



## **Australian Education Union**

### **Submission to the Review of Disability Standards for Education 2005**

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## 1.

### INTRODUCTION

The AEU welcomed the introduction of the Disability Standards for Education (the Standards) in 2005, and their intent that students with disability receive education on an equal basis to other students.

However, the goal of ensuring all students with disability can enjoy the benefits of education in inclusive and supportive environments will not be reached until adequate resourcing is provided to schools and improved training and professional development to teachers.

The Standards are fatally compromised due to a lack of resources and are failing to ensure students with disability receive the education they need.

Without adequate resourcing the Standards are unenforceable in practice and are irrelevant to the daily experience of many students with disability and their schools.

This was raised as a key problem in the last Review of the Standards – with stakeholders believing that *“the resourcing available to meet the needs of students with disability is inadequate and this compromises the effectiveness of the Standards”*.

This Review reported that all education sectors reported an increase in participation rates of students with disability, leading to the stretching of available resources to meet the needs of a growing number of students.

The level of need in schools has risen significantly since that Review and is not being met under current funding arrangements which saw disability funding provided to schools in 2013 for only 5.3 per cent of students (190,887).

The Australian Bureau of Statistics found in its 2012 Survey of Disability, Ageing and Carers, that 133,000 students with disability were receiving no support or special arrangements at school.

The Nationally Consistent Collection of Data has shown that this figure could be even higher, with the 2014 collection showing 16.3 per cent of students had a disability, as defined by the Disability Discrimination Act.

Figures from a survey of parents of children with disability conducted by Children with Disability Australia showed that:

- 23 per cent of parents said their child had been refused enrolment at a school at some point, while 17 per cent said their child had only been offered part-time enrolment
- 68 per cent of parents believed their children did not receive adequate support at school.

The AEU’s 2015 “State of Our Schools” survey found that 84 per cent of public school principals said they have had to divert funds from other parts of school budgets because they do not have the resources for students with disability.

This is clear evidence that disability education is under-resourced and that the pressure of dealing with this is being shifted to individual schools and educators. It is not acceptable that a child with disability misses out on an education because their school cannot afford to provide an in-class assistant, personalised lesson plans, or vital equipment.

We cannot adequately educate students with disability unless our resourcing system is based on student need, and the extra resources promised in the full six years of the Gonski funding agreements are delivered to schools. In addition, an increased disability loading that funds all students with disability on an equal basis for the first time must be introduced from 2016.

Mainstream schools now educate 86 per cent of students with disability. This is a welcome trend, but increases the pressure on scarce resources in the education system, and the level of responsibility for schools to ensure that they are meeting the Standards. The public school system is still educating a disproportionate amount of students with disability, despite having lower average resources per student than the private sector.

Too much responsibility for complying with the Standards falls to teachers and principals rather than on the educational authorities which manage school systems. More onus must be placed on the bodies which fund schools – in particular State and Territory education departments. Putting full responsibility on to schools which do not control their own level of resourcing places an unfair burden on educators.

In addition, the Standards do not contain adequate practical definitions of terms such as ‘reasonable adjustment’, ‘unjustifiable hardship’ and ‘consultation’ and this affects the application of the Standards. Schools are often unaware of what their responsibilities are, as well as lacking the resources to fund them.

Any real progress in equity for students with disability will only happen if resourcing is increased, as well as an increase in specialised training and professional development for teachers.

The AEU is concerned that current Initial Teacher Education is failing to prepare young teachers for the reality of teaching children with disability. This must become a greater focus for Initial Teacher Education and we need to ensure that no ITE student graduates without greater knowledge of how to teach students with disability. We also need a better focus on professional development for teachers currently in schools to increase their knowledge and skills.

It is disappointing that the issues of resourcing which were raised in the last review of the Standards have not been addressed and that the position of students with disability in our schools, despite the dedication and professionalism of educators, has not improved.

Our education system must be funded to ensure that all students, including those with disability, are able to receive the support they need at school to reach their potential and to prepare them for further education and life after school.

## 2.

### ***To what extent (and in what ways) do you think the Standards influence access and participation in education by people with a disability?***

Since 2005 participation of people with disability in education has grown. The number of school students classified as having disability by state and territory governments (an unsatisfactory measure of disability, see Part 5 below) has increased from 134,863 (4 per cent of all students) in 2005 to 190,887 in 2013 (5.3 per cent).<sup>1</sup> The percentage of students enrolled in vocational and education training with disability grew from 5.9 per cent in 2005 to 6.8 per cent in 2013.<sup>2</sup> Largely, this reflects an overall increase in young people with disability. According to the ABS, the proportion of children aged 5-14 years with disability rose from 9.5 per cent in 1998 to 10 per cent in 2003 and 11.4 per cent in 2009.<sup>3</sup>

AEU members report that the introduction of the Standards and the DDA have increased students and their parents' awareness of their right to pursue an education and to do so in a mainstream school if desired. The proportion of students with disability in mainstream schools is now 86 per cent, including 78 per cent of children with profound or severe core activity limitation.<sup>4</sup>

While the rights and obligations created by the Standards have had a positive effect, their influence on access and participation is constrained by the reality of limited resources. In April 2015, a Children with Disability Australia survey of parents and carers found 23 per cent had had a child refused enrolment because a school could not provide adequate support.<sup>5</sup> As discussed in detail in Part 5, underfunding is the main issue in educating students with disability and the biggest barrier to the effective functioning of the Standards.

Rural and remote students often have difficulty accessing education that complies with the Standards. Outside of cities, special schools are much less common and specialist teachers and classes are often not provided in mainstream schools to meet the needs of small cohorts of children.

In metropolitan areas there are often long wait times for special schools and classes.

Another common barrier to students having their rights under the Standards upheld is excessively long wait times for assessments of disability on which additional funding depends. Delays of up to 18 months are reported in most jurisdictions, meaning students are routinely denied crucial early intervention support.

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<sup>1</sup> Productivity Commission (2007, 2015) *Report on Government Services*.

<sup>2</sup> NCVET (2014) *Students with a disability 2013*.

<sup>3</sup> ABS Disability, Australia, 2003, 2009.

<sup>4</sup> ABS (2014) *Disability, Ageing and Carers: Young People and Disability 2012*.

<sup>5</sup> Children with Disability Australia (2015).

3.

*To what extent are people in the education community aware of barriers faced by people with disability who want to access education?*

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

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

*To what extent has awareness improved over the past five years?*

Awareness of the Standards and the barriers faced by people with disability are high among those working in special schools or dedicated school units for students with disability. In mainstream schools where the majority of students with disability are located, awareness can vary greatly.

### **Teacher education and professional development**

There is a concern graduate teachers do not always leave university equipped to identify the barriers faced by people with disability and appropriate ways to deal with them. 63 per cent of school teachers surveyed by the AEU in January 2015 said their training did not provide them with skills to teach students with disability.<sup>6</sup> While most teacher education courses contain some instruction on educating those with a disability, clearly many graduates feel the level is inadequate. The report to the Teacher Education Ministerial Advisory Group *Action Now: Classroom Ready Teachers* released in February 2015 noted the concern that the ability to work effectively with students with disability be made a core requirement of all teacher education, not an option or specialisation.

Provision of professional development to make sure school staff are aware of the Standards and able to uphold them in their work varies greatly across jurisdictions. Some states provide ongoing PD via online courses. Others conducted training when the standards were first introduced but have not followed it up since. At the local level, professional development on teaching students with disability may or may not be provided, largely dependent on the priority given it by the principal. This is despite the Standards recommendation that

timely, relevant and ongoing professional development (be) provided to staff to ensure they are equipped with the knowledge, skills and understanding to enable students with disabilities to participate in the full range of educational programmes or services on the same basis and to the same extent as students without disabilities.<sup>7</sup>

While schools are adept at making adjustments for physical disability, they often require greater assistance to identify and accommodate intellectual disability such as autism and

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<sup>6</sup> AEU, (2015). *State of our Schools Survey*.

<sup>7</sup> *Disability Standards for Education, 2005*, Guidance Notes, p.51.

conditions associated with behavioural disorder. Upskilling of the workforce and additional staff with expertise in these areas are required.

### **Students and their associates**

Awareness of the Standards among students and their parents/carers is definitely in need of attention. At present there is no requirement for the standards to be posted in educational facilities, or for students and their associates to be given information about their rights when they enrol.

A lot of parents have poor awareness of the Standards and the options available to them. Information is not readily available and often not presented in clear language accessible to all. Ultimately, if a student or their associate believes they are not having their rights under the Standards upheld, they can lodge a complaint with the Australian Human Rights Commission but there is not a high degree of awareness of this.

Contributing to low levels of awareness among parents of students with disability are:

- higher levels of families with lower socio-economic background
- higher rates of marriage breakdown/single parent families
- parents often having disability themselves
- being time poor due to caring responsibilities or lack of respite.

## **4.**

### ***To what extent do the standards make clear the obligations of providers?***

The Standards contain a flawed definition of ‘educational authority’ and place the entire obligation for compliance at the institution level. These institutions end up doing all the adjustment for students with a disability. Other bodies defined as ‘education provider’ under the Standards but which do not enrol students, such as curriculum development authorities, are largely able to push the work of adjustment onto schools.

An educational authority is defined in Section 1.4 as a body or person administering an educational institution. This definition does not specifically include government education departments or non-government education authorities that are responsible for running school systems. Further, Section 1.5, of the Standards, lists educational institutions (schools, universities, training providers etc.) as providers who must comply with the Act.

Combined, these remove responsibility for ensuring compliance from what are commonly considered education authorities i.e. government departments of education and non-government schooling authorities.

The result is that the Standards place all the burden of compliance on individual institutions and those who run them, and put no onus on funding bodies. Considering the standards require providers to make adjustments to accommodate students with disability, giving the bodies that fund education no responsibility for ensuring compliance creates an anomaly. The

feeling among school staff that all responsibility for ensuring compliance is pushed down to their level is thus well justified.

Requiring education authorities to comply with the Standards could lead to improvements in the coordination of support services, particularly those that are not required all the time in a particular school. Central authorities are best placed to carry out this role, but with no responsibility under the Standards, they often do not.

The Standards include clear obligations on providers to consult with a student or their associate before adjustments are made. While this is a logical requirement and has widespread support, there is a sense among those who are required to carry out consultation that authorities underestimate the time demands involved.

### **Concepts of ‘reasonable adjustment’ and ‘unjustifiable hardship’**

As raised in the previous review of the Standards, there is some confusion among schools and staff about exactly what can be expected of them in making ‘reasonable adjustment’ and in what instances adjustment would impose ‘unreasonable hardship’ on a provider. Better clarity could be provided through the provision of examples in the guidance notes.

### **Curriculum development**

Under Section 6, *Standards for curriculum development, accreditation and delivery*, providers must take reasonable steps ensure that a course or program is designed to enable students with disability to participate on the same basis as those without.

Development of curriculum has been increasingly determined at the national level over the period the Standards have been in place. Although bodies charged with developing curriculum such as the Australian Curriculum and Reporting Authority (ACARA) are classified as providers under the Standards, there is a widely held view that ACARA does not provide much curriculum support for those teaching students with disability.

NAPLAN tests are developed and overseen by ACARA. Most students with disability are expected to sit the test and ACARA provides advice on adjustments that should be made by schools. ACARA itself makes no substantial adjustments other than producing a Braille version of its tests. This contrasts with the international PISA survey which publishes a shorter questionnaire for students with special needs.

An outcome of placing all the onus for making adjustment on schools is that some students with disability find themselves excluded or discouraged from taking the NAPLAN test.

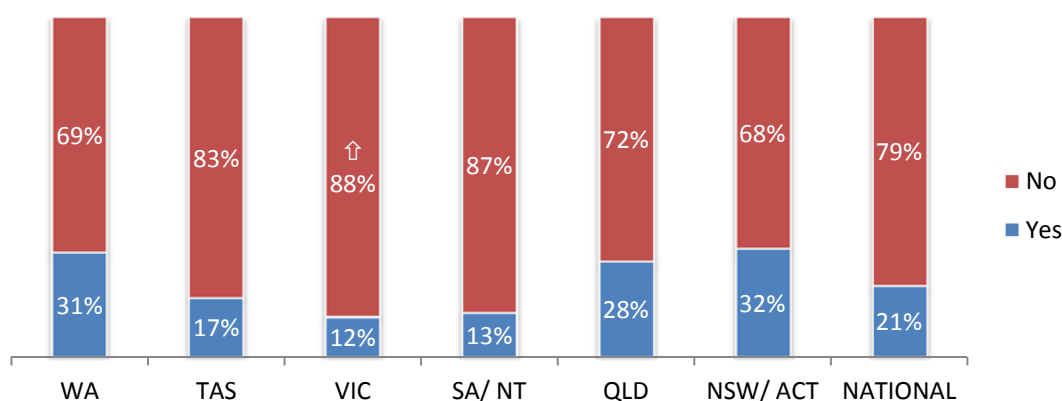
## 5.

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

Insufficient funding and resourcing were raised as issues that prevented the effective functioning of the Standards at every consultation for the 2011 review and in the majority of submissions.<sup>8</sup>

Since then, despite the official Commonwealth review of school funding recommending a new student disability entitlement be created as part of a significant increase in overall funding, the situation has not improved. Responses to the AEU's 2015 State of our Schools survey indicate lack of resources to support disability is pervasive (Figure 1).

**Figure 1. Schools with insufficient teaching resources to meet needs of students with disability**



Q: Overall, do you have sufficient resources to appropriately meet the needs of students with disability at your school? (Principals with students with disability n=709)

Source: AEU State of our Schools survey 2015

### **Unmet demand**

A main cause of the resource squeeze is the large number of students with disability who receive no extra support at school. For 2012 The Productivity Commission calculated the number of school students that satisfied the criteria for funding for disability at 183,610, based on information supplied by states.<sup>9</sup> For the same year the ABS reported there were approximately 295,000 children aged 5-17 with disability attending Australian schools.<sup>10</sup>

<sup>8</sup> Australian Government (2012). *Report on the Review of the Disability Standards for Education 2005*.

<sup>9</sup> Productivity Commission (2014) *Report on Government Services*, Table 4A.31.

<sup>10</sup> ABS (2014) *Disability, Ageing and Carers: Young People and Disability 2012*.



**Table 1. Proportion of students with disabilities in mainstream schools receiving support, by type.**

	With profound or severe disability	All with disability
Special equipment (including computer)	8.6% (9,900)	5.6% (14,200)
Special tuition	35.1% (40,100)	28.5% (72,700)
Special assessment procedure	19.2% (21,900)	12.9% (33,000)
Other support	40.2% (45,900)	27.5% (70,100)
No support	32.9% (37,600)	50% (127,400)

Source: ABS (2014) Disability, Ageing and Carers: Young People and Disability 2012.

The ABS estimated, based on its 2012 Survey of Disability, Ageing and Carers, that 133,000 students with disability were receiving no support or special arrangements at school. As Table 1 shows, these were overwhelmingly located in mainstream schools.

37,600 students with profound or severe core activity limitation receiving no support or special arrangements in mainstream schools indicates a crisis level of under resourcing.

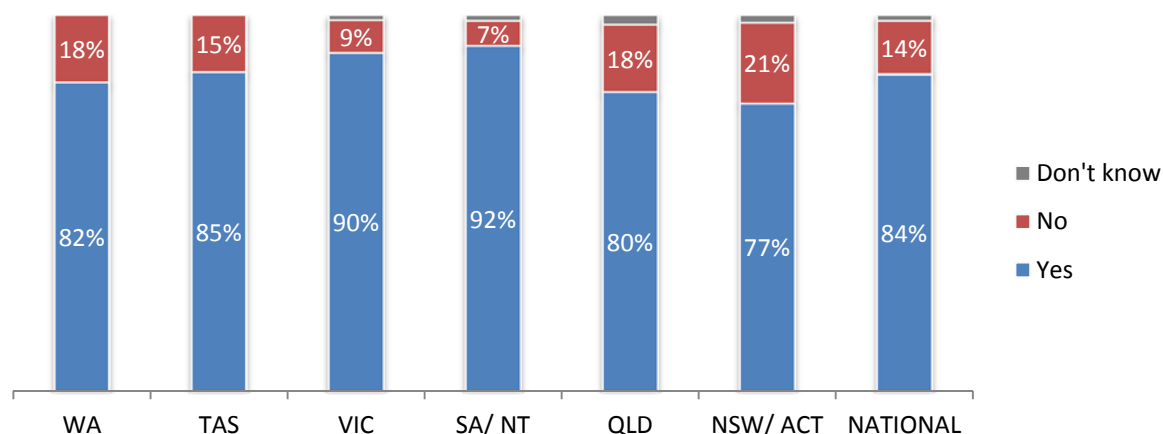
It is clear from the figures and in feedback from AEU members that there is a high level of undiagnosed/unrecognised and hence unfunded disability among school students. The result is schools having to spread scarce resources to make necessary adjustments to accommodate students with a disability (see Figure 2).

Concerns raised by AEU members include:

- excessive wait times for funding approval
- arbitrary funding criteria that exclude a lot of students needing support,
- students' loss of funding when transitioning to secondary school
- students funded for only part of their education, such as two days out of every five
- funding arbitrarily cut off and students forced to reapply.

Staff working with students with disability take their duty seriously and often act as advocate as well as educator, helping with funding applications and other tasks over and above their core duties.

**Figure 2. Schools using funding from other areas to fund students with a disability**



Question: Are there students with disability at your school who you have to assist using funds from other areas of your budget because they are ineligible for targeted government funding or the amount you receive is inadequate? (Principals with students with disability  $n=709$ )

Source: AEU State of our Schools survey 2015

### Need for nationally consistent collection of data

The inadequacy of methods currently in place across states and territories for determining whether a student has disability is well established. As far back as 2008, the Council of Australian Governments agreed to work towards a nationally consistent approach to identifying students with disability.

The first full national collection of data will take place in 2015. This entails informed professional judgement by teachers to determine the extent of adjustments made to enable participation of students with disability on the same basis as students without disability. Trials of this model indicate it will much more accurately capture the real number of students with disability enrolled in Australian schools. The 2014 trial, involving 73 per cent of all schools returned a disability rate of 16.3 per cent of students. Among the total Australian school student population this would equate to around 598,000 students with disability, suggesting existing measures for determining disability are fundamentally flawed.<sup>11</sup>

The Standing Council on School Education and Early Childhood (now the Education Council) stated that, when fully implemented, the nationally consistent collection of data on school students with disability (NCCD) will “assist schools to better meet their responsibilities under the Disability Discrimination Act and the Disability Standards for Education.”<sup>12</sup>

Unfortunately, support and training for staff undertaking the NCCD varies widely across the country. Concern exists over workload implications with responsibility for the collection being added to existing duties of teachers in some states. The Commonwealth Government

<sup>11</sup> South Australian Department for Education and Child Development (2015) *Phase 2 Report: 2014 South Australian Implementation of the Nationally Consistent Collection of Data on School Students with Disability*.

<sup>12</sup> 6<sup>th</sup> Standing Council on School Education and Early Childhood meeting 29/11/13, Agenda item 8.3(3).

needs to take a more decisive role in ensuring that school staff responsible for the NCCD have the training and support they need to ensure the highest quality of data collection.

### **Gonski review recommendations**

The 2011 Review of Funding for Schooling - also known as the Gonski Review - endorsed the NCCD and recommended it inform new funding arrangements required to allow students with disability 'to participate in schooling on the same basis as students without disability.'<sup>13</sup> Or, in other words, to realise the Disability Standards for Education.

This use of the NCCD was endorsed by the Education Council in October 2014<sup>14</sup> meaning the Commonwealth and all state and territory governments and the largest review of school funding for the past 40 years acknowledge that existing methods for determining whether a student has disability are inadequate and improved funding based on a more accurate classification system is required.

Research conducted for the Gonski Review cited the 2009 National Disability Strategy Consultation Report, which noted that

The education system continues to fail to respond to the needs of students with disabilities...the current system has little or no capacity to meet the learning needs of students with disabilities and lacks the resources to ensure their full participation in classrooms and schools.<sup>15</sup>

Without adequate resourcing, inclusive education policies are likely to be perceived merely as efficiency measures. Extra demands placed on providers without adequate support and recognition of matters such as class size will affect the quality of education received by all students and lead to a loss of support for inclusion.

After the Gonski Review handed down its final report, the former federal government reached a National Education Reform Agreement with the states. This included a transition to a new schooling resource standard comprising an increased per student amount supplemented by loadings for specified measures of disadvantage, including disability.

The Gonski Review also addressed the issue of compound disadvantage. This is the concentration of different sources of educational disadvantage at the school level. Research by the Australian Institute of Health and Welfare has found disability is more common among those living in areas with fewer economic resources.<sup>16</sup> The well-established negative effects of combined disadvantage led the Gonski Review to recommend that in devising a better funding system, high priority be given to schools that enrol students who experience multiple factors of disadvantage.

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<sup>13</sup> Australian Government (2015) *Review of Funding for Schooling*, p.183.

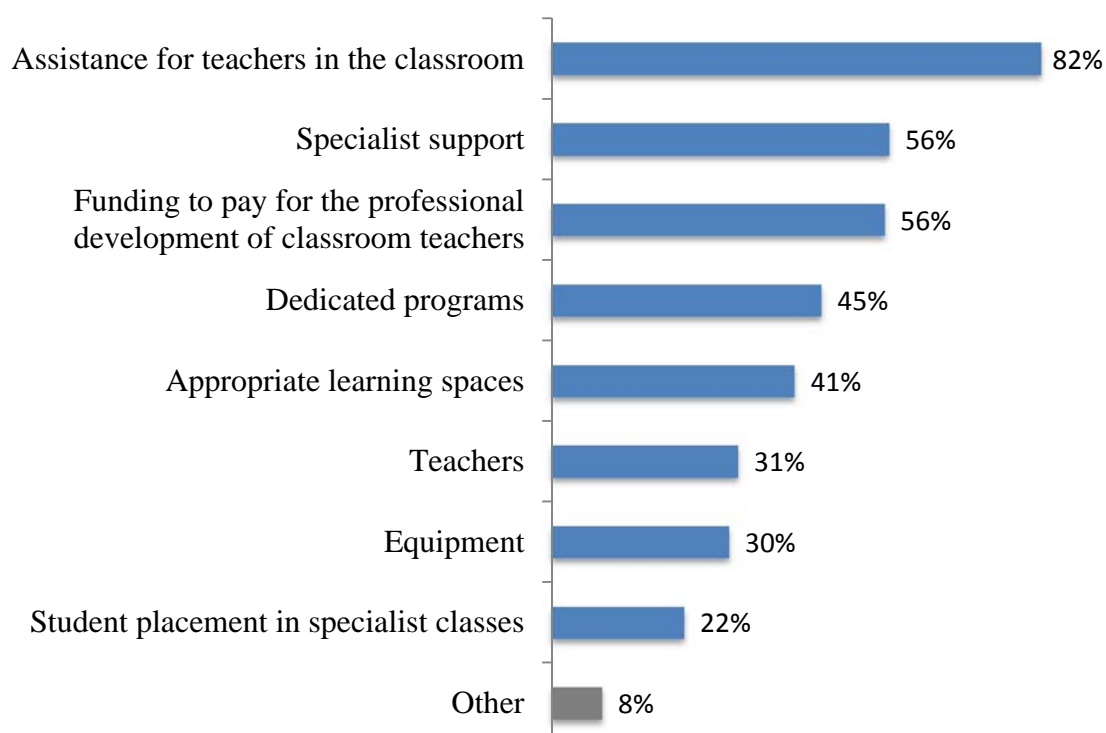
<sup>14</sup> 2<sup>nd</sup> Education Council meeting 31/10/14.

<sup>15</sup> Australian Council for Educational Research (2011) *Assessment of current process for targeting of schools funding to disadvantaged students*. (A report prepared for the Review of Funding for Schooling Panel), p.63.

<sup>16</sup> Australian Institute of Health and Welfare (2009) *The geography of disability and economic disadvantage in Australian capital cities*.

Under the Gonski review's recommendations, until the NCCD process was in place, the status quo would remain, with an interim disability loading of 186 per cent for students in mainstream schools and 223 per cent for special schools. This entails no increased funding and is merely a quantification of combined Commonwealth and State resourcing that was in place in 2013.<sup>17</sup>

**Figure 3. Resources needed to support students with disability reported as lacking by school principals**



Question: What resources are you lacking? (Principals with students with a disability and inadequate resources  $n=560$ )

Substantial research has been carried out for the Education Council on the additional resourcing required by schools to make adjustments for students with disability, using definitions consistent with the NCCD.<sup>18</sup> Clearly current levels of funding are inadequate. A 2015 AEU survey of principals highlighted a chronic lack of support resources (Figure 3).

Inadequate classroom assistance for teachers is a major issue. In mainstream classes, education support staff allocated responsibility for a small number of 'funded' students often find themselves attending to a larger group, including students with unrecognised autism and behavioural problems. It is often these students who require the most attention. The impact of insufficient support is felt not just by these students but the class as a whole.

<sup>17</sup> Senate Standing Committee on Education, Employment and Workplace Relations. DEEWR Question no. EW0005\_14.

<sup>18</sup> 2<sup>nd</sup> Education Council meeting November 31/10/14. *Survey on the additional resourcing provided for levels of adjustment for students with disability* (report prepared by Pricewaterhousecoopers).

It is important that the current review considers the interests of teachers and support staff. Their committed work in often trying circumstances needs to be better acknowledged. The resourcing shortfall in disability education discussed in detail here affects not only the quality of education received by students, it has a serious impact on the working life of staff.

Occupational health and safety (OHS) is a common concern among staff working with students with disability. The rights of violent or unpredictable students to participate can come into conflict with the right to a safe workplace. The Standards don't specifically mention the OHS of workers, although it may be covered by the requirement to take into account effects on the education provider, staff and other students. The health and safety rights of workers should be made explicit in the Standards and would benefit from examples being given in the guidance notes.

**Box 1. School principals on challenges they face giving students with disability an education that complies with the Standards under current funding arrangements.**

*"It seems like no matter how severe a child's disability, the amount of support is limited. Often no child gets a fulltime EAs yet many cannot be left unsupervised or simply can't work unless they have one-on-one support. Also, time necessary for the making of resources is not considered. This is often significant, especially for students with autism. Children with autism are really missing out, as mainstream schools alone simply don't have the knowledge and skills to assist the child in reaching their potential. Children with autism in mainstream schools can be very disruptive and cause staff a great deal of stress, and distress."*

Jennifer Broz, Curtin Primary School, WA

*"I have to divert money from other curriculum areas to employ additional PSD aides to ensure that children who require full time assistance and support receive it even though they're only funded at levels 2 or 3. I have a significant number of other students who are ineligible for funding but who still require support and assistance to be in a mainstream classroom, able to learn and not stopping other students from learning. Again, I divert money from elsewhere to provide assistance for them. Wherever possible, particularly in Years Prep - 4, we also use parent volunteers as additional support in classrooms to assist with reading and aspects of numeracy."*

Kim Stewart, Yarrawonga P-12 College, VIC

*"Many students have a learning or behavioural disability but it does not present itself as so severe that paediatricians will give it a diagnosis. With extra funding, these students would be supported and engaged in learning in the classroom, freeing up teachers to be able to better service all children in the classroom."*

Rick Daly, Enfield Public School, NSW

Source: AEU state of our Schools Survey 2015

AEU members take their professional responsibility seriously. Unfunded and underfunded cases of disability cannot be ignored. They simply mean that existing human and other resources have to be spread thinner. In large part, it is the professionalism and forbearance of the workforce under difficult conditions that is propping up Australia's broken model for educating students with disability. Examples of how resourcing shortfalls place pressure on schools and affect the quality of education students with disability receive are given in Box 1.

### **Consensus and clear evidence that funding must improve**

To summarise, the Gonski review recommended a significant increase in school funding with an improved entitlement for students with disability. There is widespread acceptance that current criteria for determining how students are classified as having disability for the purpose of funding are inadequate. The Nationally Consistent Collection of Data on Students with Disability will provide a sound basis for determining disability and allocating funding. The research on appropriate funding loadings to provide for the real levels of adjustment schools need to make for disability has been carried out.

Despite this agreement and weight of evidence, the current federal government has abandoned the transition to the schooling resource standard and done nothing to address the inadequate level and availability of the disability loading. In fact, they have reduced funding even further by ending the More Support for Students with Disabilities national partnership, which put an extra \$100 million into schools each year.

## **6.**

### **Conclusion and recommendations**

The Standards encapsulate an inclusive, human rights-based attitude to disability that has widespread support across the Australian community including from the Australian Education Union. Since 2005 the Standards have provided a framework for students with disability to pursue their right to education on an equal basis. More students with disability are now participating in education, and more are doing so in mainstream classes.

The urgent need now is for funding mechanisms to catch up with the Standards. The resourcing crisis in Australian disability education has two main components

- A great many students not having their disability recognised by authorities, hence their education providers receiving no additional funding
- Inadequate loadings for students classified as disabled that do not fund providers for adjustments they are required to make.

The current funding arrangements predate the introduction of the Standards in 2005. Action on the Gonski Review's 2011 recommendations and the body of evidence showing Australia needs improved funding for students with disability based on a more accurate classification system and recognition of the real costs of making adjustment is overdue.

Failure to act will mean another generation of children with disability will receive inadequate or no support at school, leaving unrealised the object and aim of the Disability Standards for

Education that ‘persons with disabilities have the same rights to equality before the law in the area of education’ and can participate ‘on the same basis... as those students without disabilities.’

There are also issues regarding awareness of the Standards, training and professional development and definitions and requirements to comply with the Standards. Accordingly, the Australian Education Union makes the following recommendations.

- 1. That the recommendation of the 2011 Review of Schooling Funding that a schooling resource standard comprising the recurrent resources required to provide all students with the opportunity to achieve agreed national educational outcomes supplemented by a student disability entitlement set according to the level of reasonable educational adjustment required to allow students to participate in schooling on the same basis as students without disability, be implemented by all Australian Governments without delay.**
- 2. That some of the funding allocated under the 2015 Commonwealth Budget item Improving the Quality of Teachers and Teacher Education Courses be used to assess how all Australian teacher education courses prepare graduates for teaching students with disability.**
- 3. That all Australian university teacher education courses must provide sufficient training to prepare students for teaching students with disability as part of a two year postgraduate degree.**
- 4. That education authorities ensure staff in mainstream schools receive sufficient ongoing professional development to enable students with disability to participate on the same basis and to the same extent as students without disability.**
- 5. That the Commonwealth Government take responsibility for ensuring school staff receive adequate professional development to ensure the effective implementation of the Nationally Consistent Collection of Data on school students with disability.**
- 6. That government departments of education and non-government education coordinating bodies be listed under who must comply with the Standards at Section 1.5.**
- 7. That the definition of educational authority at section 1.4 of the Standards be amended to specifically include government departments of education and non-government education coordinating bodies.**
- 8. That greater clarity be provided around the term reasonable adjustment through the provision of examples in the guidance notes.**
- 9. That schools be provided with greater support in meeting their often conflicting obligations under the Standards and occupational health and safety laws.**
- 10. That all Australian education institutions be required to display a poster summarising the Standards.**
- 11. That all students with disability and their associates be supplied with clear information on the Standards when they enrol at an institution.**