



VCOSS submission to the inclusive education policy discussion paper

October 2017

Introduction

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to provide feedback on the discussion paper for the inclusive education policy for students with disabilities and additional needs.

VCOSS is the peak body of the social and community sector in Victoria. VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups, and individuals interested in social policy. In addition to supporting the sector, VCOSS represents the interests of vulnerable and disadvantaged Victorians, including people with disability, in policy debates and advocates for the development of a sustainable, fair and equitable society.

We welcome the development of an inclusive education policy to support the learning and development of students with disability. However, to be meaningful, the policy must be more than a set of aspirational statements. It must include clear tangible actions and the Department of Education and Training must ensure schools comply with the policy.

Views on the policy statement

Overall we believe the wording of the draft policy statement and principles for inclusive education are sound. In particular we are pleased the policy and principles make reference to:

- implementing evidence-based practices
- taking a strengths-based and personalised learning approach
- being founded on human rights
- involving students, parents and carers in decision making processes
- focusing on students learning, engagement and wellbeing

We believe this policy could be enhanced by placing an onus on schools to actively engage students and families. The VEOHRC 2012 Held Back report found that “around one in three parents had not been consulted by the school about the adjustments their child required to participate on the same basis as students without disabilities.”¹ Student Support Groups (SSGs) are the primary formal mechanism for consultation between parents, students and the school, however, VCOSS members report too often parents are not engaged by school in these groups. VCOSS members also report families are not consistently provided with

¹ Victorian Equal Opportunity and Human Rights Commission (VEOHRC), *Held Back: The experiences of students with disabilities in Victorian schools*, VEOHRC, 2012, p. 3.

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copies of Individual Learning Plans (ILPs). The Held Back report found that of those children eligible for PSD funding, 17 per cent of parents reported that their child did not have a plan, and eight per cent were not sure if their child had a plan.² Of those who did have a plan, 32 per cent of parents did not feel well consulted and around four per cent reported not being consulted at all.³

We also believe the policy should explicitly reference schools holding high educational expectations for all students for disability and additional needs. VCOSS members report some schools assume or accept students with disabilities will not achieve the same academic outcomes as their peers, rather than considering the educational barriers that exist and working to address these. For example, a VCOSS member provided an example of a student whose skill level was assessed as three years below her peers. This was not considered an issue by the school yet would have been of serious concern if the student did not have a disability. VCOSS members also report examples of ILPs which focused on motor skills or self-care, rather than learning outcomes.

Having a strong emphasis on implementing evidence-based approaches could help improve the educational and wellbeing outcomes for students. VCOSS members report inconsistent practices exist among schools. While some schools were using robust, evidence-based interventions to support their students, many schools implement ineffective or poor practices often due to a limited knowledge and/or resources to provide effective interventions. VCOSS members report schools are not provided with sufficient guidance on how to implement evidence-based interventions in practice.

Converting policy into practice

VCOSS warns against delivering a well-sounding inclusive education policy which does not translate into practice in the classroom and school grounds. The principles in action resource must have tangible actions for schools to follow and the policy must be clearly communicated to schools. School compliance with the policy must be monitored and enforced by the Department of Education and Training.

VCOSS members report some good policy material currently exists but are not implemented by schools. These documents are frequently only disseminated electronically or placed online and are not mandatory. Teachers and school staff are busy and often do not have the time to engage with material proactively. VCOSS members report there is also limited departmental oversight of compliance with policies. In particular, VCOSS members report concerns about the use of restraint and seclusion and the lack of positive behaviour support. Some students with disability are also being placed on reduced hours or only being permitted to attend school part-time, despite this not being permitted by Departmental policy.^{4,5}

The recent Held Back analysis raises similar concerns about the enforceability of policy material, particularly in relation to restraint and seclusion. The report recommends independent oversight, strict enforcement of reporting requirements, adherence to new

² VEOHRC, Op. Cit., p. 87.

³ Ibid.

⁴ Victorian Ombudsman, *Investigation into Victorian government school expulsions*, August 2017, p. 37.

⁵ Victorian Equal Opportunity and Human Rights Commission, *Held back: the experiences of students with disabilities in Victorian Schools – Analysis paper*, August 2017, p. 5.

policy material by educators and possible legislative reform to reduce and eliminate the use of restraint and seclusion.⁶

The Department of Education and Training has a crucial role to play in sharing evidence-based research and translating this into meaningful actions for school. Providing schools with access to training, particularly face-to-face training, and providing support from experts and regional offices would help schools implement the policy and embed evidence-based interventions in the classroom.

Implementing this policy effectively also relies on schools having adequate resources to assist students. Only around 24,000 of the estimated 84,000 students with disability in Victorian schools receive targeted funding under the Program for Students with Disabilities (PSD), resulting in many children missing out on support required to succeed at school.⁷ The recent Held Back Analysis report update identified there is still “significant unmet need for support service in schools including integration aides, occupational therapists and speech therapists”.⁸ The PSD currently takes a deficit-based approach focusing on a student’s disability diagnosis, rather than the educational and functional needs of the student. It does not recognise that students facing disadvantage require greater support.

Reforming the PSD to take a functional, educational needs based approach and expanding it to include all students with disability would help improve the educational trajectory of every child with disability and additional needs. The review of the PSD,⁹ the Government Schools Funding Review,¹⁰ and the Inquiry into services for people with Autism Spectrum Disorder¹¹ all recommend shifting to a functional needs-based approach.

To meet the aspirations of the ‘Education State’ and support every child and young person with disability to succeed, the inclusive education policy must drive consistent, evidence-based practice within every school. It will also rely on reforming the Program for Students with Disabilities Program.

⁶ Victorian Equal Opportunity and Human Rights Commission, *Held back: the experiences of students with disabilities in Victorian Schools – Analysis paper*, August 2017, P. 22.

⁷ Victorian Government, Department of Education and Training, *The Education State: Review of the Program for Students with Disabilities*, April 2016, pp. 11, 13.

⁸ Victorian Equal Opportunity and Human Rights Commission, *Held back: the experiences of students with disabilities in Victorian Schools – Analysis paper*, August 2017, p. 22.

⁹ Victorian Government, Department of Education and Training, *The Education State: Review of the Program for Students with Disabilities*, April 2016, pp. 28.

¹⁰ Victorian Government Department of Education and Training, *Greater returns on investment in education: Government schools funding review, Final Report*, December 2015, P.22.

¹¹ Parliament of Victoria, Family and Community Development Committee, *Inquiry into services for people with Autism Spectrum Disorder Final Report*, June 2017, p. 158.