

DSE Review
Economic and Social Advisory
Urbis
Level 12, 120 Collins Street
Melbourne, Victoria 3000

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We thank you for the opportunity to provide a submission to the inquiry into the 2015 Review of the Disability Standards for Education.

About Inclusion Melbourne

Inclusion Melbourne is a community support organisation that provides services to people with an intellectual disability, helping them to create more enjoyable and rewarding lives and participate fully in the community. Inclusion Melbourne was established in 1950 and remains the only registered disability support provider to have transformed its services during the life of the previous Victorian State Disability Plan (2002-2012), resulting in the sale of our premises and the delivery of all of our supports within the community, alongside community members. Inclusion Melbourne is also a Registered Training Organisation, specialising in the delivery of Foundation level courses to adults with an intellectual disability.

Our vision at Inclusion Melbourne is for people with intellectual disability to live in an inclusive community, where everyone has the same opportunities to participate in community life and to take their place in society as respected citizens.

We believe our role as a disability support provider is to encourage and enable people with disability to achieve and maintain a valued quality of life. We accomplish this by supporting people to create highly personalised and flexible lifestyles based on their needs and desires. To accomplish this we encourage people to participate in activities and develop relationships with people within their local community.

Our response

As a funded service provider with over sixty years of experience in the provision of support to people with intellectual disability, Inclusion Melbourne welcomes the opportunity to assist with the review of the Disability Standards for Education.

What has been your experience of accessing and participating in education and training?

Inclusion Melbourne began to recognise two decades ago that the adults with intellectual disability we were supporting either had nascent literacy skills as young adults who had recently completed school, or were older adults who had acquired literacy skills earlier in their life that were underutilised and hence slowly being lost. In response, the organisation began to seek out adult literacy options and discovered that there was a binary response - either small group sizes provided by unqualified instructors outside of the formal educational system within the disability support system working with people with higher support needs, or large class sizes working with people with lower support needs - so in effect there was (and continues to be) little (if any) access to adult continuing education for adults with moderate or profound disabilities. This is what led to the registration of our organisation as an RTO, where class sizes are limited to eight students and we utilise highly skilled and qualified teachers to deliver accredited training.

Inclusion Melbourne has found that accessibility in education and training encompasses assistance with transport, mobility, campus navigation and personal care, including assistance at meal-times and wraparound support services. However, such wraparound services are not bundled nor offered in a comprehensive manner by the overwhelming majority of educational providers, which then limits access for people who have concurrent support needs alongside their desire for educational attainment.

How aware do you think people in the education community are of the barriers faced by people with disability who want to access education?

In general, educators are not aware that there are no additional systems designed to help overcome barriers faced by people with a disability. There is a lack of understanding that a foundation level (Certificate 1) course in the VET sector is bound by the same rules and regulation as a certification at the higher level.

Barriers for people with a disability are most often considered in relation to physical access, with little if any thought given to designing systems that support entry and completion by adults with cognitive impairments, such as easy English prospectus, LLN assessments performed by accredited specialist professionals and simplified online application forms. Further, the impact of an impairment on education does not exist in isolation, and so in order to succeed in education thought must be given by providers as to how to holistically meet the broad range of associated needs such as transport, mobility, communication, inclusion into campus life, and so forth.

To what extent (and in what ways) have the Standards helped to raise awareness among educators and education providers about these barriers?

When known to support organisations, students' advocates and carers, individual staff in education providers and to students themselves, the Standards play a vital role in illustrating the obligations of education providers to provide inclusive education. However, it appears that when the Standards are not clearly communicated, the barriers are not challenged.

Are there particular sectors or settings that are more or less aware of the Standards? If so, why?

Yes, Our experience is that larger VET providers that deliver human services courses (ie: Certificate IV in Disability) alongside courses aimed at people with a disability (ie: foundation level courses) appear to have better outcomes for people with a disability across the whole range of courses, presumably through an organisational understanding and access to specialist knowledge in various faculties that assist across the whole educational institution. Another setting that appears to have better understanding of the Standards are those specialist community RTOs that focus exclusively on delivery for marginalised groups, including people with a disability.

What has been your experience of working with the Standards?

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To what extent and in what ways have the Standards helped education providers to eliminate discrimination and ensure equity of access and participation?

The intended outcomes of the standards are, in summary, for students with a disability to have freedom from discrimination, equality before the law, and equal rights to education as the rest of the community.

While the value of equality is paramount, and though it is true that equality of learning outcomes can never be guaranteed for any student, the equality of opportunity that the Standards seek to achieve is not entirely sufficient. There is a value that exists between the guarantees of equality of opportunity and equality of outcomes. This is equality of access. Access is about ensuring all students can begin their education journey at the same starting line. Simply ensuring they can enter the playing field is necessary but not sufficient. Access requires systematic models of language and literacy assessment, personalised supports, interpersonal systems of support and mentoring, intelligent and flexible timeframes for course completion, adapted training materials, inclusive partnerships with industry, and redesigned income support connections so as to facilitate connectivity between mobility, personal care, tuition support and educational provision. A broader but not less relevant consideration is ensuring that conscientious family, carers and advocates will be able to support a person with a disability to enrol in a course knowing that there is a pathway to further study or viable employment following completion.

The knowledge, materials, resources and practice models that allow and demonstrate equality of access already exist within higher performing disability support providers. However, the biggest challenge faced by people with cognitive impairment is the current assumption regarding maximum student contact hours, which do not take into account the additional time required by individual learners to achieve competency. With the Standards having a strong focus on tangible reasonable adjustments, course completion time and nominal hours (and associated implications for government funding) is one tangible area that is not adequately addressed.

In short, the Standards do not assist people with cognitive impairments to be able to succeed in courses where they might otherwise have the capacity to reasonably expect successful completion but do not have the opportunity to realise this capacity within the currently established maximum funded student contact hours.

What has been the most significant impact of the Standards on your part of the education system?

As a small specialist provider we are finding more and more people with intellectual disability finding our RTO after struggling within mainstream systems. This is potentially correlated with funding cuts to the TAFE sector, who have been the traditional providers of these courses, which leaves us to surmise that practical implementation of the Standards can not exist without appropriate resourcing of those providers working with people with disability.

To what extent do the Standards make clear the rights of people with disability?

Australia has ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and we must ensure that every opportunity to learn and fully participate in our education system is given to young people in this state. Article 24 of the UNCRPD outlines education and states: "effective individualized support measures are provided in environments that maximize academic and social development, consistent with the goal of full inclusion". Any revision to the Standards should explicitly reference the standards and articulate how providers will provide fair and equal access to all students in our education system. This requires that we recognise and individualise a plan for each child or young person, and that the standards serve to make clear that Australian systems of education and training should be accessible to all and that it is therefore incumbent upon education providers and developers of curriculum to ensure inclusion.

To what extent (and in what ways) do you think the Standards are used effectively by people with disability to advocate for their rights?

It is our belief that the Standards are more effectively utilised by parents to ensure access to primary and secondary schools, and much less likely to be used in relation to tertiary education, potentially due to societal attitudes to the participation of people with intellectual disability in vocational training.

Conversely, RTOs with a focus on inclusive education, particularly for people with a disability, rely strongly on the Standards to support their mission of ensuring accessibility, reasonable adjustment, and to build partnerships with external organisations.

What kinds of barriers remain for people with disability wanting to access and participate in education?

Many barriers exist for people with disability wishing to access and participate in education. Chief among these are a lack of:

- Inclusive curricula design
- Sufficient time (student contact hours) to enable learning to occur
- Teacher awareness of inclusive educational practices
- Built environment to support physical access
- An increasing trend to online delivery, excluding people who are reliant on others to gain access to the internet (the TILDA study out of Ireland reveals that 85% of people with an intellectual disability have never accessed the internet)
- Practical physical supports for people with other support needs (such as assistance to navigate from the entry to the classroom, or the toilet, or to the library or café)

While the Standards have several transformative implications for people with disability wishing to access educational opportunities, it must be recognised that training and education form part of a pathway for people with intellectual disability. This pathway originates in early learning and perhaps even therapeutic intervention in early years. The destination is different for each student, but it usually requires a level of flexibility at *several steps* in the educational journey – during primary and secondary education, in tertiary education and vocational training, and in the linkages created with industry when planning industry placements (for example, during vocational training in certificate courses), flexible completion windows and connectivity with succeeding courses – that the Standards do not currently explicitly support.

We thank the Minister for Education and Training, in consultation with the Attorney-General for the opportunity to provide input to this five yearly review of the Disability Standards for Education.

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