely aligned with one or more Christian churches in their communities, others have their heritage in a group of parents coming together to start a school.

Christian schools represented by our organisations have attracted very strong community support as evidenced by their significant enrolment growth. In addition to serving Christian families, most schools also attract significant enrolments from families who, while not currently attending a Christian church, nonetheless deliberately choose the school because they desire for their children an education that is based upon Christian beliefs and values.

The commitment of Christian Schools to Students with Disabilities

Christian schools are committed to educating all students wanting a Christian education, including those with disabilities. Operating from the belief that all people are made in the image of God, we see all children as intrinsically valuable and unique. Christian schools therefore want to promote the inclusivity of all students in our community where this provides the best educational outcomes for the students concerned.

Our organisations have been, and continue to be, supportive of the Disability Standards for Education (the Standards) as the further articulation of the requirements of the *Disability Discrimination Act 1996* (Cth) (the DDA). The Standards provide a helpful source of clarity around the obligations of education providers. We believe that on the whole, they strike an appropriate balance between the right of students with disability to be treated with dignity and the opportunity to enjoy the benefits of education and the rights of the education providers – that adjustments made do not cause ‘unjustifiable hardship’.

In preparing this submission our associations surveyed member schools, following the Review’s Terms of Reference, to gain a clearer picture of our schools’ ‘on the ground’ experience with the Standards. Provided below are a summary of the responses and excerpts to the questions we asked our schools.

Schools Experience: Enrolment and Access

It is clear from our schools across the country that more and more families are seeking, and expecting, the same ability to access a faith-based school of their choice for their child with disabilities as they are for their other children. Our schools are well known in their local communities for providing a loving and supportive environment for children with disabilities. The level of interest in seeking enrolment for students with disabilities in Christian schools and the significant increases in such enrolments certainly points to greater access and participation.

The overall experience of our schools in engaging with students with disability is positive. There is a high pastoral care focus and value placed on inclusion which is reflected in willingness to work to provide necessary supports for students with disabilities. Our staff report a strong desire to improve processes and implement protocols that will better support students, using a wide range of strategies.

Some of our schools reported they had 25% of their total enrolments included in the Nationally Consistent Collection of Data (NCCD) count in 2020 (in some cohorts as many as 40%) however the numbers were actually higher for those receiving additional teacher supports and learning modifications but were unable to be included on the count due to insufficient teacher documentation. Limitations in resources, including financial, physical and teacher training/support were identified as the significant constraints in schools meeting the needs of these students.

"With or without diagnosis a student receives adjustments. Resources, including staffing resources and timetable constraints can be challenging to balance with the number of student needs which arise." Rehoboth Christian College, WA

On the whole, schools reported an increased level in staff understanding and inclusion of students with disability while also acknowledging the level of understanding around how students with disability access the curriculum varies greatly amongst staff.

We have been on a journey over the last few years where we have become increasingly more intentional in making adjustments required by students with disability to access the curriculum. There has been a growing change in culture of inclusive education, though we have a way to go." Gilson College, VIC

Supporting students with disability

A collaborative approach is essential in identifying the needs of students with disability and how they can be met by schools when determining the appropriate teaching and learning adjustments and supports required. The collaboration continues throughout the education journey, as adjustments are regularly reviewed, ensuring the student's needs are met. Schools reported a variety of ways they supported students with disabilities throughout their education, including:

- setting documented planning goals creating a universal design environment;
- inviting parents and other professionals to support the development of Individual Learning Plans;
- teacher and education assistant training and support meetings with parents introducing learning programs to meet each student's needs such as life skills;
- implementing differentiated teaching and learning programs including modifications;
- setting up dedicated learning support teams with learning support teachers and learning support assistants;
- assigning support staff to classes to provide supplementary support to small groups or to individuals to provide substantial or extensive support;

- allocating support staff to work alongside the students both in the classroom and in the playground and recording observations to inform further teacher planning;
- collaborating with external professionals to provide access to additional support;
- mentoring programs to students with a diagnosed or suspected disability.
- small group intervention consultation with therapist or chaplains;
- one-to-one teaching support for students with disability.

Harassment, Compliance and Transition Experience

Our schools reported only very isolated examples of harassment or victimisation of students with disabilities. If and when these incidents occur, schools follow their behaviour or bullying policies to ensure that these are quickly addressed to protect the wellbeing of the victim. Schools work closely with the family to provide additional support and safe spaces to the student while also working on a disciplinary approach with the child who is doing the harassing, utilising a variety of strategies including restorative practices.

“We have continued to work on educating the students peers around circles of support and how they can understand and provide support, grace and kindness to the peer that is being harassed.” St Philip’s Christian College, NSW

Partnerships with parents and students, based on clear lines of communication and regular meetings, were identified as key to ensuring parents are satisfied that our schools are meeting their compliance obligations. Complaints from parents inevitably arise from time to time. Open communication regarding rights and responsibilities of all parties is important when parental concerns are raised. Lack of disclosure of disability on enrolment, or lack of parental willingness to diagnose when educators suspect there is disability, is an issue that can sometimes interfere with meeting obligations.

“These [concerns] were addressed by meeting with parents to discuss concerns, explaining the supports that we have in place. Sometimes the parents weren't aware of all the supports we had in place for their child. Sometimes we have had to change or modify what we do.” Hills Adventist College, NSW

Schools reported positive transition experiences when teachers meet together to pass on information about students when they progress between year levels or to work experience placements. A major factor contributing to positive student transitions includes developing the teachers' understanding of the student's individual needs, their disability, strategies to support the student, their strengths and interests and how those can be integrated into the learning. Further improvements in information sharing in the transition between school sectors was identified as an area of need, as well as improvements to supporting students in their transition from school to further education and work.

Aboriginal and Torres Strait Islander (ATSI) students with disability

The majority of our schools, being largely located in major metropolitan areas, reported they did not have extensive experience working with students from an ATSI background. Despite this, schools take into account all students' individual needs and cultural backgrounds to meet them where they are at. As with any student or family, if there is a barrier for them to understand a process or service schools would work through this with them and provide them with the culturally sensitive information that they need.

“Engage community and family members as much as possible. Educate and build respect for Aboriginal culture... Regular communication and ensuring the family are part of the team and know that their input is respected is key.” Riverside Adventist Christian School, QLD

Schools reported they were providing supports to ATSI students with disability by developing and linking Personal Learning Plans with their Individual Education Plan. This is helping schools, when collaborating and consulting with families/ carers, to reflect cultural sensitivity and inclusion. Providing more cultural awareness training for staff in their local context would be of benefit to all students from an ATSI background as well as students with disabilities.

Awareness and Improvement of the Standards

Our school leaders reported having a good or very good understanding of the school's obligations under the Standards. Since coming into effect, the Standards have been a helpful tool in providing a framework for discussion with parents and other support providers and in the professional learning of

staff. This has occurred both within schools and by families and others associated with or supporting those students. It is acknowledged, however, that many teachers have quite some way to go in understanding the characteristics of various disabilities and what type of accommodations and adjustments are needed. Crowded professional learning requirements for teachers and the variety of competing interests has meant that training in relation to the Standards may have received limited focus amongst wider staff.

“Mandatory reporting is an annual compliance requirement, so I think that mandating the disability standards module completion for all school staff would be a step in the right direction.” Bayside Christian College, VIC

More practical training and support for staff was identified as an area for improvement for the Standards. While the guidance notes are useful to facilitate understanding of the Standards our schools identified that they would find regular and updated training by relevant professionals easier, especially if this could be supported with a nominated contact person for each school.

“Keep the language as simple as possible, the more it sounds like a legal document (which of course it is) the less accessible it is to parents and teachers as they feel it's beyond them.” Plenty Valley Christian College, VIC

Some specific suggestions to improve the guidance around the Standards include:

- compulsory training for pre-service teachers;
- a ‘road show’ of professional learning in all schools, both government in independent schools;
- providing links and examples to the curriculum at each year level and/or subject;
- including testimonies and case studies from parents, students, staff regarding teacher best practice and collaborative understandings;
- ‘drip feeding’ teachers with ongoing training in small chunks rather than one long session;
- training in small group settings with opportunities to meet in between sessions to implement and feedback on learning;
- short film clips documenting personal stories to provide an emotional connection and shift perceptions to help teachers see students with disability as a person with much potential;

- podcast discussions from practitioners across different states with good ‘real-life’ examples guiding teachers on how to adjust to some types of disabilities;
- provision of other resources such as checklists, support log templates and documentation required, so that there is consistency across the country in what is required and provided.

Impact of COVID-19

Schools in Greater Melbourne experiencing the extreme lockdown reported that COVID-19 has placed families of students with disabilities under enormous pressure. It has been harder for many students with disabilities to access education in similar ways to their peers as there isn't the scope for teachers to assist students in the same variety of ways.

“This has been incredibly difficult for families. We have amended our policies to provide better small group support and have targeted LSAs to support these students with small group work online and a range of other differentiated actions but it is still hard for these students.” Rivercrest Christian College, VIC

Many of the strategies that work in the classroom are not possible in online teaching and some schools reported that they asked students with needs to be on campus during both lockdowns, even if parents did not request it. Many students with disability have experienced spikes in anxiety, difficulty focusing, lack of home support, increased absences, social-emotional difficulties, referrals to psychologists, and required constant monitoring by student wellbeing and chaplaincy teams. This has also impacted their learning. Having said that, there are some students with disability who thrived in the online environment, away from the noisy distractions that classrooms provide.

Regional schools in Victoria have also reported similar challenges. While the scope of “lockdown” requirements themselves has not been as severe, the impact on generally smaller regional schools has been equally intense. From a school perspective the local context has often been a significant factor in providing support, when this has been dependent upon external providers located some distance away, possibly even in Melbourne itself, it has been particularly problematic.

Other Issues

Christian schools have a strong commitment to meeting the needs of, and consequentially not discriminating against, students with disabilities. School recommendations for diagnosis of student disability are only made after detailed observations, data collection, prayer and conversations with families. For some of our smaller schools, access to specialists for diagnosis is a significant barrier to accessing appropriate levels of support for students with disability. The cost of diagnosis is a burden on already financially stretched families and the wait time for specialist input is also lengthy adding to the stress for families.

The continued changing of the goalposts and lack of equitable funding was identified by some schools as the greatest constraint in providing the necessary support and adjustments for students with disability.

“The NCCD has become increasingly complex for schools. I support transparency for this funding however the support given to schools is minimal. To not know what gets audited, and to not have the possibility for feedback so we can get better at targeting support is unhelpful.” Casino Christian College, NSW

The public understanding of the funding available to Christian schools has, at times, lead to inflated expectations that can be extremely difficult, if not impossible, to meet during the current transition period. While the Commonwealth indicates in its resources (see <https://www.education.gov.au/what-australian-government-doing-support-students-disability-schools>) that the published per student funding amount for students with disability “does not take into account a school’s transition arrangements to consistent Commonwealth shares of the SRS” this is often not well understood by parents. The common expectation is that the full SRS loadings are available to be spent on individual students. Even when schools are receiving close to the full loadings the need for “enabling” expenditure, such as staff training and collaborate support mechanisms, if often not well understood.

A number of our schools identified that the changing the descriptors of the NCCD categories was making it harder and harder for schools to access funding. This is especially unhelpful in situations

where students change a level, based on the change of the descriptor, but the school is continuing to provide the same levels of support to the student with less funding.

“The NCCD level of support descriptors have been modified three years in a row, making the levels harder to ascribe. We have had several students drop a level (e.g. from substantial to supplementary) based solely on the change of description, with no change to the level of support we provide in the college.” Bayside Christian College, VIC

In addition, the paperwork load for learning support staff and teachers that is required to provide quality evidence when supporting students with disabilities has increased exponentially in recent years, however, staffing levels and teacher loadings have yet to adjust to that reality. The expectations in the Standards are high and many teachers struggle with the pressure of making numerous adjustments for an increasing number of students while also maintaining the paperwork required for accountability. The burden on staff is of increasing concern particularly when time is best spent providing supports and pro-active services for students. Having said that, the NCCD data collection is a rigorous process which does allow for review of practice and procedures to ensure the needs of students with disability are being authentically met.

Conclusion

Our schools are highly motivated and committed to ensuring that all students with disability are identified and supported. Our sector has a positive reputation in the broader community for our high levels of pastoral care and support which means that many more students with disability are being enrolled. To meet this challenge and successfully support students with disabilities we recommend the Government consider how it might increase resources for training and support of staff in this area. While acknowledging the vital role of education and accepting the important responsibilities of schools it must also be recognised that schools operate within a context. If it ‘takes a village to raise a child’ it takes a nation, a society, to educate a child with special needs.