Draft Disability and Learning Support Action Plan

Analysis of Engagement Feedback

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Executive summary

In September 2018, the draft Disability and Learning Support Action Plan (the draft Action Plan) was released for consultation. Its vision is a strengthened system of learning support which values every child and young person with learning support needs and actively supports their achievement, progress, and wellbeing.

Through a nationwide consultation process on the draft Action Plan, the Ministry of Education (the Ministry) collected quantitative and qualitative feedback from 893 survey responses and submissions. This *Analysis of Feedback* report presents the major themes and issues to emerge from that data, and groups them in accordance with the priority areas outlined in the draft Action Plan.

The following is a summary of the Ministry's findings.

Overarching themes

The majority of respondents reacted positively to the concept of the draft Action Plan, recognising it as a step toward a more inclusive education system for New Zealand. Many also suggested how the draft Action Plan could further address issues of systemic discrimination against students with disabilities and/or learning support needs within the education system.

Concerns about discriminatory and anti-inclusive attitudes towards children and young people with learning support needs were often overlapping. Specifically, respondents highlighted shortcomings in the current system at meeting the learning needs of Māori and Pacific students. There was a perception that the draft Action Plan – and the education system more generally – has yet to demonstrate a commitment to improving outcomes for tamariki and rangatahi Māori learners in particular. People wanted greater access to Māori-medium supports and screening tools, and saw the draft Action Plan as an opportunity for the Ministry to apply a Te Ao Māori worldview to disability. There was a desire to see the draft Action Plan go beyond tokenistic gestures of inclusion.

People also identified a lack of Māori specialists and support workers in the learning support workforce, requesting more funding to upskill Māori kaiako stating that mokopuna who learn from teachers with an inherent understanding of Mātauranga Māori enjoy enhanced outcomes when they learn.

Respondents also spoke about the difficulties faced by Deaf students and English language learners in local schooling.

Priority 1: Improve the way children and young people are assessed for learning needs [1]

Assessment and screening was one of the most commonly addressed topics in the feedback. Most people supported the idea of universal screening, and viewed early assessment as a vital preventative measure. However, they had questions about the quality and extent of post-assessment support, and held differing views about the age at which children should be screened for specific learning needs.

[1] The draft Action Plan had four priorities.

Priority 2: Strengthening the range of supports for children and young people with additional learning needs

The proposed Learning Support Coordinator (LSC) role was highly regarded. It was identified as the second-highest priority area in the quantitative survey results, and around 35% of respondents commented on the new positions. People were eager to see the role become a reality in schools and kura, but they queried how the new positions would be funded and allocated. Some identified the need for an LSC-type role within early learning.

A more flexible and targeted support system was the number one priority area identified by those responding to the Ministry's quantitative draft Action Plan survey. A large group requested that, to better support students with mild to moderate needs, the Ministry needed either to expand its criteria for the Ongoing Resourcing Scheme (ORS), or to establish an alternative programme.

Early intervention was another topic that many focused on. Respondents valued early intervention in preventing negative outcomes for students with learning support needs. The general consensus was 'the earlier, the better', and many people thought that the Action Plan should include improved provision for learning support in early learning settings.

Dispute resolution, although not a leading concern, was viewed as an important aspect of a well-functioning and equitable education system.

Those who addressed learning support needs in relation to the at-risk population stressed the importance of alternative education, activity centres, and the attendance service for supporting at-risk students.

Transitions in relation to both provision for at-risk students and early learning were discussed. The perceived funding gap between early learning and primary school was a major concern for parents and educators alike, as was the perceived lack of support for students with learning support needs who were transitioning from secondary school to higher education, training, or work. There were numerous substantive recommendations on how the Action Plan could facilitate better transition support.

People were eager to see closer collaboration between whānau, teachers, support staff, specialist services, and other relevant agencies under the strengthened learning support system. The proposed alignment of Ministry of Health and Ministry of Education supports was positively received by most, with many urging the Ministry to engage in even wider cross-sector collaboration (particularly with Oranga Tamariki).

Priority 3: Improving the way the education system responds

Both the learning support and general teaching workforces were seen as integral to the realisation of the Action Plan's proposals. Nearly half of those responding to the survey had something to say about the workforce. They expressed concern that current staff shortages were a threat to achieving the high aims of the draft Action Plan, and hundreds wanted better training – both Initial Teacher Education (ITE) and ongoing Professional Learning and Development (PLD) – for the general teaching workforce on specific learning needs.

Teachers and parents also conveyed a need for more accessible information on specific learning needs.

Priority 4: Ensuring that learning support is resourced for increased support and service delivery

Concerns about funding permeated the feedback on the draft Action Plan. Twenty-nine percent of respondents spoke to current issues with learning support funding, in relation to waiting lists for specialist services and access to resources such as assistive technology. The system of capped funding was

criticised by many stakeholder groups, who believe that learning support funding should be automatically adjusted for population growth.

A number gave feedback on how the Ministry might improve its learning support network. This reflected the need for a balance between mainstream schools, special schools, and satellite units. Whilst some viewed segregated schools as fundamentally anti-inclusive, others argued that students with learning support needs must at least have the option of receiving education in specialised settings.

At the most general level, there was a drive for a fully-integrated, accessible network of learning support to give each and every student the best possible chance to succeed.

Cross-cutting components

Some commented on the Ministry's including the learning support workforce in its Education Workforce Strategy. For early learning services and schools to be able to meet the needs of all learners, many felt more training and resourcing for the learning support workforce was non-negotiable.

People were enthusiastic about the new Child and Youth Wellbeing Strategy, with many confirming the need to improve support in schools for mental health and bullying prevention. There was a desire to see a holistic approach to wellbeing within learning support, perhaps informed by a Te Ao Māori worldview.

Introduction

One in five children and young people need some kind of extra support for their learning.

Released for consultation in September 2018, the draft Disability and Learning Support Action Plan (draft Action Plan) suggested some priorities to build a more inclusive education system, where all children and young people with additional learning needs – including disabilities – are welcome, and where their achievement, progress, wellbeing, and participation is valued and supported.

The draft Action Plan spanned four priority areas:

- improving the way children and young people are assessed for additional learning needs
- strengthening the range of supports for children and young people with disabilities and additional learning needs
- improving the way the education system responds to neurodiverse learners and gifted learners
- ensuring that learning support is resourced for increased support and delivery.

The draft Action Plan included actions that were developed in response to previous feedback from parents and whānau and the disability and education sectors. It was informed by the 2015 Learning Support Update, as well as the Select Committee Inquiry into the Identification and Support for Students Facing the Significant Challenges of Dyslexia, Dyspraxia and Autism Spectrum Disorders in Primary and Secondary Schools.

On behalf of the Associate Minister for Education, Hon Tracey Martin, the Ministry consulted on the draft Action Plan. During this consultation, we met with a range of parents, whānau and groups in the education and disability sectors. We invited written submissions, and collected feedback through an online survey. The feedback gathered was diverse: the perspectives of students, whānau, teachers, school leaders, learning support specialists, medical professionals, and academics were represented. We also included feedback from the wider Kōrero Mātauranga, Education Conversation

This report analyses the qualitative and quantitative feedback gathered during the course of this consultation, and presents some of the key themes to come from the feedback.

The feedback summarised within this report has influenced the Learning Support Action Plan 2019-2025, which can be found here: https://conversation.education.govt.nz/conversations

Synthesis of previous consultations and feedback

To ensure that consultation on the draft Action Plan consultation builds upon what people have already told us about supporting children and young people with learning support needs, this report also includes a synthesis of feedback collected from education and disability sector representative groups since 2015. For this synthesis, we pulled together recurring themes across engagement reports, with a particular focus on parents and whānau groups, schools, early learning services and other education providers, and representatives from the disability sector and wider community. The synthesis is included at Appendix A.

How we consulted

Consultation on the draft Action Plan ran from 22 September 2018 to 31 October 2018. People were encouraged to fill out an online survey or email a written submission.

Fifty-six meetings were held with stakeholders. These meetings covered a range of interested individuals and groups, including educators, disabled people, families and whānau, young people, Māori and Pacific people, and those reflecting urban and rural perspectives.

The consultation received 736 responses to the online survey, and 112 email submissions. Notes were gathered from 42 of the 56 engagement meetings (14 meetings included the provision of information only, and attendees did not provide any feedback).

For more information on who provided feedback, including demographic breakdowns for survey respondents, see Appendix B.

What did people think?

From the quantitative survey, the Ministry was able to collect data on what respondents believed the top priorities within the draft Action Plan were. From the text responses and submissions provided, it was possible to evaluate overall attitudes toward the draft Action Plan further. Both of these sets of information are reported below. Detailed feedback relating to the four priority areas of the Action Plan can be found from page 15 onwards.

Quantitative feedback

The 736 people who responded to the survey were asked whether the most important actions were included in the draft Action Plan. They were also asked to rank the proposed actions according to what they thought should be done first.

Although 415 (56.69%) answered 'No' to the first question, when asked to rank what should be done first only 90 selected something else in the 'other' box.

Are the most important actions that need to be taken over the next few years included in the draft Action Plan?

Option	Total	Percent
Yes	297	40.57%
No	415	56.69%
Not Answered	20	2.73%

Of the new actions in the draft Action Plan which one/s should we do first to have the biggest impact? (Select up to five priority actions)

Item	Overall position
Co-design a flexible package of support for children and young people with autism, dyspraxia and dyslexia, and other children and young people with learning support needs, who are not eligible for the Ongoing Resourcing Scheme (ORS)	1
Establish Learning Support Coordinators in schools, to help parents and children access the right support	2
Universal health checks at age 3	3
Screen for dyslexia and dyspraxia between ages six and eight	4
Support teachers to recognise and respond to the needs of gifted and neurodiverse students	5
Measure learning differences when children start school	6
Align education supports for disabled children aged 0 to 8 years and their families and whānau with supports from the Ministry of Health	7
Provide information about teaching and learning for neurodiverse students, and explore the potential to create tools to help neurodiverse learners	8
Determine the right level of investments for early intervention services	9
Check for health and wellbeing when young people start secondary school	10
Respond to pressures across specific supports such as Residential Special Schools, Early Intervention, Te Kahu Toi/Intensive Wraparound Services	11
Screen for gifted children between ages six and eight	12
Other	13

Qualitative feedback

The Ministry provided three channels for qualitative feedback on the draft Action Plan: free text boxes in the online survey, email, and engagement meeting. The text responses, email submissions, and engagement meeting notes gathered have been analysed for themes and specific feedback. The remainder of this document outlines this qualitative feedback.

Direct quotes have been included in the document to illustrate the points made. Where quotes have been provided by identified organisations or groups, they have been attributed. Where a quote is from an anonymous survey respondent, it cannot be attributed.

There were no detailed questions or guidelines provided when inviting submissions. Similarly, the free text boxes in the survey asked very broad questions. The strength of the response to any particular aspect of the draft Action Plan must therefore be viewed in light of the fact that comments have been generally unprompted.

> "We are very enthusiastic about the pro-active stance of the strategy, in particular around initiating a much needed systemic change to provide more effectively for our community."
>
> **Autism NZ**

General responses to the draft Action Plan

Opinions on the draft Action Plan varied widely. Some thought it too ambitious, others not wide-ranging enough; some thought it very well thought out, others considered it completely lacking in detail. Of the 15%of respondents (135 of 893) who communicated a clear view of the overall Action Plan,[2] 50% were generally positive about the draft Action Plan, 32% had mixed feelings, and 19% were negative.

Positive responses

A general feeling of optimism about the draft Action Plan and its proposed changes was evident in the anonymous survey responses and the individual submissions. Many stated that the draft Action Plan was long overdue, and praised the Associate Minister of Education for addressing what was viewed as a 'vital and missing component in education'. Phrases such as 'generous in spirit' and 'comprehensive and well thought through' were used, and many of those who praised the draft Action Plan did so on the basis of its overarching intention of inclusion.

Multiple commenters – including stakeholder groups such as Montessori NZ, the Waitakere Area Principal's Association, and RTLB Cluster Managers – specified that the draft Action Plan was a great start, a good foundation for future growth. Those responding to the survey also believed that the draft Action Plan was 'making steps in the right direction', and stated that 'there is so much that is good in this plan'.

Some appreciated the draft Action Plan's focus on tangible change. One secondary student, for example, said that, "It is great to be able to look at a plan as most other engagements are conversations so no firm actions for change have been signalled […] The Action Plan is the opposite".

Support was also expressed for the priority areas, with Blind Citizens NZ stating its enthusiasm for "the four proposed priority areas, which cumulatively should more quickly identify all students' needs earlier."

[2] For the purposes of defining how many responses were positive and how many negative, this figure is taken as 100%.

Mixed responses

Some people found it difficult to rank each action proposed in the draft Action Plan because they were all “excellent initiatives” which made it hard to pick a preference for one over another. While in some cases this made for a positive impression, others were concerned that “the plan [did] not have a way of sorting through all these competing demands,” and that it was “incredibly ambitious.”

By far the most common mixed response was that the draft Action Plan looked good on paper, but would not be backed by the funding and resources necessary to ensure its success. As one respondent put it, “The changes will only be as good as the resources that work alongside the change.”

Closely related to this was an overriding concern about implementation. People were not convinced that the draft Action Plan would be implemented as quickly and effectively as desired or as forecast. More specifically, there were questions about who would action the policy on the ground, as well as a common concern about the impact of school leadership on implementing the priorities. People were worried that if a school and its principal were unwilling to help children and young people with learning needs, then the draft Action Plan could be too easily bypassed.

There was widespread criticism about the perceived lack of detail within the draft Action Plan (again, mainly in regard to human resources and funding).

> “Decades of reviews and tinkering have not solved the systemic and structural problems which impact adversely on students, families and schools.”
>
> **NZ Down Syndrome Association**

Negative responses

Few were strongly against the notion of the draft Action Plan, but those who were advocated for the Ministry to “throw [it] out and start again”. However, when asked what they wanted in place of the draft Action Plan, opinions were split between a totally new plan informed by evidence-based practice and specialist advice, and a plan which – rather than trying to “reinvent the wheel” – synthesised all the existing tools and resources into one workable piece of policy.

Other comments expressed more clearly that it was not the draft Action Plan that was the problem as such, but rather the system or structure at large. One respondent used the phrase “rearranging the chairs on the Titanic”; another, “just a rebranding and rearranging of a current failing system”. Negative comments of this kind were offered both by parents whose children had been negatively impacted by the current system, and by stakeholder groups.

Specific concerns/observations

Some of those responding to the survey thought that the draft Action Plan was a backwards-move “towards a more medical way of thinking that locates disability and difference within individual children”. Many believed that the draft Action Plan should, as a government document, exemplify a strength-based approach rather than a deficit model. These comments were bolstered by similar remarks made by stakeholders (New Zealand School Trustees Association, Dyslexia Foundation of NZ).

Adopting Te Tiriti o Waitangi as an underpinning framework, and including foundation concepts such as whanaungatanga and mana tamaiti, were proposed as ways to ensure that the draft Action Plan is effective for Māori requiring learning support. Some were concerned that the draft Action Plan did not include enough provision to improve learning outcomes for Māori, despite Māori being over-represented in learning support statistics. Many wanted to see the draft Action Plan address learning support for Māori in a focused and sustained fashion. – some such as the New Zealand Principals' Federation (NZPF) stated that an overarching declaration of "cultural appropriateness" would not be sufficient.

Others wanted the draft Action Plan to be more specific regarding the scope of the support to be delivered. Would the support extend to tertiary? To alternative education? To home-school settings? Was early learning included? The Early Childhood Advisory Committee, for example, was concerned that the draft Action Plan was overly focused on schools and kura.

Some were concerned about the range of learning needs covered by the term 'disability'. Several commenters saw the draft Action Plan as preoccupied with the named disorders of dyslexia, dyspraxia, and autism at the expense of other additional learning needs.

Another concern was the perceived acceptance of the failures of the current education system. One suggested that the existing problems were the result of years of political denial, and that although "any improvement is better than none", government agencies should avoid giving "false hope" to those "already at their wits end".

Some responses criticised the Ministry's lack of engagement with disabled people during the drafting of the Action Plan. Submissions stated that "apart from generic input into previous consultations," there had been little opportunity for disabled people to "shape this specific plan".

Suggestions for improvement

While the majority of comments were supportive in principle, people suggested a range of ways in which the draft Action Plan could be improved. The most common were:

- Embedding a section on accountability or review: as one wrote, "How will you know in 1, 2, and 5 years that this is working?"
- Aligning the draft Action Plan with policy and legislation, namely:
    - the Children's Charter
    - the Oranga Tamariki Legislation Bill
    - the United Nations Convention on the Rights of the Child (UNCROC)
    - the NZ Disability Strategy.

Overarching themes from the engagement

Several key themes emerged from the engagement. These were not directly related to any one of the four priority areas, but to wider issues affecting learning support and the education system.

These themes related to inclusion and discrimination. They encompassed concerns about cultural and attitudinal barriers to inclusion, and about the need for the education system to eliminate discrimination.

The theme of cultural responsiveness and identity indicated a need to reflect a Māori perspective in the strengthened system of learning support, and to take into account the importance of identity, culture and language in service provision to Māori. As one person offered, "Learning support provisions need to be considered through a Te Ao Māori worldview, because the same things look different from a Pakeha point of view." Respondents also wanted workforce development needs to be designed with improving outcomes for tamariki and rangatahi Māori in mind.

More detail about points raised under these themes is set out in a separate section starting on page 52.

Priority 1: Improve the way children and young people are assessed for learning needs

Tools for assessment of needs

Thirty eight percent of total respondents (or 341 out of 893) made comments relating to *Priority 1: Improving the way children and young people are assessed for learning needs*. This made assessment and screening the second most popular topic to emerge from the feedback. Comments varied, with some addressing the general concept of screening, and others focusing on the proposed assessment tools from the draft Action Plan.

The proposed tools for assessment include:

- universal health checks at age three
- consistent school entry measurement tool
- screening for dyslexia and dyspraxia between the ages of six and eight
- identifying gifted children between the ages of six and eight
- standard health and wellbeing checks when children move from primary to secondary school.

Feedback on each of these individual assessment tools proved very similar, with the age when assessment takes place the only topic linked to individual assessment tools. Therefore, the feedback below relates to all the proposed assessment tools.

> "IHC welcomes the intent to provide early, regular, comprehensive (across health, disability and education) assessment of learning needs as the research and other evidence is clear that early assessment and intervention is linked to successful engagement with and outcomes from and through learning."
>
> **IHC**

General concept of universal screening

Respondents were generally positive and open to the idea of universal screening.

A number of respondents had concerns and recommendations about the proposed screenings. The main themes from these responses are outlined below.

Concern over diagnosis

Eight percent of those who mentioned universal screening (29 of 341) questioned the worth of screening for a particular diagnosis. These concerns often centred around the adverse effect of 'labelling' on children, and that a needs-based approach would have a greater impact on a child's learning than a diagnosis-based approach. Others were concerned that the proposed screening and assessment measures would lead to point-in-time diagnoses, and fail to take into account the ever-changing needs of the student. Some were concerned that screenings could overlook the complex needs of children with more than one need, with the potential for screening to misdiagnose one or more learning disability. Lastly, several respondents were concerned that trauma, poverty, or neglect manifesting in behavioural problems might be misdiagnosed as a special learning need.

> "The proposed five checks would support schools and whānau to better understand the needs of our young people."
>
> **NZPF**

Post-diagnosis support

A significant number of people questioned what supports would be available to students, whānau and teachers following screening. Many asserted that it was not a lack of diagnosis currently causing issues for young learners, but rather wait times for specialist services and resources, and a lack of support for teachers. For example, the Office of the Children's Commissioner states in its submission that screening "must then be followed by policy development, workforce development, and investment to provide services to fulfil those needs". Consequently many recommended that the draft Action Plan elaborate on what actions and supports will be available once a diagnosis is made.

There were also concerns about whether the funding allocated to the proposed screening and assessment measures would result in cuts to other vital programmes and resources.

Changes to screening parameters

Nineteen percent of those who mentioned screening (66 of 341) recommended widening the scope of the screening to encompass more learning needs than those listed in the draft Action Plan. This was an especially emotive topic. Responses suggested also screening for Foetal Alcohol Spectrum Disorder, dyscalculia, autism spectrum disorder, and various sensory processing disorders. Several responses, such as the submission from attendees at the Learning Disabilities Association of New Zealand (LDANZ) conference in July 2018, suggested the addition of a "phonological assessment at school entry".

Cultural relevance

People questioned if and how the screening tools would be modified to meet the needs of Māori children and young people, and whether such screening would be culturally relevant for Māori. There was concern about how students in Māori medium schools and kura would be included within the checks, and whether tools for assessment and screening will be available in Te Reo Māori.

Screening and assessment processes will need to take into account identity, language, and culture, and recognise the very real barriers to learning faced by particular groups.

One person identified gifted and talented as a demographic in which Māori were massively under-represented, another asking the question, "How does culture and the perception of giftedness affect students of different ethnic and cultural groups?"

> "How will the health checks be done for these students? Screening for dyslexia, dyspraxia & giftedness – are these tools culturally relevant for Māori? Are they available in Māori?"
>
> **Survey respondent**

Concern about implementation

There were concerns about who would undertake the screenings. People thought that to ensure accurate results, assessments should be carried out either by 'qualified professionals' or by people with the specific training to so.

There was also concern about the lack of information within the draft Action Plan on methods of screening and assessment. The need for 'robust methods' in order to get accurate results was stressed. Concerns typically stemmed from worries about the potential of misdiagnosis.

Respondents highlighted the significant cost of diagnosing learning disabilities within the current system. To make sure future access is equitable, they recommended that, the cost of screening should not fall to the individual parent. A submission from SPELD NZ (a provider of support for those with dyslexia and other specific learning disabilities) called for the draft Action Plan to "ensure that families/whānau do not have to pay for extra support".

Commenters offered their suggestions for how universal screening might be practically implemented. One respondent suggested a focus on "observable aspects of children's functioning" rather than a focus on diagnoses with "contestable" definitions.

Universal checks at age three

Of those who mentioned screening in their response, 33% (113 of 341) those responding specifically mentioned universal checks at age three. Most were positive about the checks, particularly in view of the need for "the Plan […] to address how the Ministry of Education will measure and increase the participation rate of disabled children in Early Childhood Education" (submission by CCS Disability Action).

Age and timing of universal checks at age three

Of those who mentioned screening in their response, 24% (27 of 113) were concerned about the timing of the universal checks. A number considered age three too late to check, because children could begin to demonstrate the indicators tested for as early as 18 months. Conversely, some considered age three too early to screen, referring to the reluctance of medical professionals to diagnose conditions like dyslexia before the age of seven. Several suggested ongoing and flexible testing.

Consistent school entry measurement tool

Twenty-one percent (72 of 341) of respondents addressed the proposed consistent school entry measurement tool, and generally considered that this kind of assessment would be beneficial.

Age and timing of a consistent entry measurement tool

Twenty-three percent (17 of 72) of these respondents questioned the timing of the screening. There was little consensus from this group on the best time for screening, with around half stating that screening should be done as early as possible; whilst others suggesting ongoing testing, and focussing on transitions between schools and kura.

Practical aspects

Feedback suggested that modifying and standardising existing school entry checks would be simpler than creating new tests.

Some highlighted the need for the tests to be "easy and quick to-do". One response referred to the "time consuming" nature of the "old SEA [School Entry Assessment] assessment", which was a burden on teachers.

Screening for dyslexia and dyspraxia between six and eight

Of those who mentioned screening, 33% (113 of 341) addressed the proposal to screen for dyslexia and dyspraxia between the ages of six and eight. Most expressed support for some kind of screening measure, whilst also voicing practical concerns about implementation.

A small number questioned whether testing for dyspraxia specifically was"… necessary, highlighting the fact that it "relates to motor skills" and should be clearly identifiable by whānau and teachers.

Age of screening for dyslexia and dyspraxia

Thirty-six percent of those who mentioned screening (41 of 113) were concerned with the proposed timing of the screening for dyslexia and dyspraxia. Just over half of these (21) called for earlier screening, with testing between the age of three and five most frequently suggested, as early detection ensured the best outcome for individual students.

Kāpiti College found that its dyslexic students "felt it was helpful to know they had dyslexia", and "thought screening at primary school was a good idea". Likewise, Autism New Zealand stated that, "the evidence is clear that the earlier we get the indication that a child may have autism and in turn an assessment of their needs, the better chance that child can go on and live to their full potential".

A small number of those responding suggested that multiple screenings to detect potential changes in a child's learning needs should be available. These typically suggested a second screening at around the ages of 12 and 13 when a student enters high school.

However, there were also concerns over the implications of changing diagnoses for the student, and for students who were misdiagnosed, or not diagnosed at all.

"…the evidence is clear that the earlier we get the indication that a child may have autism and in turn an assessment of their needs, the better chance that child can go on and live to their full potential".

Autism NZ

Screening for giftedness between ages six and eight

Most of the 23% (78 of 341) of those who commented on screening for gifted students between the ages of six and eight supported the proposal. Most also suggested modifications, based on concerns and recommendations about the nationwide implementation and accuracy of screening.

Age of screening for giftedness

Of those commenting on screening for giftedness, 33% (26 of 78) were concerned with the suggested timing of the screenings. The majority preferred earlier screenings during early learning and/or between the ages of 3 and 5. The Wellington Association for Gifted Children Incorporated stated that, "As Gifted characteristics are often present from a young age, we support before-school or early school screening for Giftedness at around 4-6 years of age." Similarly, Gifted Aotearoa stated that "ECE screening is a must".

Others were concerned about the lack of ongoing screening, and the effect on children who missed screenings, or who failed to present signs of giftedness during the initial screening. Those who favoured continued testing suggested screening during early learning and when children reached primary-school age, whilst others suggested testing when children entered high school.

'ECE screening is a must."

Gifted Aotearoa

Conditions of screening for giftedness

People wanted more information about the method(s) used to identify gifted students. A few were concerned that a regular IQ test would not provide an accurate assessment of giftedness.

One response wanted “qualified professionals” to undertake the screenings. Similar concerns about the accuracy of untrained assessment and also of blanket screening were expressed.

Two responses highlighted the potential impact of socio-economic conditions on screening for gifted students, both in terms of delayed childhood development and the potential for children to be overlooked by testing.

Health and wellbeing check on transition into secondary school (MOH)

There were fewer written comments (10%, 34 of 341) regarding the proposed health and wellbeing check. Of those comments, the majority were positive, but expressed practical concerns about implementation which mirror those discussed above for other proposals for universal screening.

Age of screening for health and wellbeing check

Of the few who responded, 17% (6 of 34) were concerned about the age and timing of the screenings, and questioned why a health and wellbeing check was proposed only once when young people reached high school. They suggested that at least one check be carried out during primary school.

Additionally, one response queried how the checks would be undertaken.

Central Data Collection

Responses to the general concept of central data collection were largely positive, though there were common concerns about exactly what that would entail.

Eleven percent of all respondents (98 of 893) addressed the matter of central data collection.

Of this group, 62% (61 of 98) agreed with the proposed data collection. IHC’s submission, for example, said that, “There is enormous value in the aggregation and disaggregation of the data by impairment type that can be shared across agencies for future planning and responsiveness.” The Inclusive Education Action Group’s (IEAG) members also stated their agreement with the proposal, as “there is a need for data disaggregated by disability that can be shared across multiple agencies”.

> “…there is a need for data disaggregated by disability that can be shared across multiple agencies.”
>
> **The Inclusive Education Action Group**

Those making submissions highlighted a lack of current data collection in New Zealand, with the consequence that policy and funding decisions were made in a “data vacuum” (submission by Special Education Principals’ Association of New Zealand). Those responding to the survey

also stated that the lack of a central data system was detrimental to children and young people -- without easily accessible data, transitions between schools were difficult, educators could not easily access medical reports, and parents were forced to provide medical information to multiple persons and agencies.

One respondent stated that by not currently collecting data, the Ministry is ignoring the United Nations Convention on the Rights of Persons with Disabilities' (UNCRPD) recommendations.

Concerns about central data collection

Forty-nine percent (48 of 98) of those who mentioned data collection expressed some concern over data shared nationally, mainly about how the data would be used by educators and specialists, and whether the data would be "accurate" and "appropriate".

Some were concerned that data-sharing could be used to 'problematise' rather than 'empower' individual students, reflecting 'systemic' issues surrounding engagement with disabled students. The submission by the New Zealand Principals' Federation posed a common question, "How will this data be shared between schools and across the system?"

Responses highlighted the need for 'appropriate data' in order to ensure positive outcomes for students, and emphasised that without the correct data, the integrity of decisions based on that data would be undermined.

Recommendations

A small number of responses included suggestions for implementing central data collection. These included the use of peer-to-peer evaluations, the appointment of schools and kura to collect data, and the open publication of data on schools and kura with reputations for "repelling or attracting disabled students".

Priority 2: Strengthening the range of supports for children and young people with additional learning needs

A better model for delivering learning support

A small number of respondents (24) specifically addressed the Learning Support Delivery Model (LSDM). These were generally positive, and felt that the proposal outlined a “useful approach” which has “merit”. There was little direct response to any of the six key elements of the proposed model. However, a number of questions were posed about the current proposal.

Capability and staff

People primary had concerns about the “capability and capacity” of the workforce to implement the LSDM. More particularly, they were concerned that implementation would be ineffective unless “all teachers are thoroughly prepared and committed to their responsibility to teach all students”. Some were unconvinced that the new model would change what they considered to be pervasive cultural issues influencing how teachers engaged with students with learning support needs.

Those responding were unsure about the position of Resource Teachers: Learning and Behaviour (RTLBs) within the LSDM. They stated that the role of the RTLB was of “critical” importance to the current system, and expressed concern that there was no mention of their work within discussions of the LSDM.

The Learning Support Coordinator (LSC) was seen by many as a “critical” element of the LSDM, and vital to its success.

One respondent focused on the role of the parents and whānau within the LSDM, questioning where the parent sits in relation to the proposed work across “experts, iwi and service providers”. They suggested that the exclusion would “widen the present gulf” between teaching staff and parents.

Evaluation

The NZEI (New Zealand Education Institute) and IHC NZ both raised questions about the lack of evaluative data collected or published from the Bay of Plenty pilot programmes. The IHC NZ stated that without this evidence of the new LSDM’s efficacy, “it is difficult to understand or appreciate that the proposals within the Action Plan are credible and sound approaches to implement and embed an inclusive education system”.

Other

Several submitters noted the lack of reference to UN Convention on the Rights of the Child (UNCROC) and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) within the LDSM. These responses stated that there needed to be a “specific focus” on students’ experiences as a requirement of the charters.

Learning Support Coordinator

The proposed LSC role proved the third most commonly addressed topic within the feedback, with 35 percent of total respondents (or 317) addressing the LSC in some way.

NZEI and Inclusive Education Action Group (IEAG) each conducted their own member surveys to inform their perspectives on the LSC role.

Overall perspectives

Of those responding about the LSC, the majority were enthusiastic about the idea of a formalised role, with those making submissions stating that they "applaud[ed] the inclusion of this role in the plan" (Karori West Normal School). Support was often accompanied by questions about how the new LSCs would be trained, funded, and allocated to schools and kura.

Both NZEI and Post Primary Teachers' Association (PPTA) were strongly supportive of a formal LSC role. NZEI confirmed that the two surveys it ran (the first with Special Education Needs Coordinators (SENCOs), the second with RTLBs and Ministry learning support staff) reflected "extremely consistent views about the need for fully-released LSCs in all schools". The PPTA thought the LSC vital to the vision of an inclusive education system for New Zealand, and believed that the role would "enable all students to have access to the support that they need in order to succeed at school".

Similarly, IHC's submission stated that the "LSC role will be a critical part of the success of the Plan's implementation".

Current Special Education Needs Coordinators (SENCOs)

There was much support for the current SENCO role, but people also asserted that SENCOs currently lacked funding and release time to be effective. Several noted that they held multiple positions in a school, SENCOs were overworked and suffered a lack of expertise. As one respondent stated, "I am the SENCO and Deputy Principal at our school. These are two full time jobs, and it would make an enormous difference at our school if I was not 'spread so thinly".

There was uncertainty over the difference between a SENCO and a LSC, and whether the roles would effectively be merged under the Action Plan. Some were concerned that current SENCO staff would be prevented from transitioning into the LSC role if it required a specific qualification.

LSC in early learning

There were 49 responses that spoke of LSCs in early childhood education. Many identified the need for an LSC-type role to coordinate support and resources within early learning to provide children with the early interventions they deserved.

A major concern of NZEI with the proposed LSC was the apparent absence of consideration of early learning support for children under five. NZEI recommended that, to resolve the issue of how LSCs would be allocated to rural and smaller schools and kura, in these areas a fully-released LSC could also be charged with working with children and teachers in local early learning services.

Rural and urban areas

Twenty-five responses talked about the lack of services and resources available in rural and isolated areas. One parent shared that they travel 200km each day to access therapy and education for their child, whilst another acknowledged that "to access this support it requires significant effort and sacrifice in comparison to our urban counterparts".

A majority of IEAG's members believed that there should be different requirements for LSCs in rural and in urban environments. Members specifically mentioned the challenges of keeping support nationally consistent as well as in keeping with the the geographical area, and ensuring that different cultural needs

were acknowledged. However, organisations such as Rural Women NZ "wouldn't want to see separate job descriptions for rural and urban based coordinator roles".

Consistency

Consistency was a pronounced theme within feedback about the LSC. In particular, people wanted training for the role to be centralised in some way, either through a specific education provider or the Ministry. They also wanted LSCs to have the same resources regardless of their area or jurisdiction.

Responsibilities/content of the LSC role

Job description

There were 251 responses on the content and responsibilities of the LSC. A significant number (43) said they wanted the role to not just coordinate learning support and design programmes for individual students, but also support teachers within classrooms. As one respondent said, "Teachers do not need more advice, strategies or suggestions that cannot be implemented successfully without ongoing people support *in the classroom."*

> Teachers do not need more advice, strategies or suggestions that cannot be implemented successfully without ongoing people support in the classroom."
>
> **Survey respondent**

Another significant group said they wanted the LSC to be a central point of contact between students, whānau, schools and external agencies. As one commented, having an ongoing point of contact had been "invaluable" for them.

There were 82 responses suggesting other responsibilities for the LSC role. For example: screening for gifted and neurodiverse children, delivering specialist programmes for individuals and groups, monitoring students' progress, liaising with external agencies, providing teachers with intervention techniques for behavioural management, and organising professional development for teachers.

The PPTA and NZEI each identified what they deemed the key functions of an LSC. The LSC should be:

- a first point of contact for parents and whānau (across both surveys run by the NZEI, over 80% of respondents either agreed or strongly agreed with this function)
- a transition support for children moving from early childhood education into school, and from school to work or further education
- a part of the senior management team, in accordance with many current SENCOs' roles.

In addition, PPTA submitted that the SENCO/LSC should be:

- a mediator between schools, early learning services, specialists, providers and other key stakeholders
- a key point of data-sharing for the wider education community.

NZEI also emphasised the importance of the LSC in supporting schools and kura to build the capacity and knowledge base of teachers.

Role within the school

Thirty-one of those responding believed that LSCs needed to be part of the school leadership team in order to be "truly effective". It was also suggested that the LSC represent students with additional needs on the school's board of trustees.

General comments

Several comments were made about putting the focus back on the child. One person noted that the amount of administration required to access learning support currently is "absolutely ridiculous". They wanted this addressed so that energy could instead be spent "on supporting these students".

Some commented on how the current system put Māori and Pacific students at a disadvantage when accessing learning support. It was important that the LSC should actively address these disparities and serve all families and students, not just a subset of families.

Many also focused on the stressful demands of such a position, stating that the LSC should be properly recognised for their important work in terms of funding and release hours.

Questions were raised around how existing RTLBs and Resource Teachers: Literacy would fit into this new system, and why neither group was specifically mentioned in the draft Action Plan.

Criteria for holding the Learning Support Coordinator (LSC) role

Of those who commented on the LSC role, nearly half commented on the criteria for holding the role. Along with many others, both NZEI and PPTA recommended that the LSC be a registered teacher, equipped with additional training and specific professional learning and development.

Training and qualifications:

There were 150 responses that commented on the criteria of the LSC role. Almost all believed that LSCs need some form of training or qualification. One respondent stated that "these will be demanding roles and will require intensive supervision, coaching and support in order to maintain the wellbeing of these people. People will leave when the pressure is too great, presenting an on-going need for induction and training."

The University of Canterbury's School of Health Sciences supported a recognised career pathway to becoming an LSC, preferably a postgraduate university qualification. This was echoed by Inclusive Education for All (IEAG) members, who said that the LSC should have a Master's degree in Education and preferably undergraduate training in Disability Studies in Education. REACH Education suggested that a possible option would be to introduce an LSC pathway for those currently working as teacher aides.

It was acknowledged that RTLBs are highly qualified, often holding Master's degrees in Special Education with a suggestion to align training for both the RTLB and LSC, combining around the Master's in Education Psychology. Other addressed the limited training of SENCOs, and expressed a desire that LSCs have more training in child and adolescent psychology, guidance counselling, and learning differences and needs.

One parent, however, believed that LSCs "don't have to be university educated. Just passionate, engaged and respectful".

Funding the Learning Support Coordinator role

Eighty respondents were concerned about how LSCs would be funded. Ultimately, they did not want extra funding for LSCs to come at the expense of other learning support services.

Questioning where the funding is coming from

Overall, 44 respondents acknowledged the need for the LSC to be properly resourced to be effective in their role; 14 were concerned about the impact of funding on other support services; and 6 believed the funding should be spent elsewhere.

Many felt unclear about how these new positions would be funded. They acknowledged it would need an increase in funding to pay for the new LSCs, but were concerned that would decrease access to other essential learning support services. IHC, for example, stated that they "supported the intent to fund a coordination role in schools but confidence in that approach will be reduced because of the lack of certainty about future provisions for all other components".

In particular, people did not agree with individual schools and kura funding their own LSC. Several suggested ways to reduce the burden on individual schools and kura. For example, NZEI suggested the funding come in part through an increase to the Special Education Management Allowance in the Education (School Staffing) Order. More than 90% of IEAG members believed the LSC should be funded by the Ministry from the Education budget in addition to existing staff allocations. The New Zealand Foundation for Conductive Education Board submission stated that "we would be very disappointed to see that a new system comes at the expense of specialist service delivery and hands-on support to students".

Other concerns were raised about how the LSCs would be allocated. The NZEI's survey of SENCOs and Principals reported strong support (85%) for needs-based resourcing of the LSC, determined by a combination of the school roll and individual children's needs. One member suggested that allocation of LSCs is based "on roll numbers, but that there is an automatic 0.4 staffing on Decile 1 & 2 schools first (as this is where the greatest need is)". NZEI warned that any "needs-based funding needed to avoid increasing the problem of creating 'magnet' schools and decreasing inclusion in others".

Funding and accountability

Thirty-two of those responding raised questions over who the LSC would be accountable to and employed by. Several believed that to be effective, the LSC should be accountable to the Ministry, so that their integrity would not be compromised if a conflict of interest arose within the school. On the other hand, several wanted limited Ministry interaction so that there was not another layer of government presiding over funding.

Learning Support Facilitator

Of the 50 respondents who commented on the Learning Support Facilitator (LSF) role, a quarter raised questions about the nature of the role. There appeared to be some misunderstandings about the different responsibilities between LSCs and LSFs. The general comment was that the LSF should be based within schools and kura providing a central advisory point, and not based in an office focused on administrative tasks. The Waitakere Area Principals Association, for example, wanted the LSF to be a seasoned educator who was proactive within the school, not an administration referral mechanism.

Nearly one third of parents and educators wanted the Learning Support Facilitator to be independent of the Ministry. There was a strong feeling that they should work directly with students, families, schools and support services, and that they should be able to hold the Ministry accountable without any conflicts of interest.

Other concerns included the amount of work that was required of LSFs to manage LSCs and other support agencies, the potential that they will use up funding that could go to already established SENCOs or RTLBs, and the notion that LSFs were not needed if LSCs were in place.

Flexible package of support

Nineteen percent (168 of 893) of respondents commented on the lack of support for students who were ineligible for ORS. Most see this lack of resources as a failing of ORS itself, and suggest increasing the scope and funding of the current ORS programme as the solution. This suggests that some may prefer to extend the current familiar system rather than create a new model.

Of these comments, 50% suggested how to increase support for "mild-moderate" learners, including increased resources for teachers, the use of learning support field staff within the plan, increased teacher aide hours, and more options for ORS funding at both early childhood and secondary school level.

Access to current support systems

Throughout the feedback to the draft Action Plan there was a perceived lack of support services for students in need. As one person commented, "Most schools and parents can see the students who are in need, they just can't get help."

> "Most schools and parents can see the students who are in need, they just can't get help."
>
> **Survey respondent**

Many said that support services needed to be wraparound, and that programmes needed to be more flexible. Another said that initial engagement can take too long (in some cases, more than a year).

Concerns were raised about barriers to learning support for Māori. It was suggested that the Whaia Te Ao Marama (the Māori Disability Action Plan) was a good model for how the draft Action Plan might support Māori.

Several commented on the lack of funding for support programmes. One parent said that although a programme was working for their autistic child, the government had stopped funding it. Another support worker spoke of having to retire early due to being burnt out from working for an underfunded organisation that helps students with dyslexia.

Several also indicated a need for more support for deaf and hard of hearing children and young people. Their comments included:

- concern about hard of hearing children who do not qualify for support because their needs are "not serious enough", but learning is impacted by hearing loss
- concern about those children who are now able to hear (e.g. cochlear implant), but time spent with significant hearing loss has left them behind – they need support but may not qualify
- support for gifted deaf students is withdrawn when they meet age appropriate milestones, as they don't meet the criteria, but they do not then reach their potential
- concern about lack of support for Māori deaf and hard of hearing with reduced outcomes.

Modifications to the Ongoing Resourcing Scheme (ORS) to support children and young people with mild to moderate needs

A number of those responding mentioned how the current ORS scheme could be modified to better support children and young people with mild to moderate learning support needs.

A significant number expressed that the criteria for ORS be expanded, stating that current eligibility criteria creates a gap between those who qualify for ORS funding and those who need support but are not eligible. They also requested increased funding to the ORS programme for students who did meet the criteria.

> "While we support increased support for students who are ineligible for ORS, this raises questions around ORS itself. We would support a review of ORS and support a more flexible funding model that is designed to meet the needs of individuals."
>
> **Disabled Persons Assembly**

Issues with the current the Ongoing Resourcing Scheme (ORS) programme

Issues with the current ORS system were specifically mentioned by 17% respondents (148 of 893). There was a strong feeling that ORS was not capturing the needs of a large number of students, with both those who failed to fit the criteria and those eligible for ORS support mentioned by respondents.

Those who identified as Pacific were particularly concerned with an increase of accessibility of ORS funding, or a replacement with other resourcing. Similarly they were concerned about whether the current ORS criteria were sufficient to cater to the number of students who needed ongoing support.

There was support expressed for a review of and/or changes to ORS:

Several of those responding stated that the current ORS system of funding should be scrapped completely. They felt that ORS was "negative deficit" based and the concept for funding needed to be changed to a "needs based system".

Some individuals who made submissions asked for additions to ORS such as yearly reviews for funding applications, and removal of life-long ORS funding.

A few requested a review of the "consultative model" and some individuals described the model as "inadequate" and "not working".

> "We very strongly feel that any action plan for disability and learning support must include reviewing the ORS and consultative model systems. These are supposed to support our most vulnerable students and these areas need to be addressed with urgency."
>
> **VIPS Equity in Education NZ**

What could a flexible package of support outside the Ongoing Resources Scheme look like?

Some people asked for a support system for children and young people with "mild-moderate" needs that was separate from modifications to the current ORS system. Suggestions about what this could look like included increased staffing and funding for schools and kura to work with disabled students, and blanket requests for "sufficient resourcing". Individual submissions suggested integrating outside specialists into classroom teaching, and creating a "pathway to specialist schools" for students.

Several wanted more support for children with speech language needs. There were specific references to supporting those with moderate needs, and a few acknowledged the high numbers of juvenile offenders with communication and speech language needs.

Best practice models and services

Many noted that there are support services, resources and research already available locally and internationally that could be better used or adopted. Information available to parents and teachers on websites was acknowledged, such as the submission by KidsLink outlining their website and resources, the Ministry's documents on different neurodiversities, SPELD courses, and other existing websites (for example, New Zealand Dyspraxia Support Group's website).

Those who discussed communication issues suggested assessments by educational psychologists, phonological awareness programmes, and drawing on findings in the UK's Bercow Report. They also wanted communication to be acknowledged as an educational challenge rather than as a medical illness.

Some mentioned a number of overseas programmes and implementations that could inform best practice. One parent specifically mentioned the Davis Dyslexia programme that their child had participated in for eight years, citing Australia's implementation of the programme. Another referred to the "Partnering for Change" delivery model in Canada, where the government provides funding for students with dyspraxia to access physical disability services.

Respondents also endorsed the expansion of existing services, including:
» specialists providing consultation for schools and kura
» funding for different therapies to make them more accessible (for example Applied Behaviour Analysis [ABA] therapy for autism)
» reinstating the Ongoing and Reviewable Resourcing Schemes (ORRS) to give children an initial boost
» helping with transitions and learning routines to enable access to the classroom and the curriculum.

It was also suggested that the Kāpiti College neurodiversity programme, which has proved effective with minimal funding, be adopted nationally.

Early intervention

Twenty-nine percent (or 260 out of 893) of all those who responded to the survey addressed early intervention in some way, making it – along with 'learning support funding' – the fourth most common topic for feedback.

Many felt that early intervention was incredibly important. The joint submission from NZ Kindergartens and the Early Childhood Leadership Group stated that "early intervention could remove or reduce the level or nature of the support needed in later years", and the Office of the Children's Commissioner stated that it "strongly support[ed] the inclusion of a focus on early intervention".

The joint submission from NZ Kindergartens and the Early Childhood Leadership Group stated that "early intervention could remove or reduce the level or nature of the support needed in later years."

Joint submission: NZ Kindergartens & Early Childhood Leadership Group

Early interventions

Intersection of early intervention and at-risk prevention

Educators and parents alike, spoke of the adverse effect of leaving intervention too late. In order to give children with additional learning needs the best chance of accessing the school curriculum, it was essential that their needs were detected early (early intervention is the "most cost effective way to remediate our students"; "Early support for the child and their whānau will help them through").

The general consensus was "the earlier, the better". Barnados' submission offered that "the sooner that neurodiversity is identified, the sooner teachers and other adults around that child – including parents and caregivers – are able to get support and implement effective learning and support strategies". The New Zealand Human Rights Commission (NZHRC) was in agreement: "We submit that identification and interventions, particularly for learning difficulties and not just other health issues, should be […] conducted as early as possible in a child's life".

> "The sooner that neurodiversity is identified, the sooner teachers and other adults around that child – including parents and caregivers – are able to get support and implement effective learning and support strategies."
>
> **Barnardos NZ**

Barriers to diagnosis/identification of need in early learning and primary

There were concerns about how difficult it could be to get a specific diagnosis in the current system. Many parents identified a lack of clarity or guidance on who to approach – either in early learning or primary – to identify their children's learning needs. Additionally, many educators argued that diagnosis was an equity issue, with some families unable to pay for assessment.

Other commenters – primarily educators – claimed that the inability of new entrant teachers to refer a child until after they had been at school for six months was a major barrier to early intervention: "new entrant classes are full of children who have needs but we're told they are not old enough to be assessed, which is totally against research".

Delivery of support

There was widespread enthusiasm for a one-to-one model of support in the early years, so that children with additional needs could receive targeted and individualised support.

There was also enthusiasm for a flexible package of support which would fix the prevailing issue of siloed funding, and provide students with the interventions they need.

Educators and parents shared a desire to see improved collaboration between schools and kura, whānau, learning support specialists, and other agencies, so that early intervention teams were truly multidisciplinary. One educator said that their school had a well-functioning advisory team made up of a public health nurse, an RTLB, a SENCO, Police, Ministry specialists, and Oranga Tamariki: "This helps us to coordinate the knowledge held across the sectors represented and to make decisions as a team to best support the learning for our tamariki". Similarly, Waitakere Area Principals' Association affirmed that by "working more closely together we are more able to develop trusting relationships, share and develop expertise, identify systemic gaps and share resources".

Specialist services and programmes recommended

There was a strong desire for specialist services to be made available for early intervention purposes. The most commonly mentioned were educational and general psychologists (particularly highly-valued by parents), occupational therapists, registered nurses, and speech language therapists. Teachers' aides and physiotherapists were also mentioned.

Both educators and parents often referred to the Mindplus programme for extending gifted students.

Role of parents and whānau in early intervention

A large number of parents did not think the draft Action Plan sufficiently addressed the importance of supporting whānau at the early intervention stage. One commenter said that, "This plan focuses very much on service to ECE and schools, but not on parents and I feel this is a major gap, in particular when early intervention is an identified priority, and classed as being best practice." Especially when children were younger, it was important for "family [to be] at the centre and included in all decisions". Occupation Therapy NZ explained further: "Developmental support needs to start at home and then be transferred to the school setting rather than the other way around."

In contrast, some educators saw parents as a potential barrier to sourcing help for children in need. One ECE educator said that they relied entirely on getting parents' permission in order to access help, and that sometimes this permission was not readily given.

A small but vocal group of survey respondents and stakeholder groups (including Blind Citizens NZ) pointed out that the draft Action Plan was "silent on how it will respond to the needs of parents and whānau who themselves are disabled".

Mix of services across Health and Education

Support was widespread support for aligning Education and Health supports for early intervention, with a significant number attesting to the need for the two ministries to work more closely and effectively together. For example, the Disabled People's Organisation said that Health and Education "don't talk to each other", and that there was good reason to "make the interface easier". Likewise, the Early Childhood Advisory Committee asked whether Health and Education could "share each other's systems".

There was particular enthusiasm for the prospect of increased mental health support in schools and kura, and cross-Ministry collaboration was seen as essential. Social workers' assistance was also viewed as vital to supporting families in early intervention.

Health and Education "don't talk to each other", and that there was good reason to "make the interface easier".

Disabled People's Organisation

Recommendations

There were various recommendations for improving early intervention services and supports, including:

- look at the Early Intervention Service currently working across Education and Health in Christchurch

- expand service alignment beyond Health and Education (Oranga Tamariki was seen as particularly essential to providing comprehensive early intervention support)
- ensure that the alignment of Health and Education support continues after the child turns eight
- exercise caution when merging medical (i.e. Health) and socio-cultural (i.e. Education) theories/models.
-

Including early learning

The outlying concern was that early learning was not included to the degree it should be. For instance, NZ Kindergartens' submission spoke of the "invisibility of ECE" in the draft Action Plan, and the Early Childhood Advisory Committee noted that there "seems little acknowledgement of early childhood in the Action Plan".

Many were concerned that the draft Action Plan did not properly recognise that many behaviour and learning problems begin and can be identified in kindergarten or pre-school. Both educators and parents believed that the "first few years of a child's life are critical for future outcomes", and that "ECE is where all this needs to begin". Te Akonga noted that "True early intervention is simply that…early! We would be turning our back on extensive research if the early years, birth to 6, are not top priority."

> "True early intervention is simply that…early! We would be turning our back on extensive research if the early years, birth to 6, are not top priority."
>
> **Te Akonga**

Recommendations

Many commenters wanted trained support workers in kindergartens who could provide one-to-one support (e.g. Early Intervention Teachers, Visiting Neuro-developmental Therapists). Alternatively: "Could we better train and equip pre-school staff to note learning progressions?"

Some wanted to see the Learning Support Coordinator role established in early learning services as well as in primary/secondary settings.

Respondents were split on whether Plunket should continue to provide screening/checks before age three, or whether trained professionals should be put in early learning services for that purpose.

Dispute resolution

Although dispute resolution was a less popular topic with those responding to the survey, 44 submissions (or 5% of the total) still addressed the matter of their own accord. The vast majority of these seemed unaware that the Ministry's is current phasing-in a new "Dispute Resolution Process" (DRP) in various regions of NZ.

However, there was general consensus that having a reliable dispute resolution system in place is vital. People were not confident about the results that came from lodging a complaint under the current system, and hoped the strengthened system would ensure that children's rights to education were supported, and schools and kura were held responsible for any breaches.

For more information on the DRP, see the Ministry of Education website: https://parents.education.govt.nz/learning-support/learning-support-needs/resolving-problems-about-your-childs-learning-support/.

Current system

A strong and common theme was that the "current" system of dispute resolution was difficult, time-consuming, and accorded no accountability to schools and kura which were unfairly standing-down or discriminating against students.

Some families attributed the difficulty of the current system to untrained and biased boards of trustees (BOTs) who treated children with learning support needs unfairly due to a lack of understanding. Whereas the BOTs was supposed to provide an objective view if problems arose with individual teachers and within classrooms, parents had rarely received the kind of help they needed to solve disputes.

Dispute Resolution Process

Where people knew about it, they expressed support for the new Dispute Resolution Process. Montessori Aotearoa New Zealand described the new system as a "positive move". Massey University referred to "the importance of Dispute Resolution as an avenue for parents" as a "strength" of the draft Action Plan.

Parents wanted somewhere to go to complain about issues like schools' use of ORS funding, and how schools identified and provided support for gifted students.

Support for parents and whānau

People asked for better support for families during the complaints process. The main type of support requested was funded legal advice, and better information. A couple of respondents asked for the Ministry to support parents and whānau to lodge disputes. One recommendation was for an active advocacy team at the Ministry of Education that takes up the process of complaints for parents.

VIPS (Very Important People Supporting Equity in Education) NZ suggested an easy-to-access code of rights at schools so that families and children could understand their rights during the dispute process. Further, some respondents suggested an easy-to-read poster with a code of rights for children and information on where to get help if those rights were breached. Some wanted an independent local support mechanism for immediate advice and help when a dispute arose.

It was recommended that the family be heavily involved in the dispute resolution process so that the child at the centre of the complaint is always supported. Respondents also wanted the student to have agency in the dispute process.

Independence

Those responding made it clear that the dispute resolution service should be independent of schools and other agencies that might have a biased stake in the process.

Many people said that some schools are illegally suspending, excluding, or standing down students as well as treating students poorly. This was why the dispute resolution process should to it outside of schools, kāhui ako, and the Ministry so that it remained totally objective.[3]

A couple of submissions proposed that part of the LSC role could be to settle disputes or intervene if a school is discriminating against a student.

[3] The Ministry's new Dispute Resolution Process includes provision for an independent mediation process through the Ministry of Business Innovation and Employment (MBIE), to ensure neutrality.

This could only occur if the LSC was separate from the school and the regional Ministry office.

It was also recommended that trained mediators be made available to support the dispute resolution process. One respondent, for example, recommended that each school have a specially-appointed external party that teachers can call on in order to resolve disputes on the spot.

Other comments regarding the new dispute resolution system

A couple of respondents were concerned about the cost of the service, and whether that money could perhaps be better spent on staff or resources to directly support students.

The Office of the Children's Commissioner suggested that the Ministry evaluate the existing pilots of the new system to ensure its effectiveness, before rolling the DRP out to other regions of New Zealand.

Improving the provision of at-risk education

Of those responding to the survey, 5% (or 44 out of 893) addressed provision for at-risk students. Most of these criticised the Action Plan for not providing enough detail on how it was going to improve outcomes for at-risk students.

Many emphasised the importance of giving a voice to at-risk students, particularly in the event that their parents – perhaps due to their own physical and/or mental health issues – were not able to advocate for them.

Respondents criticised the "deficit model" that informed the current approach to at-risk provision. Some proposed a sector-wide culture change so that blame and responsibility was directed not at those students who were at-risk, but at the education system which had failed and alienated them.

Current provision for at-risk

Alternative education

Many of those who addressed provision for at-risk learners wanted to retain alternative education options for students who either fall below the ORS funding requirement, or are unable to thrive within a mainstream setting. They said that alternative education was a valid choice for many at-risk students, and believed that it needed to be stripped of the stigma it currently holds. As Te Ora Hou's submission stated, "some young people are worse off when they remain in mainstream education rather than accessing alternative education".

> "Some young people are worse off when they remain in mainstream education rather than accessing alternative education."
>
> **Te Ora Hou**

Many students prefer alternative education because there is less judgment from teachers, and because class sizes are smaller. This helps students build a relationship with their teachers, and feel empowered to use their voices. One inmate at Rimutaka Prison reported liking alternative education during her schooling experience because "there were brown people there, Māori like you".

Likewise, in a meeting with Titiro Whakamua, the Teen Parent Unit attached to Heretaunga College, they talked about how Teen Parent Units work well for some students "because the teachers care about them and they get to know them, they have their tamariki around, and there are less people in the classes". NZSTA also supported Teen Parent Units as a valuable education pathway, adding that sometimes students do not find the right answer in mainstream education.

Conversely, some submitters thought it preferable to strengthen mainstream schools and kura to support at-risk students, and to use alternative education only as a last resort. As one group mentioned, the potential cost of doing nothing for kids who were not in employment, education or training (NEETs) was far greater than the cost of supporting them throughout mainstream education.

> Teen Parent Units work well for some students "because the teachers care about them and they get to know them, they have their tamariki around, and there are less people in the classes".
>
> **Teen Parent Unit,** Heretaunga College

Activity centres

New Zealand School Trustees Association (NZSTA) said that although activity centres were not always equipped to meet the needs of students with mental health issues, they did provide educational pathways for at-risk students.

Some identified issues with getting funding from the District Health Board and Ministry of Education to take children to one-day-a-week activity centres.

Prison education for youths

Several groups were concerned about the lack of funding and resourcing for prison education.

Attendance Service

Some submissions stated that it was difficult for kids to get to school if their parents suffered physical and/or mental health issues. For this reason, the Attendance Service was seen as a valuable means of transport to school or activity centres for those at-risk. The Service was especially important for students living in rural areas or far away from activity centres.

Funding for at-risk students

Many submissions said that a lack of funding, compounded by staff shortages, was causing long wait-lists for students to access alternative education. Students and their families were left to struggle whilst educators called for "more resources […] for teachers to support at-risk students" (Epsom Girls Grammar School).

For example, Te Kura Central South reported that there were a large number of at-risk students enrolled with Te Kura without adequate interagency support. These students had no funding behind them and yet were unable to attend mainstream education. Te Kura Central South suggested that funding needs to follow students from institution to institution, and be transferable regardless of the funding stream.

Similarly, some underlined the importance of cross-sector coordination in bringing about positive, long-term, sustainable change to at-risk student statistics.

Recommendations

Recommendations for improving provision for at-risk students included analysing the roll for Te Kura, and investigating the number of prisoners who had been failed by the education system.

Several also provided examples of effective at-risk student models in an international and national context. One recommendation was that New Zealand adopt the United Kingdom's approach, which involves:

- allowing for absence due to mental illness
- supporting students with mental illness at school and helping them seek help
- working with local authorities to ensure that children who have been absent 15 or more days can access education
- creating a flexible child-focused support plan that is sympathetic to mental illness
- making or supporting a referral to Child and Adolescent Mental Health Services (CAMHS) or to an education psychologist.

In a New Zealand context, the Achieving at Waitakere project was praised for improving school attendance for the at-risk students within the programme.

Transitions

Twelve percent (or 105) of all those responding to the survey addressed transitions. Those making submissions were equally interested in the movement of students from early childhood education to primary as in the movement of students out of secondary school to further education and employment.

Transitions between early learning and primary

Just over 6% of total responses (57 out of 893) addressed the topic of transitions from early learning to primary.

Concerns

The gap in funding to support children between early learning and primary was identified as an issue in several submissions. For example, the New Zealand Health Research Council's (NZHRC)' submission noted that "there appears to be a gap in terms of support for children transitioning from early childhood services to school". Some pointed out that whilst the law states that a child need not start school until age six, support for children with additional needs in early learning centres ends at five, which puts unwelcome pressure on the parent to enrol their child in school.

Respondents also perceived a lack of provision in the draft Action Plan for students who transition between schools or go to multiple schools throughout their schooling life.

Recommendations for transitioning students from early learning to primary

There were various recommendations for improving transitions, including:

- create a personalised action plan/"One Plan" for each student with high needs transitioning to school (recommended by BestStart Education, among others)
- improve information-sharing protocols: create a system that allows reports to flow from early learning services to school "so that a student's needs can be easily tracked as they move schools" (Empowered Learning Trust)
- make a health and wellbeing check a key part of the transition between early learning services and primary school: "don't just look at academic achievement"
- ensure that the child's financial support follows them from early learning to primary school: "One pool of money so support is not disrupted"
- for gifted students who need to transition to a school sooner than other children of their age group, focus on "micro" transitions – e.g. between rooms in early childhood settings (GiftEDnz).

Transitions to further education, training, or employment for at-risk students

Of the 105 (12% of all respondents) who mentioned transitions, 57 specifically discussed transitions following secondary schooling. Many focused on funding issues and the need for ORS funding to continue after formal schooling.

Overall, there is a perceived lack of support for young people with learning support needs after secondary school, either from the tertiary sector or supported employment agencies. The submission from the Community Care Trust highlighted this concern, stating "we are of the opinion that a focus on transition planning for what life looks like post school for these students… is an area needing development". From the references made to future employment, young people with learning support needs and their families appeared to have experienced little careers advice or transition support.

> "…we are of the opinion that a focus on transition planning for what life looks like post school for these students… is an area needing development."
>
> **Community Care Trust**

Funding

The need for ongoing funding to provide support post-school was a strong theme, and was often mentioned as vital to the transition process. Suggestions included continuing ORS support through this period, and starting the Ministry of Social Development transition contract in Year 9 or 10 rather than only during the last year of schooling. One commenter said that the lack of ongoing ORS funding for those continuing on to tertiary study after secondary school implied that these students were not capable of higher study.

Pathways

Many expressed the need for better "pathways" for students both during and after compulsory education. Within school, learning plans that included pathway directions and opportunities to explore employment possibilities could be developed. Post-school, students would ideally embark on meaningful study and employment pathways with the support of education providers and inclusive employers.

A need was seen for students to have "options" available to them in the community and more assistance to get into employment. One suggestion was that, given the over-representation of Māori in national learning support statistics, the draft Action Plan should explicitly include proposals to support Māori students and their vocational outcomes.

Career advice

Several commenters addressed the need for careers advisors (and teachers) to have better knowledge of disability and the supports available to students and their families in the community. It was suggested that career education for these students start at primary school to give them the best opportunity to achieve their potential.

Alignment with Ministry of Health supports

Of the 8% of respondents (75) who addressed the alignment of education and health supports, nearly half favoured the cross-agency approach proposed within the draft Action Plan. Comments were made about smoother transitions, and sharing of information between ministries to minimise duplication (TalkLink Trust).

There were concerns that aligning supports would lead to invasions of privacy and the further framing of children as difficult, and that flexibility between agencies would allow children to fall into newly-created cracks.

There was also concern that current funding models were creating barriers to supports, in particular the way funding of therapy and support services was divided between the Ministry of Health and the Ministry of Education. For instance, one parent commented that whilst they do not use their Ministry of Health allocated funds because their child refuses the services offered, their Ministry of Education funding – which the child requires far more – has been used up.

One professional also noted that neurodiverse children cannot be directly referred to therapy services provided through the Ministry of Education Physical Disability Service. Instead, this referral needs to be made by the school, and can lead to services not continuing when a child transitions between schools and kura.

Developing a holistic service across health and education

Parents and disability sector groups (Disabled Peoples Organisation, IHC) called for a holistic wraparound delivery of services that included both health and education. As one submission stated, “The current system is inefficient with health therapists being responsible for 'whole of life' and education therapists with 'accessing the curriculum'. In reality, the lines are very blurred and this division can lead to children missing out completely (e.g. ORS funded children who would still benefit from therapy to improve their mobility) or two therapists being involved when one holistic model of care would be much more efficient.”

There was also a call for this form of holistic wraparound service to continue through to secondary school and for it to be more accessible throughout an individual’s life. One submission gave the example of a disabled student who was only eligible for a wheelchair after the age of sixteen. They stated, “This is all at the wrong end of the journey and is disabling our student population, our teachers and staff, often permanently in terms of their right to reach their potential and become a strong work and social force according to each one's right and ability.” Specific mention was made of the need for health and social development supports such as nurses, mental health and social workers to be accessible in all schools and kura.

Professional Learning and Development for teachers and health professionals

There was a desire to see teachers and health professionals collaborate more effectively. Professional development in this area was seen as necessary to “develop trusting relationships, share and develop expertise, identify systemic gaps and share resources for the same goal of improving outcomes for students and families”. However, there were also concerns that the education and health sectors’ different structures may make it hard for them to work effectively together.

There were calls for teachers and health professionals to upskill together, so they could identify symptoms of developmental disorders early. As one parent stated, the teacher “simply dropping 'hints' to parents (as was our case) is unprofessional and can serve to delay important diagnoses and support by months or years”. Another respondent suggested training nurses to detect early signs of autism, as is best practice in Victoria, Australia.

Priority 3: Improving the way the education system responds

Improve workforce capability

Workforce-related matters were very popular: 46% of those providing feedback (or 410 out of the 893) commented on workforce issues in some way, making this the most commonly-addressed area of concern.

The lack of Māori specialists in the learning support workforce concerned many. Across multiple disciplines – including speech language therapy and Resource Teacher: Learning and Behaviour (RTLB) – respondents perceived a lack of specialists who were trained in the Māori medium and familiar with Te Ao Māori. The absence of recognition of language, culture, and identity in education settings because of this gap in the workforce may be creating a barrier to learning for some Māori students.

General teaching workforce

The 32% (289 out of 893) who addressed the general teaching workforce, largely expressed dissatisfaction with the current system. Hundreds suggested that teachers should receive more training on "best practice" for students with additional learning needs.

Training

Nearly 60% (172 of 289) of those who addressed the general teaching workforce believed that increasing training for teachers on specific learning needs should be a priority. In the words of one person, the "education of our educators is clearly lacking".

It was suggested that training on specific learning needs should be a compulsory part of "pre-service" teacher education, with the agreement with universities and teacher training programmes. Responses asked that existing teachers undertake extensive professional learning and development (PLD) and stated that the current provision of PLD via "occasional one-off workshops" was insufficient as it resulted in "little transfer into practice".

> "In my work around the country, I am constantly asked, 'why did we not learn about this, or why hasn't this been part of our Professional Learning and Development?"
>
> **Survey respondent**

Improved training would equip teachers with the tools and strategies to identify students with additional learning needs earlier, as well as to continue the work of support services within the classroom. Ideally, teachers would learn methods such as phonological awareness and decoding during their initial training or in ongoing PLD. As one specialist respondent stated: "In my work around the country, I am constantly asked 'why did we not learn about this, or why hasn't this been part of our Professional Learning and Development?"

Many believed that teacher training should include how to recognise and support gifted students. Teachers should understand how to enable gifted children to be autonomous learners, and how to provide them with more dynamic ways of being stimulated.

There were concerns about the availability of workforce training. The need for teacher training to be "readily and consistently available" was

highlighted; one response noted the discrepancy between teachers whose schools funded “in-depth courses”, and teachers only able to attend “occasional one-off workshops”. Respondents raised the issue of access to training and ongoing professional development for Māori staff in education settings. This was seen as a consequence of overly-stringent entry criteria for specialist teaching scholarships, as well as the funding structure for these services.

Resources and support

Thirteen percent (39 of 289) of respondents stated that teachers needed additional resourcing and support (outside of training) to adequately support neurodiverse students. Specific suggestions included increasing wages for teachers, more release time, and additional programme resources.

People expressed concern over where extra support would come from given the current teacher staffing crisis in New Zealand, and generally thought that the draft Action Plan’s proposal to increase support would not be realised until workforce shortages were addressed.

> “With the teacher shortages, how do we get people to do these roles?”
>
> **Hobsonville Point School**

SENCO roles and teacher aide positions were popular topics, and evoked similar concerns about training, funding, and availability.

Specialist help within the classroom from outside professionals was viewed slightly differently with opinions divided. Some saw a “devolving” of teacher responsibility onto specialist supports as a result of the proposed screenings. However, others stated that the help of outside experts such as speech language therapists would benefit a student’s learning.

Curriculum

There were also several suggestions on how the curriculum could be a lever for cultural change in classrooms. These included restructuring the curriculum and classroom environment to suit the needs of neurodiverse students. Several suggested that incorporating teaching methods (phonological awareness and decoding) specifically designed for dyslexic students, could also improve literacy outcomes for all learners.

Learning support workforce

Of the 410 respondents who addressed workforce issues, 208 (51%) focused on the learning support workforce. Most were concerned with the current state of training, funding, and resourcing for the learning support workforce, and did not find adequate provision for any of these things within the draft Action Plan. Whilst some questioned the effectiveness of specific roles such as teachers’ aides and RTLBs, these were largely concerned with the resourcing of the positions, rather than the concept of specialised help for students.

Training

There was a resounding call for more training for support staff who assist the learning of students with disabilities. Fifty-eight respondents were concern about the lack of training teachers’ aides currently receive, feeling that with untrained teachers’ aides in the system “the students with the needs don't get the education they are entitled to”. They

questioned where training for general support staff would come from, with one respondent concerned about the "limited expertise" on additional learning needs in New Zealand. Suggestions included inviting specialists to train teachers' aides and providing targeted university courses.

Resourcing

A number addressed the resourcing of teachers' aides, RTLBs, SENCOs, and other specialist staff. There were a number of calls for increased resourcing of learning support staff, including increasing wages, hours, and funding for schools and organizations.

Resource Teachers: Learning and Behaviour (RTLBs)

Of those who mentioned the learning support workforce, 41% (85 of 208) were concerned about the RTLB role. They generally conveyed a positive view of RTLBs and the specialist assistance they provide, with many expressing appreciation of the service. They were concerned about the minimal mention of the RTLB role in the draft Action Plan, and requested more "clarity".

A large number – many of whom identified themselves as RTLBs – specifically asked that the RTLB role not be merged, re-captured, or disestablished as a result of the draft Action Plan.

Several raised issues with the current RTLB system. These included resourcing of RTLBs, their effectiveness in providing "practical" classroom suggestions, and current "20 week time frames" for RTLB assistance which created limitations for students with ongoing needs.

Groups and individuals made the common suggestion that RTLBs help train teachers. A RTLB submission stated that, "We use a strengths-based model to grow teacher capability through collaborative problem solving, coaching, and modelling. This leads to differentiation of the curriculum and adaptations to classroom programmes which aim to maximise the engagement and participation of students."

RTLBs also facilitate workshops which support teachers to refine their teaching strategies to better meet the needs of students. Examples include the Incredible Years Teachers and Parent programmes, phonological awareness programmes aimed as supporting year one and two teachers, and training and support for assistive technology apps such as Google ReadWrite, which successfully remove barriers for students with dyslexia.

Other specialists

Some mentioned other specialists that could be involved in the learning support workforce, particularly the need for more educational psychologists and literacy coaches. Such roles were seen as an important feature of the learning support system.

There were specific concerns about the deaf education workforce. The lack of New Zealand Sign Language (NZSL) users was seen as a barrier to deaf children and young people learning and succeeding. To increase NZSL use in the education system, NZSL tutors and educators/teachers' aides needed pay rates and employment conditions that were fit for their work as teachers with a second language.

"Learning Assistant time needs to be funded to help apply the OT/PT advice and programmes to be implemented within the school."

Paediatric Therapy Ltd

School leadership

The 6% (53) of respondents who commented on school leadership addressed a wide range of issues, and many recommended top-down cultural change in how schools and kura engage with disabled learners.

Culture change within schools and kura

A significant number highlighted the need for a holistic culture change in how schools and kura, senior leadership, and boards of trustees engage with students who need learning support. They affirmed that the attitudes of principals and Boards of Trustees influence the (BoTs) wider culture of the school in relation to neurodiverse and gifted children. A number held a low opinion of school leadership teams' attitude toward disability. One respondent stated that in their experience, the culture perpetuated by principals and teachers made school "an unsafe place" for such learners.

Training

A number of respondents requested increased training for principals, senior leadership teams, and BoTs on the needs of students with learning disabilities. These requests were driven by a perception that school leadership teams suffered a lack of understanding about the needs of learning support students, and would benefit from training. They felt that properly-educated and aware senior leadership teams would be equipped to improve the culture of the whole school around learning support.

Suspension and exclusion

Some complained about schools' misusing their powers of suspension and exclusion when it came to students with disabilities and students with mental health issues. They were concerned that schools were suspending or excluding students with additional needs because they were ill-equipped or unwilling to support them. One specialist, for example, told of an experience in which a child had been suspended simply so that school leadership could "convince the parents to move to a different school".

Respondents specifically mentioned mental health issues in relation to suspension and exclusion, with the view that "depression and anxiety go hand in hand with autism spectrum disorder".

Make information more accessible

The need for more accessible information was woven through many responses. Parents told of the difficulty they face in finding information on learning needs, and then understanding how to access help. Teachers expressed the need for more information about how to identify and support all the children and young people in their school or kura, early learning service me kōhanga reo.

There was a wide call for more information and support for parents and whānau when identifying and understanding specific behaviours and developmental needs. As one respondent commented, "I have known several parents of autistics who firmly believed their child was not autistic. If parents aren't aware that their child's development isn't typical they might not report it accurately to someone who isn't skilled enough to ask the right questions." There were several suggestions about what support

"If parents aren't aware that their child's development isn't typical they might not report it accurately to someone who isn't skilled enough to ask the right questions."

Survey respondent

families should get, including supporting parents and guardians to accept their child has a disability, and establishing support groups where parents and whānau share experiences and knowledge. As one teachers' aide commented, "I feel that the parents need to accept the fact, receive all the support that they need, and guide the child to the best possible environment."

Feedback showed that educators and parents often were not aware of the resources available to them. Several parents spoke of the frustration of having to find support services by themselves, with one stating "it's very exhausting trying to find help". Parents also identified their lack of knowledge about how to approach a child's school regarding a diagnosis.

Parents of gifted children and young people were particularly eager to see accurate information about giftedness disseminated to educators and communities. Several provided definitions to clarify the difference between gifted and highly achieving, and stated that the distinction was often overlooked by laymen. One cited the Columbus Group's 1991 definition of giftedness: "giftedness is asynchronous development in which advanced cognitive abilities and heightened intensity combine to create inner experiences and awareness that are qualitatively different from the norm. This asynchrony increases with higher intellectual capacity. The uniqueness of the Gifted renders them particularly vulnerable and requires modifications in parenting, teaching, and counselling in order for them to develop optimally."

Recommendations included creating a central website for all information relating to additional learning needs, and that training on specific learning needs be included in professional development.

"The uniqueness of the Gifted renders them particularly vulnerable and requires modifications in parenting, teaching and counselling in order for them to develop optimally."

Parent of gifted child.

Priority 4: Ensure that learning support is resourced for increased support and service delivery

Cost and demand pressures

Many respondents (individual survey respondents as well as stakeholder groups) believed that the draft Action Plan would be successful only if sufficiently funded and resourced, and were worried that its success would depend on future budget decisions.

Capped funding system for specialist support

A main belief was that, "Resources are stretched so thin it is impossible to meet the needs of all learners."

There was a strong request for learning support to be funded as a needs-based system reflecting demographic changes. As the Human Rights Commission's submission stated, "The existing level of learning support is not scaling to meet demographic demands […] Unlike other forms of funding (such as Early Child Education funding) which are automatically adjusted for population growth, learning support funding is not." The Inclusive Education Action Group's submission also noted that current resourcing frameworks "are not based on accurate prevalence data, and there are no mechanisms in place to respond to increased student roll or need growth".

> "The existing level of funding of learning support is not scaling to meet demographic demands."
>
> **Human Rights Commission**

Respondents expressed an acute worry that schools and parents of children and young people in need of learning support would be forced to compete with each other for funding. "Must we continue the system of these different clusters of children having to compete for funding?", asked one respondent, while another criticised the draft Action Plan for "do[ing] nothing to help decision-makers who are still constrained by lack of funds […] They will still have to choose one child's needs over another's, while there is not enough cash to help both". One respondent interpreted a phrase used in the draft Action Plan – "pressures across specific supports" – to mean competition for resources.

As mentioned previously, many focused on the Ongoing Resource Scheme (ORS) and on providing funding for students with additional learning needs who did not qualify for ORS. Students with moderate needs were identified time and again as the group most in need of funding.

Respondents also criticised the fixed length of support programmes: "Putting 20 week time frames on RTLB limits progress for student need and stops on-going service". Likewise, "often programmes/funding which last for say 10 weeks are not enough". It was suggested that the criteria be relaxed so that the student can access support for as long as they require it.

Waiting lists and access

There was much frustration around waiting lists (mentioned by 9% or 81 of 893 respondents). Many parents said that they had waited a matter of years to access supports like Intensive Wraparound Services (IWS) or ORS. There was the suggestion that some schools and kura had stopped referring students for support altogether because “they don’t think the referral will be accepted or is worthwhile”.

Some people were worried that the proposed screening measures would only add to already bulging waiting lists (for assistive technology, for example).

Concern was expressed about equity of access in rural and isolated areas, as waiting lists for parents/children in these areas were even longer due to the dearth of qualified support people.

School funding

Teachers and school leaders were concerned that the draft Action Plan’s proposals would stretch school-based learning support funding thinner than is already the case. “Schools wait for months, for support from the MoE”; “Schools have no option but to suspend or exclude because the real help is not available to support the child to develop”.

Many took note of the difficult spot occupied by schools when they were forced to access resources through a variety of funding pools (Interim Response Fund/RTLB/learning support), rather than through directly allocated funding. “Leadership in schools is put in an impossible position when allocating funds for equity”; “school boards have a terrible dilemma with so many priorities and no money”.

> “Leadership in schools is put in an impossible position when allocating funds for equity.”
>
> **Survey respondent**

There was some concern that special and residential schools were receiving too high a proportion of government funding in relation to regular schools.

Parents were concerned about school funding decisions.

There was a call for more public transparency over school expenditure. This request commonly fed into apprehensions about school leadership: currently, it is up to the principal and BOT (and their varying attitudes toward additional learning needs) to make decisions on resourcing learning support. Concerns about how schools and kura spent their learning support funding were often hand-in-hand with parents’ desire for an improved dispute resolution/accountability system.

A small number of parents were concerned about schools and kura funding programmes “identified as ineffective by independent organisations”.

Parents paying for support

There were repeated concerns that parents were forced to pay privately to get timely screening and interventions for their children because the relevant support was not available in or funded by schools and kura. This

raised equity issues about which parents could and could not afford to pay.

This was also seen by some as a human rights issue: “The fact that private tuition services are flourishing in an environment where the law and human rights conventions say children are entitled to a free education is indicative of just how poorly the education system is working”.

Learning support funding

Learning support funding was a significant area of concern. Of the nearly 900 total respondents, 29% addressed funding in some way, making it the fourth most popular topic overall (equal with ‘Early Intervention’).

Funding not available for the specialist supports needed

Many respondents identified that more funding is needed for speech therapists, psychologists, RTLBs, and most notably occupational therapists. They noted that the proposed screening measures would result in more diagnoses and thus increased demand for specialist support.

From a speech language therapist (SLT): “There is a lot of pressure on SLTs (and other field staff) to work more efficiently – see more children in less time. This isn’t effective and is unsafe for staff and for children.” Acknowledgement of the risks involved in overworking and underpaying learning support specialists was echoed throughout the submissions.

Some suggested that schools and kura allocate more full-time equivalents (FTEs) to specialist staff.

> “There’s a lot of pressure on speech language therapists (and other field staff) to work more efficiently – see more children in less time.”
>
> **Speech Language Therapist**

Learning support workforce funding

There was a wide call for more teachers’ aides in schools (both primary and secondary), with 6% (62) of total respondents specifically requesting more teachers’ aides. For some high-needs children, teachers’ aide supervision was the only means of safely attending school, and without it the student could only attend school half-time or even less. There was particular emphasis, therefore, on increasing ORS teacher aide funding. Many wanted part of this funding to go toward training/PLD for teachers’ aides.

Respondents noted that when teachers’ aides in primary schools were given their last pay rise, schools were not given extra money to cover this. Pay equity for teachers’ aides is an urgent matter to address in the view of many.

Other

Outside of specialist roles and teachers' aides, there were many comments calling for more investment in teachers – those "at the coalface". There was more enthusiasm for supporting teachers by providing them with specialist supports and teacher aide support than there was for funding teachers to "cover all the bases" themselves.

VIPS NZ was concerned that "The proposed amount [to fill gaps in LS workforce] seems to be intended to cover the shortfall between the hourly funding rate that the Ministry contributes and the amount schools are actually paying, rather than on recruiting more support staff."

Future network provision

Mainstream vs. special education for children and young people with learning support needs

Some respondents were vehemently opposed to the notion of special schools and satellite units, and considered the government's funding of such institutions an affront to human rights under the United Nations Convention of the Rights of Persons with Disabilities. However, a small group of respondents asked for more satellite classrooms in schools to cater for children who were mainstreamed but required specialist teaching support.

The need to strike a balance between the two modes of education was widely felt. Blind Citizens NZ's submission stated: "Blind Citizens NZ upholds the principle of inclusive education, but there is still a place for a specialist school or facility such as BLENNZ. We encourage the Ministry of Education to consider these elements when clarifying the role of special and residential schools."

> "Blind Citizens NZ upholds the principle of inclusive education, but there is still a place for a specialist school or facility such as BLENNZ."
>
> **Blind Citizens NZ**

Some stated that inclusive education and a Universal Design for Learning (UDL) approach was ineffectual for high-needs children, who are "lost" in a mainstream classroom environment. They believed that truly inclusive education encompassed also the provision of specialist services and alternative education options for those who could not cope in a mainstream setting.

Many who mentioned inclusion conveyed the belief that schools and kura were important training-grounds for an inclusive future society, and thus it was up to schools and kura to pave the way towards inclusion.

Concerns

Both educators and parents criticised modern learning environments as anti-inclusive. This was due to the additional noise and stimulation brought by larger student-to-teacher ratios, and the perceived inability of teachers to meet the needs of their students in such environments.

The Disabled Persons' Assembly articulated that, "truly inclusive education means addressing holistically the barriers that deny disabled

students an equal education: physical building design, classroom set up, lesson delivery, attitudes and discrimination."

A holistic system of learning support

Parents, educators and several support services acknowledged the need for a holistic system of learning support. As one educator stated, "This needs to be recognised by more than just education; housing, economic resourcing/employment, drug and alcohol addiction, parenting skills. These are all issues that contribute to the complexity of the issues our children, teachers and services are faced with."

Suggestions

Respondents' recommendations on how to improve the network were diverse. Suggestions included:

- implementing UDL
- finding an alternative – and a more truly-inclusive – approach than UDL
- having smaller class sizes
- changing the environment to suit the needs of children with disabilities and neuro diversities
- having satellite classrooms within schools
- having satellite schools so those with behavioural needs do not negatively impact their own learning and that of other children (FASD-CAN)
- implementing more assistive technology within schools and kura
- having immersion hubs for NZSL students, whānau, teachers and fluent speakers to be taught in bilingual environments
- pooling NZSL resources so that fluent personnel, including NZSL-fluent teachers and para-professionals, can be brought into regular contact with NZSL students
- having support services (for example, a MindPlus) within every region.

Cross-cutting components

Learning support workforce strategy

The 8%of respondents (65 of 839) who commented on workforce strategy generally shared the view that out of all the actions proposed in the draft Action Plan, more training and resourcing for the education workforce would have the biggest impact on disabled students within the school environment.

Training

As above, responses were concerned with the training of teachers, specialists, and learning support staff. They generally stressed the importance of "qualified" staff being appointed to support students with additional learning needs. It was believed that increased training improved the quality of service for students and decreased the need for blanket intervention services.

A number specified where or how the proposed training should be undertaken. They asked about the role of Institute of Technical Education (ITE) providers within the proposal, and stated that the cooperation of ITEs would be vital to ensuring that teachers were adequately trained to work with learning support students before they entered the classroom.

Respondents expressed concern over the resources available for training of teachers and support staff. One response spoke of the draft Action Plan's "limited mention of where the current skill base is coming from to upskill the new positions". Massey University's Institute of Education stated that "workforce development needs to focus on cultivating/keeping good teachers, [and] building capability and capacity".

> "…workforce development needs to focus on cultivating/ keeping good teachers, [and] building capability and capacity."
>
> **Institute of Education, Massey University**

Resourcing

Respondents expressed a need for resourcing of staff outside of training and PLD. Of these, many wanted the draft Action Plan to prioritise an increase in the number of staff. Others requested an increase in the number of staff in day-to-day contact with children (those "on the ground"), including teachers, RTLB and Resource Teachers: Literacy, and teachers' aides. These responses were concerned that the current staff shortage was a major obstacle to the effective implementation of a strengthened learning support system.

Respondents largely supported the inclusion of specialist help, including counsellors and physiotherapists. They noted the current wait time for such specialists indicated that the need for these specialists outweighed the availability. Respondents felt that alongside the requested increase in teacher numbers, increased specialist support for schools and students was necessary to improve support for students with additional learning needs.

Wellbeing and resilience

Eleven percent of respondents made comments relating to wellbeing.

A recommendation was made to ensure the Government's Child Wellbeing Strategy framework aligns with the equivalent set of concepts in Te Ao Māori. The development of a culturally appropriate plan for Māori student wellbeing was also promoted.

Some comments referred to the acute need for the education system to support children in building resilience – so that, one said, individual students did not "fall through the cracks and become a prison statistic" (Submission from the Newtown School Board of Trustees).

Respondents believed that schools and kura were an ideal setting for building resilience. The Paediatric Child Development Service's submission said that the advent of "whole-of-school resiliency building […] fits with the work being done by the newly formed child wellbeing unit on the New Zealand child wellbeing strategy".

Wellbeing of Māori

Wellbeing was seen, by respondents who identified as Māori or addressed issues concerning Māori, as a multi-faceted concept that extended far beyond education.

Te Kōhanga Reo National Trust applauded the government's new focus on wellbeing, and recommended the inclusion of an indigenous framework for understanding and supporting wellbeing. That framework included pou tuawhā: "pou tuawhā focuses on the wellbeing of our mokopuna and their whānau, expressed as ā-wairua (spiritual wellbeing), ā-whatumanawa (emotional wellbeing), ā-tinana (physical wellbeing), [and] ā-hinengaro (cognitive / intellectual wellbeing)".

Respondents related wellbeing to equitable education – including for children from historically-disadvantaged backgrounds. The Office of the Children's Commissioner stated that, "Any policy and practice that impacts on the wellbeing of children should have the objective of reducing disparities by setting measurable outcomes for, in this case, Māori children."

"Any policy and practice that impacts on the wellbeing of children should have the objective of reducing disparities by setting measurable outcomes for, in this case, Māori children."

Office of the Children's Commissioner

Child Wellbeing Strategy

There was widespread support for the proposed Child Wellbeing Strategy's inclusion of disability and learning supports (including by stakeholders like IHC). Some took issue, however, with exactly what kinds of needs the strategy would cover and the nature of the supports. For example, one individual asked: "What about those with high personal care, mobility and health issues?"

Wellbeing within education is important

All but a very few respondents thought that wellbeing within education was important, and considered that it should be an education priority

within both early learning and compulsory schooling.[4] The takeaway was “sick children don’t learn”.

Mental health support at a younger age was thus seen as a preventative measure – a means of avoiding the “ambulance work” administered by the Department of Corrections. Wellbeing support was seen, in this respect, as a vital aspect of provision for at-risk students.

In the eyes of many, wellbeing was a natural by-product of students being able to access the learning supports they needed to access the school curriculum. They identified a strong link between a lack of early intervention for students with additional learning needs, and the development of self-esteem and other psychological issues later on in life (as one survey respondent wrote, “children who have difficulties are often not diagnosed as there is no funding in any sector, and they can end up with a myriad of mental health and well-being issues”).

In particular, it was emphasised that giftedness can be highly detrimental to a child who does not receive the right support. Parents repeatedly stated that their children were misbehaving because they were bored and were being bullied because they were different, with both of these factors contributing to their child’s development of low self-esteem issues. It was reported that gifted and talented students – especially those who are twice exceptional – face trajectories that involve the health system (mental health and addiction) and the justice system (truancy, delinquency, and criminality). These defined trajectories exclude the less-clearly-measurable but still crucial impacts of loss of connection and contribution to community that gifted students face.

Wellbeing and resilience supports

Feedback indicated that current supports for wellbeing are not working well. Teachers and school leaders were often singled out in this respect as not cultivating the classroom culture of understanding and support that students needed to feel empowered in education.

There was a resounding call for assistance for children who suffered trauma, anxiety, depression, and stress-related issues alongside or as a result of their learning needs. Many of the children seen in CAMHS, one commenter observed, had learning difficulties.

Outside of the named mental health issues, there were quite a few calls for school-based assistance with developing social skills and behaviour management techniques. Help with socialising and making community connections was seen as particularly important for disabled learners (as in the Disabled People’s Organisation’s submission, for example).

The specific learning needs that were mentioned most often in relation to poor mental health were autism spectrum disorder and giftedness, both of which were correlated to heightened emotional sensitivity.

Respondents were not only concerned with the mental health of students. A number (largely educators/school leaders) also referred to the scarcity of mental health support for staff. Poor mental health and wellbeing was seen as a leading contributor to attrition in the general teaching workforce.

Support needed for bullying prevention

There was unanimous agreement on the need for support for bullying prevention, although the number who addressed bullying was not substantial. A significant point made was that neurodiverse/disabled children were more subject to bullying (psychological and physical) than other children and young people. This was backed by the NZHRC’s submission, which reported that disabled children were over-represented in bullying and victimisation numbers.

[4] Those who were against this notion did not consider the health and well being of students to be the government’s responsibility, but rather the responsibility of individual parents.

Recommendations

Respondents suggested various actions to address wellbeing, including:

- make mental health studies part of the curriculum; teach wellbeing and resilience strategies universally in schools and kura to promote inclusion
- align Health and Education supports in order to address the mental health of young learners
- ensure access to general psychologists or counsellors, nurses, social workers in primary and intermediate schools and kura, including small and rural schools and kura
- educate teachers on suicide prevention
- explore alternative programmes to support mental health: one respondent said that for one high-needs student, “Being out in the bush, exploring the outdoors and being able to explore his creative abilities has done ten times more for his personality and wellbeing than standard schooling ever did”
- create dispute resolution pathways for appealing exclusions and expulsions due to mental health issues: there is a concern that schools and kura are not required to inform the Ministry of mental health issues experienced by children and young people with learning support needs
- review expectations for students with learning needs or disabilities. Whether held by educators or by whānau, low expectations could reinforce feelings of failure in students
- support educators to identify and address bullying in schools
- improve information-sharing protocols, and have an ongoing record of health and wellbeing for individual students.

“Being out in the bush, exploring the outdoors and being able to explore his creative abilities has done ten times more for his personality and wellbeing than standard schooling ever did.”

Parent

Overarching themes

Several themes that emerged from the feedback fell outside of the four main priority areas, yet spoke to the draft Action Plan's vision in important ways. These themes and the feedback related to them is included below.

Inclusion

Sixteen percent of total respondents addressed the topic of inclusion in some way, making it the fifth most common topic addressed.

A number thought it "wonderful" that the government was trying to assist children with additional learning needs in their local education setting. However, there were many suggestions for how the draft Action Plan could further promote inclusion. The submissions from IHC NZ and the NZHRC expressed particular concern about the draft Action Plan's vision of inclusion.

Defining inclusion:

Various definitions of inclusion were provided by respondents, including:

- "Inclusive education is about giving all children and young people the chance to be present, participate, learn and achieve regardless of their individual needs or differences" – RTLB Cluster Managers
- "Inclusion is concerned with the identification and removal of barriers…Inclusion is about the presence, participation and achievement of all students" – UNESCO, as cited in the Disabled Person Assembly's submission

> "Inclusive education is about giving all children and young people the change to be present, participate, learn and achieve regardless of their individual needs or differences."
>
> **RTLB Cluster Managers**

Experts from Massey University Institute of Education recommended that in order to further the vision of a genuinely inclusive system, greater alignment was needed between the draft Action Plan and legislation/ resources such as the UNCRPD, the NZ Disability Strategy, Success for All, TKI Inclusive Education, and Te Tiriti o Waitangi. Several groups, including the Disabled Persons Assembly and IHC, directly quoted sections of the UNCRPD establishing the right of disabled citizens to an inclusive education. The NZHRC also provided models of inclusivity from within New Zealand, citing the vignettes included within the Education Review Office's 2015 report on "Inclusive practices for students with special needs in schools", and IEAG's "Voices Project".

Cultural and perspective change

Respondents were troubled by the culture surrounding the current system. One cause for concern was how difficult it was to engage with the system, which according to one individual has become "complex, slow and difficult to navigate" due to many years of evolution.

Many questioned whether the proposals would do anything to change the attitudes of educators, and whether a failure to change these attitudes

would undermine any potential success. For example, one response was concerned about teachers engaging with disabled students as “a method of generosity” rather than as a right.

In the words of one: “Inclusion [should be] meaningful, not tokenistic”. This desire for systemic or structural change over “additional support” was echoed by the NZHRC’s submission: “One small but telling example of how the Plan appears to function more as an adjunct rather than driver of change is the references in it to ‘additional learning needs’. This phrase implies that these matters are an ‘add on’ to an existing system. The creation of an inclusive education system requires a systematic review and complete revision in the vein of the recent review and reform of the Care and Protection system.”

Survey respondents also wished to see a perspective change within the education system. As one commented, there is “a general systemic position which sees Gifted, ASD and Disabled (particularly neurodiverse) students and their parents as a ‘problem’”.

The proposed perspective change would include an acknowledgement that we are all neurodiverse learners because we all learn differently. In order for everyone to accept that “atypical neurological development is a normal human difference that is to be recognised and respected as any other human variation”, many of the labels associated with neurodiversity would need to be reconsidered.

Similarly, many comments mentioned that teachers did not acknowledge, accept or understand gifted students and made decisions based on personal perspectives rather than evidence-based practices.

> “…atypical neurological development is a normal human difference that is to be recognised and respected as any other human variation.”
>
> **Survey respondent**

Other suggestions for increasing inclusion

“Training” – for teachers, senior leadership staff, and boards of trustees – was the most common suggestion for increasing inclusion. Many commenters suggested PLD for teachers and teachers’ aides on inclusive classroom practices (provided centrally by the Ministry to ensure quality control). Some suggested a co-teaching model in which each subject teacher was accompanied by a specially-trained inclusive educator.

Respondents offered that learning about disability history and disability rights and identity should be a compulsory part of the education curriculum in order to raise disability awareness in all children and to support inclusion,. They also wanted to see all students learn about neurodiversity; if this information came from teachers who were themselves neurodiverse, even better.

Several submissions referenced the importance of catering for additional learning needs within the national curriculum, not only at NCEA level but from school entry upwards.

Desire for recognition of a specific learning need within the draft Action Plan

Nearly half (47%) of total respondents mentioned a specific type of disability, health or learning need in their feedback. Many questioned: if a learning need was not mentioned specifically in the draft Action Plan, did that mean that it was not included? This concern drew into discussion the ongoing trauma caused by lack of recognition, with one respondent stating “my husband was dyslexic and I am personally aware of how devastating lack of recognition is, and adults never get over it and always feel they need to 'prove' themselves”.

The specific learning needs mentioned most often were: dyslexia (192), giftedness (172), dyspraxia (115), autism (134), ADHD (61), Foetal Alcohol Spectrum Disorder (35), trauma-related disorders (36), dyscalculia (21), dysgraphia (17), auditory or visual processing disorder (15), and anxiety (4).

The focuses on Foetal Alcohol Spectrum Disorder (FASD) and behavioural management issues were particularly pronounced because these were learning needs that were not explicitly mentioned in the draft Action Plan. Respondents wanted more support, training and resources for FASD students, their families and teachers. As one commented, “FASD impacts more individuals globally than autism, and yet is not mentioned once in the draft Action Plan”. In regards to behavioural management, respondents believe there are a lot more students experiencing behavioural issues than the draft Action Plan recognised. They wanted the Action Plan to support an awareness of the impact of behaviour for the children and young people concerned as well as for the classmates, teachers and learning support staff around them.

Of those who specifically addressed neurodiverse learners, there was a strong reaction to “inadequate” definitions used in the draft Action Plan. By placing multiple learning needs under the same “umbrella”, commenters said, the draft Action Plan ignored the “massive” differences between them. As one stated, “learning difficulties/disabilities are solely neurological and affect the way information is learned or processed in the brain – This is how learning needs differ from other disabilities such as physical, intellectual, sensory etc disabilities”.

Discrimination

There was agreement across the board that the draft Action Plan needed to do more to reduce discrimination.

The Action Plan and discrimination

Issues of labelling and terminology recurred in submissions to do with discrimination. There were doubts about the draft Action Plan’s view of disability. Some expressed the need for an alternative concept of learning need or disability. Once again, the focus was on language: “If we want inclusive education we need to take away words like disability.”

Some thought the draft Action Plan could benefit from more consideration of human rights legislation (NZ Disability Strategy and UNCROC/UNCRPD) regarding each child’s right to receive health care and education proportional to their need. They felt that shifting the focus towards a child’s right to education would improve the quality of education for the children in question.

Some identified a further source of discrimination within the current Ongoing Resourcing Scheme (ORS) of “discriminatory rationing”, which prevented students in need from accessing the support they needed to fully participate in the education system.

Many saw discrimination as deeply embedded within the education system, and thought that the draft Action Plan should advocate for cultural change around this prejudice more explicitly.

Accountability and school enrolment

Five percent (43 of 893) of respondents raised questions over accountability within the system. Parents, educators and organisations were concerned about the lack of accountability within schools for students with learning disabilities. As the Office of the Children's Commissioner acknowledged, there is "no accountability for non-inclusive behaviours from school leaders and staff". REACH believed the Ministry of Education needed to "clearly and decisively remind schools of their regulatory obligation to identify and cater for this group of learners.

The majority wanted schools and kura to have some level of accountability to the Ministry. Few offered suggestions for what form this accountability might take; one respondent, however, proposed "financially rewarding" specific schools and kura as one method.

Some also wanted the Ministry to be held more accountable for the programmes they implement.

The University of Canterbury, School of Health Science's submission asked the question, "How many children are in special schools because they have been excluded from their local school?" An example of exclusion in action (and its consequences) was heard at the Ministry's Corrections visit to Mauri Toa Rangatahi in Christchurch: "I was excluded and no school wanted me but they should have trialled me and let me have a chance and see if I would fit in different schools".

> "How many children are in special schools because they have been excluded from their local school?"
>
> **School of Health Science, University of Canterbury**

Suggestions for reducing discrimination

A common suggestion for reducing discrimination was "enforcing schools to enrol all eligible students". Respondents believed that school leadership teams/BOTs (and "schools" more generally) should be held to account for discriminating against students with additional needs. They stated that disabled students and their families should have a choice between attending their neighbourhood school or a special school (or both), rather than being funnelled directly toward the latter.

Many also advocated for an improved accountability/dispute resolution system which would allow children and families who had been unfairly discriminated against to challenge the schools and kura at fault. The draft Action Plan, they advocated, should place the onus directly on the school and its educators for reducing discrimination. The Disabled Peoples Organisation's remarked, "We need a rights based focus – there is no accountability in the current system for when a school turns away a family or a child – it is too easy for schools to get away with a poor attitude."

As with "inclusion", training for teachers and educators was another popular recommendation for reducing discrimination.

Responsiveness to identity, language, and culture

Māori responses

Of the survey responses, 13% identified as Māori. However, only 4% of total responses (surveys combined with email submissions) explicitly addressed matters relating to Māori students, Māori learning support workforce members, or outcomes for Māori learners.

Te Reo Māori

There were criticisms that the Māori medium was nowhere to be found within the draft Action Plan, particularly in regards to provision for Māori immersion schooling and kōhanga reo. One respondent said that "Māori medium is nowhere in the document at all".

Commenters saw language as a basic element of inclusion. According to the University of Canterbury – School of Health Sciences, a basic knowledge of both Te Reo Māori and NZSL "enables belonging of all".

It was not only within the draft Action Plan document that respondents identified a lack of Te Reo Māori. Limited access to Māori-medium learning supports was also deemed a major obstacle within the current education system. One commenter said that "there is no support mentioned so people will not consider the languages and focus on the impairments".

Concern about disability within a Te Ao Māori worldview

"There are multiple perspectives from Māori about disability", one respondent noted. "How do we ensure that these views are taken into account?"

Several thought that the draft Action Plan espoused a westernised view of disability and learning support. The Teaching Council's submission noted the cultural individualism inherent in the Action Plan's outlook: "[The language used within the Action Plan] currently reflects a Western understanding of disability and additional needs that is individualised. All learners with disability and additional needs are being treated as one homogenous population – ignoring the intersectionality of a disability or additional needs with a learner's language, identity and culture."

Several respondents called for the draft Action Plan to be informed by a Te Ao Māori worldview. One respondent recommended a "plan solely modelled using Te Ao Māori and tikanga"; another stated that the draft Action Plan "needs the lens of a Māori world view"; yet another said that learning support provisions needed to be considered through a Te Ao Māori worldview, because the same things "look different from a Pakeha world view".

Outcomes for Māori

Respondents were concerned that, despite Māori children being over-represented in learning support statistics more generally, the draft Action Plan did not appear to specifically address learning outcomes for this integral group within the education system. They therefore wanted the draft Action Plan to include Māori students and their vocational outcomes more explicitly in its vision.

> "All learners with disability and additional needs are being treated as one homogenous population – ignoring the intersectionality of a disability or additional needs with a learner's language, identity and culture."
>
> **Teaching Council**

Respondents noted cultural disparities within the education system at large which put both Māori and Pacific students at a disadvantage in terms of accessing appropriate learning support. As the New Zealand Principals' Federation stated in its submission, "It is not enough to say all 'actions will be culturally appropriate' – they need to specifically address this issue".

Discrimination against Māori students

The submission provided by the Office of the Children's Commissioner reported hearing from Māori students "who said that they had disengaged from school because they didn't feel their needs were being met, and they felt stigmatised by being poor, having lower performance, having different behaviour, or speaking their own language". Feedback given by individuals at the Ministry's engagement session at Rimutaka Prison substantiated this complaint: one inmate said he felt unsupported at school, and often felt that "it's because we're Māori". Another female inmate said that, in school, "a white girl would do the same thing as me but didn't get in trouble".

> "A white girl would do the same thing as me but didn't get into trouble."
>
> **Female inmate, Rimutaka Prison**

This view was supported by individual respondents, who saw the draft Action Plan as perpetuating discrimination against Māori students and families within the education system. One respondent, for instance, said that "the plan is racist […] it provides service only to articulate parents who are generally white […] what about being indigenous, pacific, or a refugee?".

There were concerns about the relative absence of provision for Māori children and young people within the draft Action Plan. A survey respondent commented that "Māori are mentioned only in relation to having screening tools in Te Reo Māori, which may reinforce within-learner perceptions of Māori underachievement".

Māori students, respondents said, were typically underrepresented in giftedness statistics, which was an act of racially-driven exclusion. One respondent posed the question: "How does culture and the perception of giftedness affect students of different ethnic and cultural groups?".

Workforce not responsive to Māori

There was a perceived lack of Māori specialists in the learning support workforce. For example, the Te Kōhanga Reo National Trust pointed out that "There are very few competent Reo Māori Language speech therapists" currently engaged.

There was also specific concern about the number of Māori RTLBs currently engaged. One respondent observed that whilst only 13% of RTLBs identified as Māori as of April 2018, the RTLB caseload was made up of some 36% individual Māori cases.

This dearth of Māori learning support specialists was seen as disadvantageous to Māori students and their families, who would prefer to receive assistance from someone who deeply understood their culture than from someone removed from it. The bottom line was: "Māori medium supports [are] required for Māori families and children". During the Ministry's session with female prisoners at Rimutaka prison, inmates said that having more Māori teachers at school would have made them feel more included and ready to learn.

Some respondents recommended investigating and removing the access barriers – the primary one being the registered teacher restriction – "which continues to amplify the dearth of Māori language speaking specialists to support Māori medium learners in the system" (Te Kōhanga Reo National Trust).

> "There are very few competent Reo Māori Language speech therapists."
>
> **Te Kōhanga Reo National Trust**

Workforce-related funding inequities

The lack of Māori learning support workers was connected to a lack of support for training within Māori education settings. One commenter pointed out that "Te Tohu Whakapakari continues to be overlooked and kaiako cannot register as teachers to qualify for specialist teaching scholarships". Te Kōhanga Reo National Trust told of how, at present, "our kaiako are stepping outside Kōhanga Reo and going into mainstream services and support provisions to acquire awareness, skills and knowledge for various types of learning needs. Once they have garnered a few skills they return to TKR and there they are translating the specialist learning and teaching strategies to provide support services to mokopuna in need".

Multiple commenters urged the Ministry to review "inequitable funding arrangements to Kōhanga Reo and access criteria to the range of scholarships to support specialised skills development including Kōhanga Reo capability and capacity to support mokopuna in 'care' and mokopuna with 'disabilities' or any other learning need".

Common concerns for survey respondents who identified as Māori

Common concerns included the following:

- support for children both inside the classroom (e.g. teachers' aides) and outside of it (e.g. social workers, whānau supports)
- Māori medium/ language
- early intervention
- a holistic approach to support
- equity of access – including in the consultation phase for the draft Action Plan. One commenter who identified as Māori said that "the Ministry shouldn't just be asking the 'squeaky wheel' parents who can get to meetings in main centres and are confident enough to say something [but] every family and teacher supporting a child".

Recommendations

Respondents offered suggestions on how to make the Action Plan more responsive to Māori. These included:

- strengthen the draft Action Plan by including Te Tiriti o Waitangi "as an underpinning framework", with particular attention to such concepts as mana tamaiti and whanaungatanga, "which are particularly important for tamariki". The Office of the Children's Commissioner specified that the draft Action Plan should "overtly and expressly provide a practical commitment to the principles of the Treaty of Waitangi"
- ensure that Whaia Te Ao Marama 2017-2022 (the Māori Disability Action Plan) is woven into how services are provided and how tamariki and rangatahi are described (suggestion from Occupation Therapy NZ)

- » align the government's new focus on 'wellbeing' with the equivalent set of concepts in Te Ao Māori
- » work with Māori researchers to frame a holistic and culturally-appropriate plan for student wellbeing
- » review funding arrangements in order to make "A realistic intervention capability in kura, kōhanga, rumaki […] a top priority"
- » "Kids need to be noticed as an individual […] not because of the colour of their skin but because of who they are".

Pacific responses

Four percent of survey respondents identified as Pacific.

There was a strong feeling that Pacific voices were missing from the draft Action Plan. As one respondent noted, this absence was concerning given that Pacific children are overrepresented in "almost every statistic". Another criticised current practices for collecting data on minority groups. They suggested that drawing on equity-focused data might garner more of a response and, in turn, create a more accurate picture of where needs lay. For example, information about stand-downs and exclusions, or poverty and racism, might prove more accurate than comparing rural areas to urban.

Eight respondents who identified as Pacific discussed the need for ORS to have increased funding and be more accessible. One respondent reported that their school only had one child who received ORS funding, and that even then the school faced a struggle to maintain the funding due to unrealistic criteria and the requirement to frequently reapply.

Several acknowledged that there needs to be a greater focus on Pacific learning needs. Specific mention was given to objective screening, under-representation in gifted education, and English-language learning problems due to higher rates of dyslexia. As one respondent acknowledged, there was no measure for how outcomes will be deemed improved.

Six parents who identified as Pacific spoke specifically of the lack of support for their dyslexic children. One parent stated that their child's wellbeing and resilience has suffered from the inability to access the curriculum; they have had to move him to a play-based school until his confidence returns. Another stated that they are going to establish their own school for children with dyslexia, so acute is the need for targeted learning support. State education, this last respondent wrote, was not serving their child's "emotional, communicative, academic and social needs".

Deaf culture and New Zealand Sign Language (NZSL)

Of those who mentioned support for the specific learning needs of sensory students, more than half (14 of 25, 56%) were concerned about the current position of Deaf Culture and NZSL within schools and kura. One third of these respondents (9 out of 25) were concerned that there needs to be a transition from the medical model to the recognition of Deaf Culture. Deaf Aotearoa's submission stated that the "Action Plan assumes that support and services are all individually allocated and this

"Kids need to be noticed as an individual […] not because of the colour of their skin but for who they are."

Survey respondent

is not the case for deaf and hard-of-hearing children who comprise a language and cultural group".

Respondents commented that there was little recognition within the draft Action Plan of NZSL and the culture of Deaf children – it needs to be in line with what is written about Māori and Te Reo. These children need to be seen as having a "culture, language and identity" (Deaf Action NZ). The education curriculum needs to teach Deaf history and culture to Deaf children.

Among Deaf organisations, there was a strong message that all students should be able to access NZSL as an official language of New Zealand. This is related to the desire to access education content directly in NZSL and have learning assessed in NZSL.

Deaf and hard of hearing secondary students also emphasised the importance of accessing NZSL, and suggested that the education system should "teach children NZSL; teach hearing and deaf people and tell them that we are all the same; have educational interpreters in all mainstream classrooms; interpreters would be available in all classrooms with deaf students; …every high school have a class to learn NZSL as an official subject".

> "The Action Plan assumes that support and services are all individually allocated and this is not the case for deaf and hard of hearing children who comprise a language and cultural group."
>
> **Deaf Aotearoa**

English language learners (ELLs)

One respondent was concerned that the draft Action Plan only recognised the "specific cultural needs and context for Māori and Pacific children and young people and their whānau" and did not acknowledge the "children and young people from all culturally and linguistically diverse backgrounds". Another concern was the lack of acknowledgement of bilingual education pathways, and the attendant implication that learning support was not needed for students whose second language was English.

One respondent was concerned that the draft Action Plan framed English Language Learners (ELLs) as having a disability. As one respondent articulated, "it is essential that ELLs, their families, and our society as a whole understand that proficiency in an additional language is advantageous. Maintaining and nurturing students' first languages is important for a strong sense of identity and ultimately therefore a crucial component of wellbeing and resilience". This respondent went on to offer the recommendation that the draft Action Plan make more explicit provision for students with English language learning needs, without defining this group or any other as "disabled".

Appendix A

Synthesis of previous consultations and feedback

To ensure that the feedback gathered through the draft Action Plan consultation builds upon what people have already told us about supporting children and young people with disabilities and learning support needs, this report also synthesises feedback collected from education and disability sector representative groups since 2015. For this synthesis, we pulled together recurrent themes across engagement reports, with a particular lens on parents and whanāu groups, schools, early childhood education and other education providers, and representatives from the disability sector and wider community.

The feedback reports included in this synthesis are:

- the Education Summit and the Education Conversation | Kōrero Mātauranga: Insights and integration across the Education Portfolio Work Programme proposal (2018)
- Education Conversation | Kōrero Mātauranga: Voices of three population groups (Global Research Ltd, 2018)
- Curriculum, progress and achievement: Sector engagement by the Reference Group (Martin Jenkins, 2018)
- NCEA review regional roundup and July CoLab summary (2018)
- Pacific education fono – first findings and detailed analysis (2018)
- Education and Science Committee: Inquiry into the identification and support for students with the significant challenges of dyslexia, dyspraxia and autism spectrum disorders in primary and secondary schools (Ministry of Education Departmental Report, 2016)
- Engagement forums feedback: Special Education Update (2015).

High-level priorities

The eight high-level priorities generated out of the synthesis are summarised below. These priorities are similar to the feedback received on the draft Action Plan, and support the importance of attending to these issues.

1. Ensure equitable opportunities for the best educational outcomes

Themes included providing equitable resourcing for those with similar needs, irrespective of school setting or geographic location; embedding difference within the system so that inclusive practice was made the rule, not the exception; and changing peoples' attitudes to learning support needs at a cultural level.

2. Greater involvement of parents and whānau (and better support and information for them)

Parents and whānau wanted more support and information, enhanced communication with teachers, and to work in partnership with schools and specialist services.

3. Identifying the need for additional support earlier

Themes included the importance of early identification of need(s); the importance of upskilling professionals to enable identification of need(s); concern that the threshold for meeting criteria for support was too high; and a desire for clearer information about the supports available.

4. Improved coordination of services

Communication, coordination, and collaboration were seen as essential to strengthening relationships between whānau, educators and support services. A strongly-supported suggestion was for a key worker/single point of contact to connect all support parties around the child.

5. Much simpler and more transparent access to support

Themes included ensuring access to the right support at the right time, without being limited by age- or situation-based criteria. The system of learning support should be easy to access, responsive, and flexible.

6. Better transition management (streamlined support when a child moves to primary or high school, or to another school)

Respondents asked that formal processes be established to actively manage transitions and to ensure continuity of personnel and information. This was so that gaps did not occur in the process of transition, and so that support was not unnecessarily interrupted.

7. Better guidance and training for educators (from early childhood education onwards)

There was a sweeping focus on the capability and capacity of educators. All teacher education and professional learning and development should include a much stronger concentration on how to teach students with diverse learning needs.

8. Effective allocation of resources

Feedback revealed the need for extra funding in general, as well as for changes in the way funding is allocated (flexible funding, removal of caps and barriers), and for improved access to experts, specialist staff and resources.

Appendix B

Who provided feedback?

Survey respondents

Where provided, demographic data was collected from the 736 people who filled out the survey. Demographic information was not collected from email submissions or meeting notes.

Ethnicity data indicated that 85% of survey respondents identified as European, 13% as Māori, 4% as Pacific, and 11% as other.[5]

We also asked how people were connected to education, with whānau of students (73.77%) and educators (60.94%) making up a large proportion of the survey respondents. The majority of respondents selected more than one connection to education.

Option	Total	Percent
Primary student	22	3.01%
Secondary student	22	3.01%
Tertiary student	33	4.51%
Early childhood educators	72	9.84%
Teacher	252	34.43%
Principal	59	8.06%
Parent / whānau member/ caregiver (early childhood)	64	8.74%
Parent / whānau member/ caregiver (primary student)	218	29.78%
Parent / whānau member/ caregiver (secondary student)	143	19.54%
Parent / whānau member/ caregiver (Tertiary student/ left home).	70	9.56%
Grandparent	45	6.15%
Employer	32	4.37%
Education administrator	20	2.73%
Teaching support staff	41	5.60%
Board of Trustees member	46	6.28%
Tertiary educator	22	3.01%
Iwi education representative	1	0.14%
Other	169	23.09%
Not answered	28	3.83%

[5] As people were able to select more than one response for ethnicity, these figures total more than 100%.

Respondents were also asked to select an age range, with the vast majority of people aged between 35 and 64 (81.42%).

Option	Total	Percent
12 years or younger	6	0.82%
13 to 18	3	0.41%
19 to 24	5	0.68%
25 to 34	56	7.65%
35 to 44	203	27.73%
45 to 54	242	33.06%
55 to 64	151	20.63%
65 or over	32	4.37%
Prefer not to say	30	4.10%
Not Answered	4	0.55%

Submissions and meeting notes

One hundred and twelve email submissions were received from groups, organisations and individuals. 56 meetings took place with groups of people and organisations, and 42 meeting notes were included in the feedback.

Demographic information was not collected from email submissions or meeting notes. However, the names of groups and organisations have been noted. A few of these emails were from individuals writing in support of a submission from an organisation (for example, the submission from Very Important People – Supporting Equity in Education).

The following organisations and groups provided email submissions to the consultation on the draft Action Plan.

- Arbitrators
- Autism New Zealand
- BestStart Education and Care
- Blind Citizens NZ
- CCS Disability Action Office
- Community Care Trust
- Deaf Action NZ
- Deaf Aotearoa
- Disabled Persons Assembly NZ
- Dyslexia Foundation New Zealand
- Early Childhood Advisory Committee
- Early Childhood Leadership
- Empowered Learning Trust
- Epsom Girls Grammar School
- Fetal Alcohol Spectrum Disorder – Care Action Network Inc (FASD-CAN Inc)
- Gifted Aotearoa
- giftEDnz

- Bay High School
- Hobsonville Point School
- Inclusive Education Action Group (IEAG)
- IHC NZ Inc
- Karori West Normal School
- KidsLink
- Learning Disabilities Association of NZ
- Massey University, Institute of Education
- Montessori Aotearoa New Zealand
- Naenae College
- New Zealand Down Syndrome Association
- New Zealand Educational Institute
- New Zealand Foundation for Conductive Education Board
- New Zealand Human Rights Commission
- New Zealand Kindergartens Inc
- New Zealand School Trustees Association
- Newtown School
- New Zealand Post Primary Teachers Association (NZPPTA)
- National Science Teachers Association (NZSTA Professional Standards)
- Occupational Therapy New Zealand
- Office of the Children's Commissioner
- Paediatric Society of New Zealand – Child Development Special Interest Group
- Paediatric Therapy Ltd
- Parliament
- Raising Achievement
- REACH Education
- Remutaka RTLB Cluster Managers
- RTLB Cluster 7
- RTLB Lead School Principals' Executive
- Rural Women NZ
- Special Education Principals' Association of NZ
- Shirley Boys' High School
- SPELD NZ Inc
- TalkLink Trust
- Te Akonga Early Learning Centre
- Te Kōhanga Reo National Trust
- Te Kura (the Correspondence School)
- Te Runanga
- University of Canterbury – School of Health Sciences, Specialist Teaching, College of Ed, Health & Human Development
- van Asch Deaf Education Centre
- VIPS Equity in Education
- Waitakere Area Principal's Association (WAPA)
- Wellington Association for Gifted Children Inc
- YES Disability