

Review of the Educational

Adjustments Model

Final Report

Department for Education, Children and Young People

May 2023



Executive summary

The Educational Adjustments Model

The Tasmanian Government established a taskforce in 2014 to improve the supports, or educational adjustments, students with disability have at school. The Taskforce Report recommended that the way schools are funded to provide support to students with disability should be based on the educational adjustments they provide a student with disability in the classroom rather than the student's disability type or severity.

The Taskforce Report led to the Tasmanian Department for Education, Children and Young People (DECYP) putting in place a new model to provide funding to schools to support the educational adjustments they provide students with disability in the classroom. In 2020, the *Educational Adjustments Model* began and schools now receive funding based on the adjustments students get in the classroom.

The model and its underpinning processes were designed to align with national legislative obligations. The *Nationally Consistent Collection of Data on School Students with Disability (NCCD)* collects data on school students with disability to help inform the way schools and Government understand and respond to the needs of students with disability. The NCCD requires schools to review their processes and practices relating to the level of adjustments they provide to support students with disability. The *Disability Discrimination Act 1992 (DDA)* and the *Disability Standards for Education 2005 (DSE)* articulate the rights of people with disability in an education setting. Under the *DDA* and *DSE*, all schools have an obligation to ensure that students with disability can access and participate in education on the same basis as students without disability. In particular, under the *DSE*, schools are required to:

- Treat students with disability on the same basis as students without disability
- Make reasonable educational adjustments to students' learning program and/or learning environment
- Consult with the student or their parents/carers on the reasonable adjustments that will be provided.

The review

As it has been three years since the model started, DECYP requested KPMG undertake an independent review to understand how the model has impacted students with disability and schools and to identify if any changes may be needed to improve the impact of the model. The review focused on four main areas:

- · How the model aligns to changes happening nationally
- The principles, structure and underpinning processes of the model
- How schools implement the model within their schools
- The impact and outcomes of the model.

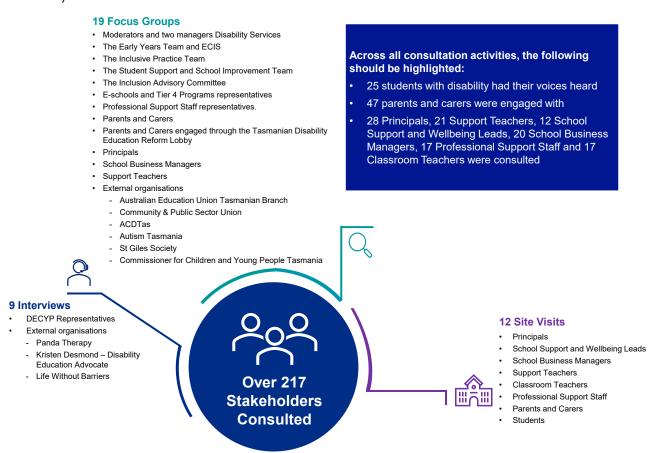
The review did not explore the adequacy of funding. This is being addressed through work being completed nationally by the National School Resourcing Board.

Approach

The review occurred from December 2022 - May 2023. The review consisted of a document review, stakeholder consultations, an interim update to DECYP, a validation workshop with DECYP and the



development of a final report (this report). KPMG consulted a range of stakeholders as part of the review to hear their perspectives on the model and how it has been implemented to date, including students, parents and carers, school leaders and staff and external organisations (as presented below).



Review findings

Overall, the introduction of the model has meant a greater number of students with disability are receiving funded educational adjustments from their school. The introduction of the model has also led to positive outcomes for students with disability and contributed to a greater understanding of disability and inclusive practice within schools. The review identified five broad themes of findings which are summarised below.

Model principles and structure

The review found that the overall structure and principles of the model are sound. However, the extent to which the practice of schools reflected the principles was inconsistent. The Descriptor Tool was also found to act as a useful guide for both school staff and moderators to make decisions in relation to the determined level of adjustment for students with disability, noting some minor modifications could be made to improve its usability.



School leadership, governance and culture, and workforce capability

School culture, leadership and governance and workforce capability have a direct impact on the outcomes for students with disability and the cultivation of an inclusive practice culture within a school. This review identified a range of examples of where students have had positive experiences of inclusive practices within schools. These examples were often underpinned by skilled and motivated school staff, and strong leadership, governance and culture within schools. However, it was also identified that school leaders and staff have varied capability in relation to inclusive practice. This can impact the extent to which a school is able to identify need associated with disability and the quality of educational adjustments made in the classroom setting.

Engagement, communications and guidelines

Implementation of any new policy of funding approach such as this model requires careful communication, change management and capability building support with impacted stakeholders to enable the success of the implementation. The review found that the supports provided by DECYP have helped school staff to understand their obligations under the DSE, the model itself and how to deliver educational adjustments aligned to inclusive practices. However, the scale of change required under such a model is significant and requires time. The time taken to achieve the system change required with the implementation of this model has also been impacted by the disruption caused by COVID-19. This has had a range of impacts including on the ability of schools to implement the model as intended. For example, the roles and responsibilities of each stakeholder to identify student need associated with disability is not always clearly defined or well understood. There is also varied practice amongst schools in participating in the model processes including engagement with parents and carers and students.

Processes underpinning the model

Opportunities were identified through the review to strengthen processes underpinning the model to improve implementation and minimise administrative impact on schools. This was particularly the case in relation to learning plans and the implementation of educational adjustments. While the development of learning plans for students with disability was a requirement under the previous model, increased oversight over learning plans under the new model and an increase in the number of students with disability on learning plans above the Quality Differentiated Teaching Practice (QDTP) level of adjustment has increased workload for schools. Some teachers were also found to be experiencing challenges in relation to identifying and documenting educational adjustments required by students.

Transitional funding arrangements

The transition from pre-kinder to kinder, year 6 to 7 and year 10 to 11 was noted as particularly challenging for schools and students. The change in setting is often related to a change in student need associated with disability and therefore the adjustments they require. In some instances, schools are able to put students forward for moderation or access contingency funding. However, where this is not possible schools may need to resource educational adjustments within existing funding allocations.



Recommendations

Recommendations reflect the themes identified in this review. As the structure and principles of the model were found to be appropriate, no recommendations have been proposed for this theme.

Theme	Recommendations		
School leadership, governance and culture, and workforce capability	DECYP should consider designing and delivering a learning program to uplift capability on inclusive practice, leadership, culture and governance in schools.		
	 DECYP should consider developing a Workforce Capability Framework to ensure the workforce is equipped with the knowledge, skills and attributes to deliver inclusive practice in schools. 		
	 DECYP should consider expanding the Inclusive Practice Coaching team to increase their ability to provide support to schools on inclusive practice. 		
Engagement, communications and guidelines	DECYP should consider reviewing the intersect between the Mid and High Extensive levels of adjustment and expanding the glossary within the Descriptor Tool.		
	 DECYP should consider reviewing and refreshing existing guidance for schools on how to identify need associated with disability, the processes underpinning the model and inclusive practice. 		
	 DECYP should consider strengthening its engagement activities with schools on inclusive practice and the processes underpinning the model to improve awareness and understanding at schools. 		
	7. DECYP should consider reviewing and strengthening its existing complaints processes to ensure there is a clear and transparent mechanism for schools to raise complaints and provide feedback relating to the model and for parents and carers to raise complaints and provide feedback relating to practice within schools and the educational adjustments students with disability are receiving from the school.		
Processes underpinning the model	8. DECYP should consider reviewing and updating learning plan templates to enhance the technological functionality and usability of learning plans for schools and DECYP.		
	 DECYP should consider exploring ways to improve capacity to support and provide feedback to schools on how to improve learning plans and educational adjustments. 		
Transitional funding arrangements	 DECYP should consider investigating options to provide additional support to schools to support the transition of students with disability between primary school and high school. 		
	 DECYP should consider exploring the viability of expanding contingency funding to resource schools for students with newly identified or increased need associated with disability. 		
	 DECYP should consider exploring alternative funding arrangements for educational adjustments provided for students with disability in Kindergarten. 		



Disclaimer

Inherent Limitations

This report has been prepared as outlined with the Department for Education, Children and Young People (DECYP) in the Scope Section of the engagement contract 4 January 2023. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

The findings in this report are based on documentation and data review, stakeholder consultations and targeted site visits as part of this review and the reported results reflect a perception of KPMG and DECYP but only to the extent of the sample surveyed, being DECYP's approved representative sample of stakeholders. Any projection to the wider stakeholders is subject to the level of bias in the method of sample selection.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, DECYP and stakeholders consulted as part of the process.

KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.

Third Party Reliance

This report is solely for the purpose set out in the Scope Section and for DECYP's information and is not to be used for any purpose not contemplated in the engagement letter/contract or to be distributed to any third party without KPMG's prior written consent.

This report has been prepared at the request of DECYP in accordance with the terms of KPMGs engagement contract dated 4 January 2023. Other than our responsibility to DECYP, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that party's sole responsibility.

Accessibility

To comply with the Commonwealth Government's accessibility requirements for publishing on the internet, two versions of this Report are available: a KPMG-branded PDF version and an unbranded Microsoft Word version. The KPMG-branded PDF version of this Report remains the definitive version of this Report.

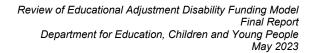




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Glossary

Term	Definition
ADHD	Attention deficit hyperactivity disorder
AEU Tasmania	Australian Education Union Tasmanian Branch
AITSL	Australia Institute for Teaching and School Leadership
Australia's Disability Strategy	Australia's Disability Strategy 2021-2031
CPSU	Community and Public Sector Union
DDA	The Disability Discrimination Act 1992
DECYP	Department for Education, Children and Young People
Descriptor Tool	The Tasmanian Educational Adjustment Descriptor Tool
Disability Royal Commission	The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability
DSE	Disability Standards for Education 2005
ECIS	Early Childhood Intervention Service
FFM	Fairer Funding Model
FTE	Full-Time Equivalent
IAC	Inclusion Access Coordinators
The Inquiry	The Independent Inquiry into the Department of Education's Responses to Child Sexual Abuse
IQ	Intelligence quotient
NCCD	Nationally Consistent Collection of Data on School Students with Disability
NSRA	The National School Reform Agreement
NSW	New South Wales
QDTP	Quality Differentiated Teaching Practice
RAR	Reasonable adjustments resourcing model
SBM	School business manager
SMART	Specific, Measurable, Achievable, Relevant, and Timely
SRP	School Resource Package
SSS	Student Support System
The Standards	The Disability Standards for Education 2005
THEAC	The Tasmanian Home Education Advisory Council



1 Introduction

1.1 Background

The Tasmanian Government established a Ministerial Taskforce in 2014 to examine current support for students with disability and provide recommendations to improve educational support for these students and their families. A significant component of their work focused on funding and resourcing, and their 2015 Report (*Improved Support for Students with Disability*) highlighted several issues with the current funding approach, including:

- Diagnosis and IQ-based models not reflecting student need for support and adjustment in an education setting
- Current resourcing being unnecessarily complex
- · Lack of clarity regarding the sufficiency of current resource levels in meeting student needs
- Lack of transparency and accountability of the current funding approach.

In 2015, the *Improved Support for Students with Disability Ministerial Taskforce Report* set out recommendations based on input from families of students with disability, experts, organisations, and schools, with the ultimate aims of addressing the barriers students with disability face and improving engagement with mainstream schooling through the creation of inclusive educational environments. The Ministerial Taskforce Report recommended that funding move towards a needs-based model with a focus on the educational adjustments required for each individual student with disability to participate on the same basis as students without disability.

The findings and recommendations of the Ministerial Taskforce provided a case for change for a new model. In response to this, DECYP developed a new needs-based funding model that became known as *Educational Adjustments: Disability Funding Meeting Learners Needs* (the model). KPMG supported DECYP throughout consultations with schools to ascertain the level of student need and to develop the theoretical underpinning of the new model. The model was developed in 2019 and the related funding has been providing resources to Tasmanian Government schools to support educational adjustments that they provide for students with disability since 2020.

1.2 Purpose

As the model has been implemented for three years, DECYP engaged KPMG to undertake an independent review to better understand the effectiveness of the policy settings that underpin the model; and to review the model's implementation both from a systemic standpoint and from the perspective of a representative sample of schools.

1.3 Scope

The scope of this review focuses on four key areas of enquiry:

- Context and alignment to reform Alignment of the model with national disability reform agendas and the move to needs-based funding models across other jurisdictions
- Principles and structure Effectiveness of the underpinning principles, model structure and processes to deliver needs-based funding to Tasmanian Government schools providing



educational adjustments for students with disability. This includes a review of the refinements to the model made since 2019, as well as the relationship between targeted funding for educational adjustments for students with disability and any school-wide supports and interventions available for all students

- Process and implementation Assessment of the quality and effectiveness of the model implementation by schools, including school structures and processes, supports and accountability for the resources, and student outcomes through educational adjustments
- **Outcomes –** Where the model has improved delivery of educational adjustments for students with disability by schools in-line with the ongoing implementation of the Ministerial Taskforce.

The following area is out of scope for the purposes of the review:

Adequacy of funding – The adequacy of the funding provided to schools through the model to
resource educational adjustments for students with disability was out of scope of this review,
including the funding amounts for the specific levels of adjustment. While funding, along with other
broader factors, was reported to be impacting the outcomes achieved from the model, this area is
being explored at a national level through a review being undertaken by the National School
Resourcing Board.

1.4 Project methodology

The project consisted of three phases of activity across December 2022 - May 2023. The following activities were in scope for this project:

- **Document review** A document review of both internal and publicly available data was undertaken to gain an understanding of the model, any refinements made and the model's alignment to the national disability reform agenda
- Consultations Interviews and focus groups were conducted with representatives from sample schools, DECYP representatives, parents and carers and external organisations from the education and disability sector, including:
 - Nine one-on-one interviews with DECYP representatives and external organisations
 - 19 focus groups with DECYP representatives, external organisations, school representatives and parents and carers.
- Interim update Preliminary findings from the consultation process were presented to DECYP to finalise the approach for the site visits
- Site visits Site visits were conducted across 12 schools in Tasmania to gain an understanding of the model's implementation at a school level, and to understand schools' experiences, challenges and suggestions for improvement. Principals, School Support and Wellbeing Leads, Support Teachers, Classroom Teachers (including Early Years Teachers), School Business Managers, Professional Support Staff, Parents and Carers and Students were consulted on site visits. The schools visited included:
 - Four Primary Schools
 - One College
 - Three High Schools
 - Four District Schools.

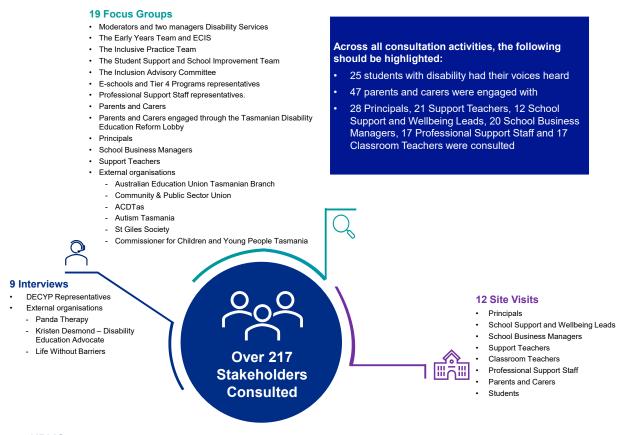


The school sites were chosen to be a representative sample of the different school types, sizes and regionality of Tasmanian Government schools.

- Validation workshop A workshop with DECYP representatives was conducted to present and
 validate the findings across the course of the project, to validate the preliminary recommendations,
 and to identify any areas of overlap with existing work
- Final report Development of a report which summarises the review findings and recommendations (this report).

Refer to *Appendix B* for a full break down of the project approach. A snapshot of consultation activities undertaken as part of this review is outlined below in Figure 1-1.

Figure 1-1 Consultation Overview



Source: KPMG

1.5 Purpose and structure of this report

This report presents the findings from the review and recommendations for enhancing the educational adjustments provided to students with disability in Tasmanian schools. The report is structured into the following sections:

- Chapter 1: Contains an introductory overview of the report
- **Chapter 2:** Provides an overview of the national policy settings and obligations, and the overall structure and processes underpinning the model



- Chapter 3: Outlines an overview of the model
- Chapter 4: Presents the findings from the review
- Chapter 5: Presents recommendations for improvements to the model and its underpinning processes
- Appendix A: Provides an overview of the stakeholders consulted throughout the review
- Appendix B: Provides the detailed project approach that was used to guide the review.



2 Policy and legislative context

The following section sets out the legislative obligations underpinning the approach, national policy settings and obligations, and strategies and directions with respect to students with disability.

2.1 National legislative obligations underpinning the Tasmanian approach

Disability Discrimination Act, the Disability Standards for Education and the Nationally Consistent Collection of Data on School Students with Disability

The Disability Discrimination Act 1992 (DDA) and the Disability Standards for Education 2005 (DSE) articulate the rights of people with disability in an education setting. Under the DDA and DSE, all schools have an obligation to ensure that students with disability can access and participate in education on the same basis as students without disability. Under the DSE, schools are required to:

- · Treat students with disability on the same basis as students without disability
- Make reasonable educational adjustments to students' learning program and/or learning environment
- Consult with the student or their parents/carers on the reasonable adjustments that will be provided.

The Nationally Consistent Collection of Data on School Students with Disability (NCCD) collects data on school students with disability to help inform the way schools and Government understand and respond to the needs of students with disability. The NCCD requires schools to review their processes and practices relating to the level of adjustments they provide to support students with disability. The model and its underpinning processes were designed to align with the national legislative obligations under the DDA, DSE and NCCD.

In 2020, the Australian Government reviewed the DSE. The Hon Alan Tudge MP, Minister for Education and Youth, released the final report on 12 March 2021. The final report made 13 recommendations which reflect four reform directions:

- Empowering and supporting students with disability and their families
- Strengthening the knowledge and capability of educators and providers
- Embedding accountability for the Standards throughout the education system
- Building awareness and capability in the early childhood education and care sector.

The Australian Government is working closely with state and territory governments and education authorities to implement the recommendations. Importantly, changes are being made with help and advice from people with disability and educators. This work will have a direct impact on the model and any future refinements made.

Funding and resourcing for educational adjustments

The Commonwealth, State and Territory governments co-contribute funding to resource schools to provide educational adjustments for students with disability, which is in addition to base school funding. Commonwealth funding for students with disability is determined by a specific loading under the *Schools Resourcing Standard* and is based on the number of students recorded in the *NCCD*.



State and territory governments' recurrent funding contribution levels for their government and non-government schools are set out in bilateral agreements with the Commonwealth under the National School Reform Agreement (NSRA). Under the NSRA, each state government is required to introduce its own needs-based funding arrangement that is consistent with Commonwealth Government requirements. There has been a bilateral agreement on the NSRA between Tasmania and the Commonwealth Government to invest and implement the work within Tasmania¹.

Review of the loading for students with disability

The Australian Government Minister for Education commissioned the National School Resourcing Board (the Board) to make findings and recommendations relating to the:

- Current SRS settings for the loading for students with disability
- Australian Government assurance processes to support the accuracy of information provided to calculate funding entitlements for students with disability.

Alignment of Tasmanian approach to national obligations

The processes underpinning the model and how they align to national obligations under the NCCD, DDA and DSE are presented in *Table 2-1*. This table highlights the legislative obligations that precede the implementation of the model and its associated processes:

¹ Minister for Education and Training (2018) *National School Reform Agreement provides long-term funding certainty.* Tasmanian Government.



Table 2-1: Processes and legislative obligations underpinning the Educational Adjustments Model

#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
1	Identify need associated with disability	An integral part of identifying and understanding the needs of students with disability requires schools to understand the backgrounds, strengths, and aspirations of students. DECYP's guide for Differentiated Classroom Practice Learning for All suggests that teachers should undertake the following activities to support need identification: Identifying students' strengths, what they are passionate about and their goals Awareness of students' cultural and language background Awareness of social disadvantage or trauma that may be part of students' background Creating opportunities for students to socialise and appreciate the diverse qualities they bring to the classroom Modelling and teaching about wellbeing, mutual support and respectful interactions Knowing where students are up to in their learning with respect to the curriculum.	Under the <i>DDA</i> and the <i>DSE</i> , all schools have an obligation to ensure that students with disability are able to access and participate in education on the same basis as students without disability. For students with disability, this requires schools and teachers identifying and understanding their individual needs.
2	Determine educational adjustments and document in learning plan	When a need associated with disability is identified, appropriate educational adjustments need to be implemented. Evidence is required to determine that need is associated with disability rather than learning difference or difficulties ² . DECYP's <i>Learning Plan Procedure</i> requires schools to complete the following steps to determine and evidence adjustments in the learning plan: Teachers have the primary responsibility for developing the learning plan in collaboration with families, students, professional support staff and other relevant stakeholders In development, it is important to identify strengths, needs and educational adjustments for the student	Under the DDA and DSE, all schools have an obligation to ensure educational adjustments are documented and evidenced. Tasmania has translated this legislative requirement as the learning plan which is required for all students with disability above QDTP under the <i>Tasmanian Learning Plan Procedure</i> . Under the NCCD, there must be a minimum of 10 weeks of evidence of adjustments that

² NCCD (2023) *Learning differences, learning difficulties, learning disabilities and the NCCD.* <u>Learning differences, learning difficulties, learning disabilities and the NCCD.</u> Nationally Consistent Collection of Data.



#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
		 These are then recorded in the learning plan as SMART (Specific, Measurable, Achievable, Relevant, Timely) goals to track a student's progress Teachers are responsible for documenting and updating this information in the Learning Plan and Student Support System (SSS) For the moderation process, this learning plan must show 10 weeks of evidence of adjustments over the previous year, including a description of the frequency and intensity of these adjustments. 	have taken place in the 12 months preceding census. Under the Australian Professional Standards for Teachers, standard 1.5 and 1.6 require all teachers to 'differentiate practice to meet the specific learning needs of all students' and implement 'strategies to support full participation of students with disability' 3.
3	Moderation	The moderation process involves an external facilitator working with school staff to identify the level of adjustment for a student with disability which informs the funding allocation a school will receive to resource the educational adjustments they provide for a student with disability under the model. The level of educational adjustments a school provides a student with identified need associated with disability are moderated every year by the moderation team. However, the moderation process differs depending on whether a) the student with disability has new educational adjustments or has changes in the level of their adjustments; or b) the student with disability has an existing level of adjustment with no changes required A desktop review is completed by a moderator for the majority of students with disability to confirm the level of adjustment for each student. To do this, moderators review learning plans, including information on the frequency and intensity of educational adjustments in place for students. Where levels are inconsistent with the current adjustment level, moderators engage in discussions with the school to agree the level of adjustments.	The NCCD recommends that schools, sectors and/or jurisdictions develop protocols and processes for moderation in relation to determining levels of adjustment. The key activities recommended to be included are: Establishing a moderation team Selecting sample students from each adjustment level for moderation Summarising student information Independently examining student cases Moderators comparing judgements Reaching consensus ⁴ .
		Students with new educational adjustments or changes in the level of their adjustments Moderation conversations with schools occur in the following circumstances:	

³ AITSL (2023) Australian Professional Standards for Teachers. <u>Teacher Standards (aitsl.edu.au)</u>.

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⁴ NCCD (2019) Moderation resource for schools. Moderation resource for schools (nccd.edu.au).



#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
		When the school believes the level of adjustment has changed	
		Any student with evidence of educational adjustments for need associated with disability not previously included in the NCCD/Tasmanian Educational Adjustments Disability Funding model	
		All Kindergarten students receiving educational adjustments for need associated with disability	
		Any students who have a 'review' comment in the student with disability tab/ Disability Moderation General Report in SSS	
		When more information is required following a desktop review (e.g., the level of adjustment appears to have changed).	
		Moderation conversations involve confirming evidence of educational adjustments for need associated with disability and they involve considering the frequency and intensity of adjustments being made by the school.	
		Moderation conversations between schools and moderators occur between Week 7 of Term 1 and 31 July. The level of adjustment is agreed upon by 31 July which is used by DECYP to determine the funding allocation for the following school year.	
		The moderation process has changed since 2019. The intent of these changes was to improve the quality and consistency of the moderation process and to navigate challenges associated with COVID-19.	
4	Allocate funding and implement	Under the Fairer Funding Model (FFM) every school is allocated funding to support the delivery of differentiated learning practices. Students who are deemed through moderation as requiring higher levels of adjustment for needs associated with disability receive additional funding.	Under the DDA and the DSE, all schools have an obligation to ensure that students with disability have reasonable adjustments
	educational adjustments	Model funding contains a base allocation for every student funded through the model which includes a Support Teacher allocation and financial resource component which schools can use to support	made to participate in learning to achieve outcomes at school.
		students with disability at their discretion. A targeted financial resource allocation is also given to schools to support and make specific educational adjustments for students with disability moderated at the Substantial and Extensive levels.	This requires schools to ensure that the adjustments they provide to students with disability allows them to access education on
		Model funding is provided to schools in the school year after a level of adjustment is determined following moderation. This allows for the completion of school planning and resource allocation processes. Prior to receiving funding, schools receive a draft list of funding allocations under the	the same basis as students without disability.



#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
		model. This list will include the associated level of adjustment for each student with disability and funding provided associated with that level. Interim allocations also include estimates of the number of students transferring to other schools and the financial impact of this (e.g., Grade 6 to Grade 7). Final funding allocations are provided to schools in March/ April after the February student census has been completed. It is at the school's discretion to utilise funds for educational adjustments. DECYP provides guidelines on better practice adjustments for inclusive practice. Schools are not required to report on how the funding is utilised for adjustments.	
5	Review and update learning plans	Schools are required to review and update learning plans as outlined in the Learning Plan Procedure. Specifically, schools are required to: Review learning plans at least twice a year, including mid-year and year-end Update the learning plans in the SSS and report on learning outcomes against the SMART goals Share information from reviews with parents and carers.	Reviewing and updating learning plans allows schools to demonstrate their legal obligations under the DDA and the DSE to ensure the achievement of outcomes for students with disability. The NCCD also notes that while there is no set duration for the template in order to demonstrate this monitoring and review of adjustments, it is recommended that learnings plans are created at the start of the school year and reviewed at least once before the commencement of the third term (i.e. prior to the reference date in early August).
6	Imputed disability	A proportion of students included in the NCCD and the model have formal evidence of disability supported by medical or allied health professionals' diagnostic reports. However, there are cases where a student's disability has not been formally diagnosed and a school team 'imputes' disability for the purposes of the NCCD to receive funding for the educational adjustments they provide the student under the model. A school team will impute disability when it believes, based on reasonable grounds and supported by documented evidence, that undiagnosed disability is having a functional impact on the student's capacity to access and participate in education on the same basis as their peers and requires educational adjustments based on this in the classroom.	Under the NCCD, if an educational adjustment(s) is made for a student with imputed disability, they may meet the conditions for inclusion where: The student has been counted in the school's census for the relevant year The student's needs meet the DDA's definition of disability

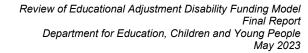


#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
		 The NCCD provides guidance around learning differences, learning difficulties, learning disabilities and the NCCD to help schools determine when to impute disability. The model has built additional layers on top of the NCCD obligations, and internal DECYP guidance procedures outline the following requirements to impute a disability: To be included based on imputed disability, evidence is required that a student needs educational adjustments due to disability, not other circumstances The documentation should provide indicators of imputed disability, including the teaching and educational adjustment(s) made, so that the student can access and participate in the learning on the same basis as their peers⁵. Examples of documentation that can be provided include assessments, observations of school, preliminary diagnoses from school psychologists and referral documentation Documentation should also include parental consent. This may take the form of a signed letter that a student be included for 12 months or until disability is confirmed If confirmation of disability is not received within 12 months, the student can continue to be imputed where appropriate. 	 The student has been provided with an adjustment(s) for a minimum of 10 weeks of schooling in the 12 months preceding census day 3 to address the functional impact of a disability; and The school holds supporting evidence collated over the relevant year, including assessed individual needs, adjustment(s) provided, ongoing monitoring and review of the adjustment(s), and consultation with the student and/or parents, guardians or carers, or associates⁵.

⁵ NCCD (2021) *Imputing disability for the NCCD*. <u>Imputing disability for the NCCD</u>.



#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
7	Applying for contingency	Schools can apply for contingency funding for the educational adjustments they provide students with disability who are in the following categories:	The contingency funding process allows schools to meet their legal obligations under
		Come from outside the Tasmanian Government school system, either from interstate, independent or Catholic school	the DDA and the DSE, and it allows them to provide reasonable adjustments where there is a change in school setting or significant
		Have started Kindergarten and have not been moderated at Early Childhood Intervention Service (ECIS)	change in levels of adjustment provided to a student with disability.
		Are returning from a significant time of disengagement	
		Have a significant change in need due to a medical condition requiring immediate or short-term adjustments.	
		Contingency applications should be submitted within 12 weeks of a student's enrolment or commencement date with the school, and they require the following documentation:	
		Evidence of disability	
		 Evidence of educational adjustments for a minimum of 10 weeks, including information about frequency and intensity documented in a learning plan, which can be provided by the previous school 	
		The previous NCCD level if the student was included.	
		Contingency applications are reviewed in week 7 of each term and funding is backdated to the date of enrolment or engagement.	
8	Transition points	Schools navigate several transition points for students with disability depending on their grade enrolment. These transition points include:	Under the DDA and the DSE, all schools have an obligation to ensure that students
		Early years to primary school	with disability can access and participate in education on the same basis as students
		Primary school to secondary school	without disability.
		Secondary school to college	





#	Process step	Tasmanian Educational Adjustments Model	Legislative obligations underpinning the Tasmanian approach
		Transitions between schools in different states and territories	
		Transitions between schools as a result in change in circumstances.	
		Students that have previously been moderated and received a level of adjustment should have a learning plan and evidence of adjustment when presenting to a receiver school to assist the receiver school in the transition.	
		Where a student with disability has not previously had a determined level of adjustment, receiver schools can either access contingency funding or put the student forward for moderation to obtain funding to provide educational adjustments.	

Source: KPMG analysis of DECYP, NCCD and DSE documents.



2.2 Education for children and young people with disability

Inclusive education

Contemporary approaches to education and disability have evolved significantly over the past 50 years to a rights-based approach that seeks to achieve equality and prevent discrimination, based on the *UN Declaration of the Rights of Persons with Disabilities*.

At the core is a commitment to inclusive education, which recognises the right of every child and young person, including children and young people with disability, to be included in general or mainstream education settings. Inclusive education involves adapting the environment and teaching approaches to ensure genuine and valued full participation of all children and young people. Inclusion is embedded in all aspects of school life, and is supported by culture, policies and everyday practices.

Inclusive education has been demonstrated to improve learning outcomes for all students, including social skills, academic achievement and personal development. Students with disability at mainstream schools are more likely to have higher academic achievements than those in segregated settings. International experience shows that parents are very likely to choose a mainstream school for their child with disability, particularly if they are confident that additional resources will be available.

Individualised supports

Contemporary approaches to supporting people with disability, including in education, ensure supports and services are highly individualised and specific to the needs of the person. An individualised approach involves placing the person at the centre and focussing on their individual strengths, needs, goals and aspirations. The person (and their family, where appropriate) is central to the planning of supports and decision-making about the design and delivery of those supports, and this ensures supports are tailored to their unique needs.

2.3 Disability policy context

Australia's Disability Strategy 2021-2031

Australia's Disability Strategy outlines Australia's vision for a more inclusive and accessible society where people with disability are equal members. Australia's Disability Strategy outlines activities to ensure all areas of public policy are inclusive and responsive to people with disability, and to improve outcomes for people with disability.

One of the seven Outcome Areas in Australia's Disability Strategy relates to 'Education and Learning', which consists of four Policy Priorities:

- Children with disability accessing and participating in high-quality early childhood education and care
- 2. Building capability in the delivery of inclusive education to improve educational outcomes for school students with disability
- 3. Improving pathways and accessibility to further education and training for people with disability
- 4. People with disability having increased opportunities to participate in accessible and inclusive lifelong learning.

Actions being undertaken to achieve Policy Priorities should be leveraged and any refinements to the model should align with key Policy Priorities (where relevant). The targeted action plan for Education and Learning is yet to be developed; however, the Early Childhood Action Plan references the development of online resources to promote initial dialogue between schools and families on



adjustments for children in their first year of school with needs consistent with autism. This action has been considered and is consistent with recommendations in this Review.

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

The Disability Royal Commission was established in April 2019 in response to community concern about reports of violence against, and the neglect, abuse and exploitation of, people with disability. The Disability Royal Commission has heard a range of evidence on the experiences and conditions of people with disability across a number of life domains, settings and contexts, including in education. These have included:

- Different viewpoints about the relationship between inclusive education and special/segregated education settings for students with disability, and the complexities around parental choice
- Difficulties in implementing inclusive practice in mainstream education settings
- Shortfalls in individualised planning and engagement, and instances where reasonable adjustments have not been provided
- Pressure on parents of students with disability to seek out a particular diagnosis to support access to additional, targeted funding and supports.

At the time of this Review, the Disability Royal Commission had yet to deliver its final report, which is due in September 2023. Governments, institutions and the community will consider the recommendations and their impact on state and territory service systems, including the Tasmanian education system, once the report is released.

The Independent Inquiry into the Department of Education's Responses to Child Sexual Abuse

The Inquiry investigated all DECYP responses to the management of historical allegations of child sexual abuse. The final report provided DECYP with recommendations for practical steps to continue to improve practices and provide children and young people with the strongest possible safeguards from the harm of abuse. DECYP has committed to responding to all 20 recommendations in full. The final report made recommendations related to implementing complaints processes for managing abuse within the school setting. A recommendation related to the handling of complaints about the model and inclusive practice has been highlighted in this report.

Commission of Inquiry into the Tasmanian Government's responses to Child Sexual Abuse in Institutional Settings

The Commission of Inquiry into the Tasmanian Government's responses to Child Sexual Abuse in Institutional Settings was established on 15 March 2021 by Order of the Governor of Tasmania. The Commission's inquiry has been focused on the Tasmanian Government's current responses to allegations and incidents of child sexual abuse in government institutions (e.g., hospitals, public schools, youth detention centres) and in non-government institutions where they receive funding from the Tasmanian Government to provide services on its behalf (e.g. out-of-home care). The Commission is directed to make any recommendations arising out of its inquiry that it considers appropriate, including recommendations about any policy, legislative, administrative or structural reforms. At the time of this Review, the Commission had yet to deliver its final report, which is due in August 2023. The Tasmania education system will be required to consider recommendations and their impact on state services, once the report is released.



3 Overview of the model

3.1 Educational Adjustments Funding Model

From 2020, DECYP implemented a new model to deliver resources to Tasmanian Government schools to support educational adjustments that they provide for students with disability. Educational adjustments reflect the assessed individual needs of the student and can be made in both the classroom and whole-school settings, as well as at an individual student level. Educational adjustments may involve a combination of:

- Addressing physical barriers, including modifications, to ensure access to buildings, facilities and services
- Modifying programs, and adapting curriculum delivery and assessment strategies
- Specialised technology or computer software or equipment
- Additional support, such as Teacher Assistants to assist with personal care or mobility
- · Providing ongoing consultancy support or professional learning and training for staff
- Provision of study notes or research materials in different formats
- Services such as sign language interpreters, visiting school teams or specialist support staff.



3.2 Underpinning principles

The model is guided by six key principles:

Figure 3-1 Educational Adjustment Disability Funding Model Underpinning Principles



Source: DECYP

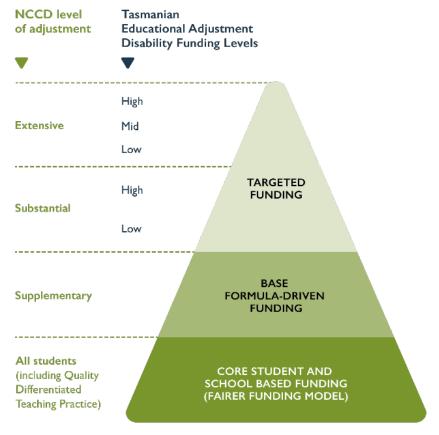
During the initial roll-out of the model, there was a seventh principle of 'transitional fairness' which has since been removed as it is not relevant to the ongoing implementation of the model.



3.3 Structure of the model

The model allocates resources (support teacher staffing and financial resource) to schools for each student with disability at the Supplementary, Substantial and Extensive levels of adjustment. Under the model, the number of resources allocated correlates with the frequency and intensity of support and educational adjustments provided by schools to each student with disability. Therefore, provision of more intensive and frequent support and adjustments to a student with disability attracts more resources than less frequent and intense adjustments. The model links with the NCCD levels of educational adjustment, but with extra levels of adjustment in Substantial and Extensive levels to differentiate between need (refer to Figure 3-2).

Figure 3-2 Educational Adjustment Disability Funding Model Structure



Source: DECYP

Other school funding

In addition to any Educational Adjustments funding received, all schools receive funding through the Fairer Funding Model (FFM). This allocation is intended to be sufficient to provide high-quality education to the student cohort. The FFM includes a base allocation in addition to specific loadings related to school size, geographic location and socio-economic status. FFM allocations are provided in two parts, as a monetary allocation and an allocation of teaching staff (FTE).



There are also a range of other programs and services in place to support students with disability, including:

- Transport Assistance Program
- Minor access works and building modifications
- Assistive technology
- Provision of Specialist Equipment
- Consultative Physiotherapy and Occupational Therapy Program
- Mediation and Liaison Services
- Competency-based assessment and training for DECYP school staff working with students with complex health care needs
- Tier 4 programs
- The Tasmanian eSchool.

3.4 Processes underpinning the model

As part of implementing the model, DECYP introduced processes to support schools to identify needs associated with disability and to determine levels of adjustment for students with disability. In accordance with NSRA, the processes developed by DECYP align to obligations under the NCCD and the DSE. This includes obligations under the DSE for each student to have a documented evidence of educational adjustments, make reasonable adjustments to the student's learning program and/or learning environment, and consult with the student or their parents or carers on the reasonable adjustments that will be provided. A detailed breakdown of these processes and their associated legislative obligations are outlined in *Table 2-1*.



4 Review findings

This section presents the findings from the review. Overall, the introduction of the model has meant a greater number of students are receiving funding. The introduction of the model has also generated positive outcomes for students with disability and contributed to a greater understanding of disability and the implementation of inclusive practice within schools (described further below). The majority of stakeholders described that the overall structure and principles of the model are sound, but there are opportunities to strengthen the processes underpinning the model to improve implementation and minimise administrative impact on schools (as described in Section 4.4). There are also range of external factors which are impacting the achievement of outcomes (as described in Section 4.2).

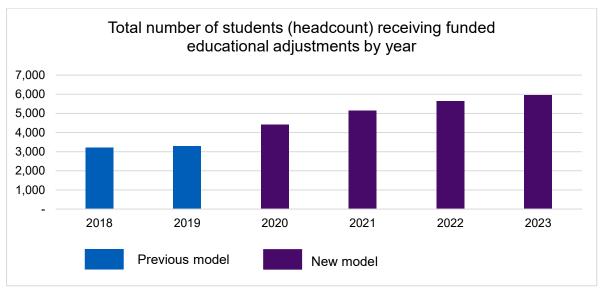
4.1 Outcomes

This sub-section presents findings from the review in relation to the outcomes achieved from implementation of the model.

4.1.1 Overall funding and students receiving funded educational adjustments from their school

There has been a significant increase in the number of students receiving funded educational adjustments from their school since the implementation of the new model. Data shows that 4,416 students with disability had a determined level of adjustment in the first year of implementation in 2020 in comparison to 3,275 in 2019 under the previous model (refer to Figure 4-1). This means that schools are being allocated funding to resource a greater number of educational adjustments they provide students with disability.

Figure 4-1 Total number of students with disability receiving funded educational adjustments from their school in Tasmania by year – 2018 to 2023



Source: DECYP





Students are now receiving funding who never have. The use of the funding allocation supports a broader range of disabilities. We are able to support more students." – School Support and Wellbeing Lead from a District High School

The amount of funding allocated by government to support schools to provide educational adjustments to students with disability has also increased since the introduction of the new model. The amount of disability funding allocated to schools increased by 46% between 2019 and 2023. The amount of disability funding allocated to schools has also increased over time (as presented in Figure 4-2).

Total amount of disability funding allocated to Tasmanian Government schools by year \$100,000,000 \$90,000,000 \$80,000,000 \$70,000,000 \$60,000,000 \$50,000,000 \$40,000,000 \$30,000,000 \$20,000,000 \$10,000,000 \$-2020 2022 2023

Figure 4-2 Total disability funding allocated to schools in Tasmania by year - 2018 to 2021

Source: DECYP

4.1.2 Awareness of inclusive practices for students with disability

Previous model

Financial resource allocation to schools

It was reported throughout the review that awareness of disability and inclusive practices for students with disability has improved across various stakeholder groups. The new model provides funding based on level of adjustment provided by the school rather than disability severity. Some stakeholders reported that the level of awareness and understanding of disability types and their impact on students' participation in the classroom setting and the inclusive practices required in the form of educational adjustments has increased with the shift in focus from disability type to need.

New model

■ Total Allocation

■Teaching FTE as \$



Case study 1: Weekly practice meetings

One school in Tasmania has implemented weekly practice meetings. Meetings are attended by classroom teachers, support teachers, in-house specialists and principals. The key purpose of the meetings being to:

- Share learnings in relation to different inclusive practices implemented
- Explore strategies to better meet the needs of students with a disability
- Identify opportunities for improvement in relation to how inclusive practice is being implemented across the school.

Meetings were reportedly helpful in building the skills and knowledge of school stakeholders in relation to inclusive practice and how to approach the various needs students with disability may have.

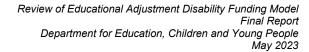
However, awareness and understanding of disability and its impact on student participation in classroom settings remain varied across schools. Most stakeholders reported that where students enter schools without an existing diagnosis or learning plan, teacher capacity and capability can impact the extent to which a student's needs are identified, and provided with appropriate educational adjustments. Examples were provided of a school identifying need associated with a disability for students without a learning plan and that have transitioned from another school, indicating that need for that student may have been missed by the previous school.

There is also room for improvement in disability awareness, particularly for 'hidden disabilities' that may require a more specialist understanding to identify in the school setting. Hidden disabilities include any disability not visible including intellectual and learning disabilities ⁶. The site visits found that the needs of some students with less obvious disabilities were not being identified or identification was delayed.

4.1.3 Oversight and accountability of educational adjustments for students with disability at a school level

With the introduction of the model and moderation process, evidence contained in learning plans directly links to the level of adjustment determined and subsequently funding provided. This change has introduced a level of independent oversight of learning plans as well as a greater level of accountability by schools for the information contained within the learning plans. In response to these changes, some schools have introduced whole-of-school processes and structures to identify and evidence educational adjustments. This has contributed to greater awareness and understanding of the model, its underpinning processes, and disability and inclusive practice generally across the whole school. In addition, in some schools, responsibility for the development of learning plans has shifted from the Support Teacher to the classroom teacher. This has contributed to improved understanding and awareness amongst classroom teachers, and therefore greater accountability by classroom teachers for the educational adjustments delivered in their classroom.

⁶ Disability Support Guide (2023) *What are the types of hidden disabilities?* What are the types of hidden disabilities? | Disability Support Guide.





Case study 2: Using data and inquiry to inform inclusive practice

One school in Tasmania has developed a process for Support Teachers to utilise data and inquiry by reviewing learning plans, collating and analysing data to improve the quality and consistency of plans and provide advice on adjustments. Meetings associated with this process were reportedly helpful in building the skills and knowledge of school stakeholders in relation to inclusive practice and how to approach the various needs students with disability may have.

More broadly, the introduction of the moderation process has led to improvements in the quality of information contained within learning plans in many schools.



The model allowed us to see we weren't disability ready so gave us opportunities to develop awareness in the classroom and implement strategies to learn." – Support Teacher

4.1.4 Adoption of inclusive practices by schools

The introduction of the model has led to the adoption of more inclusive practices by some schools. Examples were provided of schools and teachers going above and beyond to implement innovative, best practice adjustments for students with disability. Some schools described redesigning programs and timetabling for students with disability, as part of the implementation of the model, to enable students to remain in mainstream classroom settings.

Case study 3: Relationship building activities

One school in Tasmania has implemented formal and informal processes to build relationships between Support/classroom teachers and new/currently enrolled students with disability. Examples of these processes include peer engagement groups to facilitate and strengthen relationships between students with disability and their teachers as well as their peers. The purpose of these processes is to understand the unique strengths, interests and needs of these students. These insights were used to identify and implement suitable, individualised inclusive practices.

However, the extent to which inclusive practices are adopted and applied by schools is inconsistent. This was reportedly driven by varied levels of understanding in relation to how and when to utilise inclusive practices. For example, some schools reported using segregated classroom models e.g. 'learning centres', whereas other schools prioritised inclusion and implemented educational adjustments within the mainstream classroom setting.

In addition, the introduction of the model has had some unintended consequences. The Tasmanian Educational Adjustment Descriptor Tool (Descriptor Tool) supports schools to align identified need with frequency and intensity of educational adjustments to determine a level of adjustment for a student. However, examples were provided of schools determining the educational adjustments based on descriptions in the Descriptor Tool as opposed to student need in an attempt to access additional funding through higher levels of adjustment. For example, a student who may ordinarily require adjustments to the usual educational program at certain points in the week have had fully differentiated learning programs developed to obtain access to higher determined levels of adjustment.



4.1.5 Teacher workload and wellbeing

Most school stakeholders reported that the time investment required of staff to develop learning plans is significant and for the majority of teachers, creating and updating learning plans occurs outside of work hours. This finding is consistent with the 2020 Review of the DSE which identified that educators nationally face difficulties in finding time to consult with students, parents and carers and to develop learning plans⁷.

Learning plans have always been required by schools in Tasmania for students with disability. Learning plans are the Tasmanian Government's application of the DSE requirement for schools to evidence the reasonable adjustments provided to students with disability.

Therefore, while the introduction of the model and its underpinning processes has not established a new requirement, evidence contained in learning plans now directly links to the level of adjustment determined and subsequently funding provided. This has introduced a greater level of accountability by schools for the information contained within the learning plans.



The workload of writing and updating learning plans can be a big commitment whilst you are ensuring you are differentiating for all students." – Classroom Teacher

Reviews conducted by the DECYP in relation to learning plans have historically identified varied consistency and quality of learning plan documentation. With the introduction of the model and its underpinning processes, schools are motivated to improve the quality of the learning plans and prescriptiveness of evidence as it is directly linked to funding they are provided. For many schools, this has required a significant capability uplift amongst the workforce and increased workload for staff, particularly classroom teachers. The number of students with levels of adjustment above QDTP for need associated with disability and therefore requiring a learning plan has also increased under the model, further increasing workload (refer to Figure 4-1 which demonstrates the increase in students with disability with levels of adjustment above QDTP requiring a learning plan).

Some stakeholders reported that these changes have impacted staff wellbeing. It is important to note that the introduction of the model coincided with a range of broader changes to the education system and COVID-19 which are likely to have exacerbated these issues (refer to Section 4.2.4).

⁷ Department of Education, Skills and Employment (2020) *Disability Standards for Education 2005 – 2020 Review.* Final Report - 2020 Review of the Disability Standards for Education 2005.pdf



4.2 External factors impacting outcomes

There are a range of external factors which are impacting the outcomes achieved from the model. This sub-section presents findings in relation to these factors.

4.2.1 Workforce capacity and capability

The knowledge, experiences and capability of the workforce can impact the experiences of students with disability and the adoption of inclusive practices in schools. Under the DDA and the DSE, all schools have an obligation to ensure that students with disability have reasonable adjustments made to participate in learning and to achieve outcomes at school. To meet this obligation, classroom teachers, Support Teachers and school leadership need a strong understanding of disability and inclusive practice, how disability can impact the ability of students to engage in learning and what educational adjustments can be implemented to support learning in the classroom setting.

Furthermore, access to funding for educational adjustments provided under the model is critically tied to the knowledge and capability of staff. Under the model processes, learning plans and consultation with school staff through moderation meetings are used to determine level of adjustment. Therefore, classroom teachers and other support staff need to be able to adequately identify need associated with disability, determine the required educational adjustments to meet that need and adequately evidence them.

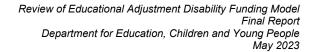
This review identified a range of examples of where students have had positive experiences of inclusive practices within schools. Examples were heard throughout the review from students with disability of attendance and engagement in school improving based on the educational adjustments provided to them by classroom teachers and Teacher Assistants. Examples of these adjustments included small group activities practicing new skills with other students or the use of assistive technologies to participate in classroom activities. Similar to findings from the 2020 Review of the DSE, stakeholders reported that these positive experiences were often underpinned by skilled and motivated school staff. However, the capacity and capability of teachers in relation to identifying need associated with disability is varied. The 2020 Review of the DSE found that while educators across Australia have a desire to deliver positive learning experiences for students with disability, not all educators have a strong awareness of their obligations under the DSE or how to implement them 8. Similarly, in Tasmania, not all school staff or teachers hold the relevant skills or understanding of disability to respond to student needs in the classroom. Thus, teacher capability has a range of impacts, including the level of funding a student receives and the quality of educational adjustments made in the classroom setting.

Role of Support Teachers

Support Teachers in particular play a critical role in the adoption of inclusive practice in schools and implementation of the model. Stakeholders provided examples of Support Teachers who had played a significant role in implementing the model, building the knowledge and skills of school staff in relation to inclusive practice and who's work had contributed to positive outcomes for students with disability.

Support Teachers do not always have a discrete role in schools. Schools are provided with an allocation as part of the model. It is at the discretion of the school as to how this role is used and schools may expand or utilise this role's FTE which can impact the intended support available through this allocation. This means Support Teachers hold varied skills, knowledge and capabilities. Some

⁸ Department of Education, Skills and Employment (2020) *Disability Standards for Education 2005 – 2020 Review.* Final Report - 2020 Review of the Disability Standards for Education 2005.pdf.





stakeholders reported that the current arrangements do not recognise the highly specialised nature of this role and the need for this role to have a specific role within the school structure.

Role of Teacher Assistants

Teacher Assistants often play an important role in the delivery of inclusive practices in school through their implementation of educational adjustments in the classroom setting. Some stakeholders reported that the expectations of Teacher Assistants and the complexity of the role has evolved over time and not all Teacher Assistants have the required skills or expertise to deliver educational adjustments in accordance with inclusive practice. In addition, there is limited opportunity for Teacher Assistants to participate in ongoing professional learning and development.

Teacher Assistants are required to obtain a Certificate in School Based Education Support prior to entering the workforce for the Kindergarten years. However for Teacher Assistants more broadly, there are no qualifications required.

Workforce capacity

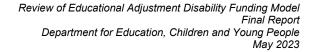
Workforce capacity also had a significant impact on outcomes achieved through the model. Workforce shortages are being experienced nationally, including in Tasmania, across the education and allied health sectors. Some school stakeholders reported that, due to staffing shortages and increased workload more broadly for teachers, schools may not create learning plans for all students with identified need associated with disability, particularly those that would have lower levels of adjustment determined. This means that not all students with need associated with disability have a determined level of adjustment and schools are not funded for their adjustments under the model. Shortages in allied health professionals including psychologists and paediatricians across Tasmania in some regions has led to long wait times for assessments and supports from these professionals. This also impacts the capacity and availability of professional support staff within schools, with greater impact in more remote and isolated settings.

4.2.2 Professional development, learning and capability building supports

Professional development, learning and supports can help build the capability of the workforce and the ability of schools to adopt a culture of inclusive practice. A student support model is in place in Tasmania which seeks to support schools and build capability to effectively implement the model 9. Under the student support model provided by DECYP, there are several supports available to schools to build capability, specifically:

- The Inclusive Practice Team who provide evidence-based teaching recommendations for diverse learning needs
- Inclusion Access Coordinators (IAC) who work with schools to determine access requirements for students with disability
- Support Teacher professional learning, including induction days and forums on a term-basis
- Disability-specific and inclusive practice online training
- Learning Plan and disability-specific professional learning on request
- Intranet pages, videos information sheets and resources for schools on the model and disability
- Targeted Support Partnerships with schools that require specific capability uplift

⁹ DECYP (2023) Student Support Model: Known, safe, well and learning. Tasmanian Government.





- Mentoring/coaching for Principals
- Suite of Good Teaching Guides, including Inclusive School and Inclusive Teaching, Differentiation and Trauma-Informed Practice.

School stakeholders reported that the supports delivered by DECYP had helped school staff to understand their obligations under the DSE, the model itself and how to deliver educational adjustments aligned to inclusive practices. However, the availability of these supports can be limited. For example, some school stakeholders described that the Inclusive Practice Team delivers valuable support to schools in assessing their maturity in relation to inclusive practice and they are helpful in identifying opportunities to improve school systems, processes and practices. However, not all schools are able to access this support to the same degree and some stakeholders reported that they would benefit from a greater intensity of support through these mechanisms.

4.2.3 Technology and data

Technology and data are widely acknowledged enablers to delivering learning outcomes for students with disability, supporting efficiencies in process and administration and supporting monitoring and evaluation of outcomes across the education system.

The review found that there are a range of factors related to technology and data that are impacting implementation of the model and broader monitoring and oversight of performance and outcomes under the model. These include:

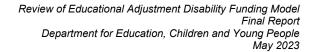
- There is varied practice by schools in terms of reviews and updates made to learning plan and the
 quality of information contained in learning plans. However, there is no formalised and streamlined
 mechanism for schools and DECYP to oversee and monitor this at a school and whole of system
 level to support continuous improvement.
- SMART goals are used to track a student's progress and can be a useful indicator to measure
 outcomes achieved for students and across the system. However, progress against SMART goals
 is only able to be monitored at an individual level.
- As described previously, stakeholders reported that the time investment required of staff to
 develop learning plans is significant and creating and reviewing learning plans occurs outside of
 work hours for the majority of teachers. Some teachers also experience challenges describing the
 educational adjustments delivered and the frequency and intensity of adjustments utilised. Both of
 these issues could be addressed through a streamlined, technology-based learning plan
 approach, which is understood at the time of this report to be under development.

4.2.4 Broader reform and COVID-19

The broader reform environment can both enable and constrain the successful implementation of policy. The introduction of the model coincided with a range of broader changes to the education system and COVID-19 which has impacted the implementation of the model and school stakeholders.

In Tasmania, there are a number of concurrent reforms and implementation of policy that intersect with the education sector. This includes the Disability Royal Commission, Australia's Disability Strategy, Inquiry into Child Sexual Abuse, the National School Reform Agreement, Tasmania's Bilateral Agreement as well as the various projects being undertaken by DECYP ¹⁰. This reform, to varying degrees, has required schools and their staff to understand and adapt systems, processes and practices and introduced new administrative requirements alongside changes to disability funding arrangements.

¹⁰ Jaensch, R. (2022) *Improving educational outcomes through significant investment*. Tasmanian Government.





COVID-19 had a significant impact on the workforce in the education sector in Tasmania. The lockdowns associated with the pandemic resulted in rapid transitions of the teaching environment in the pandemic, staffing shortages due to isolation requirements, and wellbeing impacts. Most school stakeholders reported that the workload associated with adapting to changes under the new model, broader reform and COVID-19 has been significant and impacted the wellbeing of staff.

Adaptations to the moderation process were also required during COVID-19 to meet the needs of students with disability as well as to address capacity issues in both schools and DECYP. As a result, understanding of the model and associated processes is influenced by varied practices over the COVID years (2020-2022). This has resulted in mixed understanding and perception of certain elements of the model processes, specifically evidence required, the learning plan process and moderation.

4.2.5 School leadership, governance and culture

School leadership, governance and culture have a direct impact on the outcomes for students with disability and the cultivation of an inclusive practice culture within a school. Good leadership, governance and culture also have broader benefits for the school as a whole and the quality of education delivered in schools. School leaders have an influence on the culture and structures of accountability within a school to engage with parents and implement quality teaching practices. Horizontal accountability structures are ensured when governance set by leadership allows for the involvement of the whole school community in inclusive education ¹¹. The enabler of school leadership, culture and governance was evidenced throughout the review as a key component of successful implementation of the model and positive outcomes for students with disability.

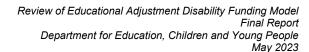
Case study 4: Features of schools successfully implementing the model

Schools in Tasmania who appeared to be successfully implementing the model and noted positive outcomes for students, appeared to have the following in common:

- Visible leaders: This included leaders being accessible, approachable and reliable. Visibility
 also involved two-way communication and engagement across all levels of a school to
 understand both the theory of the model and how practice was occurring on the ground.
- Collaborative and continuous improvement cultures: A collaborative culture enables shared responsibility for enacting strategies to achieve model priorities and fosters collective efficacy to drive learning and ongoing improvement.
- Accountable governance structures: Clear governance structures across a school ensures clear lines of authority, accountability and responsibility. This enabled issues to be escalated and resolved when required transparently.

Where leadership understood and was committed to inclusive practice, they ensured the right governance structures and culture were cultivated to enable this within the school. However, school leaders have varied capability in relation to inclusive practice and there are varied practices across schools in terms of governance and accountability for inclusive practice. Where there was a lower level of understanding of disability and inclusive practice, not all students with disability were identified and receiving reasonable adjustments. High quality leadership, governance and accountability ensured the right structures were in place, resourcing was adequate and a whole-of-school approach was taken to supporting students with disability.

¹¹ Santiago, P. and Cerna, L. (2020) Strength through Diversity: Education for Inclusive Societies. OECD.





4.2.6 Change management

Implementation of any new policy of funding approach such as this model requires careful communication, change management and capability building support with impacted stakeholders to enable the success of the implementation. DECYP conducted a range of activities to support schools to implement the model in 2019, including:

- Support teacher forums
- Intensive moderator support
- · Workshops run by DECYP with schools
- Resources including videos, information sheets and the Descriptor Tool.

However, the scale of change required under such a model is significant and requires time. The time taken to achieve the system change required with the implementation of this model has also been impacted by the disruption caused by COVID-19. A range of methods and approaches are needed to build the ongoing change of practice and skills required in schools to support the model. The review found that, in the future, there is a need to maintain ongoing communications and engagement about the model processes on a yearly basis, changes in the model and inclusive practice. This will ensure the sustainment of change amidst workforce turnover and adaptations to the model.



4.3 Principles and structure

This sub-section presents findings from the review in relation to the model's principles and structure.

4.3.1 Principles and practice

As discussed in *Section 3.2*, the Model is guided by six key principles: equity and fairness, accountability, promote inclusive education practice, transparency and simplicity, integrity in needs assessment and financial sustainability. There was an initial seventh principle of *'transitional fairness'* which has since been removed as it is not relevant to the ongoing implementation of the model. There was broad acceptance of the principles by stakeholders. However, the extent to which practice reflects the principles is inconsistent across schools. For example:

- Promotion of inclusive education practice: Some stakeholders reported instances where schools
 utilise non-inclusive practices to access higher tiers of funding. For example, providing a fully
 differentiated learning program for a student to illustrate higher levels of intensity and frequency of
 adjustment intensity, where a student would ordinarily benefit from moderate adjustments to their
 learning program.
- *Transparency and simplicity:* Some stakeholders reported that the decisions made by DECYP regarding resource allocation are not always clear and transparent.

4.3.2 The Descriptor Tool

The Descriptor Tool is used to support school staff and moderators to understand and make decisions about the levels of adjustment for students with disability. The review identified findings in relation to the usage of the Descriptor Tool, interpretation of language within the tool and the ability of the tool to capture need. Overall, stakeholders reported that the Descriptor Tool acts as a useful guide for both school staff and moderators to use to make decisions in relation to the determined level of adjustment for students with disability, however some minor modifications could be made to improve usability. These are discussed below.

Usage of the Descriptor Tool

Some stakeholders reported the Descriptor Tool is a useful guide to support schools to engage in discussions and make decisions in relation to the determined level of adjustment for students with disability. From a moderator's perspective, the Descriptor Tool helps direct moderation discussions regarding educational adjustments required and adjustment resourcing. School stakeholders also reported the Descriptor Tool supports them to identify appropriate ways to evidence adjustments being implemented, for the purposes of moderation.

Although readily accessible, some stakeholders consulted as part of this review were not aware of the Descriptor Tool. Anecdotally, this can impact the quality of information contained in learning plans to support moderation and therefore the level of adjustment determined.

Terminology and interpretation

Some stakeholders noted that some language within the Descriptor Tool is open to interpretation, for example the meaning of 'considerable' vs. 'highly structured' vs. 'explicit'. This can impact the ability of schools to identify and evidence the level of adjustment.

In addition, as previously mentioned, examples were provided of schools determining the educational adjustments based on descriptions as opposed to student need in an attempt to evidence higher levels of adjustment and subsequently funding.



Capturing the spectrum of student need

Some students may require the quantum of support under the highest tier but do not meet all of the elements of the educational adjustments described for that level. For example, some stakeholders described that a student is required to have a physical disability in order to meet the educational adjustments required for the highest tier. However, some students, for example students with autism, may require the level of funding attributed to the highest tier but do not meet the Descriptor Tool threshold. Stakeholders suggested that some students need to receive the highest level of adjustment and the Descriptor Tool needs to facilitate access to that level for students who do not have a physical disability.

4.3.3 Refinements to the model

There have been a number of refinements made to the model structure since 2019. These refinements include introducing a pro rata approach to awarding targeted funding in some cases, refining funding allocations for students with diabetes and the introduction of block funding to Tier 4 programs, Tasmanian eSchool and funding for Support Schools. Overall, stakeholder feedback on the refinements to the model was limited. The refinements made to the model appear to be addressing the unique contexts of specific school settings and for certain students, noting some specific process changes have been identified.

Findings in relation to these refinements are detailed in Table 4-1 below.

Table 4-1 Refinements to the model

Refinement	Description	Findings
Pro-rata approach to awarding targeted funding	Student enrolment/attendance FTE is confirmed as a part of the moderation process. Funding allocation to resource educational adjustments for students with a part time enrolment are calculated pro rata, on a case-by-case basis. Students with significantly decreased attendance, both with and without formal part time enrolments in place, are considered for pro rata funding. Budget and Resources Services staff support this process by manually overriding the automatic funding allocation in the budget system and providing pro rata funds as agreed by the moderator. Targeted funding is adjusted in line with attendance rates.	 Some stakeholders reported that the pro rata approach to awarding targeted funding has increased equity across the model. The funds originally being held by schools (where a student does not attend school and therefore is unable to be supported) are being redistributed to other students with identified needs associated with disability. Moderators reported that the approach to implementing this refinement is inconsistent as a result of: Limited data and tracking processes to determine the attendance rates of students. This means moderators rely on the goodwill of schools to inform them when students have informal attendance arrangements. Schools incorrectly using learning plans to document part-time attendance. The procedure outlines that schools are able to include temporary part-time attendance provisions within a student's learning plan. However, in practice, schools are continuing to use learning plans to document part-time attendance requirements as opposed to submitting formal applications to DECYP.



Refinement	Description	Findings
Funding for students with diabetes (only)	Some students with diabetes only require adjustments that relate to managing their medical condition (e.g., adult support with blood glucose checking). These students are supported by a staff member with relevant training (e.g. Administration staff or Teacher Assistant) and do not require additional support for learning from the Support Teacher. Budget and Resources Services staff override the automated funding allocation to schools in the budget system, and instead manually allocate funding based on the following basis: • For students moderated at the level of Supplementary adjustments, the funding is calculated at 4.5 times the base financial resource allocation amount • For students moderated at the level of Low Substantial adjustments, the funding is calculated at eight times the base financial resource allocation amount.	Commentary by stakeholders as part of this review regarding this refinement was limited. However, the diabetes refinement was introduced in response to feedback received from schools that Support Teacher allocations are not required for these students and instead required funding to employ Teacher Assistants or administrative staff to support students with completing health care, e.g., monitoring glucose levels.
Tier 4 programs	The Tier 4 program is a re-engagement provision that is designed to ensure that every young person accesses, participates and engages in learning to successfully pursue life opportunities. The program is available to students in years 7 to 10. All learners participating in the Tier 4 re-engagement provision must remain enrolled with their home/referring school. Block funding is allocated to Tier 4 programs from a central state-wide budget, based on a fixed estimate of 50 students with disability engaging across all programs in a school year. As DECYP are unable to be determine how many students will engage at the commencement of the school year, students referred to a Tier 4 provision are funded, on a pro rata basis, from the home/referring School Resource Package. This funding supports student access, participation and engagement and includes any Educational Adjustment Support funding.	Commentary by stakeholders as part of this review regarding this refinement was limited. However, desktop review by KPMG has identified that there is an opportunity to improve how the Tier 4 program is aligned with broader approaches to disability funding and inclusive practice.
eSchool	Tasmanian eSchool is a government co-educational school, catering for students from Kindergarten to Year 12	The transition between eSchool to the mainstream schooling system was noted as



Pofinoment	Description	Findings
Refinement	 Who meet the criteria of currently being unable to attend a mainstream school. Students access eSchool programs in two ways: Through 'enrolment' Through 'registration' by a base school. The school aims to develop excellence in learning outcomes for students through the provision of blended and personalised online learning. Block funding is based on: A fixed estimate of 95 students with disability enrolled at eSchool in the calendar year 4.5 x annual base financial resource 2.2 FTE base grade teacher staffing Students not receiving targeted funding or a per student staffing allocation. 	Findings a particularly difficult transition. When a student enters eSchool, they are funded in a different manner through a block funding arrangement. This is because of the structure of the program and the way in which it is delivered. When a student returns to the mainstream system, their funding returns to the previous level which is not always sufficient as the educational adjustments a student requires may have changed. As a result, schools are required to either apply for contingency or resource adjustments from other school funding until moderation can be completed the following year, if the adjustment needs are different.
Support	Within the Tasmanian Government school system, there are three Support Schools that eligible students with disability may nominate to attend through the Nomination for Enrolment at a Support School Procedure. Prior to Term 1, Week 3, the Moderation team confirm that all students enrolled in a Support School for kindergarten or from a school or educational setting outside of DECYP, have had a contingency moderation completed and SwD tab created. Moderation processes and procedures for Support Schools are the same as at Local Schools. However, it is especially important that the Moderator understands the 'usual school processes' for each context (e.g., higher staff-to-student ratio) to ensure consistency in decision-making. In the instance where students have a dual enrolment with a Support school and a local school, generally the school with the largest FTE undertakes the moderation process.	Commentary by stakeholders as part of this review regarding this refinement was limited.



Refinement	Description	Findings
	Support schools are funded based on "active" status enrolments at the February census date. Schools receive 6 x the annual base financial resource. Targeted funding is at reduced levels to regular schools (as a reflection of economies of scale).	
Small school loading	A loading of a minimum Educational Adjustments staffing allocation of 0.4 FTE is provided for schools with a lower number of census students receiving Educational Adjustments funding has been included as a refinement to the model. This is in particular in cases where the majority of students have a level of adjustment above the Supplementary level of adjustment. To qualify for this adjustment, a school needs 10 or less students eligible for Educational Adjustments funding and of those 10, more than 50% need to have a level of adjustment of Substantial or Extensive.	 Stakeholders from small schools noted that at times they face challenges in resourcing the educational adjustments for new students that have entered their school without funded educational adjustments. Small schools can also experience challenges with attracting and retaining school staff, including staff with skills, experience and understanding of inclusive practice.



4.4 Process and Implementation

This sub-section presents findings from the review in relation to the processes underpinning the model and implementation of the model by schools. Eight key process components underpin the model. These components are illustrated in Figure 4-3.

Figure 4-3 Process components



Source: KPMG



4.4.1 Identify need associated with a disability

Practice in schools

There are a range of people in a school who are responsible for identifying the needs of students with disability. In some schools, Support Teachers play a more active role in identifying need while in others, this role is undertaken by classroom teachers. Parents and carers also take an active role in identifying need associated with disability for students through active advocacy and engagement with the school.

Findings

A number of findings were identified in relation to this process component. These findings are described below.

Unclear roles and responsibilities

As described above, there are a range of individuals in schools who play a shared role in identifying the needs of students with disability. However, most stakeholders reported that the roles and responsibilities of each school stakeholder in the identification of student need associated with disability is not always clearly defined or well understood and can vary across school contexts. As a result, there is variation in how schools identify needs associated with disability and, in some instances, the needs of some students with disability are being missed or are going unrecognised.

Teacher capacity and capability

Teachers have varying levels of capacity and capability to identify need associated with disability. Most stakeholders reported that where students enter schools without an existing diagnosis or level of adjustment, teacher capacity and capability can impact the extent to which a student's needs are identified, appropriate educational adjustments provided, evidenced and moderated and subsequent level of adjustment determined under the model.

Presentation of need

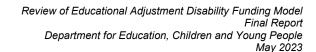
The needs of students with disability present differently within the school setting. Some stakeholders reported that behavioural needs associated with disability are at times 'easier' to identify. Students with hidden disabilities, e.g., associated with dysgraphia, can be more difficult to identify and therefore their need can be missed, or interventions delayed.

4.4.2 Determine educational adjustments and document in learning plan

Practice in schools

The stakeholder(s) responsible for determining educational adjustments and developing learning plans differs across schools. In some schools, Support Teachers are responsible for determining educational adjustments and developing learning plans with the input of classroom teachers and School Support and Wellbeing Leads. In other schools, determining educational adjustments is the responsibility of classroom teachers (in accordance with DECYP guidelines) with the input of Support Teachers (to varying degrees). Professional Support Staff and external professionals, e.g. school psychologist, social workers, and independent specialists, may also contribute to determining adjustments and developing learning plans.

Under the DSE, schools are required to consult with students and parents and carers on reasonable adjustments, which in Tasmania is through the development of the learning plan. Only a small number of schools described engaging with students. Where engagement is occurring, students participate in parent/teacher meetings to provide input on their goals. Comparatively, the majority of schools





reported engaging with parents and carers on student goals and learning plan content. The level of communication with parents and carers often aligns with the level of adjustment a student requires, with greater engagement for students with more frequent and intense adjustments. Some parents and carers described that their engagement with schools had been positive and consultations with teachers and other school staff had enabled them to understand their child's learning needs, to input into educational adjustments being adopted and to support their child's learning outside of the school setting. However, not all parents and carers consulted as part of this review felt satisfied with the consultation process. In a small number of instances, parents and carers were not involved in the process. Parents and carers noted they are unaware of the escalation pathways they can follow when they are not engaged by schools.

Findings

A number of findings were identified in relation to determining educational adjustments and the learning plan process. These findings are described below.

Workforce capability

There is varied capability amongst Support and classroom teachers to identify appropriate educational adjustments and evidence them in learning plans. Some stakeholders noted that teachers had experienced challenges describing the educational adjustments delivered and the frequency and intensity of adjustments utilised.

Professional support staff have inconsistent involvement in this process and noted that the process would benefit from their increased involvement. There is also varied utilisation of Inclusive Practice Coaches who provide specialist advise on the process, where required.

Workload for schools

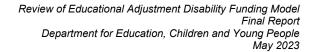
As noted previously, while the introduction of the model and its underpinning processes has not established a new requirement, evidence contained in learning plans now directly links to the level of adjustment determined and subsequently funding provided. This has introduced a greater level of accountability by schools for the information contained within the learning plans. With the introduction of the model and its underpinning processes, schools are motivated to improve the quality of the learning plans and prescriptiveness of evidence as it is directly linked to funding they are provided. For many schools, this has required a significant capability uplift amongst the workforce and increased workload for staff, particularly classroom teachers.

Deficit language

Some stakeholders reported that the introduction of the model and the use of evidence of educational adjustments in learning plans to determine a level of adjustment and subsequent funding allocation, has led to a shift from strengths-based to deficit-based language in learning plans. DECYP stakeholders noted that deficit language was used to evidence need in the prior model and may have influenced current perceptions around language. In some instances, deficit-language prevents schools from sharing learning plans with parents, due to concerns regarding how information will be perceived.

Accountability

As previously noted, the introduction of the moderation process has introduced a level of independent oversight of learning plans and, therefore, a greater level of accountability by schools for the information contained within the learning plans. In response to these changes, some schools have introduced whole-of-school processes and structures to appropriately evidence educational adjustments provided to students with disability (see Case Study 2 for example). Some schools noted the learning plan provides a useful mechanism for Support Teachers and school leadership to monitor and provide advice on the adjustments made for students with disability and their outcomes, ensuring they are meeting their obligations under the DDA and the DSE. It was also seen as a useful





communication mechanism for parents and carers to collaborate on goals and demonstrate the adjustments being made in the classroom.



We've seen an increase in the accountability of teachers here with understanding of the purpose of learning plans and it has been really great at putting accountability on educators for inclusive practice." – Primary school Support Teacher

4.4.3 Moderation

Moderation in practice

As described in *Table 2-1*, evidence of the educational adjustments schools are providing to students with disability are moderated every year by the moderation team to support schools to determine a level of adjustment. However, the moderation process differs depending on whether a) the student is receiving new educational adjustments or has had changes in the level of educational adjustments they are receiving or b) the student already has a determined level of adjustment which has not changed. This has been done in response to school workload concerns, where the moderation process has been refined over the years since the model was implemented to reduce the number of students that need to be discussed with school teams, and therefore the time required to undertake moderation.

There has also been a number of changes to the moderation process since 2019. The intent of these changes was to improve the quality and consistency of the moderation process and to navigate challenges associated with COVID-19. Modifications to the moderation process included:

- In 2019, the moderation team worked with schools to ensure the right level of evidence of
 educational adjustments was captured in learning plans for the first year of moderation. Some
 schools shared detailed evidence such as photographs and videos from the classroom setting,
 noting this information was not required by DECYP, but was a solution for evidence of adjustments
 in place where these were not documented in Learning Plans.
- In 2020, as a result of adapted processes in response to COVID-19, only instances of new
 educational adjustments being provided to students with disability or changes in the level of
 educational adjustments provided were moderated, while other students received a consistent
 level of adjustment determined in the previous year's moderation process.
- In 2021, the process ran as it was intended as per policies and procedures.
- In 2022, as a result of adapted processes in response to COVID-19, only instances of new educational adjustments being provided to students with disability or changes in the level of educational adjustments provided were moderated, while other students received a consistent level of adjustment determined in the previous year's moderation process. Imputing disability was limited in this year due to resourcing and time constraints within the moderation team who had been seconded to support other DECYP priorities for part of the year.

Findings

A number of findings were identified in relation to the moderation process. These findings are described below.

Consistency

Moderators are required to support schools in making decisions regarding the levels of adjustment for students with disability. The process involves assessing evidence submitted by schools regarding the



educational adjustments provided to students with disability as well as evidence of disability. The substance of evidence varies and, at times, can be complex. Moderators require understanding of how to interpret documentation from diagnosing professionals (e.g. paediatrician, psychologist) and when to seek advice if aspects of this documentation is not clear. Moderators have diverse backgrounds and professional skillsets, which can influence how evidence is reviewed and considered. Some school stakeholders reported that these issues have at times impacted the consistency of moderation outcomes. However, there are internal processes in place to support moderators to discuss and agree on levels of adjustment for students (including those with more complex needs), which supports consistency of decision making. This includes implementing a team moderation approach for complex decisions and cross-checking moderation decisions as a team for consistency and equity in decision-making. Moderators are also able to facilitate discussions with schools in different ways, and therefore these reports may be influenced by the different styles adopted by moderators.

Feedback

Moderators are able to provide advice or feedback to schools on the process and how to best document evidence of adjustments within learning plans. However, providing advice on the quality of adjustments is not in scope for their role. While moderators are responsible for providing feedback to schools to build capability, moderators described that due to workload there is often insufficient time to provide timely feedback during moderation. This was supported by schools who reported that they do not always receive feedback on learning plans and noted the potential learning benefit it could present.

Determining recorded levels of adjustment for students

Moderators review learning plans to make decisions regarding levels of adjustment for students which impacts the funding allocation provided to schools. Decisions are determined by the frequency and intensity of educational adjustments described in learning plans, which are aligned to the Descriptor Tool. Schools reported that the ability of school staff to describe educational adjustments within learning plans impacts the decisions made by moderators regarding levels of adjustment and therefore funding for educational adjustments provided. For example, a student's need for adjustments may be comparable to a student with Low Substantial levels of adjustment. However if a school is unable to articulate / evidence the adjustments they are making, a student may be categorised in a lower level. The intent is for moderators to verbally discuss adjustments with schools or bring these cases back to the team if they felt the school had difficulty articulating evidence of adjustments to ensure equitable decisions are made.

Moderation outcomes

When schools are dissatisfied with moderation outcomes, they can contact the moderators or moderation team to raise their concerns. DECYP's current complaints mechanism is to review decisions made by DECYP government schools with no formal mechanism for complaints against decisions made by DECYP Business Units ¹². There is also currently no formal complaints management process to collect data, monitor outcomes and provide feedback. Schools noted they would benefit from a more formal and accountability-driven feedback process in the future.

¹² DECYP (2023) *Complaints – Schools and CFLCs*. <u>Complaints - Schools and CFLCs - The Department for</u> Education, Children and Young People Tasmania (decyp.tas.gov.au)



4.4.4 Allocate funding and implement educational adjustments

Practice in schools

The approach taken by schools to allocate and utilise funding varies across the state. These approaches are detailed below.

Approach to allocation

Stakeholders described two approaches to allocating funding:

- Collaborative discussions are held between Principals, Assistant Principals, Support Teachers, School Business Managers (SBM) and School Support and Wellbeing Leads. Discussions involve determining how best to allocate funds to maximise resourcing for educational adjustments for all students with identified need associated with disability.
- Decisions on how funding is used is at the discretion of SBMs or Support Teachers. In these
 instances, other school stakeholders, for example Principals, are not included in the decision
 making process.

Utilisation of funds

Funds can be used by schools in a variety of ways. The majority of schools use funding for Teacher Assistants; however some schools utilise funding to increase classroom or Support Teacher allocations. A small amount of funding is also used by schools for assistive technology, adapting infrastructure to support students to access classroom settings and in-classroom tools, for example wobble boards and fidget spinners. Notably, schools are not required to report to DECYP on how funding is used at the completion of the school year.

Findings

A number of findings were identified in relation to allocating funding and implementing adjustments. These findings are described below.

Isolated decision making

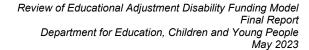
As noted, in some schools, SBMs are solely responsible for allocating funds. Stakeholders reported that, in some instances, SBMs are allocating funding and making decisions on how funding is used in isolation of leadership and Support Teachers. This has meant that funding is not always being utilised in a way that supports inclusive practice for students with disability.

Funding allocation timing

As discussed, for students with newly identified educational adjustments or changes in adjustments required, model funding is not allocated until the following school year in March or April. The lag often results in schools needing to fund adjustments out of other 'buckets' of funding. For example, existing educational adjustments funding allocations or FFM allocations. Most stakeholders reported the financial pressure resulting from this and, in some instances, having to make difficult decisions regarding where to source funding. However, there are also instances where the educational adjustments provided to a student with disability may decrease throughout the school year and schools can flexibly use the resources provided through the model to support students with new or increasing educational adjustments for needs associated with disability.

Varied implementation of adjustments

Implementation of educational adjustments varies across schools. Examples were provided of schools and teachers going above and beyond to implement innovative, best practice adjustments for students. For example, educating themselves beyond professional learning offered on how best to implement adjustments for need associated with specific disability types.





However, not all schools adopt better practice approaches to inclusive practice. School culture, leadership, governance and staff capability in particular impact the extent to which a school is able to implement educational adjustments aligned to inclusive practice. For example, staff in particular require support and quarantined time to build capability in relation to inclusive practices and educational adjustments. Where support and quarantined time is not provided, staff can find it difficult to implement innovative, best practice adjustments for students. Parents and carers noted in the review that they find it difficult to raise complaints where they are dissatisfied with educational adjustments provided for students with disability or poor practice in the classroom setting.

4.4.5 Review and update learning plans

Practice in schools

The extent and way in which learning plans are reviewed and updated varies amongst schools. Variation exists in relation to:

- **Timing and data collection:** Some schools review and update learning plans regularly, up to three times a year, based on data collected. However, other schools or teachers within schools only review learning plans once a year and do not collect data to inform revisions.
- **Engagement with students and parents:** Some schools engage with parents and students when reviewing and updating plans, while others do not. Some schools also use reporting milestones as an opportunity to keep parents engaged with their child's progress.

Findings

A number of findings were identified in relation to reviewing and updating learning plans. These findings are described below.

Illustration of progression

As part of developing learning plans, teachers are required to develop SMART (Specific, Measurable, Achievable, Relevant, Timebound) goals aligned to the curriculum. Stakeholders provided examples of evaluating, reporting and/or commenting on the student's progress against the learning plan SMART goals. These processes are used to illustrate changes in a student's progression throughout a school year. Illustrating change is important when it comes to schools effectively developing future goals for students.

Utilisation of learning plans

Learning plans are intended to act as a live document to track student progress and should be updated in accordance with changing levels of adjustment and achievement of goals. However, not all learning plans are being utilised as intended. Instead, in some instances, plans are only being updated once a year or not at all. This anecdotally suggests there may be some students who are progressing and/or requiring updates to their plans in relation to support requirements and goals, which are not being completed. It is anticipated that this process may be supported efficiently through the learning plan updates DECYP is currently progressing including the new Learning Plan Module that is in development through the Case Management Platform.



Case study 5: Learning plan teaching tool

One school in Tasmania has developed a template which places the learning plan goals and educational adjustments in a weekly teaching calendar. This allows classroom teachers at the school to plan lessons for the week around the differentiation required in the classroom whilst ensuring students with disability are meeting their goals. Classroom teachers complete these weekly plans at the end of each week for the following week which the Support Teacher can then view to ensure educational adjustments are being implemented in the classroom.

4.4.6 Imputed disability

Practice in schools

As discussed in *Table 2-1*, there are cases where a student's disability has not been formally diagnosed and a school team 'imputes' disability. A school will discuss with their moderator to impute disability when it believes, based on reasonable grounds, that undiagnosed disability is having a functional impact on the student's capacity to access and participate in education on the same basis as their peers. From a school perspective obtaining evidence for imputed disability involves:

- Gathering information: Schools collect information in relation to adjustments being provided for the student to address their assessed needs associated with disability this includes support provided within quality differentiated practice. Examples of evidence that can be provided include records of behaviour incidents, reading assessments, numeracy assessments, school-based observations, notes from parent meetings, behaviour support plans, safety plans and health plans. Gathering information may also include schools referring students for external assessments. Both school teams, particularly school psychologists, Principals, classroom teachers and Support Teachers, and parents and carers are involved in coordinating required assessments. Parents and carers can choose to access assessments either publicly or privately.
- Seeking parental or carer consent: Parental or carer consent is needed to include a student on the
 basis of imputed disability. A mature minor can also provide this for themselves where able to
 provide informed consent. Typically, this consists of a signed letter from the family/carer that states
 that they consent for the student to be included for 12 months or until a disability is confirmed. In
 some cases, where the consenting adult prefers to provide consent verbally, they do so to a
 school staff member who records this in SSS.

Findings

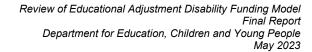
A number of findings were identified in relation to imputed disability pathway. These findings are described below.

Awareness of imputed disability pathway

There is varied awareness of the imputed disability pathway amongst schools. DECYP adaptations to the moderation process, due to the COVID-19 pandemic, are likely to have impacted the awareness amongst school stakeholders.

Schools that were aware of the pathway have had varying levels of success in receiving a level of adjustment and subsequent funding provided for the educational adjustments they provide for the student with disability. The NCCD website describes the importance of correctly differentiating between learning differences, learning difficulties and learning disabilities in the classroom to avoid assumptive disability diagnosis ¹³. DECYP stakeholders noted that some students that have not

¹³ NCCD (2023) Learning differences, learning difficulties, learning disabilities and the NCCD. <u>Learning</u> differences, learning difficulties, learning disabilities and the NCCD - Nationally Consistent Collection of Data.





obtained funding through the imputed disability pathway presented with needs associated with other areas such as trauma, transience and other social factors.

Some schools unsuccessful in progressing a student through the imputed disability pathway reported not engaging with the process in subsequent years.

Evidence requirements

There is a lack of clarity amongst school stakeholders about the type of evidence required by DECYP for the imputed disability pathway. For example, some stakeholders noted they needed to demonstrate a student was on the 'pathway to diagnosis' by demonstrating that a child has accessed specialists, or a preliminary assessment has been conducted. This is driven by:

- Changes to the moderation process which have meant that students have not been considered under the imputed disability pathway in some years
- Some schools reported that moderators have communicated to schools that students require a diagnosis to access funding
- DECYP guidelines do not appear to specify evidence requirements for imputed disability.

Access to assessments

One of the main forms of evidence utilised to evidence disability is an assessment from a relevant professional. Access to assessments however, and therefore diagnoses for students, can be challenging for a range of reasons. For example:

- Supply restraints: The limited supply of specialists leaves people waiting up to 24 months to access assessments
- Associated costs: The costs associated with private specialists prohibits some people from accessing assessments
- Parent willingness: The willingness of parents to engage with schools and accept diagnosis, especially for families from refugee backgrounds, prevents them from accessing assessments.

Capacity and practices of Professional Support Staff

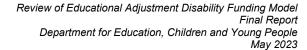
Some schools have access to in-house specialists in the form of Professional Support Staff, for example school psychologists. Professional Support Staff are able to conduct preliminary assessments, make diagnoses for some disabilities e.g., ADHD and support the collection of evidence associated with a disability. The capacity of specialists however is limited and not all specialists have the skills to assess for all disabilities. This increases the demand for external assessments and broader access issues for other support services for the broader student population.

4.4.7 Applying for contingency

Practice in schools

The contingency process, including the application form, has been refined significantly over the last four years in response to feedback from schools. Currently, contingency funding is available to support the educational adjustments provided to transitioning students where students:

- Come from outside the Tasmanian government school system either from interstate, independent or Catholic school
- Have started Kindergarten and have not been moderated at ECIS
- Are returning from a significant time of disengagement





 Have a significant change the level of adjustments required due to a medical condition requiring immediate or short-term adjustments.

Contingency applications will be considered on a case-by-case basis, if submitted within 12 weeks of the student's enrolment/commencement date. If eligible, targeted Educational Adjustment funding will be backdated to this date.

A contingency panel reviews submissions in Week 7 of each term. Requests can be submitted at any time and should be submitted no later than the week before the panel meeting, to allow time for moderators to review the documentation provided and ask for further information if needed. Schools collect the following documentation as a part of the contingency application:

- Evidence of disability (e.g., paediatrician report/letter, psychologist diagnostic report)
- Evidence that demonstrates adjustments have been provided for a minimum of 10 weeks during the previous 12 months (e.g., learning plan from previous school) where available
- Previous level of adjustment in the NCCD on school students with disability, if the student was included in this
- Information regarding intensity and frequency of educational adjustments in the current school setting, as documented in the Learning Plan.

Students already in a Tasmanian Government school who have been identified as requiring educational adjustments for needs associated with disability during the year are not eligible for contingency support and must wait until the school's moderation process during the year. In these instances, schools provide adjustments for students based on their need even if they are yet to be resourced for these adjustments under the model.

Findings

A number of findings were identified in relation to contingency funding. These findings are described below.

Awareness of contingency funding arrangements

The majority of stakeholders reported that the contingency funding process is appropriate and allows schools to be responsive to resource educational adjustments provided to students transitioning to their school. However, not all stakeholders were aware of the process or how to apply for contingency funding. Some school stakeholders noted that they do not have capacity to complete the contingency funding application within the 12 weeks of a student's school commencement. In some instances, this can mean that some schools are not accessing funding for the educational adjustments they are providing students with disability when they transition to their school.

Contingency funding criteria

New or additional educational adjustments a student with disability requires may be identified when transitioning between schools in the public system or between years. Where this occurs at the beginning of a school year, and moderators determine a student's level of adjustment, the school is provided funding in the following school year. Similarly, for students who transition to the school after the moderation process has occurred within the public school system, schools are unable to receive funding for the educational adjustments they provide these students with disability until the following school year. This means schools may need to fund educational adjustments within existing resource allocations. The majority of stakeholders reported that delays in accessing funding impacts their ability to deliver educational adjustments or delays investment in other areas.



4.4.8 Transition points

Practice in schools

There are several points of transition for a student, including between early years and primary school, between primary and secondary school, secondary school to college, between schools in different states and territories and between non-government schools. The response by schools differs between these transition points, these differences are described below:

- Pre-kinder to kinder transition: Prior to starting school, some children access ECIS. ECIS is responsible for providing early years support for children with developmental delay and/or disability 14. However, some students start school without having been supported and/or moderated via ECIS information. In these instances, schools are required to put students through the standard contingency application process in the first term of the Kindergarten year i.e. identify need, determine educational adjustments, and gather and document evidence.
- Year 6 to 7 transition and Year 10 to college: A proportion of students transitioning from Year 6 to 7 or Year 10 to college with needs associated with a disability already have a determined level of adjustment under the model, while some students with these needs do not (e.g., because the previous school has not identified needs or previously put the child forward for moderation). Where students have a determined level of adjustment, the receiver schools are alerted of the students transition and level of adjustment. In these instances, the receiver schools:
 - Collect student information and documentation from the feeder school. This information could include numeracy and literacy assessments, learning plans, etc.
 - Undertake transition processes in place with feeder schools or other schools in their catchment (where they exist). Processes included orientation days, sending teachers to the feeder school to meet students and giving opportunities for students to experience their new schools before the school year begins.

Case study 6: Transition activities between schools

Schools across Tasmania have established beneficial relationships with schools in their area that students frequently transition to or from. Some of the activities implemented to help transition students include:

- Orientation days for students to visit the new school and get used to the new built environment and teaching staff
- Transition of partial classes to the new school setting for the final term of school for students with disability
- Transition of the Support Teachers with the students with disability to the new school for a period of time
- Regular contact between the two Support Teachers and parents and carers to discuss any
 changing educational adjustment needs for the student with disability in their new environment.
- Between states and territories and non-government schools: Where students join schools from other states or non-government schools mid-year, schools are able to apply for contingency funding (described in Section 4.4.7).

¹⁴ DECYP (2023) *Early Childhood Intervention Services (ECIS)*. <u>Early Childhood Intervention Service (ECIS)</u> - The Department for Education, Children and Young People Tasmania (decyp.tas.gov.au).



Findings

A number of findings were identified in relation to transition. These findings are described below.

Changes in need and adjustments requirements

Transition points change the level of adjustment required for a student with disability as they enter a new environment or context. A student's level of adjustment is determined in one setting, and these adjustments are not necessarily the same or appropriate in new settings that students transition to. As a result there can be a greater need for schools to review educational adjustments provided and then gather and document evidence to allow for the educational adjustments provided to a student with disability to be assessed as part of the moderation process. As discussed, even where a level of adjustment is determined through moderation, delays in the provision of funding to the following school year can have impacts on a school's ability to resource and deliver educational adjustments, noting obligations under the DSE.

Pre-kinder transition

Students with additional needs who do not engage with ECIS prior to starting school are not subject to pre-school moderation processes and, as a result, start school without a determined level of adjustment and subsequent funding allocation provided to the school. This can create significant workloads for schools to ensure they have sufficient evidence for the moderation process. Where the process is successful however, schools are required to wait until the following school year to be provided funds. Contingency funding can be accessed for this cohort of kinder students (to receive funding prior to the following school year) however, stakeholders reported difficulties in accessing this funding as a result of the evidence requirements.

Year 6 to Year 7 transition

The transition from year 6 to 7 was noted as particularly challenging for schools and students. Students go from having one teacher to up to seven teachers and seven different learning environments. The change in setting is often associated with a change in the level of adjustment a student with disability requires. Teachers reported being stretched to gather and document the required information within the required time period to prepare for moderation. Additionally, even where moderation applications are submitted and successful, delays in the provision of funding impacts a school's ability to resource educational adjustments or delays investment in other areas.

College transition

Stakeholders reported that in some instances, students with need associated with disability transition to college without any determined level of adjustment. It was reported that this is often because the feeder secondary school has not to identified or responded to needs associated with disability. In these instances, teachers are required to gather and document the relevant information for moderation. Most stakeholders noted that even where successful, delays in the provision of funding means educational adjustments provided to students with disability are only funded for the three terms they have remaining in the school system. Departmental stakeholders also reported that many students transition to college from non-government secondary schools, this creates a significant number of contingency applications for colleges.

Transition processes

As noted, some schools have established relationships with feeder schools to support transition points. Where there are no established relationships and transition processes between schools, this can impact a school's ability to effectively plan and prepare for a student's transition. This can impact on how resources are planned for the school year as well as a school to adequately resource educational adjustments when a student first arrives at a school.



5 Recommendations

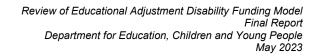
A series of 12 recommendations have been developed which outline the key actions for DECYP to uplift the model's implementation and outcomes in Tasmania.

Recommendations have been developed based on the findings identified through this review and seek to address key themes and issues which are currently impacting the model's implementation. This includes:

- · School leadership, governance and culture, and workforce capability
- · Engagement, communications and guidelines
- Processes underpinning the model
- Transitional funding arrangements.

Table 5-1 Overview of recommendations

Theme	Recommendations
School leadership, governance and culture, and workforce capability	 DECYP should consider designing and delivering a learning program to uplift capability on inclusive practice, leadership, culture and governance in schools.
	2. DECYP should consider developing a Workforce Capability Framework to ensure the workforce is equipped with the knowledge, skills and attributes to deliver inclusive practice in schools.
	3. DECYP should consider expanding the Inclusive Practice Coaching team to increase their ability to provide support to schools on inclusive practice.
Engagement, communications and guidelines	DECYP should consider reviewing the intersect between the Mid and High Extensive levels of adjustment and expanding the glossary within the Descriptor Tool.
	 DECYP should consider reviewing and refreshing existing guidance for schools on how to identify need associated with disability, the processes underpinning the model and inclusive practice.
	 DECYP should consider strengthening its engagement activities with schools on inclusive practice and the processes underpinning the model to improve awareness and understanding at schools.
	7. DECYP should consider reviewing and strengthening its existing complaints processes to ensure there is a clear and transparent mechanism for schools to raise complaints and provide feedback relating to the model and for parents and carers to raise complaints and provide feedback relating to practice within schools and the educational adjustments students with disability are receiving from the school.





Processes underpinning the model	 DECYP should consider reviewing and updating learning plan templates to enhance the technological functionality and usability of learning plans for schools and DECYP.
	 DECYP should consider exploring ways to improve capacity to support and provide feedback to schools on how to improve learning plans and educational adjustments.
Transitional funding arrangements	 DECYP should consider investigating options to provide additional support to schools to support the transition of students with disability between primary school and high school.
	 DECYP should consider exploring the viability of expanding contingency funding to resource schools for students with newly identified or increased need associated with disability.
	 DECYP should consider exploring alternative funding arrangements for educational adjustments provided for students with disability in Kindergarten.



5.1 School leadership, governance and culture, and workforce capability

The following recommendations relate to uplifting the leadership, governance and culture of schools and strengthening the capability of the workforce to embed inclusive practice and implement the model

Recommendation 1: Consider designing and delivering a learning program to uplift capability on inclusive practice, leadership, culture and governance in schools.

DECYP should consider designing and delivering a learning program targeted at building the capability of school leaders in inclusive practice, leadership, culture and governance. The program could focus on:

- School leader obligations under the DSE for inclusive practice and providing educational adjustments for students with disability
- The model and the role of school leaders in implementing the model
- Roles and responsibilities of school stakeholders in implementing the model and how school leaders can keep stakeholders accountable for these responsibilities
- Better practice governance and accountability approaches in schools and how good governance can support inclusive practice and quality education
- · Building leadership capabilities
- Best practice inclusive practice in schools including case studies and examples from schools across Tasmania
- Building a culture of inclusive practice in schools and the key elements associated with a culture of inclusive practice
- Data collection and reporting practice in relation to inclusive practice and the model.

The learning program could initially be used to uplift capability of school leaders across Tasmania and used on an ongoing basis as part of formal induction programs for new school leaders. Consideration could be given to delivering multi-modal learning, which includes opportunities for school leaders to learn as a school group and connect with leaders across the state.

Rationale for recommendation

- School culture, leadership and governance has a significant impact on the extent to which a school is able to implement educational adjustments aligned to inclusive practice.
- School leaders have varied capability in terms of inclusive practice and implementing the model.
- Horizontal accountability structures are ensured when governance set by leadership allows for the involvement of the whole school community in inclusive education ¹⁵.
- School leadership, governance and culture has broader benefits for the outcomes of all students and the delivery of quality education.
- There are varied practices across school leaders in terms of governance and accountability for inclusive practice within schools.

¹⁵ Santiago, P. and Cerna, L. (2020) Strength through Diversity: Education for Inclusive Societies. OECD.



Risk and benefits

Benefits

- Improved leadership, governance and culture will have a direct impact on outcomes for students with disability
- Improved governance and culture within schools will have broader benefits for all students and staff
- More effective implementation of the model and capability amongst all school stakeholders as a result of shared learnings from school leaders
- More capable and highly trained school leaders to support inclusive practice across schools.

Risks

- School leaders may not have the capacity to participate in the program
- The training may require regular updates as school contexts and better practice inclusive practice changes over time.



Recommendation 2: Consider developing a Workforce Capability Framework for Inclusive Practice

DECYP should consider developing a Workforce Capability Framework to ensure the workforce is equipped with the knowledge, skills and attributes to deliver inclusive practice in schools. The Workforce Capability Framework could include:

- A set of capabilities for each segment of the workforce which articulates the skills, knowledge and attributes required of the workforce to deliver inclusive practice
- Role profiles for each segment of the workforce in relation to inclusive practice. In developing role
 profiles for the workforce, DECYP could review the roles of Support Teachers and Teacher
 Assistants, including required skills and expertise, to ensure there is alignment with current and
 future duties. DECYP could also consider including specificity in the role profile for Support
 Teachers around it being a specialist role and explore whether Support Teachers should be
 included in school leadership teams
- Defining new career pathways for roles such as Support Teachers in recognition of the highly specialised nature of the role. These pathways could be linked with the reframed role profiles and capability areas
- Consideration of accountability mechanisms that could be implemented in role profiles. For example, including a Performance and Development Plan goal aligned to building inclusive practice for Principals
- Review of existing workforce professional development, training, communities of practice and capability building programs
- Identification of actions to strengthen existing or introduce new initiatives to build the capability of the workforce against the new framework.

Rationale for recommendation

- The knowledge, experiences and capability of the workforce can impact the experiences of students with disability and the adoption of inclusive practices in schools
- This Review identified a range of examples of where students have had
 positive experiences of inclusive practices within schools. Similar to findings
 from the 2020 Review of the DSE, stakeholders reported that these positive
 experiences were often underpinned by skilled and motivated school staff.
 However, the capacity and capability of teachers in relation to identifying need
 associated with disability is varied.
- Support Teachers play a critical role in the adoption of inclusive practice in schools. Support Teachers do not have a discrete role in schools. Schools are provided with a discrete allocation as part of the model. It is at the discretion of the school as to how this role is used and schools may expand or subsume this role's FTE. This means Support Teachers hold varied skills, knowledge and capabilities. Some stakeholders reported that the current arrangements do not recognise the highly specialised nature of this role and the need for this role to have a specific role within the school structure.
- Teacher Assistants play a critical role in the delivery of inclusive practices in school through their implementation of educational adjustments in the classroom setting. Some stakeholders reported that the expectations of Teacher Assistants and the complexity of the role has evolved over time and not all Teacher Assistants have the required skills or expertise to deliver educational adjustments in accordance with inclusive practice. In addition, there is limited opportunity for Teacher Assistants to participate in ongoing professional learning and development.



	 The approach taken to allocating funding varies by schools and in some cases, funding is allocated at the sole discretion of School Business Managers only. 	
	 Not all School Business Managers have an appropriate level of understanding of inclusive practice to make best practice decisions around funding allocations. 	
	 As part of the development of a Workforce Capability Framework, DECYP could consider broader review of governance, management and support structures for the workforce to ensure the workforce is supported to execute its role consistently. 	
Risk and benefits	Benefits	
	Increase capability of workforce to respond to needs of students with disability	
	Improved attraction and retention of staff with new career pathways	
	 More holistic and aligned supports to build capability across the workforce in the future. 	
	Process decisions will better reflect inclusive practice	
	Resource allocation decisions will reflect the multi-disciplinary skills and knowledge of a number of stakeholders, rather than a few.	
	Risks	
	Potential for significant redesign work of some workforce profiles	
	Significant capability uplift likely to be required which will need to be accompanied by investment in new initiatives.	



Recommendation 3: Consider expanding the Inclusive Practice Coaching team

DECYP should consider expanding the Inclusive Practice Coaching team to increase their ability to provide support to schools on inclusive practice. This could include:

- Understanding the level of unmet demand at a school level for capability building supports. This
 could be completed through consultation with Principals, the Moderation team and through review
 of results from data collection activities
- Assessing workload of the workforce against demand
- Reviewing skills, experience and professional development needs of Inclusive Practice Coaches to ensure they are able to respond to the needs of schools.

Rationale for recommendation	 School stakeholders have varying levels of capability in relation to inclusive practice which impacts their ability to identify need associated with disability, determine and document educational adjustments, and deliver inclusive practice. 	
	This can impact the level of funding a school receives, and the quality of educational adjustments provided to students with disability.	
	The Inclusive Practice Coaches provide important supports to schools to ensure inclusive practice for students with disability. However, there are capacity constraints on the Coaches to be able to provide timely and responsive support.	
Risk and benefits	Benefits	
	Greater capacity in the Inclusive Practice Coach team to respond to the needs of schools. Risks	
	RISKS	
	 There are current teacher shortages in Tasmania which may make it difficult to expand the team given the role profile of Inclusive Practice Coaches. 	



5.2 Engagement, communications and guidelines

The following recommendations relate to the engagement, communications and guidelines provided by DECYP to schools to effectively implement the model.

Recommendation 4: Consider reviewing and strengthening the Descriptor Tool.

DECYP should consider reviewing the intersect between the Mid and High Extensive levels of adjustment and expanding the glossary within the Descriptor Tool. The purpose of this review is to explore how to best capture the frequency and intensity of educational adjustments for the entire spectrum of needs associated with disability under the Mid and High Extensive levels of adjustment and to better define and create shared understanding about certain terms such as 'considerable', 'highly structured' and 'explicit'. DECYP could undertake the following activities as part of this review:

- Review the types of adjustments required by students with highly individualised support needs
 associated with disability and who are not currently eligible for support under Mid and High
 Extensive. This would include understanding the frequency and intensity of adjustments required
 for these students.
- Conduct a gap analysis of the Mid and High Extensive levels of adjustment description of the Descriptor Tool to understand the description of educational adjustments that would best reflect this level of adjustment.
- Assess the feasibility of expanding this category to appropriately support these students as per the legislative obligations of schools.
- If agreed, consider updating the Descriptor Tool to reflect the new eligibility for the Mid and High Extensive levels of adjustment in schools.
- Undertake a communications and engagement exercise to communicate to build understanding of changes made to the Descriptor Tool as a result of this recommendation within schools.

Where relevant, the glossary could include examples in order to increase the level of understanding amongst schools. An annual review of glossary could also be undertaken to identify terms which require further clarification and areas of improvement.

Rationale for recommendation

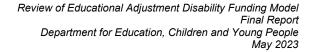
- Under the Descriptor Tool, to be eligible for funding under Mid and High Extensive levels of adjustment, evidence must be provided of educational adjustments across all domains at all times including teaching and learning, communication, access, health and full personal care support needs (mobility, toileting, communication, meal management and at times medical intervention)¹⁶.
- However, some students who require full-time personalised support in accordance with the frequency and intensity of educational adjustments under these levels of adjustment do not require support across all of these domains. This means for students who have an equivalent level of need for adjustments as the Mid and High Extensive levels of adjustment, schools are not receiving funding for the level of adjustments they provide these students.
- Students currently require personal care adjustments in order to meet the eligibility for the Mid and High Extensive levels of adjustment.

¹⁶ DECYP (2023) Tasmanian Educational Adjustment Descriptor Tool. Tasmanian Government.



	To address this issue, some states such as Queensland have adopted an 'Extensive Plus' category which provides a high-level of funding to schools for students with disability who require highly individualised adjustments in three of four of the domains 17.
	The glossary currently contains a number of terms relating to educational adjustments.
	Some language in the Descriptor Tool is open to interpretation, especially relating to describing the frequency and intensity of adjustments.
	This can impact the ability of schools to determine and evidence the frequency and intensity of those adjustments, and therefore receive resourcing in accordance with student need associated with disability.
Risk and benefits	Benefits
	Students with higher needs associated with disability for educational adjustments will receive the correct level of adjustment under the Descriptor Tool.
	There will be greater understanding by DECYP of the quantum of need within schools at the Mid and High Extensive levels of adjustment.
	A shared understanding amongst stakeholders about how to correctly evidence frequency and intensity of supports
	Efficiencies in the moderation process as evidence documentation is improved.
	Risks
	Expanding eligibility could result in 'category creep' i.e. upward movement of students across all levels of the Descriptor Tool. This would have a significant fiscal impact
	Any expansion of eligibility will require additional investment by government, require financial modelling.
	DECYP will need to consider how the principle of financial sustainability can be maintained through these changes.

¹⁷ Department of Education (2023) *Students with disability – Reasonable adjustments resourcing: Information for students and families.* Queensland Government.





Recommendation 5: Consider reviewing and refreshing existing guidance on identifying and evidencing student need, inclusive practice and the processes underpinning the model including the imputed disability pathway

DECYP should consider reviewing and refreshing existing guidance for schools on how to identify need associated with disability, the processes underpinning the model and inclusive practice. The guidance could include:

- · Common signs and presentations which may indicate a student has need associated with disability
- A pathway that articulates what steps a school may take when need associated with disability has been identified
- Articulation of the roles and responsibilities associated with this pathway, including:
 - Involvement of professional support staff and the support teacher alongside the classroom teacher
 - Engagement with the parent or carer
 - Engagement with external professionals.
- How to make and evidence educational adjustments to communicate to all involved parties as well as prepare for moderation
- Detailed guidance around the imputed disability pathway, including:
 - The evidence requirements to impute disability, including specific examples
 - The engagement that is required with the parent or carer to receive consent to impute disability
 - Clarification around the team moderation process that is undertaken to impute disability for transparency.
- The roles and responsibilities of each stakeholder involved in the processes underpinning the model
- Guidance for School Business Managers and broader school stakeholders on how funding allocation decisions should be made including reference to decisions being made through a multidisciplinary approach
- Guidance around how different forms of resourcing can be leveraged to maximise the funding provided for educational adjustments in line with inclusive practice guidance
- The level of evidence and timeline required for moderation and examples of how this can be documented in the learning plan
- The moderation team's processes for reaching a decision including the team moderation approach
- How schools can engage with the moderation team or inclusive practice team to receive support to undertake the processes underpinning the model and raise concerns
- The process schools can undertake when they are dissatisfied with moderation outcomes

Release of revised guidance could be supported by communications and engagement activities with all school stakeholders (in accordance with *Recommendation 6*), including:

• A summary of the guidance as well as links to guidance documentation



- Links to DSE modules to refresh understanding around DSE obligations
- Links to other relevant documentation that provides guidance, for example the *Knowing our Students as Learners* guidance from the Australia Institute for Teaching and School Leadership (AITSL)¹⁸.

·		
Rationale for recommendation	The roles and responsibilities of each of different school stakeholders in the identification of student need associated with disability is not always clearly defined or well understood.	
	As a result, there is variation in how schools identify needs and in some instances the needs of some students with disability are being missed or are going unrecognised.	
	Teachers have varying levels of capacity and capability to identify need associated with disability.	
	Current DECYP guidance does not contain information on the steps schools should take when there is a newly identified need associated with disability in the classroom.	
	Not all schools are aware of what evidence is required to impute disability and the process underpinning this pathway.	
Risk and benefits	Benefits	
	Schools are equipped to identify and respond to needs associated with disability in the classroom setting.	
	Appropriate governance structures and personnel are involved in responding to need associated with disability.	
	Better access to funding for schools to provide educational adjustments to students who have need associated with disability, including those who are awaiting formal evidence of disability.	
	Risks	
	Clarification of the requirements associated with imputing disability could result in a large number of students accessing the imputed disability pathway and have an impact on the students as well as a fiscal impact.	

¹⁸ AITSL (2023) Teacher Standards. Teacher Standards (aitsl.edu.au)



Recommendation 6: Consider strengthening engagement activities with schools to improve understanding of inclusive practice and the processes underpinning the model

DECYP should consider strengthening its engagement activities with schools on inclusive practice and the processes underpinning the model to improve awareness and understanding at schools. It is recommended these activities are undertaken with all school stakeholders that interact with the implementation of the model, including classroom teachers, Support Teachers, School Business Managers and school leaders as well as broader sector stakeholders such as Unions. This could include consideration of:

- The channels of communications to ensure the channels are pervasive and meet the needs of relevant stakeholders. This could include channels such as roadshows, forums, email, videos and factsheets to ensure information is accessible to a range of needs.
- The target of communications to identify which stakeholders need to know specific information and the way they like to receive this information.
- Links to relevant resources This could include links to the DSE modules and training relating to the process.

Engagement activities could focus on the elements of inclusive practice and the processes underpinning the model identified under Recommendation 5.

Rationale for recommendation	 Information is shared with specific school stakeholders, such as Support Teachers or Principals, which may not be disseminated back to the wider school stakeholder group.
	 Implementation of educational adjustments is varied depending on understanding of inclusive practice and who is involved in resourcing decision- making.
	 There is a varied level of understanding of the moderation process by schools. This has been exacerbated by the adaptations to the moderation process in response to COVID-19.
	 There is varied practice amongst schools in terms of preparing for the moderation process.
	Transparency in terms of how moderation decisions are reached could be improved, including on the team moderation approach adopted by DECYP.
	Schools are unaware of the steps that can be undertaken when they are dissatisfied with moderation outcomes.
Risk and benefits	Benefits
	Improved understanding of the moderation process by schools.
	 Greater satisfaction amongst schools in terms of the transparency of the moderation process.
	Greater rapport built between moderators and schools.
	 Reduced workload burden for schools and moderators as a result of improved adoption of the process.
	Risks
	Engagement will need to be ongoing to ensure sustainability of understanding.
	Engagement will need to be tailored to recognise those who have a long association with the model in comparison to those who are newer to the

model's implementation, to ensure the right level of engagement.



Recommendation 7: Consider reviewing and strengthening complaints processes for schools and parents and carers

DECYP should consider reviewing and strengthening its existing complaints processes to ensure there is a clear and transparent mechanism for schools to raise complaints and provide feedback relating to the model and for parents and carers to raise complaints and provide feedback relating to practice within schools and the educational adjustments students with disability are receiving from the school. The following elements could be considered in a revised complaints process:

- Complaints mechanisms that allow for escalation of issues related to decisions made by schools, relating to educational adjustments provided for students with disability, for parents and carers as well as decisions made by DECYP for schools
- A case management system that could be used to manage and respond to complaints to provide accountability, tracking and data collection of complaints that are raised across the system
- Clear guidelines could be made available around how complaints are managed and pathways to outcomes for schools and parents and carers
- Data collection and monitoring processes could be established to feed insights from complaints processes into broader policy and practice across the system.

Rationale for recommendation	Existing complaints mechanisms within DECYP are for decisions made by Tasmanian Government schools only, not for decisions made by DECYP business units ¹⁹ .	
	Parents and carers noted in the review that they find it difficult to raise complaints where they are dissatisfied with educational adjustments provided for students with disability or poor practice in the classroom setting.	
	 Schools noted in the review that they find it difficult to raise complaints about decisions and outcomes relating to the model beyond the moderation team itself. 	
	Strong processes that respond to complaints to ensure outcomes for children are consistent with Standard 6 of the Tasmanian Child and Youth Safe Standards ²⁰ .	
	 Improving complaints processes are in line with Recommendation 2 of the 2020 review of the DSE²¹. 	
	Data collected through complaints mechanisms can help inform innovations, capability-building and communications to improve implementation of the model.	
Risk and benefits	Benefits	
	Better identification and response to issues related to the model	
	Improved relationships and trust between parents, schools and DECYP	
	Improved ability to identify and respond to system-wide issues.	
	Risks	

¹⁹ DECYP (2023) *Complaints – Schools and CFLCS*. <u>Complaints - Schools and CFLCs - The Department for Education</u>, <u>Children and Young People Tasmania (decyp.tas.gov.au)</u>.

²⁰ Department of Justice (2023) *Child and Youth Safe Standards*. <u>Child and Youth Safe Standards</u> (justice.tas.gov.au).

²¹ Department of Education, Skills and Employment (2020) *Disability Standards for Education 2005: 2020 Review.* Final Report - 2020 Review of the Disability Standards for Education 2005.



- Volume of complaints from improved processes may outweigh capacity of DECYP to respond to complaints.
- Complaints need to be triaged effectively to ensure they are resolved in an
 efficient and effective manner and by the best channels to respond.



5.3 Processes underpinning the model

The following recommendations relate to improving the processes schools undertake to implement the model.

Recommendation 8: Consider reviewing and enhancing technological functionality of learning plans to enhance usability

DECYP should consider reviewing and updating learning plan templates to enhance the technological functionality and usability of learning plans for schools and DECYP. This should be done in alignment with the current work DECYP has underway to review and update the learning plan process through a new Case Management Platform. The following steps could be undertaken to support this work:

- Review of the learning plan template to ensure the fields associated in the learning plans are
 fit-for-purpose and are an effective tool for teaching, monitoring student outcomes, engaging with
 parents and carers and determining levels of adjustment through the moderation process
- Incorporate a technology-based repository of types of educational adjustments into the learning plan template, using strengths-based language and with options for frequency and intensity, to enable schools to readily populate learning plans and build understanding of educational adjustments
- Ensure the learning plans have content restrictions around the amount of documentation that can be incorporated within certain fields to ensure information is targeted, succinct and fit-for-purpose
- Build a technology capability to enable DECYP to monitor reviews and updates to learning plans across the education system
- Review the learning plan guidance to ensure it aligns with updates to the learning plan templates and provides specific examples for learning plan content to help guide schools
- Communicate and engage with school stakeholders on the updated template, guidance and roles
 and responsibilities associated with the learning plan process to ensure effectively manage the
 change.

Rationale for recommendation	While the development of learning plans for students with disability was a requirement under the previous model, the introduction of the new model and moderation process has created an impetus for schools to improve the quality and consistency of information. In addition, the number of students with disability on learning plans above the QDTP level has increased, which has increased workload for schools. Learning plan templates have not been reviewed in some time.	
	 Schools reported that language contained in learning plans can at times focus on deficits as opposed to strengths or educational adjustments. 	
	Some teachers experience challenges describing the educational adjustments delivered and the frequency and intensity of adjustments utilised.	
	Not all schools consistently review and update learning plans in accordance with DECYP's Learning Plan Procedure.	
Risk and benefits	Benefits	
	Improved efficiency and effectiveness in the development of learning plans leading to more consistent and appropriate moderation outcomes for students.	



- Reduced workload for classroom teachers.
- Reduced workload for Support Teachers and moderators to address gaps in learning plans for moderation.

Risks

- Greater automation and pre-population in the learning plan template could fail to capture the spectrum and individuality of need in the cohort of students with disability.
- Examples used in learning plan guidance need to be encompassing of a range of different levels of need and contexts that schools experience.



Recommendation 9: Explore ways to improve capacity to provide support and feedback to schools regarding learning plans and educational adjustments.

DECYP should consider exploring ways to improve capacity to support and provide feedback to schools on how to improve learning plans and educational adjustments. Some options to do this include:

- Reviewing the FTE of the moderator team to ensure capacity to provide feedback and support adequately.
- Consider formalising accountability structures and processes between the Moderation Team and the Inclusive Practice Team so that schools identified by the Moderation Team as requiring more intensive capability building support are referred to the Inclusive Practice Team.
- Consider case management solutions from DECYP teams to providing support and feedback to schools.

Rationale for recommendation	The scope of the moderator's role is to provide capability building and feedback on the moderation process and documentation of evidence in learning plans. However, moderators have limited capacity to provide advice to schools on the moderation process and how to best document evidence of adjustments to schools.		
	 Moderators are unable to provide advice on the quality of adjustments or inclusive practice even though they may collate useful observations on these in their roles. 		
	 Moderation decisions are influenced by the quality of information and evidence provided by schools. 		
	Stakeholder understanding of the learning plan process and educational adjustments is varied.		
	The moderator team and Inclusive Practice Coaches collate useful information as they are supporting schools which may assist each team in building the capability of the school.		
Risk and benefits	Benefits		
	Improved awareness and understanding of inclusive practices and the learning plan process and educational adjustments amongst schools.		
	Capability will be built in school to determine optimal levels of adjustment and therefore improve outcomes for students with disability as well as attracting additional funding to resource the adjustments they make.		
	Greater connection between the moderator and Inclusive Practice Team will enable efficiencies in capability-building in schools.		
	Risks		
	Role expectations need to be clearly defined to ensure role creep does not occur for moderators which may further exacerbate capacity constraints, as well as ensuring other roles do not assume moderator duties.		
	This recommendation needs to be implemented alongside Recommendation 3.		
	There are current teacher shortages in Tasmania which may make it difficult to expand the team given the role profile of moderators.		



5.4 Transitional funding arrangements

The following recommendations relate to enhancing the transitional funding arrangements to support students transition settings.

Recommendation 10: Consider investigating options to provide additional support to schools during the primary to secondary school transition

DECYP should consider investigating options to provide additional support to schools to support the transition of students with disability between primary school and high school. Options could include but are not limited to:

- Expand contingency funding to enable schools to apply for adjustments to determined levels of adjustment for students as they enter high school
- Block funding either through financial resource or staffing component to provide additional resourcing to schools to support transition activities
- Targeted capability building support from Inclusive Practice Coaches or equivalent.

A feasibility study could be conducted to explore relative costs, benefits and impact of each option on students, schools and DECYP.

Rationale for recommendation	 The transition from year 6 to 7 was noted as particularly challenging for schools and students. For example, students go from having one teacher to up to 7 teachers and 7 different learning environments. The change in setting is often associated with a change in student need associated with disability and therefore the adjustments they require. Teachers reported being stretched to gather and document the required information within the required 10-week period to prepare for moderation. Additionally, even where moderation applications are submitted and successful, delays in accessing funding impacts a school's resources for educational adjustments or delays investment in other areas. 		
	DECYP provides a range of supports to schools to build capability in relation to inclusive practice, however the availability of these supports is varied.		
Risk and benefits	Benefits		
	Students are better supported during key transition points in school.		
	Schools are adequately resourced to identify need and deliver educational adjustments in Year 7.		
	Risks		
	Workforce shortages exist in a range of professions across the state. Careful consideration will need to be given to recruitment of any new positions required as part of this recommendation.		



Recommendation 11: Explore the viability of expanding contingency funding to resource schools for students with newly identified or increased need associated with disability

DECYP should consider exploring the viability of expanding contingency funding eligibility criteria to enable schools to apply for funding to resource educational adjustments for students with newly identified or increased need associated with disability. This work could involve:

- Conducting analysis to understand the quantum of students who may be eligible under such revisions
- Review of existing criteria to explore if there are any additional gaps within the criteria that were not identified as part of this review
- Assessment of fiscal impact of modifications and alignment to existing moderation processes
- Exploration of how students with reduced levels of adjustment are managed through a similar process.

Rationale for recommendation	New or additional adjustments required by students with disability may be identified when transitioning between schools in the public system or between years. However, contingency funding is not available for educational adjustments for students with disability already active and transitioning within the public system.
	Where this occurs at the beginning of a school year and moderators determine the level of adjustment which impacts the funding by August census, the school is allocated funding in the following school year.
	For students who transition to the school after the moderation process has occurred, schools are unable to seek funding for educational adjustments until the following school year and funding allocations made up to 24 months later.
	This means schools may need to resource educational adjustments within existing funding allocations. Most stakeholders reported that delays in accessing funding impacts their ability to effectively resource educational adjustments or delays investment in other areas.
Risk and benefits	Benefits
	Schools are adequately resourced to respond to the needs of students with disability.
	More effective transitions occur for students with disability in new school environments.
	Risks
	Potential scope creep of contingency funding bucket by expanding criteria.
	Schools may still not have capacity to apply for contingency funding.
	Financial impact for DECYP with potential large increase in contingency applications.



Recommendation 12: Explore options to provide responsive school funding to support adjustments for Kindergarten students

DECYP should consider exploring alternative funding arrangements for educational adjustments provided for students with disability in Kindergarten, for example block funding. This is to support schools to adequately understand the needs of all students within this setting and have sufficient resourcing to provide educational adjustments, while minimising process and administration requirements. DECYP could consider as part of this work:

- Exploring how changes could align with the existing model, including how work undertaken by schools to identify need associated with disability will be used to determine levels of adjustments for students with disability in future years
- Assessing feasibility and impact on students with disability, schools and government.

Rationale for recommendation	Students with additional needs associated with disability who do not engage with ECIS prior to starting school are not subject to pre-school moderation processes and as a result start school without schools having access to resources that support educational adjustments.	
	This can create significant workloads for schools to ensure they have sufficient evidence to include them in moderation process.	
	Transition to the Kindergarten setting can be a significant adjustment for students with disability. Schools reported that often a large amount of work is required to settle students in and understand their needs as they are new to the school setting.	
Risk and benefits	Benefits	
	Schools will be resourced adequately as they identify need associated with disability in the Kindergarten setting.	
	Government investment is targeted at early intervention.	
	Schools will have adequate time to transition students and identify the educational adjustments they need in the classroom.	
	Risks	
	Ensuring there is an appropriate balance between staffing and financial resource allocations.	
	There is a financial risk to DECYP depending on whether they are able to meet the quantum of funding required.	
	There is a risk interaction with ECIS may not be encouraged or sustained.	



Appendix A: List of stakeholders consulted

The following table includes a list of stakeholders consulted as part of this review.

Table A - 1: List of stakeholders

#	Focus Group Service/Organisation		
Focus	Groups		
1	Moderators	Moderators Managers Disability Services	
2-9	School Stakeholders (x8)	 Support Teachers School Business Managers Principals (x3) Tier 4 Program, Support School and e-School representatives Professional Support Staff (x2) 	
10-15	External Stakeholders (x6)	 ACDTas St Giles Society Commissioner for Children and Young People Tasmania Autism Tasmania Australian Education Union Tasmanian Branch Community & Public Sector Union Parents and Carers (x2) Parents and Carers engaged through the Tasmanian Disability Education Reform Lobby 	
16-19	DECYP Representatives (x4)	 Early Years Team Inclusive Practice Team Student Support and School Improvement Focus Group Inclusion Advisory Committee 	
1:1 Int	erviews		
1	DECYP Leadership		
2-6	DECYP representatives (x5)		
7	Life Without Barriers		
8	Panda Therapy		
9	Kristen Desmond – Disability E	Education Advocate	
Site Vi	isits		
1-4	Primary Schools (x4)	 Margate Primary School Devonport Primary School Rokeby Primary School Somerset Primary School Principals School and Support Wellbeing Leads School Business 	
5-7	High Schools (x3)	 Parklands High School Latrobe High School Kings Meadow High School Managers Support Teachers 	



#	Focus Group	Service/Organisation	
8-11	District Schools (x4)	 Campbell Town District High School Oatlands District High School Tasman District High School Sorell School 	 Professional Support Staff Classroom Teachers Parents and Carers Students
12	College (x1)	Rosny College	



Appendix B: Project approach

B.1 Project approach

The project consisted of three phases across the course of December 2022 – May 2023. This included a project initiation phase, a desktop review and state-wide process phase, and targeted site visits and final reporting phase. The following section provides an overview of the project approach across these phases.

Phase 1: Project initiation

The aim of this stage was to confirm the end-to-end project plan to support the successful delivery of the engagement, including agreeing the purpose, scope, deliverables, timeframes, and governance arrangements.

The activities conducted as part of this phase included:

- A project initiation meeting
- · A draft and final Project Plan
- Stakeholder engagement plan.

The outputs of this phase included a project plan and stakeholder engagement plan agreed upon with DECYP.

Phase 2: Desktop review and state-wide process

This phase involved a detailed review of relevant documentation and data, and the first tranche of stakeholder consultations to review the model principles, structure and processes supporting the model.

The activities conducted as part of this phase included:

- Document review of both internal and publicly available data to gain an understanding of the
 refinements made internally since implementation in 2019 and rationale for changes, activities and
 processes undertaken by DECYP to implement the model and alignment to the national disability
 reform agenda for comparative purposes.
- 9x one-hour one on one interviews and 19x two-hour focus groups with DECYP representatives
 and external organisations from the school and the disability sector to gather the required
 information, gain perspectives and data to initially evaluate the four key focus areas of the review
- Development of the Interim Update to present preliminary findings from the initial phase's activities and recommend proposed areas of focus during the subsequent phase.

The outputs of this phase included an Interim Update which informed the subsequent phase of the project.

Phase 3: Targeted Site visits and final reporting

This phase involved conducting a detailed analysis of the model's implementation at the individual school level and producing a final report incorporating the review's findings and recommendations for model refinements.



The activities conducted as part of this phase included:

- Conducting site visits of 12 sample schools and further consultations with a range of school staff, students, and parents and carers to gain an understanding of the implementation of the model at a school level, understand their experiences, challenges, and suggestions for improvement.
- Holding a two-hour Validation Workshop with the DECYP Working Group to present and validate
 the findings that have been further defined and the direction the analysis is heading, any emerging
 issues and further refinements to the final report.
- A fit-for-purpose report which outlines the findings and recommendations formed as part of the review.
- Finalisation of the report following two rounds of consolidated feedback from DECYP.

The outputs of this phase included a draft and final report presented to DECYP (this report).



The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

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