



Victorian Equal Opportunity
& Human Rights Commission



Held back: The experiences of students with disabilities in Victorian schools

> Analysis paper



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Published by the Victorian Equal Opportunity and Human Rights Commission, Level 3, 204 Lygon Street, Carlton, Victoria 3053. August 2017.

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Held back: the experiences of students with disabilities in Victorian Schools – Analysis paper

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Printed on Precision

ISBN 978-0-9953832-2-7

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Executive summary

In 2012 the Victorian Equal Opportunity and Human Rights Commission ('the Commission') published *Held back: the experiences of students with disabilities in Victorian schools*. The first report of its kind in Australia, *Held back* examined how well students with disabilities fare in government, Catholic and independent schools across Victoria.

Held back found that, while many individual schools and teachers are working successfully to build inclusive schools and communities, disability discrimination was still occurring in schools and students with disabilities face significant barriers to achieving equal outcomes. Barriers included funding limitations, lack of specialist supports, inadequate knowledge and training about disability among teachers, lack of time for teachers to provide an individualised approach for students with disabilities, and discriminatory attitudes.

The Commission welcomes the range of positive policy developments that have occurred since *Held back's* release and the current government's public commitment to inclusive schooling. The Department of Education and Training has consulted closely with the Commission on many of the recommendations within *Held back* and has developed specific strategies to respond to issues raised by the Commission and other stakeholders.

Significant policy developments since *Held back's* release include the announcement of the Victorian Government's Special Needs Plan in 2015, which includes the Program for Students with Disabilities (PSD) Review, the establishment of the Principal Practice Leader (Education) to oversee the use of restraint and seclusion in schools, and improving processes for school dispute resolution through the recently established Independent Office for School Dispute Resolution.

In April 2016 the Victorian Government released its response to the PSD Review and work is underway to implement recommendations by 2018. The Inclusive Education Agenda will deliver the PSD Review recommendations and include ongoing work to address the recommendations from *Held back*.

Notwithstanding these developments, the Commission has continued to receive feedback from stakeholders, including its Disability Reference Group, that in some areas progress remains slow – in particular, some stakeholders have suggested that these high-level policy changes are simply not being felt in schools. These stakeholders have suggested that sustained or increased requests for advocacy support for students facing barriers to inclusion in the Victorian education system since *Held back's* release provide strong evidence of this gap in policy and practice.

In the interest of understanding the effect of *Held back* and the progress on a range of recommendations, the Commission has completed a five-year analysis. This paper includes observations on what is needed to build on existing policy gains to achieve genuine change for students with disabilities in Victorian schools.

This paper addresses the following themes:

- maximising participation for students with disabilities through providing reasonable adjustments, the effective use of Individual Learning Plans and other tools
- accountability and the use of data
- workforce training and capacity, and the proposed new Inclusive Education Workforce Capability Strategy
- regulation and oversight of the use of restraint and seclusion in schools
- rights awareness, complaints and engagement.

The importance of data, accountability mechanisms and the current shortcomings in this area are central to any reflections about progress since *Held back* was published. Without data measures and monitoring it is not possible to consistently determine whether policy initiatives – which are positive in principle – are leading to practical improvements in educational experiences and outcomes for students with disabilities. Such policies will have little effect if they are not adequately enforced or followed and there is limited capacity to measure this.

Schools that are understanding of difference and properly resourced to respond to individual student needs will help create a society that is more tolerant, less discriminatory and more genuinely inclusive. Many of the issues raised in *Held back* are complex. Sustained commitment and regular evaluation is required to ensure that existing and new policy developments lead to genuine practice change in schools and tangible improvement in the experience of children with disabilities and their families.

Key observations

Participation, student support services and providing reasonable adjustments

The Commission welcomes a number of initiatives aimed at improving participation for students with disabilities. These include improved data collection, training for educators, and initiatives addressing personalised learning and support to make sure adjustments are being provided for students with disabilities.

More work on data collection and stronger accountability mechanisms is needed to measure the impact of these initiatives, such as by auditing Individual Learning Plans (ILPs) to make sure educators are using training and guidelines effectively. Feedback from stakeholders suggests

there are continuing problems with the quality and consistent use of ILPs. While new guidelines may assist, more practical guidance and further investment is needed, including giving educators access to quality specialist advice and support when needed to help with developing ILPs.

Further consultation is needed on initiatives that have addressed *Held back* recommendations, such as the changes to Victorian Curriculum and Assessment Authority exam policies and procedures.

Accountability and the use of data

Since *Held back* there have been a number of positive initiatives to improve accountability and the use of data. These include the Nationally Consistent Collection of Data initiative, improvements in data collection to monitor student services support cases, and a central recommendation from the PSD Review to improve accountability and data collection (PSD Review recommendation 12).

It appears there is only emerging capacity to ensure accountability for and effective measurement of educational outcomes for students with disabilities through the use of data. To achieve this, more work is needed to develop a comprehensive, overarching data strategy. Education authorities and government agencies need to improve their capacity to work together and share data to build understanding of systemic issues for students with disabilities in schools.

In building a monitoring framework, government agencies must include the qualitative feedback of parents, students and disability advocacy agencies. This will help build an understanding of systemic issues faced by students with disabilities, and areas for improvement

Workforce capacity and leadership

The Commission welcomes additional training requirements for educators and undergraduates relating to educating students with disabilities, and planned work to respond to the PSD Review recommendations. This will include the development of an Inclusive Education Workforce Capability Strategy, and this paper outlines some key considerations to help inform it.

Efforts should continue to ensure the training is delivered widely. All educators should receive mandatory core training relating to students with disabilities, discrimination and associated legal responsibilities. More targeted efforts will be needed to provide specialist advice and support to educators and to address any discriminatory attitudes towards students.

Use of restraint and seclusion

The Commission welcomes policy efforts to respond to *Held back* findings and recommendations relating to the use of restraint and seclusion. These include the establishment of the role of Principal Practice Leader (Education), a revised policy for educators and requirements to report any use of restraint and seclusion.

However, reducing and eliminating the use of restraint and seclusion will take a sustained effort and further consideration of the necessary components of a robust and transparent approach. This includes the need for ongoing independent oversight through the Principal Practice Leader (Education) or equivalent role, strict enforcement of reporting requirements, adherence to new policy material by educators and possible legislative reform.

As noted in relation to other positive policy materials, it is crucial to ensure policies are followed and enforced in practice. The Commission and stakeholders contributing to this analysis have stressed that policy material will have no practical effect if it is not strictly enforced and followed by schools and educators.

The Victorian Government should prioritise consultation on this issue to determine how effective past efforts have been to address the use of restraint and seclusion in schools, and what future work is needed.

Rights awareness, complaints and engagement

There have been positive policy developments to address awareness of rights and channels of complaint. These include new materials providing information about rights and making complaints, and the launch of the new Independent Office for School Dispute Resolution. Further consultation will be needed to determine how effective these initiatives are, noting that the Independent Office was established in March 2017 so evaluation of this initiative will need to occur after it has been in operation for a longer period.

This links to a central observation in this report that stronger and more frequent consultation and engagement mechanisms should be established – together with public reporting on any actions arising – to receive feedback about the Independent Office for School Dispute Resolution and broader initiatives relating to students with disabilities.

National Disability Insurance Scheme (NDIS) rollout

More work is needed to address specific issues and recommendations from *Held back* that are affected by transition to the NDIS, including transport barriers and issues relating to student support services. Significant issues identified in *Held back*, such as discriminatory attitudes from school bus drivers, remain unaddressed.

Chapter 1: Participation, student support services and providing reasonable adjustments

This chapter outlines key findings and recommendations relating to enrolment, student support services and funding, attendance patterns and the provision of reasonable adjustments. Key progress observations from the Commission include the need for additional efforts to ensure part-time attendance of students with disabilities does not occur, address disability-specific bullying and build on existing efforts relating to the use of Individual Learning Plans.

Summary of Held back findings and recommendations

Participation, student support services and providing reasonable adjustments were core themes examined in *Held back*. These were explored through chapters aligning directly with the Disability Standards for Education 2005 (Education Standards).¹ These findings are outlined below.

Enrolment, participation and attendance patterns

- While the majority of parents surveyed (85 per cent) reported they were able to enrol their child at the first school they applied for, parents who reported unsuccessful enrolment had made applications to many schools before being accepted. Refusal to enrol was rarely explicitly stated. It was more common for

parents to be subtly informed that the school would not be able to accommodate their child. The Commission recommended improvements in data collection and the development of plain English materials outlining rights at enrolment to address these findings.²

- Fifty-three per cent of parents reported that their child was not able to fully participate in education. However, educators and students surveyed took a more positive view. Seventy-two per cent of educators said that students with disabilities could fully participate while 68 per cent of students (of a total of 60 surveyed) reported full participation. Reported participation barriers included lack of teacher training, teacher time and specialist supports. Educators surveyed were more likely to identify a lack of funding and resources, and poor coordination and school culture as well as training.
- Even though the law requires all students who are enrolled to attend school full-time, some students with disabilities are only attending school part-time due to a range of support barriers.

1 The Disability Standards for Education 2005 were formulated under the *Disability Discrimination Act 1992* (Cth) and came into effect in August 2005. They include standards relating to enrolment, participation, curriculum development accreditation and delivery, Student Support Services and harassment and victimisation.

2 Victorian Equal Opportunity and Human Rights Commission, *Held back: The experiences of students with disabilities in Victorian schools* (2012) 12. Recommendations 1 and 2.

Curriculum development, accreditation and delivery

- Adjusting teaching methods and learning materials, including the effective use of Individual Learning Plans (ILPs) and student support groups, is crucial to maximise education outcomes for students with disabilities. Providing these adjustments, including adjustments to tests and exams, is inconsistent across schools. The report also found that adjustments are not always made for all aspects of schooling, such as excursions, schools camps and other extra-curricular activities. The Commission made a number of recommendations about adjustments, including adjustments to exams, and the effective use of ILPs.³

Funding and student support services

- There is still unmet need for student support services in schools including integration aides, occupational therapists, other specialist staff and assistive technology.

3 Above n 2, 12–3. Recommendations 5, 6, 7 and 16.

- Parents identified concerns about Program for Students with Disabilities (PSD) funding. This included difficulty understanding the PSD, applying for funds, and concerns about accountability for the use of funds. Parents were also concerned about PSD eligibility criteria and loss of funding support, particularly when reassessed for eligibility in the transition from primary to secondary school. The Commission recommended that the PSD funding model be revised and that there should be greater transparency and accountability for the use of funds.⁴
- Parents and educators reported that schools are less likely to make adjustments for students not funded by the PSD.

Harassment and victimisation

- Bullying is a significant and widespread problem for students with disabilities, with six out of 10 reporting that they have been bullied because of their disability.

4 Above n 2, 14–5. Recommendations 36, 43 and 44.

Major developments and observations since *Held back*

Enrolment, participation and attendance patterns

Key *Held back* recommendations, including the collection and public reporting of data on reduced attendance patterns and the development of a 'no suspension or expulsion of students with disabilities policy' have not been addressed. Recent feedback from stakeholders has also advised refusal of enrolment and reduced attendance patterns in the manner suggested by *Held Back* persists for some students with disabilities. The Victorian Ombudsman's inquiry into expulsions in schools may provide further insight into reduced attendance patterns for students with disabilities.

DET has reported challenges associated with developing a 'no suspension or expulsion of students with disabilities policy', including those associated with determining whether behaviours are associated with the manifestation of a disability, and the need to consider the surrounding circumstances of incidents.

As noted in Chapter 2, it is hoped that the outcomes of the Ombudsman's inquiry and future work relating to the Nationally Consistent Collection of Data (NCCD), PSD Review recommendations and initiatives will lead to a more comprehensive strategy to improve accountability and capacity to measure educational outcomes and any reduced attendance patterns for students with disabilities. *Held back* findings and recommendations remain relevant and should inform this work.

Adjustments to curriculum and use of Individual Learning Plans

There are a number of initiatives purporting to address *Held back* findings and recommendations relating to adjustments to curriculum and learning materials. These include phasing in of the Ability Based Learning and Support (ABLES) resource and Victorian Curriculum and Assessment Authority's (VCAA) Victorian Curriculum F–10 (incorporating Levels A to D), enhancements to the English Online Interview (EOI) assessment tool and development of supporting resources and new guidelines on personalised learning and support (PSD Review recommendation 10).

The Commission also notes that improvements and additional training requirements for educators, (explored in detail in Chapter 3) will improve educator capacity to provide adjustments to curriculum and teaching methods for students with disabilities.

These are positive developments but more work will be needed to determine their uptake and effectiveness in practice. New guidelines will not lead to practice change without appropriate enforcement and oversight. The Commission reiterates the specific elements of *Held back* recommendations 16 and 48, including the need for auditing and oversight of ILPs, and that all students with disabilities requiring adjustments should have ILPs developed regardless of PSD funding eligibility.

Stakeholder feedback has indicated a significant gap in this area relates to a reluctance from schools to bring in necessary expertise to assist with developing ILPs and making adjustments, citing funding constraints. This suggests more effort is needed to educate schools about reasonable adjustments – and for additional investment to ensure specialist support can be provided to assist schools in areas outside their expertise.

DET should seek feedback from educators and other stakeholders on the usefulness of new and existing guidance materials about ILPs. Stakeholder feedback suggests more specific, practical guidance on the content of ILPs is needed. For example, consideration should be given to a compulsory template including minimum requirements that are specific, measurable, achievable, realistic and time bound. The Commission's recommendation that the VCAA and DET work together to develop an improved policy and administrative procedures for exams is being addressed.⁵ The VCAA is in the process of an ongoing review of these policies. In 2017 the VCAA will focus on reviewing the categories of Specific Learning Disorder (formerly Learning Disability) and significant health impairment (with specific consideration of mental health conditions). It is the intention that the revised Special Provision policy and procedures (for these two categories) are finalised and published before the 2018 academic year.

5 State Government of Victoria, Victorian Curriculum and Assessment Authority, *VCAA Special Provision Review* <<http://www.vcaa.vic.edu.au/Pages/vce/exams/specialprovision/specialprovisionreview.aspx>> at 21 September 2016.

Ongoing review and consultation with parents, students and other stakeholders will be necessary to determine the effectiveness of the revised policy. In particular, disability and adjustment categories may require further consideration, as this categorisation approach may exclude some students with disabilities requiring adjustments and potentially amount to discrimination. The importance of this has been confirmed through recent feedback to the Commission about challenges for parents associated with accessing Special Provision information and the role of the school regarding Victorian Certificate of Education (VCE) requirements.

VCAA notes that it intends to consult subject matter experts, stakeholder organisations, experienced school-based staff and other stakeholders to form advisory groups for each of these categories.⁶

Funding and student support services

There have been some positive policy developments to address *Held back* findings and recommendations relating to funding and student support services. These include:

- data improvements for recording and monitoring student support services cases, assessment and interventions through the use of a Student Online Case System (SOCS)
- establishment of a new regional structure called 'Learning Places', which will improve the provision of student support services including through a significant investment in additional staff⁷
- future plans to revise the PSD funding model as recommended by the PSD Review report⁸ and the provision of short-term funding to assist students no longer eligible for funding in Year 6–7 transition.

The Commission welcomes these policy developments. However, specific *Held back* findings and recommendations relating to funding and the PSD remain unaddressed.

A revised PSD funding criteria model as recommended by both *Held back* and the PSD Review report should remain a priority. More recent stakeholder feedback suggests continuing shortcomings with the PSD funding model including for students with little or no speech. As no adjustments are provided for students with little or no speech so they can complete the assessment, they

are deemed to have an academic capacity that does not reflect their skills and may be treated as such for their entire school life.

More work is also needed to ensure accountability for the use of funds tied to educational outcomes. This may be addressed through existing efforts or through future work – including implementation of PSD Review recommendation 12.

Harassment and victimisation

Bully Stoppers is identified as the key initiative addressing *Held back* findings and recommendations relating to harassment, victimisation and bullying of students with disabilities.

The Bully Stoppers program, policy materials and training modules for teachers provide useful general strategies for preventing bullying. These general strategies may assist with addressing disability-specific bullying. However, Bully Stoppers is a general anti-bullying program and is not a specialised program dealing with bullying on the basis of disability and there appears to be little disability-specific information about bullying in the program.

Other existing materials, including information in the School Policy and Advisory Guide (SPAG), address bullying generally but lack information about disability-specific bullying and associated rights and obligations under the Education Standards. The material could be strengthened to include more disability-specific information about bullying. For example, material for principals currently includes information on legal duty of care in relation to bullying but no information on the obligation to prevent harassment and victimisation under the Education Standards. This could be achieved by including additional content in the SPAG, or naming the obligation and providing a link to the Education Standards online resource.

In addition to improving policy and program material in this way, leadership and commitment is needed to ensure policy materials are used by schools and educators to respond effectively when disability-based bullying does occur. Recent feedback to the Commission from stakeholders suggests bullying remains a problem for some students with disabilities and that this has significant and distressing consequences for the wellbeing of students with disabilities and their families.

6 Ibid.

7 State Government of Victoria, Department of Education and Training, *Review of the Program for Students with Disabilities* (2016) 39.

8 Ibid.

Chapter 2: Accountability and the use of data

This chapter outlines key findings and recommendations relating to accountability and the use of data including enrolment, attendance patterns, participation in National Assessment Program – Literacy and Numeracy (NAPLAN) testing and measuring educational outcomes for students with disabilities. The Commission observes that while there have been some improvements in this area, a comprehensive, overarching data collection strategy is still needed. This is reinforced by a core recommendation from the more recent PSD Review – recommendation 12 – which calls for the development of a stronger system of accountability including improvements in data collection. In addition, feedback from stakeholders suggesting policy materials are not having an impact in schools confirms the importance of data and accountability mechanisms and the need to address current shortcomings. Without these measures in place it is not possible to determine whether policy initiatives – which are positive in principle – are leading to practical improvements in educational experiences and outcomes for students with disabilities.

Summary of Held back findings and recommendations

Held back included a number of findings and recommendations relating to accountability and the use of data spanning multiple themes including enrolment, participation, student support services, attendance patterns, the use of restraint and seclusion, complaints and monitoring educational outcomes.

Key recommendations to respond to these findings included:

- that education authorities collect and annually publish aggregate data on the number of suspensions and expulsions of students with disability and be required to submit data on reduced attendance patterns for students with disabilities

- that the Victorian Student Number be enhanced to enable the measurement of educational outcomes of students with disabilities
- that data collected by DET on the number and proportion of students with disabilities eligible for NAPLAN testing who are absented from testing be published in the department's annual report
- that data be collected and published to monitor demand and supply for student support services
- that PSD guidelines for schools provide a requirement for clear reports to parents on how funding allocated to the school is used to make reasonable adjustments for the student.

Held back also emphasised the importance of accountability relating to the use of ILPs to ensure they are of a satisfactory standard and are achieving educational outcomes for students.

Major developments and observations since *Held back*

Major initiatives responding to these themes and recommendations from *Held back* include:

- the Nationally Consistent Collection of Data (NCCD), and specific data improvements to monitor student support services cases, assessments and interventions
- current work on the development and implementation of a stronger system of accountability for all students with disabilities, which includes improved data quality and data collection, analysis of data, public reporting and transparency (PSD Review recommendation 12)
- work to address other relevant PSD Review recommendations including the development of an Inclusive Education Policy, Inclusive Education Workforce Capability Strategy and new guidelines for personalised planning and support.

These policy developments are positive but only emerging and it appears more work is needed. The aims of the NCCD initiative are positive, however, it appears that challenges remain before NCCD data, which is a national initiative of all state governments, can be adapted effectively for local use. Stakeholder feedback and policy submissions also suggest shortcomings in the NCCD. For example, while acknowledging the complexity of developing data capacity through the NCCD, Children and Young People with Disability Australia (CYDA) has stressed that the NCCD is flawed and requires refinement in a number of respects. CYDA argues that the NCCD is not reliable enough to be the sole underpinning data framework of funding for students with disability.⁹

PSD Review recommendation 12 presents a new opportunity to develop a comprehensive and consistent data and accountability strategy to improve understanding about educational outcomes of students with disabilities and measure the impact of policy developments. This critical work will also address *Held back* recommendations that are not addressed or only partly addressed.

9 Children and Young People with Disability Australia (CYDA), Submission to Education and Employment Legislation Committee Australian Education Amendment Bill 2017, 4–5. CYDA also notes flaws in the NCCD including problems with the data collection methodology and its reliance on educators with limited or no training and experience in inclusive education making sophisticated judgments about levels of adjustment required or provided.

Accountability for the use of Individual Learning Plans

Planned new guidelines may improve the use of ILPs and other tools for providing students with adjustments in schools. However, as stressed in other sections of this report, accountability mechanisms to audit the use of ILPs,¹⁰ as well as related training for educators, remains crucial. These mechanisms have not been established and must be prioritised. Without these mechanisms in place, it is not possible to determine whether such guidance is being followed and leading to improvements for students with disabilities. It appears that progress in this area has been slow. DET reports that, following release of the new guidelines, a decision will be made about how to enable systematic monitoring of the use of ILPs.

Victorian Ombudsman investigation – attendance patterns

The Victorian Ombudsman is currently conducting an investigation into school expulsions and consideration of vulnerable or at-risk students, and current data collection processes at DET are within the investigation's terms of reference. It is hoped that the outcomes of this investigation and any recommendations, paired with future work to implement the NCCD, PSD Review recommendation 12 and related initiatives, will lead to a more comprehensive strategy to improve accountability and capacity to measure educational outcomes and any reduced attendance patterns for students with disabilities linked to expulsions.

Held back recommended that education authorities collect and annually publish aggregate data on the number of suspensions and expulsions of students with disabilities. This recommendation has not been addressed.

In its response to requests for information from the Commission DET reports that it does not intend to publish attendance data on students with disabilities due to a number of challenges in undertaking this work. These include the possible misattribution of exemption or withdrawal to the child's disability status when it may reflect parent choice; the limited dataset that currently exists; the implications of the NCCD and the requirements of the *Health Records Act 2001* (Vic) and the *Privacy and Data Protection Act 2014* (Vic) to not report at the individual school level because it may identify the individual student.

10 Above n 2, 13–6. Recommendations 16 and 48.

More effort is needed to ensure part-time attendance due to disability does not occur and to develop capacity to systematically monitor any instances of part-time attendance of students with disabilities informed by data from a range of organisations and sources.

Data on complaints and the use of restraint and seclusion

Held back made recommendations about the collection and reporting of data relating to complaints and the use of restraint and seclusion. This is explored in Chapters 4 and 5 of this report.

Chapter 3: Workforce capacity

This chapter outlines key findings and recommendations relating to workforce capacity, including awareness among educators about different disabilities, obligations under human rights and anti-discrimination laws and making reasonable adjustments for students. A key observation from the Commission is that the proposed new Inclusive Education Workforce Capability Strategy (PSD Review recommendation 3) is an opportunity to build on existing improvements and remaining gaps in addressing *Held back* recommendations. In addition, this chapter outlines specific considerations to inform the development of the Inclusive Education Workforce Capability Strategy.

Summary of Held back findings and recommendations

Key findings in relation to workforce capacity and leadership showed that:

- more than half of educators surveyed said they did not have the support, training and resources they needed to teach students with disabilities well
- forty per cent of educators were not aware of their obligations under the Education Standards
- teacher training university courses and ongoing professional development programs need a stronger focus on understanding and teaching students with a wide range of disabilities.

Linked to findings about accountability and the use of data, *Held back* also found significant shortcomings in data collection and systems for monitoring how students with disabilities are faring in schools.

Held back made six recommendations (recommendations 45–50) relating to workforce capacity, leadership and accountability.¹¹ These included:

- recommendations for mandatory, core undergraduate course content and teacher training relating to students with disabilities
- development of an overarching disability awareness, inclusive education and accountability framework
- a recommendation to the Victorian Registration and Qualifications Authority to examine and audit ILPs and student support group minutes, incident records and complaints data and data on educational outcomes for students with disabilities (recommendation 48).¹²

¹¹ Above n 2, 16.

¹² *Ibid.*

Major developments and observations since *Held back*

There have been a number of policy developments responding to these findings and recommendations, including new professional learning requirements for registered teachers and undergraduates. Noting that, by the end of 2017, all teachers will have undertaken training to develop their capacity to educate students with disabilities, ongoing work will be needed to increase completion rates and ensure all educators receive mandatory, core disability-specific content. Future work to address PSD Review recommendations will also consider *Held back* findings and recommendations relating to workforce capacity. These include the development of an overarching Inclusive Education Workforce Capability Strategy, as well as guidelines and accompanying training on personalised learning and support.

Professional learning

As part of the Victorian Government's Special Needs Plan, the Victorian Institute of Teaching (VIT) requires all initial teacher education programs to include specific learning activities about teaching children and young people with disabilities.¹³ Currently registered teachers were also required to participate in relevant professional learning activities in preparation for their registration renewal in September 2016.¹⁴

All registered Victorian teachers are required to complete relevant learning activities that include the following options:

- Education Standards eLearning
- Victorian Deaf Education Institute (VDEI) Professional Learning Program
- Managing Challenging Behaviours
- Inclusion Online
- ABLES online professional learning
- Functional assessment and positive support

Forty-one per cent of Victorian government schools have completed one or more of the suite of Education Standards eLearning modules. While no specific learning is mandatory, as part of the new requirements all professional development must meet the Australian Professional Standards for Teachers (APST). This includes:

- (APST) 1.6 'Demonstrate broad knowledge and understanding of legislative requirements and teaching strategies that support participation and learning of students with disability'
- APST 4.1 'Identify strategies to support inclusive student participation and engagement in classroom activities'

By the end of 2017 all registered teachers (full registration) will have to declare that they have undertaken training to develop their capability to support the learning and participation of learners with disability (more than 100,000 teachers). All provisionally registered teachers have two years to demonstrate their capability to 'Design and implement teaching activities that support the participation and learning of learners with disability and address relevant policy and legislative requirements' (APST 1.6 – Proficient Teacher level).

The Commission welcomes these developments and additional training requirements for teachers and undergraduates and the extension to 2019 of training to Victorian government schools regarding legal obligations under anti-discrimination laws. However, it appears there is no 'core subject' dedicated to disability. Therefore, training will not necessarily cover all of the components recommended in *Held back* recommendation 45. While the Education Standards eLearning courses cover disability discrimination, these courses are optional for teachers and only cover Commonwealth discrimination laws rather than Victoria-specific discrimination laws.¹⁵

Ongoing work will also be needed to monitor the uptake and effectiveness of existing training and the extent to which it is leading to genuine improvements in the capacity of educators to teach students with disabilities well. This will require consultation and feedback both from parents and educators to identify support and knowledge gaps and necessary areas for improvement and additional training.

13 Information about the professional learning options available to teachers can be found at <<http://www.education.vic.gov.au/Documents/about/department/SNPteachercapability.docx>> at 7 July 2017.

14 See <<http://www.education.vic.gov.au/about/department/Pages/snpskilledteachers.aspx>> at 7 July 2017.

15 However, this cannot be confirmed as non-educators cannot access the page without purchasing a licence. See <<http://dse.theeducationinstitute.edu.au/login/index.php>> on 7 July 2017.

Measuring impact – monitoring and oversight of professional learning

Held back recommended enhanced monitoring and oversight to complement professional learning initiatives and measure their impacts. This included a recommendation for an enhanced role for the Victorian Registration and Qualifications Authority (VRQA) to examine and audit ILPs and student support group minutes, incident records and complaints data and data on educational outcomes for students with disabilities.¹⁶

DET reports that this is met through the existing scope of the VRQA's role of registering and reviewing schools according to minimum requirements and standards. The VRQA can also investigate complaints from parents of students with disabilities. DET notes that these investigations may include an assessment of ILPs and how these are implemented. Data relating to these VRQA functions is not made public.

It appears recommendation 48 is only partly met through the VRQA's current functions. Noting that there may be other ways to address the intention behind relevant *Held back* recommendations, VRQA capacity to undertake the additional oversight suggested by *Held back* has not been addressed.

New mandatory reporting from 2016 in relation to incidents of seclusion and restraint in Victorian Government schools may address the suggestion in recommendation 48 for the VRQA to examine incident records of these practices. However, the Commission has received no specific information to suggest that other components of recommendation 48 – such as the function of reviewing samples of ILPs and student support group minutes – have been addressed. The specifics of recommendation 48 should be explored further through renewed dialogue between DET and the VRQA. This may form part of future work to address both PSD Review recommendations 3 and 12.

Response to PSD Review recommendations

Multiple PSD Review recommendations address workforce capacity and leadership. These include:

- the development of an Inclusive Education Workforce Capability Strategy (PSD Review recommendation 3)¹⁷
- new guidelines to assist principals and teachers to know how and when to use Education Support Staff to maximise learning outcomes for students with disabilities (PSD Review recommendation 8)¹⁸

- guidelines on personalised learning and support including the effective development of ILPs (PSD Review recommendation 10).¹⁹

Implementation of the PSD Review recommendations provides new opportunities for improving workforce capacity and maximising learning outcomes for students with disabilities and to implement *Held back* recommendations that have not been addressed or only partly addressed.

Efforts to improve accountability and the use of data will remain crucial to ensure these high-level policy initiatives and guidance materials have genuine and measurable effects on education outcomes for students with disabilities in schools. This is also discussed further in Chapter 2 of this report. The Commission's Disability Reference Group has suggested that this is particularly important in Special Developmental Schools (SDS), where there may be a culture of low expectation for students with disabilities leading to disregard for educational outcomes. More generally, the nature of SDS as closed environments warrants particular scrutiny.

Reasonable adjustments – the need for additional investment and specialist support

Students with disabilities have the right to specialised services they need to participate in education. This might include personal or medical support at school, therapists or other specialist expertise or personal educational support, such as an integration aide.

The Commission reiterates the importance of providing specialised services, which are vital for addressing matters that are outside educators' expertise, and to complement these positive new training and policy initiatives. More recent feedback from stakeholders has stressed the need for additional investment in this area and remaining gaps in the provision of quality specialist support in schools to assist educators with making effective adjustments for students with disabilities.

Providing specialist support is crucial for ensuring the aspirations of particular policy initiatives are met in practice. This is discussed further in Chapter 4 of this report in the context of reasonable adjustments for students with behaviours of concern and the recently released *Policy Guidance, Procedures and Resources for the Reduction and Elimination of Restraint and Seclusion in Victorian Government Schools*.

¹⁶ Above n 2, 16. Recommendation 48.

¹⁷ Above n 7, 24.

¹⁸ Ibid, 25.

¹⁹ Ibid, 26.

Inclusive Education Workforce Capability Strategy – key considerations

Work on the Inclusive Education Workforce Capability Strategy is a key development with major potential to address a number of findings and recommendations from *Held back*.

The Commission recommends that the following key considerations should inform the development of the new Inclusive Education Workforce Capability Strategy (PSD Review recommendation 3) and surrounding work on PSD Review recommendations relating to workforce capacity:

- Inclusion of information on relevant obligations under the *Equal Opportunity Act 2010* (Vic), *Disability Discrimination Act 1992* (Cth), Victoria's Charter of Human Rights and Responsibilities and the Education Standards, including information on disability-specific bullying, which is not adequately addressed by existing material examined by the Commission.
- Appropriate training on positive behaviour support and the elimination of restraint and seclusion. As described in Chapter 4 of this report, it is crucial that any training on these topics incorporate messaging about discrimination and the significant human rights implications of using restraint and seclusion.
- Additional investment in specialist support for students with disabilities, to complement surrounding training and policy initiatives for educators and ensure effective adjustments are provided for students with disabilities in practice. Additional effort is needed to address suggestions from stakeholders to the Commission that some schools continue to cite funding constraints as a barrier to providing specialist support for students with disabilities.
- Ongoing work to address the use of restraint and seclusion, including reporting and oversight requirements monitored by the Principal Practice Leader (Education) or equivalent independent role.
- Enhanced guidance on personalised learning and support and the use of ILPs (to be addressed through PSD Review recommendation 10). Associated quality assurance and accountability mechanisms, such as those suggested by *Held back* recommendations 16²⁰ and 48²¹ will remain crucial to ensure any revised guidelines or training on the use of ILPs is effective.

- Establishment of regular consultation mechanisms with educators to address the central concern reported to the Commission from some stakeholders – that these high-level policy initiatives are not leading to genuine improvements in educational outcomes and teaching of students with disabilities. This is discussed further in Chapter 5.

20 Above n 2, 13.

21 Above n 2, 16.

Chapter 4: Use of restraint and seclusion

This chapter outlines key findings and recommendations relating to the use of restraint and seclusion. The Commission's central observation is that a sustained commitment will be needed to build on recent improvements in this area. In particular, the Principal Practice Leader or equivalent independent role must be maintained and revised training and policy material, which will be implemented in 2017, should be evaluated to determine its effectiveness. Further, significant effort and investment will be needed to ensure the aspirations of the new Policy Guidance, Procedures and Resources for the Reduction and Elimination of Restraint and Seclusion in Victorian Government Schools can be met in practice.

Summary of Held back findings and recommendations

The Commission examined the use of restraint and seclusion in schools in Chapter 10 of *Held back*. In addition to recording the experiences of parents reporting the use of restraint on their child at school, *Held back* also noted that more than 500 educators reported having used restraint. Main findings included that:

- there is no independent monitoring or oversight of the use of restraint and seclusion in Victorian schools and no official data on how frequently these practices occur, why they are used or their impacts
- more than half of educators who reported having used restraint said they were inadequately trained to deal with this situation

- regulation of the use of restraint and seclusion in Victorian schools contrasts with the regulation of such practices in disability services, where instances of restraint and seclusion must be reported to the Office of the Senior Practitioner
- a number of circumstances describing the use of restraint and seclusion to the Commission by parents and educators would constitute a breach of human rights and the Equal Opportunity Act.

Held back made five recommendations responding to these findings (recommendations 24–8). These included recommendations about regulation of the use of restrictive interventions in Victorian schools through amendments to the *Education and Training Reform Act 2006* (Vic), and an outline of the necessary elements of a comprehensive policy addressing the use of restraint and seclusion in schools and recommendations, focusing on training in positive behaviour support.

Major developments and observations since *Held back*

The Commission notes the following key developments addressing *Held back* recommendations relating to the use of restraint and seclusion:

- The establishment of the Principal Practice Leader (Education) (PPL). The PPL has been responsible for building knowledge and capability in reducing the use of restraint and seclusion and developing revised policy guidance with input from a range of stakeholders (soon to be released). The PPL has a strong emphasis on early intervention, positive behaviour support plans and working in partnership with families.
- Mandatory reporting of restrictive interventions used by schools (from October 2015). This data is monitored by the PPL.
- A range of professional learning opportunities accompanying the rollout of the PPL's revised policy guidance in 2017. Two modules are currently under development: (1) To provide educators with skills to functionally assess challenging behaviours and develop appropriate intervention strategies and (2) Informed by the PPL's restraint and seclusion policy, support to develop crisis response plans for students exhibiting frequent, severe behaviours of concern

Implementation of recommendations from the Program for Students with Disabilities (PSD) review will also address the use of restraint and seclusion and positive behaviour support:

- Under PSD Review recommendation 8, guidelines will be developed for principals and teachers to ensure they know how and when to use Education Support Staff to maximise the outcomes for student with disabilities. This will include how to better influence achievement and behavioural outcomes for students with disabilities.
- Under PSD Review recommendation 15, DET will develop specific resources and teacher support material for supporting students with autism and high-level communication, social and behavioural challenges.

The Commission welcomes these efforts to address the use of restraint and seclusion in schools. However, a long-term sustained commitment will be needed to ensure genuine practice change in schools. Future success will depend on a number of factors, including:

- The content and implementation of revised policy guidance. The Commission provided direct written input to the PPL towards the revised

policy guidance. The Commission stressed that the policy material should have binding policy status and regulatory protection, include stronger statements about the consequences of non-compliance, and incorporate consideration of human rights – including by giving primacy to the 'least restrictive means' principle, set out in section 7 (2) of Victoria's Charter of Human Rights and Responsibilities (the Charter), in the context of restraint. Ongoing work will be needed to ensure the revised policy guidance is sound from a human rights perspective, that it is understood and strictly followed by educators and is updated as needed through consultation with stakeholders.

The Commission's initial impressions of the recently released *Policy Guidance, Procedures and Resources for the Reduction and Elimination of Restraint and Seclusion in Victorian Government Schools* include the following.

The Commission welcomes:

- references to human rights and equal opportunity laws in the material, including 'less restrictive' means as an additional constraint on potential limitations of students' human rights, reflecting the language of the Charter
- the Commitment to regular review of the policy material noted in principle 14
- reporting requirements including notifying parents
- references to supports to address the behavioural manifestations of disabilities as reasonable adjustments and a failure to provide these as potentially amounting to discrimination.

The Commission has concerns about:

- the status and enforceability of the material. The Commission has been assured that the material is binding and that this will be conveyed strongly in all communications to educators. Use of the term 'guidance' may nonetheless lead educators to believe the material is not binding. The binding status of the material will be seen when there are consequences for non-compliance.
- the definition and treatment of seclusion in the material. The Commission's position in *Held back* was and continues to be that seclusion in schools should not be considered lawful in any circumstances. However, we acknowledge the challenges expressed by the PPL – that defining the use of seclusion in schools compared to clinical environments presents particular challenges

- the aspirational nature of the document. The Commission welcomes the strength of information about adjustments and specialist supports including positive behaviour support. However, if schools are not appropriately resourced to address behaviours of concern in the manner suggested by the new policy material then changes to practice will not occur. Significant additional effort and investment will be needed to ensure its requirements are met.
- Future status of Principal Practice Leader's role. The establishment of the Principal Practice Leader has been a positive step. However, the nature of the role including any criteria for decision-making by the PPL – or future equivalent role – about practices occurring in schools, the role's independence and surrounding legislative reform as suggested by *Held back* requires further consideration. Feedback to the Commission has also suggested that the PPL's role may have been inappropriately understood by schools as investigative, with suggestions that some have perceived school visits by the PPL as providing an 'all clear' that restrictive practices are not occurring.
- Status and enforceability of policy guidance. Efforts to address the use of restraint and seclusion to date have been policy based, relying on the PPL's efforts. The Commission is concerned about the status and enforceability of policy guidance and suggests that higher-level legislative and regulatory reform is necessary to ensure accountability, compliance and changes to practice.
- Training content and messaging. The Commission has not accessed the content of any training addressing the use of restraint and seclusion and positive behaviour support. Any training addressing these topics should incorporate messaging about the human rights implications of using restraint and relevant obligations under human rights and discrimination law. It should also note relevant obligations under the Equal Opportunity Act, Disability Discrimination Act and Education Standards – for example, by stating that restraint or seclusion of a student with behavioural manifestations associated with a disability or a failure to provide adjustments through positive behaviour support may amount to discrimination. This training should be delivered across all schools.

The PPL or equivalent role should be maintained in future with the necessary degree of independence and legislative reform suggested by the *Held back* recommendations. In the longer-term, it will be important that the PPL's stricter oversight function is also well understood as capacity is built in schools to better understand the restraint and seclusion policy and data collection and reporting requirements. Future approaches to regulating the use of restraint and seclusion in schools, including necessary law reform, must be a priority area for consultation following the release of the PPL's revised policy guidance and implementation efforts.

- Legislative and regulatory reform. Broader legislative and regulatory reform is also needed to address the use of restraint and seclusion in schools, as recommended by *Held back*. The Commission has recently outlined its position on the regulation of restraint and seclusion through its submission to the *Education and Training Reform Regulations 2017* ('the draft regulations'). The submission is publicly available at humanrightscommission.vic.gov.au/policy-submissions.

Chapter 5: Rights awareness, complaints and engagement

This chapter outlines key findings and recommendations relating to rights awareness, complaints and engagement. Key observations from the Commission include the need for wider implementation of positive resources addressing rights under anti-discrimination laws, evaluation of the recently established Independent Office for School Dispute Resolution and associated communication materials – and for wider consultation and public reporting on actions to respond to stakeholder feedback in the manner suggested by *Held back*.²²

Summary of Held back findings and recommendations

Held back included a number of findings and recommendations relating to rights awareness, complaints and engagement. Key findings included that:

- there was no systematic monitoring for or data on complaints made to schools
- parents were dissatisfied with complaints processes and the repercussions of making complaints
- there was a lack of specific training or skills in alternative dispute resolution among those responsible for considering complaints in schools
- parents felt disengaged and disconnected from decisions about their child, including decisions about reasonable adjustments and the use of PSD funds.

Held back made nine recommendations (recommendations 4 and 37–44) relating to rights awareness, complaints and engagement. These included:

- improving consultation and feedback mechanisms through annual statewide parent and student feedback forums (recommendation 4)
- improvements in complaints, including through enhanced complaint information materials (recommendation 37), alternative dispute resolution training (recommendation 38) and the establishment of a panel including an independent person with expertise in disability issues to consider escalated complaints (recommendation 39)
- enhanced monitoring and oversight of complaints including through annual submission of complaints data and the publication of aggregate data (recommendations 40 and 41)
- a review of PSD funding procedures including the development of guidelines for schools providing a requirement for clear reports to parents on how funding allocated to schools is used to make reasonable adjustments for the student (recommendations 43 and 44).

²² Above n 2, 12. Recommendation 4.

Major developments and observations since *Held back*

Rights awareness

The Commission welcomes efforts to improve awareness of rights and complaints processes for parents, such as through updates to complaints policy material and the development of the online resource *Disability Standards for Education: a practical guide for individuals, families and communities* resource (the Education Standards resource). This is a positive resource addressing a range of rights under the Education Standards and recommendations from *Held back* about rights awareness and complaints, including recommendation 2 relating to rights at enrolment.

The Education Standards resource includes a page on 'Enrolment and Participation' and provides a brief definition of each of these rights.²³ This page states that:

Education providers who uphold these rights will:

1. take reasonable steps to ensure discrimination against students with disabilities at enrolment does not occur
2. ask students and their families if their disability affects their ability to enrol and, if it does, make reasonable adjustments so the student has the same enrolment choices and opportunities as students without disability.

This webpage also includes examples of how schools can realise this right in practice. The success of this resource will depend greatly on continued efforts to ensure it is being widely promoted and implemented. DET reports that, since 2015, this has been occurring through a wide range of avenues, including the Catholic and independent sectors, principal associations, stakeholder and disability reference groups and peak bodies, via DET news updates to all schools and as items in newsletters and links on stakeholder websites.

²³ University of Canberra, *Disability Standards for Education: A Practical Guide for Individuals, Families and Communities* (2014) <<http://resource.dse.theeducationinstitute.edu.au/content/enrolment-and-participation>> at 7 July 2017.

Complaint management

DET reports that it has worked with the Office of the Disability Services Commission and the Dispute Settlement Centre of Victoria to develop and deliver training in complaint management and mediation to principals. Continued delivery and availability of this training is a key part both of principals' professional capability and timely resolution of complaints.

The Commission welcomes these initiatives. However, DET and other education authorities should seek feedback from stakeholders on whether these initiatives are leading to genuine improvements in complaint management in order to address barriers reported in *Held back*. These included lack of awareness about making complaints, fear of repercussions, concerns about independence or the belief that making a complaint would not make a difference. Feedback received by the Commission, which has included regular correspondence as well as engagement with key stakeholder groups since *Held back's* release, has also suggested a tendency to default to an adversarial position of defending claims, rather than learning from complaints as opportunities to identify systemic discrimination issues and proactively prevent discrimination from occurring. Under the positive duty in the Equal Opportunity Act, all schools must take reasonable and proportionate measures to prevent discrimination from occurring.

Independent Office for School Dispute Resolution

In March 2017 DET established the Independent Office for School Dispute Resolution (the Independent Office) as part of the Responsive School Complaints Framework. The Office is independent of DET and is overseen by an Independent Chair and two Deputy Chairs, who are experts in alternative dispute resolution. Depending on the nature of each complaint, the Independent Office can draw upon two pools of experts in various issues, including disability.

The establishment of the Independent Office is a positive initiative, aligning closely to recommendation 39 from *Held back*, which called for complaints to be escalated where appropriate for consideration by a panel, including an independent person with expertise in disability issues.

Where DET receives a complaint from a parent that is a current, complex dispute that has not been resolved through the DET's usual complaints processes, DET can refer matters to the Independent Panel for resolution, where the parent agrees to this referral.

Parents (and students) are also able to contact the Independent Office directly to raise their complaints.

Future success of the Independent Office will depend on a range of factors. The Office will be evaluated, incorporating feedback from a range of stakeholders, including disability stakeholders and parents of students with disabilities about its effectiveness for addressing complaints relating to students with disabilities.

The new guidelines about the Independent Office go some way toward addressing *Held back* recommendations relating to complaints and rights awareness. The guidelines provide a clear description of the role of the Independent Office and complaints processes. Specific information about disability discrimination and associated rights and obligations under human rights and anti-discrimination laws would be a valuable addition to these materials, making it clearer that students with disabilities or parents of students with disabilities can access the Independent Office.

Engagement

A crucial recommendation from *Held back* was that education authorities hold annual parent and student feedback forums and report publicly on actions arising from this consultation process (recommendation 4).

In response to this recommendation, DET reports that it engaged with stakeholders through the consultations for the PSD Review and *Absolutely everyone: State disability plan 2017–2020*. DET also reports that it regularly consults with associations representing children with disabilities and their families, and that it has attended a number of disability associations' parent forums.

The Commission welcomes these developments and DET's reported efforts to improve communication and consultation with parents, disability stakeholders and advocates. However, ongoing feedback provided to the Commission from some stakeholders suggests that broader and more frequent engagement may be needed. Consideration should also be given to publicly reporting on actions to respond to concerns raised from these consultations in the manner suggested by *Held back*.²⁴

Consultations such as those forming part of the PSD Review process and development of the state disability plan have been important one-off exercises. However, outside of specific consultation processes, ongoing engagement is needed to ensure DET and other education authorities regularly receive feedback from a wide range of stakeholders

and are held to account on actions to respond. This will be particularly important to ensure this feedback complements the significant policy initiatives currently underway.

24 Above n 2, 12. Recommendation 4.

Chapter 6: NDIS rollout

This chapter outlines key findings and recommendations affected by the transition to the NDIS, specifically those relating to Student Support Services and transport. A key observation from the Commission is that existing engagement between DET and the National Disability Insurance Agency (NDIA) should continue and be enhanced to ensure effective engagement with parents and stakeholders. Recent feedback from stakeholders has also suggested that some parents are concerned and overwhelmed about the implications of transition to the NDIS for their child in school. Specific relevant Held back findings and recommendations should be revisited by DET and NDIA in their current efforts to ensure a smooth transition to the NDIS for students with disabilities.

Summary of Held back findings and recommendations

Held back included a number of findings and recommendations that are affected by the transition to the NDIS, largely relating to transport and student support services including early childhood intervention services. Key findings included the following:

Student support services

- there is significant unmet need for support service in schools including integration aides, occupational therapists and speech therapists
- some parents were contributing financially to the provision of specialist supports in schools to address gaps in the system

Transport

- more than a quarter of students with disabilities surveyed reported problems accessing and using transport
- some students reported travelling for many hours on buses to get to and from specialist schools. Being denied food, water and toileting facilities on these buses violates their dignity and their rights

- there is a lack of discretion in how eligibility criteria are applied to programs that may assist students with disabilities getting to and from school.

Key recommendations to respond to these themes included:

- that the Department of Health (DHHS) and DET work together to address unmet need for specialist support officers in Victorian schools, including the under-representation of Aboriginal and Torres Strait Islander allied health professionals among student support officers in Victorian schools
- that DET alter or remove transport eligibility requirements (1) by allowing students who reside outside the designated transport area for a specialist school to be eligible for bus transport where the student is enrolled at that school in order to maximise participation in education consistent with anti-discrimination laws, or in other circumstances relating to the best interests of the child; (2) by removing the requirement that a student must attend a specialist school six days per fortnight in order to be eligible for transport assistance
- that DET mandate that schools provide disability awareness, equal opportunity law and Charter training for all specialist school bus drivers and chaperones.

Major developments and observations since *Held back*

The Commission is mindful that transition to the NDIS means *Held back* recommendations relating to transport and student support services may need to be dealt with in different ways. However, the intention behind these recommendations remains relevant. The implications of NDIS transition for students with disabilities in schools, including links both to student support services and transport, must be priority topics for discussion through the necessary consultation stressed in Chapter 5 of this report. Consultations should include joint engagement between NDIA and DET for these purposes, including feedback from stakeholders on the effectiveness of DET and the NDIA's collaborative relationship.

Transitional arrangements and DET/NDIA collaboration

Student transport to and from school is in scope of the NDIS, however, until July 2019 the Victorian State Government is continuing to provide student transport services in kind. This means that the government will continue to pay for and provide school transport to students attending government specialist schools under current arrangements. DET has established a formal collaborative relationship with the NDIA and is working to resolve uncertainties around the NDIA's responsibilities for funding personal care in schools at full scheme. This work will inform DET's consideration of a new school disability funding model.

Transport

Key initiatives addressing *Held back* findings and recommendations relating to transport and transition to the NDIS include a 'smart market' pilot project from the NDIA, a trial of flexible transport options including relaxation of certain eligibility requirements and the development of a Travel Education Framework to assist students with disabilities to travel to school independently. It is unclear whether specific *Held back* findings and recommendations relating to transport barriers for students with disabilities – such as training for school bus drivers to address discriminatory attitudes – have been addressed.

Student support services

Collaboration is underway between DET and the NDIA to transition Early Childhood Intervention Services (ECIS) to the NDIA. Key activities include transfer of necessary data from DET to the NDIA, delivery of NDIS readiness information sessions and workshops for ECIS service providers across Victoria, efforts to maintain Victoria's current system of quality and safeguards for early childhood providers, and developing a provider monitoring framework and a certification process for Victorian approved providers.



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