



# Submission to the 2025 Review of the Disability Standards for Education

*From the Australian Special Education Principals Association (ASEPA)*

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## About ASEPA

The Australian Special Education Principals Association (ASEPA) represents over 600 principals and leaders of special schools and specialist support provisions across every state and territory. ASEPA's members lead schools that support students with the most complex disabilities and educational needs; settings that are integral to Australia's continuum of inclusive provision.

ASEPA's mission is to advance educational quality, access, and equity for students with disability through strong leadership, advocacy, and collaboration. As national president, I make this submission drawing on the lived expertise of special education leaders who work daily at the interface between inclusion policy and practice.

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## Overview of Position

ASEPA welcomes the 2025 Review and supports its three focus areas:

1. **Effective implementation of the Standards**
2. **Inclusive decision-making**
3. **Clear responsibilities for assessment authorities and course developers**

We reaffirm the importance of maintaining both *inclusive and specialist* learning environments, ensuring the Standards acknowledge that equal access on the same basis is not the same as identical provision. The principle of reasonable adjustment must encompass the right to specialised pedagogies, environments, and expertise

# Topic 1: Effective Implementation of the Standards

## Key Issues

The 2020 Review found low awareness and variable implementation of the Standards among education providers. ASEPA's experience confirms that this remains the case in 2025. Special-school leaders continue to report:

- Inconsistent interpretation of “reasonable adjustment” between jurisdictions and sectors.
- There is still confusion over whether adjustments are an entitlement or a negotiation.
- A disconnect between the Standards' intent and system-level resourcing, staffing, and workload realities.
- A lack of practical professional learning that builds disability-specific instructional capability, not just compliance literacy.

## ASEPA Recommendations

1. **Mandatory Professional Learning** – All pre-service and in-service educators should complete accredited training on the Standards, inclusive practice, and disability pedagogy, co-designed with people with disability and specialist educators.
  2. **Leadership Accountability** – The Standards should explicitly require education systems to evidence how school leaders are supported to implement them (e.g., through leadership frameworks, staffing ratios, and administrative load relief).
  3. **Whole-of-System Implementation Plan** – Each jurisdiction should publish a Standards Implementation Plan detailing responsibilities, timelines, and monitoring mechanisms.
  4. **Integration with the National Teacher Workforce Action Plan** – Implementation must link to workload reduction, classroom support staffing, and attraction/retention of teachers in specialist settings.
  5. **Accessible Communication** – National materials on the Standards should be translated, culturally adapted, and supported by Easy Read, Auslan, and First Nations-specific formats.
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# Topic 2: Inclusive Decision-Making

## Key Issues

ASEPA strongly supports embedding clear principles for consultation, issue resolution, and complaints handling, as outlined in Attachment B of the Discussion Paper. Current practice across states is inconsistent, often procedural rather than relational.

Families of students with complex disabilities frequently describe consultation as tokenistic, reactive, or conducted through deficit-based language. Many students in specialist schools or support units are non-verbal or have limited communication, requiring tailored consultation methods that go far beyond written forms.

## ASEPA Recommendations

- 1. Option 3 – Mandatory Principles**  
The Standards should *require* education providers to follow nationally consistent consultation and complaints-handling principles, ensuring:
    - Early, continuous, and trauma-informed engagement.
    - Active listening and co-design with families.
    - Accessible communication modes (AAC, interpreters, advocates).
    - Culturally responsive practice, especially for Aboriginal and Torres Strait Islander families.
  - 2. Independent Complaints Support Mechanism** – Establish a national education ombudsman function or equivalent to provide impartial assistance and resolution pathways for families, reducing adversarial escalation.
  - 3. Recognition of the Role of the “Lead Practitioner”** – Align consultation principles with multidisciplinary models (teacher, therapist, family, student) to ensure decisions reflect the whole child.
  - 4. Professional Standards for Consultation** – Develop an AITSL-endorsed framework defining consultation competencies for educators and leaders.
  - 5. Family Capacity-Building** – Fund training for families on their rights and on collaborative decision-making, co-delivered by peak disability and principal associations.
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# Topic 3: Clear Responsibilities for Assessment Authorities and Course Developers

## Key Issues

Students with disability continue to face barriers when they transition from school-based learning to externally managed assessments, VET placements, or higher education programs. Key concerns include:

- Loss of reasonable adjustments during Year 12 external examinations and professional practicums.
- Limited collaboration between schools and senior secondary certification authorities (e.g., NESAs, VCAA).
- Inconsistent national definitions of “reasonable adjustment” for accreditation or registration purposes.
- Professional bodies that set standards for course accreditation (e.g., medical, teaching, or engineering) are not clearly bound by the Standards.
- Poor data transparency about disability adjustments granted, refused, or appealed.

## ASEPA Recommendations

1. **Shared Accountability Framework** – Clarify that all entities involved in assessment design, accreditation, and delivery—including professional bodies—must comply with the Standards.
  2. **National Data Collection on Adjustments** – Mandate public reporting by assessment authorities on disability provisions applied, refused, and appealed to support transparency and continuous improvement.
  3. **Continuity of Adjustments Protocol** – Require education providers and assessment authorities to establish formal transition agreements ensuring consistency between classroom and external assessments.
  4. **Work-Integrated Learning (WIL) Accessibility Code** – Develop a national code of practice covering placement design, safety, and supervision for students with disability across secondary, VET, and higher education sectors.
  5. **Recognition of Specialist Expertise** – Involve special schools and disability education leaders in the design of assessment policies to ensure realistic, evidence-based adjustments are provided.
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## Cross Priorities

1. **Resourcing Alignment** – The Standards cannot be effectively implemented without sustainable funding and staffing models that reflect the true cost of adjustments. The NCCD must directly resource schools for implementation, not merely classify students.
  2. **Continuum of Provision** – The Standards should affirm parental choice and recognise specialist schools as a legitimate and essential part of inclusive education.
  3. **Monitoring and Enforcement** – Establish an independent national oversight body to track compliance, resolve disputes, and issue improvement directives.
  4. **Alignment with Australia’s Disability Strategy 2021–2031** – The Review must explicitly map how proposed changes support Priority 4: Inclusive Education, Employment and Skills.
  5. **Respect for Professional Judgement** – Ensure that compliance expectations are realistic and do not increase administrative burden, allowing educators to focus on teaching and learning.
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## Conclusion

ASEPA calls for a Disability Standards framework that moves beyond awareness toward *accountable implementation, collaborative decision-making, and shared responsibility* across the education ecosystem.

Australia’s students with disability deserve not only access on the same basis as their peers, but access to **expertise, environments, and experiences that meet their needs**. Achieving this requires genuine partnership between governments, educators, families, and the disability community, underpinned by clear, enforceable standards and adequate resourcing.

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### Submitted by:

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