

**Submission
No 200**

INQUIRY INTO STUDENTS WITH A DISABILITY OR SPECIAL NEEDS IN NEW SOUTH WALES SCHOOLS

Organisation: Occupational Therapy Australia

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PARLIAMENT OF NEW SOUTH WALES

GENERAL PURPOSE STANDING COMMITTEE NO. 3

INQUIRY INTO STUDENTS WITH A DISABILITY OR SPECIAL NEEDS IN NEW SOUTH WALES SCHOOLS

OCCUPATIONAL THERAPY AUSTRALIA (OTA)
NSW DIVISION SUBMISSION

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Introduction

The NSW Division of Occupational Therapy Australia (OTA) welcomes the opportunity to make a submission to the General Purpose Standing Committee No. 3 as part of the inquiry into the provision of education to students with a disability or special needs in government and non-government schools in New South Wales.

Occupational Therapy Australia is the professional association and peak representative body for occupational therapists in Australia. As of December 2016 there were more than 5000 nationally registered occupational therapists working across the government, non-government, private and community sectors in New South Wales. Occupational therapists are allied health professionals whose role is to enable their clients to participate in meaningful and productive activities.

Occupational therapists provide services such as physical and mental health therapy, vocational rehabilitation, assistive equipment prescription, home modifications and chronic disease management, as well as key disability supports and services.

This submission addresses the inquiry's Terms of Reference by looking at current deficits in the structure and delivery of occupational therapy services to students with disability in New South Wales schools. It considers the implications of policy reform in the disability sector, such as the roll out of the National Disability Insurance Scheme (NDIS), and makes a number of recommendations about how the provision of occupational therapy services can be enhanced to enable students to achieve their educational goals.

Summary of recommendations

- Consistent access for occupational therapists to both government and non-government schools;
- The inclusion of occupational therapists in multidisciplinary education teams to support formal ongoing dialogue with key stakeholders;
- Consultation between schools and occupational therapists to create enabling environments for students with disability;
- The introduction of a standardised accreditation process to prevent the need for therapists who visit schools to continually resubmit documentation;
- Increased education and support services for teachers, with input from occupational therapists through a process of co-design;
- Regular review of Memoranda of Understanding (MOUs) between the Department of Education and external agencies that provide therapy services;
- The employment of a greater number of teachers with special education expertise in special schools;
- The engagement of occupational therapists in the functional assessment process for students with additional needs where relevant;
- Greater clarity around complaint and review mechanisms within the New South Wales school system, with consideration given to the creation of an external review mechanism;
- The establishment of a coordinated interdepartmental approach between the NDIA and state education departments, including the creation of a specialist taskforce to reduce uncertainty around the interface between the NDIS and education;
- The engagement of occupational therapists as part of learning support teams when restrictive or exclusionary practices are applied.

Context: The role of occupational therapists in schools

Occupational therapists are an integral part of learning support teams for students with disability and special needs in schools across New South Wales, bringing a unique and specialised perspective to maximising participation in the curriculum when students encounter barriers to their learning. Occupational therapists also provide support and training to school staff.

Occupational therapists provide solutions that allow students with disability to socialise with their peers and participate effectively in classroom learning and schoolyard play. They use evidence based interventions that promote the participation of students with disability in all of the daily occupations that they want to or need to engage in. Occupational therapists seek to help students learn new skills and modify or enhance aspects of the occupation or environment to facilitate the best fit and therefore the most successful outcome for the student.

Occupational therapists perform the following tasks within the school setting:

- Working directly with students to develop new skills or improve existing skills, such as handwriting, using classroom materials, turning a page independently and understanding social interactions with other students;
- Working with the student and teacher to modify or tailor the occupation or school activity to ensure that the student is able to participate (eg. switching access to an electronic book rather than a paper reader if the child is unable to hold the book, or ensuring that they are equipped with supportive seating at their desk);
- Prescribing assistive technology and modifying the environment and instructional techniques to facilitate universal access;
- Providing input into student's care plan in relation to mobility and self-care activities.

Response to the Terms of Reference

(a) equitable access to resources for students with a disability or special needs in regional and metropolitan areas

Inconsistent access to classrooms

Access to occupational therapy resources amongst others is not consistent across the state, with unclear referral pathways, variable availability of occupational therapy and differing policies and practices regarding the visitation of occupational therapists to classrooms. The availability of occupational therapists in rural areas is a challenge, particularly in more remote communities.

OTA has also heard from its members that families are often unaware of the resources that are available to them and are required to advocate strongly for access to supports, including occupational therapy. This can be quite burdensome for already overstretched families dealing with a range of additional support needs. It also further adds to the inequity of supports, with the advocacy skills of families a key factor in students accessing the full range of accommodations.

One OTA member reported on a family that attended therapy sessions regularly, who prepared in conjunction with the occupational therapist a letter that was given to the teacher at the beginning of each year outlining the strategies that had been of benefit to her child in previous years.

The procedure for therapists to access schools has become more varied in recent times. Whilst acknowledging the importance of risk management within schools, a clear and consistent process for therapists who are visiting schools to support individual students would be of benefit. Some members have reported that they are asked to present required documentation at each visit, and

need to undertake CPR and other First Aid training at their own expense. An accreditation process, perhaps with photo ID as used in ACT schools, that is recognised by all schools would ensure consistency and streamline this process.

In addition, members identified a problem with multiple therapists visiting schools, and potentially the same classroom. OTA has heard reports of principals refusing access to classrooms for therapists because it is too disruptive when multiple therapists are supporting students. This is a logistical issue that requires attention, as the NDIS model of individual funding is likely to increase this phenomenon.

Other schools have opted for a preferred provider model, where the school engages a therapist to work with students and staff. This seems viable when the school is funding the therapy services. However, there are risks associated with this approach with regards to reducing individual choice, particularly if the student's individual funding or private health insurance is being used to pay for therapy. Further development of a consistent procedure for therapy input in the school setting is required to ensure equitable access for students to required accommodations and supports.

The way each state and territory engages with occupational therapists differs according to departmental arrangements. The Queensland Department of Education and Training employs occupational therapists to work in state schools. Queensland is leading the way in this regard. Occupational therapists may be employed as part-time or full-time employees, and on a permanent or specified term basis. The department's focus is on enhancing educational programs and outcomes for students with a verified disability.

In September last year, the ABC reported on a Riverina-based occupational therapist who called for Australia to follow the lead of the United States and have occupational therapists based in most schools.¹ Paul Newcombe noted that "In most US states it is state law to employ health professionals and place them in the schools whenever there are special needs children in a given school. This is in contrast to Australia where the vast majority of paediatric occupational therapists are located in private clinics." OTA supports this proposal and believes that mandatory employment of multidisciplinary health care teams in schools will enhance early intervention services for children with developmental disabilities.

In 2016, an audit was undertaken to examine how well the New South Wales Department of Education is managing the transition to school for students with disability.² The audit recommended that the department 'provide guidance to schools on supporting students who need occupational therapy and speech pathology services, including working with other service providers'. OTA strongly endorses this recommendation.

Recommendation 1: Occupational therapists should have consistent access to both government and non-government schools to enable better engagement with the curriculum via contemporary, evidence based therapies (such as sensory approaches for the individual needs of students with autism).

Recommendation 2: Occupational therapists should be included in multidisciplinary education teams to support formal ongoing dialogue between students, families, health and educational professionals.

¹ <http://www.abc.net.au/news/2016-09-23/call-for-occupational-therapists-in-australian-schools/7868192>

² <http://www.audit.nsw.gov.au/publications/latest-reports/supporting-students-with-disability>

Recommendation 3: Schools should consult with occupational therapists to create enabling environments for students with disability. Minimum standards for visual, acoustic and inclusive design in classrooms should be actioned to enable the full participation of students with disability.

Recommendation 4: Consideration should be given to introducing a standardised accreditation process to prevent the need for therapists who visit schools to continually resubmit documentation.

Inadequate teacher training

Another problem is the fact that teachers quite often lack appropriate levels of support, which impacts on their capacity to meet the individual needs of students with disability. Across Australia, current teacher training does not sufficiently educate trainee teachers on the needs of students with disability. In some cases this training is only optional, resulting in the majority of teachers and administrators lacking the requisite knowledge and experience to effectively support students with disability. Additionally, many teachers lack understanding of allied health professionals and occupational therapists specifically, and their role in supporting students and contributing to multidisciplinary teams.

It is common for there to be different levels of understanding across different schools, and even internally across different teaching staff. This is reflected in different attitudes and varying degrees of willingness to allow occupational therapists into classrooms to provide services to students.

This lack of knowledge and experience leads to:

- Viewing behaviour only through the lens of behaviour management, with insufficient regard for individual difference or other issues which may be triggering challenging behaviour (eg. the environment in which the child is functioning, sensory and other needs, communication issues, learning needs);
- Lack of understanding of how to reduce the impact of the disability for the student in the classroom/schoolyard;
- Lack of understanding about how the student's 'constitutional' factors/vulnerabilities impact occupational performance (eg. everyday functioning) and how these may be attenuated;
- Lack of specialist knowledge to ameliorate, accommodate and compensate occupational concerns which impact on a student's learning and success at school, as well as extracurricular activities;
- Limited knowledge and understanding by parents and educators of the role of occupational therapists in collaborating with schools to assist young people to engage and participate in their education.

Recommendation 5: Education and support services for teachers should be increased to ensure that they are cognisant of the Disability Standards for Education 2005 and are well equipped to meet the needs of students with special needs in the classroom. Through a process of co-design³, occupational therapists can provide education and support to both teachers who have a child with disability in their classroom and to integration aides. Such education and support should be provided during undergraduate and graduate teacher training, as continuing education for working teachers and within schools in relation to specific students.

³ Kwon, S. M., Wardrip, P. S., & Gomez, L. M. (2014). Co-design of interdisciplinary projects as a mechanism for school capacity growth. *Improving Schools*, 17(1), 54-71. doi:10.1177/1365480213519517

(b) the impact of the Government's 'Every Student Every School' policy on the provision of education to students with a disability or special needs in New South Wales public schools

This policy is a welcome approach to recognising the individual needs of students within the school system, aspiring to inclusion of a diverse range of students as part of the school community. However, OTA members report that this framework has not had a strong impact on collaboration between schools and external organisations that provide therapy supports to students. There is a need for greater emphasis and recognition of the importance of interprofessional collaboration to achieve optimal outcomes for students in accessing the curriculum and participating in the school community more broadly.

Therapy supports are an integral part of this process for a significant proportion of students with additional needs and disability. The needs of students with less complex support should not be overlooked in this process, as often students with lower level additional needs can benefit from an interdisciplinary approach. The MOUs with external agencies that provide therapy services require regular review to ensure the ongoing relationship between organisations and to optimise student access to supports.

OTA members report that therapy services are sought at times of crisis, rather than proactively when students are identified with additional needs. One OTA member provided an example of good practice in this regard, where the learning support teacher arranged for an occupational therapist and a speech pathologist to provide a day of service to the school to review the learning support plans of all students who were highlighted as potentially needing therapy supports. Some students were then identified as needing therapy sessions and staff training was implemented to build in universal design strategies to accommodate the students within the classrooms.

The level of individualising of supports has in some areas been reduced to a more formulaic approach, leading to less optimal outcomes for students with additional needs. There is a need for teachers with special education expertise in special schools and support units, to help ensure high quality outcomes for students and an awareness of the role and contribution of therapy supports. It is reported that this has been reduced since the introduction of the 'Every Student, Every School' policy, with a focus on the generalist teacher approach.

Recommendation 6: Memoranda of Understanding (MOUs) between the Department of Education and external agencies that provide therapy services should be regularly reviewed to ensure the ongoing relationship between organisations and to optimise student access to supports.

Recommendation 7: A greater number of teachers with special education expertise should be employed in special schools and support units to ensure high quality outcomes for students and greater awareness of the role and contribution of therapy supports.

(c) developments since the 2010 Upper House inquiry into the provision of education to students with a disability or special needs and the implementation of its recommendations

The implementation of the functional based assessment of students needs has proceeded, however OTA has heard from members that occupational therapists are not widely included in this process, despite providing support to the individual students who are the focus of the assessment. OTA believes that occupational therapists contribute a unique perspective to the development of

learning supports and provide valuable insights into the individual accommodations that will maximise participation in the curriculum and inclusion in the school community.

Recommendation 8: Occupational therapists should be engaged in the functional assessment process for students with additional needs where relevant.

(d) complaint and review mechanisms within the school systems in New South Wales for parents and carers

OTA members were not sufficiently briefed on the complaint and review mechanisms available in schools regarding supports for students with additional needs and disability, and expressed some concerns that families were not routinely informed of their rights in this regard. OTA heard reports that families were at times reluctant to make complaints due to concerns that their children may be further disadvantaged or that they would be encouraged to move their child from their local mainstream school. An external review mechanism would be of benefit, outside the individual school, on the use of restrictive behaviour management practices, exclusion or part-time enrolments. This would ensure that community standards and expectations are met and that progress towards full inclusion of students with additional needs and disability is achieved.

Recommendation 9: Greater clarity is needed around complaint and review mechanisms within the New South Wales school system. Consideration should be given to the creation of an external review mechanism to ensure adherence with community standards and expectations, and to promote the full inclusion of students with disability in all aspects of their education.

(e) any other related matters

The National Disability Insurance Scheme (NDIS)

The impact of the NDIS on access to therapy supports in the education sector is a concern that has been raised by OTA members. It is anticipated that 30,000 students with additional needs will be NDIS participants. The current provision of therapy services is often intertwined with school participation and assisting students to access the curriculum alongside support for participation outside school activities. It is unclear how this will be managed when the NDIS is implemented.

OTA believes that a coordinated interdepartmental approach between the NDIA and each state education department is needed to provide policy and funding clarity around the implementation of the NDIS in educational/school settings to ensure students and families understand how to navigate funding resources for their supports.

OTA believes that the following principles should apply in navigating the intersection of education systems and NDIS:

- Children and their families operate across a wide range of life domains (for example, educational, community, recreational and spiritual);
- Children need therapy supports and solutions which meet their needs across life domains;
- Current evidence supports ecological practice – that is, applying interventions within the life domain in which the child is occupationally engaged. Educational goals are best pursued in an educational context;

- Therapy supports, including behavioural strategies, environmental adaptations, and assistive technologies, will usually have application in other areas of life than the school;
- Educationally focused occupational therapy – occupational therapists must consider the child and their educational goals in light of whole-of-life domains.

In implementing the above principles, OTA recommends that a specialist taskforce be established to determine the following:

- How one consistent therapist can work across NDIS-specific and education-specific goals;
- How to ensure consistent access to assistive technologies used across different settings;
- How to best realise choice and control for the child and family in both the education and broader NDIS setting.

Recommendation 10: A coordinated interdepartmental approach between the NDIA and each state education department is needed to provide policy and funding clarity around the implementation of the NDIS in educational/school settings. This should involve the creation of a specialist taskforce to reduce uncertainty around the interface between the NDIS and education, and to ensure that students have consistent access to therapy supports across different life domains.

Funding shift

Under the Disability Standards for Education 2005, schools are responsible for providing reasonable adjustments to ensure that students with disability can access and participate in education. This includes the provision of assistive technology and equipment for personal care, mobility and positioning, when recommended by a suitably qualified allied health professional. In New South Wales these assessments have historically been provided by occupational therapists employed by Ageing, Disability and Home Care (ADHC), Health and non-government organisations (NGOs), with their service being funded through block funding. With the closure of ADHC and the transition of funding from block to individualised funding via the NDIS, it is unclear at this time as to the impact that the change of funding model will have on students requiring assessments for equipment, environmental modifications and technology to be used within the classroom.

Early intervention

Concerns have been raised by therapists working for local NGOs that provide screening and input to preschools before families have identified concerns. These types of programs were funded by ADHC and it is unclear how they be funded under the NDIS, as the children are not yet identified as having a disability or delay. With some intervention they may not develop ongoing issues, especially if they receive additional supports prior to starting school.

While early intervention is technically not within the scope of this inquiry, OTA believes that consideration should be given to these types of services due to the profound effect that they can have on school outcomes.

Use of restrictive or exclusionary practices

There has been some media attention in recent years on unacceptable management of challenging behaviours which has been echoed by OTA members. There are reports of students with additional needs being excluded from school or asked to attend for shorter days due to difficulties with engaging the student in positive classroom activities. Occupational therapists have a role to play as part of the learning support team in developing individualised positive support plans which is not being fully explored in the current system.

Recommendation 11: Occupational therapists should be engaged as part of the learning support team when restrictive or exclusionary practices are applied to a student to address behaviour concerns.

Summary of recommendations

- Consistent access for occupational therapists to both government and non-government schools;
- The inclusion of occupational therapists in multidisciplinary education teams to support formal ongoing dialogue with key stakeholders;
- Consultation between schools and occupational therapists to create enabling environments for students with disability;
- The introduction of a standardised accreditation process to prevent the need for therapists who visit schools to continually resubmit documentation;
- Increased education and support services for teachers, with input from occupational therapists through a process of co-design;
- Regular review of Memoranda of Understanding (MOUs) between the Department of Education and external agencies that provide therapy services;
- The employment of a greater number of teachers with special education expertise in special schools;
- The engagement of occupational therapists in the functional assessment process for students with additional needs where relevant;
- Greater clarity around complaint and review mechanisms within the New South Wales school system, with consideration given to the creation of an external review mechanism;
- The establishment of a coordinated interdepartmental approach between the NDIA and state education departments, including the creation of a specialist taskforce to reduce uncertainty around the interface between the NDIS and education;
- The engagement of occupational therapists as part of learning support teams when restrictive or exclusionary practices are applied.

Conclusion

OTA thanks the committee for the opportunity to submit to this inquiry. We would be more than happy to provide further clarification on any of the matters raised in this submission should this be required.