

# Vision Australia submission

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## **Disability Standards for Education 2005 – 2020 Review**

Submission to: Australian Government – Department of Education Skills and Employment.

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Submission approved by: Chris Edwards, Manager Government Relations and Advocacy, NDIS and Aged Care, Vision Australia.

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## Introduction

Vision Australia welcomes the opportunity to respond to the 2020 Review of the Disability Standards for Education 2005 ('the Standards').

Vision Australia provides services to more than 26,000 people who are blind or have low vision every year. We work in partnership with Australians who are blind or have low vision to help them achieve the possibilities they choose in life.

Vision Australia works closely with families of children who are blind or have low vision to ensure they are empowered to achieve the greatest levels of independence, participation and development. We provide early childhood and children's services to those aged 0-18 years, including occupational therapy, speech therapy, adaptive technology advice and training and orientation and mobility training.

Vision Australia provided responses to both the 2010 and 2015 review of the Standards. Our response to this consultation is focused around experiences of school aged students, aged 5-18.

To inform our response to this consultation and to gain a deeper understanding of the real issues that face by students who are blind or have low vision, we conducted a survey.

We asked for feedback from parents and students of issues raised in the consultation paper. We sent the survey to Vision Australia clients across the country using a variety of communication channels.

We received 87 responses to the survey. We were pleased to receive this level of response given the many competing challenges and stresses people are currently dealing with.

The responses detailed the struggles that continue to face school-aged students who are blind or have low vision.

Common themes emerged involving areas of particular difficulty, these included:

- Inadequate assistance transitioning into school and as a child progress through different levels of schooling;
- Apprehension around making complaints;
- Lack of frequency and consistency in supports provided to enable equitable participation in education; and
- Lack of knowledge and general awareness of the Standards/feeling they are unclear.

We also conducted a webinar for parents and students regarding the review of the Disability Standards for Education to receive further feedback to what is working and what isn't, and hear firsthand experiences.

We will provide responses for the 'questions for students and families' outlined in the discussion paper.

## Background

Education is a fundamental human right of all people. Article 24 of the Convention on the Rights of Persons with Disabilities (UNCRPD) recognises the rights of persons with disabilities to be able to access education without discrimination and on the basis of equal opportunities across all levels.

Education empowers people who are blind or have low vision with opportunity and choice, to be able to live the life they choose. We know there is a strong relationship between school education, leading to tertiary education and subsequently resulting in meaningful employment. In 2018, in collaboration with the CNIB Foundation (Canada), Vision Australia conducted research that revealed only 24 percent of Australian adults who are blind or have low vision are in fulltime employment. We must ensure that children are afforded equitable education from when they first commence schooling, so they are placed in the best position possible to go onto further study, and gain employment. Without interventions from an early age, children who are blind or have low vision experience difficulty transitioning into employment.

Early intervention methods in schooling are the building blocks to learning and formal education for children who are blind or have low vision. These early intervention methods include support from early childhood educators, paediatric occupational therapists, orientation and mobility specialists, physiotherapists and speech pathologists, in addition to information, accessible resources and support for families.

We know that there is little consistency in the supports and services, which children are receiving, with it heavily varying from school to school and between educators. Supports and assistance need to be uniform across all schools, to ensure all children who are blind or have low vision are receiving the best possible education they can. Where a child lives, and what school they attend or who they have as their teacher should not dictate whether they receive an equitable education.

The advocacy for a child who is blind or has low vision to receive equity in education often seems to fall to the parents. While this is not necessarily problematic for families who are confident in advocating for their child and have a solid understanding of the Standards, it cannot be assumed that all families are confident advocates. Without adequate knowledge of the Standards, parents simply do not know what they can reasonably expect, what is required of schools and what supports/assistance their child is entitled to. This often results in a child not being adequately supported.

It is important to note that the challenges experienced by children who are blind or have low vision, greatly differ from child to child. There is no one size fits all solution. A coordinated, multidisciplinary and focused approach is required, addressing the individual needs of children and implementing strategies and supports to ensure they are empowered to get the most out of their education.

While we welcome reviews such as this, to have any sort of meaningful outcomes around inclusive education for students with disability, we need fundamental change, around attitudes, awareness and inclusion. Simply bolting on accessibility adjustments, to system that is inaccessible at its core, will have little long lasting or significant impact. The Standards alone will have a limited effect on

creating an inclusive system, the philosophy of inclusivity needs to be embedded within the education system, and championed at all levels.

### The Disability Standards for Education

The Standards are in place to ensure that students with disabilities are able to access and participate in education on the same basis as other students. They impose obligations on education providers to ensure reasonable adjustments for students with disability to ensure they can properly partake in education.

From the survey and anecdotal evidence we have heard from parents and service providers, there is not enough awareness of the Standards. Further, due to a lack of clarity and understanding, they are often applied inconsistently or in some instances, not applied at all.

#### Knowledge, awareness and clarity

It is arguably impossible for the Standards to fulfil their purpose if there is not broad awareness of them amongst students, parents and educators. Without awareness amongst students and parents of the Standards, they do not know what they can expect and what they can ask for in terms of supports. Similarly, if educators do not have a full and clear understanding of the Standards, it cannot be expected that they would be able to properly fulfil their obligations under them.

The survey results revealed that 60 percent of respondents were aware of the Standards, however only 28 percent were aware of them prior to enrolment, with 60 percent finding out about them at some point after their child had been enrolled and commenced schooling. Undoubtedly, it would be far more beneficial for parents to know about the Standards prior to enrolment, so they can have a full understanding of what their child's rights are.

There is also issues around the clarity of the Standards, with 45 percent saying that they are not clear, and are difficult to understand. One commonly raised example is the ambiguity of the "reasonable adjustments" term used and the confusion that often raises.

40 percent of respondents had absolutely no awareness of the Standards. As has been mentioned, if parents are not aware of the Standards, they are not able to use them as a tool to advocate for their child. They will not know what they can reasonably expect from schools, and what supports and assistance their child is entitled to.

Further, we have heard through both parents and service providers that they frequently have to mention the Standards to schools and highlight what their obligations under them are, with schools often being quite surprised. New South Wales can be looked to as an example of best practice regarding raising awareness for the Standards amongst educators. As part of the NSW Department of Education Disability Strategy 2020, they have created a package of accredited e-learning lessons on the Disability Discrimination Act 1992, with a focus on the Standards. These lessons have been

made compulsory school principals and school executive staff. This is an excellent step towards increasing awareness of the Standards and rights and obligations under them.

In 2015 we raised the issue of educators and providers being aware of and frequently applying the “*unjustifiable hardship on education provider*” exception within the Standards and taking advantage of ambiguous language, like “*reasonable adjustments*”. This is unfortunately something that is still occurring frequently. These have become commonly used loopholes for education providers to make excuses for their shortcomings and avoid providing adjustments to students with disabilities. However, the veracity of such hardship claims can only be tested in the courts, which relies on families making a formal complaint under the DDA with the AHRC. We will discuss the issues around this complaints process later in the submission.

## Effectiveness

Through both survey results and anecdotal reports we have heard, many parents do not feel as though the Standards are an effective instrument in ensuring their child is able to participate in education on the same basis as other students. The Standards do not appear to have made a significant impact ‘on the ground’ in terms of promoting inclusivity within schools for students with disabilities.

Only 6 percent of respondents said the standards are effective at ensuring equitable participation in education for their child. This is likely due to both the lack of awareness of the Standards amongst educators and education institutions, as well as a lack of clarity around the Standards, leading to difficulty understanding and implementing them.

We also hear regular reports of poor attitudes towards inclusion for children with disabilities within schools and amongst educators. A positive attitude towards inclusion is essential to ensuring students with disabilities receive equity in their education. We heard from one family of a child who has low vision, and has had a very inclusive and supportive experience at school, that the principle of the school at the first meeting said to them:

*“The school will learn more from him, then he will learn from us”.*

This is the kind of attitude needed, if fundamental change within the education system is going to be achieved.

Enrolment and access: What has been your experience when accessing education? What was the process like to enrol in school or other education and were you happy with the outcome?

Enrolment is often the first barrier that many students with disabilities face when interacting with the education system.

We have heard anecdotal evidence from parents of children who are blind or have low vision, that the sheer process of enrolling their child can take up to a year of planning.

*“It took a full year for me to coordinate my sons, who has low vision, enrolment in school. This included organising countless documents, specialist’s appointments and meetings with the school. I had to take time out of my career to ensure he was going to be enrolled properly and provided the rights supports once he started school. For my daughter who is sighted, I simply downloaded the enrolment form, filled it out, and sent it in.”*

Further, we know that some schools are simply refusing enrolment to children who are blind or have low vision, claiming that they do not have the capacity to provide adequate resources, infrastructure or supports. This ties back into the issue of poor attitudes towards inclusion.

Participation: Has your education provider/s made reasonable adjustments to ensure you or your child can participate in education? This includes participating in courses and programs, the curriculum, and using facilities. How did your education provider consult with you? Were you happy with the outcome?

We know that for many children who are blind or have low vision, reasonable adjustments are not being made to ensure they are empowered to access education on the same basis as other students. There is a common theme of parents or the child themselves, having to advocate continually to ensure they are provided with the correct supports and adjustments to enable them to meaningfully participate.

#### Provision of education materials in preferred format

Students who are blind or have low vision need to have education materials provided to them in their preferred format for them to be able to participate in education. Preferred formats include things such as braille, large print, electronic text, real objects and tactile maps.

Worryingly, only 50 percent of respondents said that their/their child’s school is providing learning material in their preferred format all the time. Children who are blind or have low vision who are not provided learning materials in their preferred format are simply not able to adequately participate in education.

Further, there is no consistency in education materials being provided in an accessible format, with it often depending on the school or the educators themselves.

*“There are some teachers who 'get it' and go out of their way to provide accessible work and there are others who just leave it up to my child to convert it into a form that is accessible. The school has been good when they are aware of what is required when pointed out by family or itinerant teachers but no effort to educate themselves, frequently the school and teachers lapse back into old habits.”*

And;

*“In general it is not on the schools radar to ensure they are providing the material in a format my child can access. I feel like when he brings work home I always have to adjust it to suit him. I hope he is coping at school but I am uncertain and he doesn't advocate for himself as yet”.*

We have heard anecdotal feedback of situations where teachers are not providing students with the lesson materials in their preferred format, and rather this becoming a responsibility of the child. We have even heard of students showing up to sit important exams (NAPLAN and Year 12) only to provided with an inaccessible exam.

*“Exam papers were not enlarged at the start of the exam, which caused significant angst for my son. He was allowed to sit the exam the next day, but was very annoyed”.*

And;

*“My child missed out on doing her year 9 NAPLAN as the test wasn't provided to her in a format she could read”.*

Simple adjustments, such as enlarged text, should not be something that parents and students have to fight for.

### The built environment

Without adjustments to the school environment and support from orientation and mobility specialists, students cannot find their way around the learning environment independently and on the same basis as their sighted peers. Reasonable adjustments to the built environment include things such as tactile signs, ramps and blinds for windows to reduce glare.

Further, for students who have low vision, increasing contrast between an object such as a poll or curb, and its background, will generally make the object more visible. This can be done by way of 'contrast lines', where objects are painted in a certain colour, often yellow, to help them stand out. A low cost adjustment such as painting contrast lines on objects can enable them to navigate around school completely independently.

37 percent of parents have said that their child's school is only partially making adjustments to the built environment, while 16 percent have said the school has made no adjustments.

Modifications allow students who are blind or have low vision to independently navigate around school and assist in ensuring they can actively participate both in learning, but also in social participation. Not only are modifications within schools important to assist with independence, but they are also needed to ensure safety of students who are blind or have low vision.

*“The stairs at my child’s school do not have tactile markers and there is several drop-offs without barricades...after 2 years of requests to install tactile markers and railings, nothing has been done”*

Simple modifications such as installing blinds to reduce glare can dramatically improve the ability of a child who is blind or has low vision to participate in classes. However we have heard from one family that even something as simple as this, has not been done by the school, with the family having to escalate a complaint to the Department of Education to get the blinds installed.

Often, modifications to the built environment are relatively simple and low cost, however have a huge impact for a child who is blind or has low vision.

#### Case example:

*Tom\* is a primary school student with low vision. When Tom was first enrolled in school, an environmental assessment was conducted of the school grounds to determine what adjustments might need to be made for him. From the assessment it was found that curbs, steps other uneven areas of the school grounds and poles that were not painted in contrasting colours, would limit Tom’s ability to independently navigate the school grounds and pose various safety issues. To address this, the school painted these areas in a contrasting colour (in this case yellow) so that Tom could more easily identify them. This relatively simple and low cost adjustment, has significantly improved Tom’s school experience, allowing him to be able to confidently navigate around the school grounds independently.*

Tom’s example highlights how simple yet effective some adjustments to the built environment can be. Conversely, we have heard from parents that their child’s school has bluntly refused to make adjustments, such as painting contrast lines.

*“The school refused to paint contrast lines. I was consulted regarding adjustments that were required for my daughter, however after a year of repeated requests, nothing has happened”.*

Rather than make adjustments to the environment we have heard reports of schools not allowing a student who is blind or has low vision into the playground at recess and lunchtimes, as they do not believe it is a safe environment.

*“My son isn’t allowed to access the playground at lunchtime as the school have deemed it is not safe for him”.*

Restricting access to the playground would have negative consequences for students, affecting their ability to develop meaningful friendships and leading to feelings of isolation. Undoubtedly, this would have a negative flow on effect to the child’s ability to learn.

Supporting students: Have you or your child been appropriately supported during your / their education? This includes being able to access supports, including specialist resources.

Support for students who are blind or have low vision greatly depends on the attitudes of the school they are at, and the educators themselves. Receiving adequate supports often only comes with a great deal of advocacy by the parents:

*“My son has been supported but I would not say appropriately. It does require a lot of follow up and enquiries and appointments to convey the difficulties, your willingness to help in any way and find out what services and help they are willing to do.”*

### Assistive/adaptive technology

Access to various assistive and adaptive technologies is vital in ensuring students who are blind or have low vision can access and participate in education on the same basis as other students. This equipment provides access to activities, processes and materials that would otherwise be inaccessible.

For example, screen reader software provides access to computer functionality via synthetic speech, refreshable braille displays, or enlarged onscreen text. Without a screen reader, a person who is blind or has low vision cannot access a computer or participate in any activities that require the use of a computer. Other examples include electronic magnifiers, braille note takers and refreshable braille displays.

Unfortunately, we know that many children are still not being provided with the adaptive technology they need, or are being provided with incorrect technology. This is often because students are not being assessed by staff with sufficient knowledge of the needs of students who are blind or have low vision, or what technology is available for them. 35 percent of respondents reported that their child has not been provided with the technology or other equipment needed for them to be able to properly participate in education. Parents are also reporting that they have to continually demonstrate their child’s need for equipment:

*“We are having to fight for equipment that is necessary and constantly having to prove why it is needed”*

There is also the issue of students being provided with assistive or adaptive technologies, however not being provided with the training to actually utilise the technology effectively. 41 percent of respondents said that while their child had been provided with technology or other equipment to access education materials, they had not been provided training on how to actually use the technology.

Further, we have heard from families and service providers that it is a common occurrence for children to be provided with assistive technology in primary school, only to be taken away from them when they move into high school. They then face the difficulty of going through the process of trying to re-access the technology that they need.

## Braille

Braille is key to literacy for people who are blind or have low vision. It is fundamentally important that braille skills training is incorporated into early intervention and primary school programs for all children who are blind or have low vision where they are unable to use print effectively. Braille training should also be offered to children whose vision is likely to further deteriorate in the future, as well as parents and family members, to help foster an understanding of how words are structured both at school and home.

Of concern, 27 percent of respondents reported that their child's school has not provided them the opportunity to learn braille.

*"The school has not yet agreed to assist with teaching my daughter braille. I have asked each year that she has been at high school".*

Further, we know that there is a lack of qualified braille teachers for school students.

### Case study:

*Harry is blind and was enrolled into prep at a local school with the intention of becoming a braille user. Unfortunately, Harry was assigned a visiting teacher who was not fluent in braille. Harry's parents complained to the school, and he was assigned a braille literate visiting teacher, who had been supporting a year three student learning to use braille. The year three student was then assigned a different visiting teacher, who was not braille literate. The year three student's family then had to advocate for him to be provided with a braille literate teacher.*

## Specialist staff/visiting teachers

Visiting teachers are vital for teaching concepts, skills and knowledge, referred to as Expanded Core Curriculum, which a student who is blind or has low vision is unlikely to acquire in the same manner as their sighted peers. There are other concepts, skills and knowledge that students who are sighted learn "incidentally", or "causally" in the classroom or playground, but which must be taught sequentially and systematically to students who are blind or have low vision. These include, but are not limited to: braille literacy, adaptive technology training, compensatory skills training, orientation and mobility, independent living skills, social skills and career counselling.

Given the specialised nature of these curriculum areas, qualified visiting support teachers are best placed to assist students who are blind or have low vision to learn on the same basis as other students. This includes braille literate visiting teachers.

*"My child cannot access most learning materials in appropriate formats in any of her classes. She can only access appropriate learning materials when she is with her vision support teacher".*

While 73 percent of respondents said that their child has had some interaction with specialist staff, there appears to be little consistency or frequency of that support, with 60 percent reporting that there is in fact no consistency in the frequency of their child's interaction with specialist staff. There also appears to be significant delays in submitting applications for assistance from specialist staff and actually receiving it:

*"He has just received an itinerate support person for 2 hours a week. The application was submitted late last year and was confirmed at the start of Term 3 this year".*

We have further heard feedback from Vision Australia service providers, who provide services to children in schools, that it is often a lengthy process to even be able to begin providing services to a child within a school.

### Independent living skills/specific careers counselling

Independent living skills, or functional skills, allow people their independence and ability to take part in all aspects of life and, from socialisation to self-care and personal needs. These include things such as cooking, money management and organisational skills specific to someone who is blind or has low vision. For students who are blind or have low vision it is imperative they are supported in learning these skills from a young age to empower them to be independent adults, and live the life they choose.

*"This is something I really wish schools would acknowledge as an important requirement for students who are blind or have low vision"*

84 percent of survey respondents indicated that they or their child is not being supported to learn independent living skills. While we understand some schools may simply not have the resources to support this, there is an opportunity for organisations like Vision Australia, and our service providers to work closely with schools to ensure students who are blind or have low vision are not missing out.

A related concern is that school students who are blind or have low vision are not being provided with effective careers advice by counsellors who have disability-specific knowledge of education options and employment outcomes. Without exception, the 21 respondents to our survey who are high school students or parents of high school students said that they had not received any careers advice that took blindness or low vision into account. We are aware that some state education systems have developed initiatives to provide disability-specific careers advice, but based on the results of our survey we are compelled to conclude that in practice they are not reaching students and parents who need them most.

Harassment or victimisation: If you or your child experienced harassment or victimisation in an education setting, what happened? What steps did your / their education provider take to address this?

Discrimination, harassment and victimisation is unfortunately still a common occurrence for many students who are blind or have low vision. Half of the respondents to our survey reported that their child had experienced discrimination, harassment or victimisation of some kind in an education setting.

*“The principal of the school repeatedly discriminated against my child, including advising teachers not to follow professional recommendations that had been put in place to assist my child.”*

We unfortunately know that students are often actively excluded, or discouraged from participating in certain subjects on the basis that they are blind or have low vision, constituting direct discrimination:

*“My daughter was told by the school that as she had lost most of her sight she could no longer continue with her art and advanced English classes. Staff need to be educated that a person’s vision is not a basis by which to refuse them education”.*

There is a trend with students being discouraged from participating in certain subject areas. Our survey asked parents and students to advise on which subjects they were only sometimes being included in:

- **English** – 16 percent only sometimes included
- **School excursions** – 16 percent only sometimes included
- **Physical education** - 26 percent – only sometimes included
- **Information technology** – 17 percent only sometimes included
- **Science** – 22 percent only sometimes included

We heard the following from a high school student regarding his principles attitude towards inclusion:

*“I think my principal was aware of such laws being in place to the point where they didn’t actively attempt to exclude me from certain activities, although they discouraged me from being involved”.*

The above quote and statistics reinforce a strong impression that we have formed over the past decade by talking with parents, students and educators that school students who are blind or have low vision are discouraged from studying STEM (Science, Technology, Engineering, Mathematics) subjects. This discouragement can begin in primary school, but is especially insidious in the later years of high school. For example, we know of very few students who are blind or have low vision who study STEM subjects (particularly Science and Mathematics) in the final two years of school, and even fewer who study them at tertiary level.

The Australian Government has such a strongly declared focus on STEM subjects as the cornerstone of tertiary education and subsequent employment. We believe that students who are blind or have low vision will experience increasing disadvantage and exclusion from post-secondary education and

the labour market by a systemic failure to provide them with equal access to STEM subjects at all levels in the education system. The Standards must take into account the growing importance of STEM subjects by specifically highlighting the need for students with a disability to have equal access to and full inclusion in these areas.

Compliance: If you considered that an education provider was not meeting their obligations, how was it dealt with? Did you know how to make a complaint? What happened?

We know that many families and students often feel deterred from making complaints due to the negative connotations associated with doing so and the potential for discrimination or victimisation from their education provider if they go through with the complaints process. This is often of particular concern when a student remains at a school while a formal complaint is being investigated.

*"I made a complaint to the school principle. She refused to respond and sent it to the State Education Department. It took the department 5 months to provide a response. A complaint was then lodged with the Anti-Discrimination Commission. Since making the complaint to the ADC both myself and my son have been victimised for making the complaint. The investigation is still ongoing after almost 2 years".*

There is further barriers to the complaints process by way of the costs associated. If a resolution is not reached at conciliation, students who are blind or have low vision and their families may not have the time or resources needed to progress a complaint to the Federal Court.

What is clear from the survey results, and through anecdotal evidence we have heard, is reluctance amongst families to make complaints when an education provider is not meeting their obligations. Almost 70 percent of respondents said they have wanted to lodge a complaint about something that has occurred within the education setting, however have not gone through with it.

Further, for the parents who have made complaints, the process and outcomes appear to be less than ideal. The following quotes are from parents regarding their experience making a complaint:

*"The process was very challenging. It took a lot of things to make improvements".*

*"It was very frustrating. Everyone I spoke to acted like they cared but there was never any follow through"*

*"It was a drawn out process that took months to get a response. The safety issues are still not resolved"*

*"It's the same old excuses, same old results. Things may change for a brief period of time and then quickly revert back"*

*"It was made very hard with lots of paper work to complete. I understand why people give up"*

This is concerning as it highlights that when educators are not meeting their obligations under the Standards, they are not held accountable. Timely resolutions, and in many cases resolutions at all, are simply not being achieved. Further, the reluctance of parents to make complaints, takes the pressure of schools and educators to adhere to the requirements of the Standards.

[Transition: Tell us about your or your child's experience in accessing education opportunities and being supported as they transitioned from one education sector to another e.g. from school to further education.](#)

Transition into schooling for the first time, and other key transitions throughout the schooling journey, such as between primary and high school or between schools, is challenging for all children however presents even greater challenges for children who are blind or have low vision. We know there is a great deal of anxiety and stress experienced by both students who are blind or have low vision, and their families, when transitioning into school or between schooling levels. However, it does not have to be this way.

Students who are blind or have low vision require specialised supports when transitioning into a school environment for the first time, between schooling levels and between schools. When entering primary school or transitioning into secondary school, a multidisciplinary approach is essential to adequately integrate a child into the school environment. This includes supports from occupational therapists, orientation and mobility support, physiotherapists and speech pathologists.

We have heard anecdotal evidence from both parents and service providers, that there is limited and inconsistent supports provided to children who are blind or have low vision, both transitioning from early learning into school, and through different levels of schooling. Many families and students also face issues around schools not sharing information with each other and it falling to the family to ensure the new school receives all the information needed.

*"The primary school passed on the information but there was no follow up from the high school to let me know if they needed more information or work together to support my child."*

It is not only transition between primary and high school, or between different schools where issues with transition arise, but also within the same school when children move from one grade to the next.

*"I have found this year difficult as the teacher is not as on board as his last years teacher was. There didn't seem to be a passing on of information between them or the current teacher reviewing his file which has all his reports".*

As has been mentioned already, parents are taking on the role of the advocate for their child, and this rings true during the transition process. Parents have to be the driving force for getting information from their child's primary school to high school, with little to no action from the schools themselves.

If a student is not supported from the outset, they will struggle to have a positive and inclusive schooling experience. A streamlined and coordinated transition process is essential to ensure a

student is set up for success, and is going to be able to be able to actively participate in learning, as well as the social aspects of schooling.

[COVID-19: Has COVID-19 impacted your or your child's experience in participating in education? Have your experiences ever been impacted by other major events, such as natural disasters?](#)

The COVID-19 pandemic has presented never before faced challenges for all Australians. It has led to a unique set of challenges for people who are blind and have low vision, one of which is access to online learning in schools.

For students who are blind or have low vision, the rush to move to online learning at the beginning of the COVID-19 pandemic created many difficulties. Due to the ongoing restrictions in Victoria, and requirement for online learning, students are still experiencing many of these issues. With it being close to a full schooling year of learning from home in Victoria often without adequate supports, students who are blind or have low vision have been placed at significant disadvantage.

Accessibility for blind and low vision students to online learning was not uniform across education settings with it greatly depending on online learning platforms being utilised by the school, the skills of the student and the accessibility support that teachers and the specialist education support services provided. We have heard reports from parents who have said they have had to become accessibility experts during COVID.

Our survey results indicated that 70 percent of students who are blind or have low vision have had their participation in learning negatively affected due to COVID-19. We have heard anecdotal feedback from parents of blind or low vision students in Victoria that while they were provided with supports in the first lockdown, much less has been provided in the second lockdown.

From the parent of a NSW primary school student:

*"The school packs sent home weren't adjusted for his learning style. They made no contact with seeing how he was, how he was coping or ways they could help or improve. It relied on me teaching and I haven't a teaching background plus I was also working at the same time."*

While we understand that COVID-19 and the challenges it has presented are unique, it has highlighted the issue of lack of thought and planning around schooling for children with disability and what their needs may be.

### Best practice

Vision Australia believes that the Standards will only work when there is a multidisciplinary and collaborative approach between parents, schools, educators and education departments, unfortunately we know this is not occurring broadly. We have seen examples of the Standards working well and obligations being met in situations where service providers, teachers and parents work effectively together to understand the needs of a child, and implement relevant strategies to ensure those needs are met. Further, there needs to be greater focus on increasing awareness of the standards, especially among educators, and how to practically implement them.

## Case Example - New Brunswick, Canada

Policy 322 in New Brunswick, Canada can be looked to as an example of best practice. In 2013, New Brunswick Policy 322 on inclusive education was introduced. Policy 322 was put in place to ensure that provincial schools are inclusive. The policy outlines a clear set of requirements that each education authority – Department, schools and school principals must comply with.

The policy clearly identifies and provides clarity to schools around what is expected of them. A key feature of the policy was it was reinforced by a corresponding action plan to support its implementation, and adherence to it. Further the policy lays out in clear detail, what the standards for inclusion are and what requirements educators must fulfil to ensure students with a disability can fully participate in a common learning environment.

The policy also focuses on attitude change around inclusivity. It seeks to ensure that all public schools in New Brunswick recognise that inclusive education is the foundation for ensuring an inclusive society.

## Conclusion

The Standards are designed and in place to promote the rights of students with disability and ensure they have access to a full and equitable education. However, it is clear that currently, they are not fulfilling this purpose. There is minimal awareness of them amongst parents and well as educators and educational institutions, and further, they lack clarity. There are wide spread deficiencies in the supports and adjustments being made for students with disabilities in education settings, with the onus of advocating for a fair education falling to parents and students themselves.

Vision Australia believe that there needs to be a strong focus on raising awareness of the Standards, as well as ensuring they provide clarity around the obligations and requirements of educators and educational institutions.

As we mentioned at the beginning of this submission, to foster any sort of meaningful outcomes around inclusive education for students with disability, we need fundamental change, around attitudes, awareness and inclusion to ensure that students with disability are empowered to achieve their goals and live the life they choose.

## **About Vision Australia**

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include:

- Registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment;
- Assistive/Adaptive Technology training and support;
- Seeing Eye Dogs;
- National library services, early childhood and education services and Felix Library for 0-7 year olds;
- Employment services;
- Production of alternate formats;
- Vision Australia Radio network including a national partnership with Radio for the Print Handicapped;
- NSW Spectacles Program; and
- Government advocacy and engagement.

We work collaboratively with governments, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation.

Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.