



## **Submission to the “Inquiry into the Role of Technical and Further Education System and its Operation**

We are addressing the following Terms of Reference:

- The development of opportunities for Australians to improve themselves and increase their life and employment prospects.
- The delivery of services and programs to support regions, communities and disadvantaged individuals to access training and skills and through them a pathway to employment.

The AQTF 2010 says that access and equity policies and approaches must be “aimed at ensuring that vocational education and training are responsive to the individual needs of clients whose ..... disability..... may present a barrier to access, participation and the achievement of suitable outcomes.”

Over the last two decades, TAFENSW has become ‘beacon of light’ for students and prospective students with disabilities. Why is TAFENSW so important for people with disabilities?

For example, intellectual disability, by definition, involves developmental delay. Those people leaving school, at whatever stage, will not be at the norm educational level of students without disabilities. Similar, but specific, situations occur with the other developmental disabilities, such as Autism Spectrum Disorders, Specific Learning Disorders and ADHD.

In the case of profound congenital deafness, research shows that children who do not have access to language acquisition in their immediate environment have similar delays to those with developmental disabilities.

With regard to mental health, many young people are most vulnerable to initial onset of a disorder in their middle to late teens. This onset can completely derail their pathway to completing school, higher level studies and employment aspirations.

These are just some examples of the impact of disabilities and how that presents specific support needs for transition to training and employment.

Since 1981 (see Appendix 1: History of Disability Services, attached) TAFENSW has provided a state-wide service for students with disabilities by providing specially-trained Teacher/Consultants, who each covered a specific area, including Deaf, Vision, Physical, Psychiatric and Intellectual Disabilities. The Teacher/Consultant developed, in consultant with students, Individual Education Plans that identified specific support needs, based on the student needs, among many issues, access needs, identified career goals, course requirements and necessary modifications. The Teacher Consultant implemented the plan by engaging appropriate support staff, such as Disability Teachers, support Teachers from the vocational teaching sections, sign-language interpreters and Disability Assistants. The Teacher/Consultant ensured that the appropriate assistive technology was available as required.

In the early 1990s, the specific Consultancies were able to customise Employment Access courses to accommodate the identified needs and broad career aspirations of groups of students with disabilities. These courses provided training that allowed the students to transition into employment or further training. Outside of the customised courses and the students that transitioned, there were limited numbers of students with disabilities in mainstream courses and apprenticeships, on the whole, the outcomes were inconsistent. During this time, Teacher/Consultants began to engage Disability Teachers to provide specific disability support for students and their vocational teachers. The Teacher/Consultants also worked hard to develop networks and partnerships with schools, employment agencies and other disability services. The Teacher/Consultancies had a critical role in promoting inclusive practices for people with disabilities, often in the absence of policies and legislations.

In the last 15 years, many major and minor changes have impacted on the capacities of the Teacher/Consultancies to deliver support, including, generally:

- moving from central management in TAFENSW to institute management.
- local changes within given institutes.
- significant adjustments to legislative requirements for education.

Changes that have specific impact for disabilities include:

- the growth of programs in schools such as Life Skills,
- the significant number of students with disabilities accessing TVET courses.
- the increased numbers of people with disabilities gaining apprenticeships, the consequent increase in DAAWS funding.

Another thing that has impacted on all students but has had particular significance for students with disabilities has been the advances in technology and social media. Some changes presented challenges to the consultancies. Others have enabled students with disabilities to leave school with greater prospects for employment and/or higher education than was the case and in a far wider range of courses and employment areas

These were challenges and opportunities that faced the Teacher/Consultancies in TAFENSW in the early 2000s. It was incumbent on the individual Consultants to respond. The Consultants strengthened their relations with external partners in schools and employment services. Meanwhile, the Disability Teachers learnt to broaden the scope of their support skills with a greater emphasis on mainstream and higher level courses, while maintaining their skills in supporting customised courses. They accessed external funding where possible.

From 2005, the numbers of students registered with the Disability Constancies increased substantially, while the certificate levels, the range of courses attempted and the outcomes at those levels have been beyond what would have been envisaged in the 1990s. For evidence from the

South Western Sydney Institute (SWSi), look at APPENDIX 3: “Two Positions: The Inherent Shortcomings of the Ford Report from a Disability Perspective” and APPENDIX 4: “SWSi Disability Cert Levels Sem 1 2012” attached. These improvements occurred in SWSi with minimal budgetary increases.

The most important reasons for this have been shifts in attitudes in the community, in the vocational teaching sections and, most importantly, within the students themselves. Students with disabilities now begin apprenticeships or mainstream courses overwhelmingly expecting successful outcomes. One critical factor is their confidence that they are able to access support throughout their course and that this support will address their specific needs, through an Individual Education Plan. This is the type of support that they needed at school acquire the type of aspirations that we all take for granted. The role of Individual Plans, in schools, employment services and TAFE, cannot be overemphasised when one looks at the factors that underlie this shift.

These gains for former, current students and prospective students with students are now in peril. What has happened, and is happening, to create this peril?

One could go through the many factors that have led to this situation, including political. However, the most important has been that, in the rush to implement the ‘Smart and Skilled’ agenda, the specific needs and status of students with disabilities have been completely overlooked and ignored.

Notable factors, in this regard, have been:

- The desire to increase foundation skills in the workforce, without almost any consideration of how an across the board implementation of language, literacy and numeracy as the only student support mechanism will impact students with disabilities enrolled in TAFENSW.
- The introduction and indiscriminate overuse of non-specific terminology like ‘disadvantaged students’.

- The assumption, without research or evidence, that students with disabilities in TAFENSW are stuck in the 1990s model; i.e. low numbers of apprentices, low certificate levels and low completions. In this regard, look at the attached South Western Sydney's Access, General Education and Learner Support Report (see Appendix 2: SWSI AGELS Final Report for Consultation as provided on 11 October 2012.pdf). This report also has a broad bibliography of industry and NVEAC reviews that have similar flaws to the AGELS Report (see APPENDIX 3: "Two Positions: The Inherent Shortcomings of the Ford Report from a Disability Perspective" attached).
- The acceptance of a lowest denominator approach, which looks to TAFE models in South Australia, Queensland and Victoria for the cheapest model for disability support, with a willingness to throw away the practices that evolved and have demonstrably worked and, with this, TAFENSW's well-earned reputation in equity.

The model that is about to be implemented in SWSi has been based on the TAFE models in Queensland and South Australia. It fails to take into account that these states have far fewer student numbers and that their TAFE institutes are closely aligned (and in some cases merged) with the university sector and they in turn attract a different type of student. This model proposes to disengage Teacher/Consultants from the implementation of the Individual Education Plans. In this model, Teacher/Consultants will be permitted to write an IEP in consultation with the student and give the plan to the student who will in turn pass it onto the vocational teachers to implement.

In some TAFENSW institutes such as the Illawarra, Teacher/Consultants no longer have the capacity to deliver individual support via units such as 9999 Learner Support or to supervise Disability Teachers to provide this support.

At a time when stringent ASQA requirements necessitate various obligations as an RTO, it appears the institute will be leaving themselves open to litigation because students with disabilities and their support needs are to be camouflaged under the guise of Foundation Skills.

The model about to be implemented will totally disengage students with disabilities from the experienced professionals who know their needs best and have the experience to ensure that the institute meets its obligations under disability legislation; i.e. to responsive to the individual needs of clients.

Language, Literacy and Numeracy training, the sole basis for delivery of TAFE's Foundation Skills Training Package, and the sole basis for future support under the model to be implemented, is not an appropriate model of support, nor an appropriate utilisation of resources, for student with disabilities. Moreover, Teacher/Consultants need do more than just devise IEP. They must have the capacity to implement, monitor and review the IEP.

It is beyond doubt that the introduction of these two changes will have a markedly detrimental impact on the outcomes of students with disabilities in TAFENSW and, for apprentices for example, could lead to loss of employment.

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## APPENDIX 1:

# History of Disability Services in TAFE NSW 1976 to 2006 –

Disabilities Services in TAFE NSW has an unparalleled history of facilitating access to vocational education and training for students with disabilities.

It has evolved over a period of 30 years from humble beginnings. A teacher of the Deaf was seconded in 1976 from the Department of Education as a consultant to TAFE to survey the incidence and success of Deaf students in Technical Colleges in NSW. The survey identified 47 Deaf/Hearing Impaired students in pre-employment or apprenticeship courses and indicated that these students were having difficulty successfully completing their studies. The report recommended the establishment of a statewide support service for all students who were Deaf/ hearing Impaired. This vision has been the driving force for equitable access for all students with disabilities to TAFE NSW.

By 1981, a statewide service was under way. Three Consultants for the Deaf and one for the Blind were located in the TAFE School of General Studies. In 1982-83, the service expanded to include Consultants for students who had a Physical or Intellectual disability. This expansion was in response to disability community groups, the Richmond Report and the amendments to the NSW Anti-Discrimination Act.

By 1984, there were 19 *Consultants for the Disabled* with three specialist designations (Deaf, Blind and Intellectual/Physical). The focus of the service was on both Access Programs into vocational education and the establishment of a range of appropriate educational support for all TAFE courses. In the same year a “Log of Claims” tabled through the Teachers’ Federation asked TAFE to review the status and role of Disabilities staff in the TAFE structure. It also requested relocation of the service to join other special programs to better reflect the full range of service provision to students with disabilities.

In 1987, the Industrial Commission directed TAFE to establish a Disabilities Unit. It was located in the Directorate of Special Programs. The Unit structure included a Manager and

four Senior Education Officers, responsible for policy, strategic planning, curriculum input, budgetary issues and line management to the Consultants. The new disabilities staff designation was *Consultant for the Disabled* of four discrete populations of students (Deaf/Hearing, Intellectual, Physical and Visual).

1988 to 90 saw a rapid growth in the number of Consultants and by 1990 there 70 positions across NSW with the designation of *Teacher/Consultant for students with disabilities*: Deaf/Hearing - 16, Intellectual - 26, Physical -19, Visual – 9. Employment Access courses were refined in 1990 to enable customisation of accredited courses, accommodate the specific learning needs of students with disabilities and provide 'on-site' training.

The *Predl review of equity services* (1991) supported the maintenance of the Teacher/Consultants' role in supporting discrete disability populations, across each of the then devolved networks (later to become Institutes). At this time, the Disabilities Unit was relocated to Student Services and renamed Disabilities Services.

TAFE NSW service delivery was strengthened by the Commonwealth Disability Discrimination Act (1992) (DDA) requirement to provide services for students with any disability. Linked with this was the NSW Disabilities Services Act (1993) paradigm shift, focusing on outcomes.

In 1992, the TAFE NSW Disabilities Community Consultative Committee was convened to formalise community input into TAFE NSW. Research projects conducted in 1992 recommended service models appropriate for students with psychiatric disabilities and students with acquired brain injury. These led to the new designations of Teacher/Consultant for Students with a Psychiatric Disability and Teacher/Consultant for Students with Neurological Disability in 1995.

Students currently accessing TAFE NSW Disabilities Services include students who are Deaf or have a hearing impairment; those who have a vision impairment; intellectual disabilities; physical disabilities; specific learning disabilities; psychiatric disabilities; neurological disabilities; and medical conditions. Enrolment data is collected in these nationally identified disability categories, in accordance with the DDA.

TAFE NSW Disabilities Services has become the national benchmark for good practice, providing specialist support services to students with a disability; and developing resources which provide reasonable adjustments on the basis of individual negotiated needs whilst maintaining the rigour and integrity of courses.



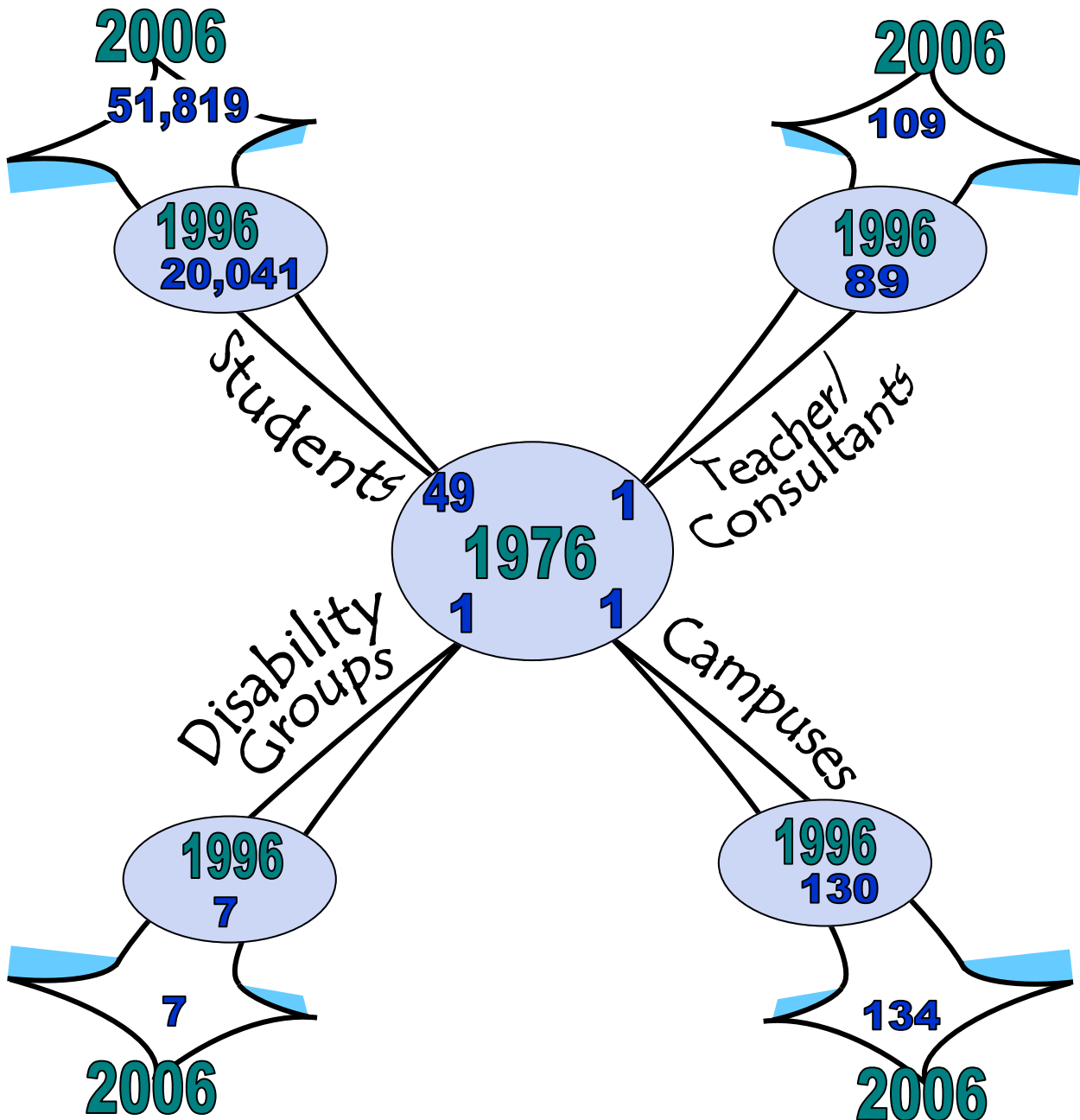
The State Office Disability Programs Unit is co-located with the other TAFE Equity teams: TAFE Women's Programs, TAFE Multicultural Education Unit and TAFE Outreach and Corrections. It provides interagency collaboration with other government and community agencies and policy, planning and resource advice across State Office and TAFE NSW Institutes.

In 2006, there were 51,819 self identified enrolments of students with a disability, representing 10.36% of all TAFE enrolments. More than 16,000 students with disabilities requested assistance from Teacher/Consultants: a 100% increase since 1996.

TAFE NSW continues to set the benchmark for equitable access to vocational training through its prompt and efficient response to students' diverse needs, inclusive educational programs and specialist disability services. It promotes quality and equity by recognising the importance of customer focus, setting standards for the development and delivery of programs and services, and continual improvement.

# TAFE NSW Disability Services

1976 to 2006



The above diagram shows the growth in TAFE NSW Disability Services from 1976 to 2006. In 1976 there were 49 enrolments of students with a disability in TAFE NSW. This increased to 20,041 in 1996; and 51,819 in 2006. In 1976 there was one Teacher/Consultant for students with a disability. This increased to 89 in 1996; and 109 in 2006. The range of Teacher/Consultants specialist services (Disability Groups) grew from one in 1976 to seven in 1996 (and 2006). The number of campuses where Teacher/Consultants provide disability services has grown from one in 1976 to all TAFE NSW campuses (130) in 1996 and 134 in 2006.

**APPENDIX 2:**

**SWSI AGELS Final Report for Consultation as provided on 11 October 2012.pdf**

## APPENDIX 3:

### Two Positions : the Inherent Shortcoming of the “Ford Report” from a Disability Perspective

The Public Service review/report design commonly follows this structure: present a proposal, search the literature for support, seek out either qualitative and/or quantitative ‘evidence’ that the current practice is ineffective, while often not seeking argument or evidence to contrary, and then, without applying scientific standards of hypothesis development, testing or proof, recommend that the proposal be implemented. The Ford Report champions the use of an ‘holistic, student-centred, wrap-around approach’ as ‘best practice’ for supporting students in general. It is argued here that there are two distinct positions that claim to meet this standard of ‘best practice’ for supporting students with disabilities: the ‘Individual Education Plan’ model, which is used currently by the Disability Consultancies, and ‘delivering embedded Foundation Skills’, which is the recommended model of the report. As such, the report needed to compare the two models. However, the Ford Report did not address the performance of the current disability support specifically. It presented neither real argument or actual evidence for its model with regard disability support nor real argument or actual evidence against the current model in SWSI. Moreover, it is shown here that the current model is demonstratively successful. Therefore, the report is not a basis for ratifying its recommended model of disability support, particularly as its model is a radical, untested and potentially deleterious, change. Also, the Ford Report points to the need to increase ‘course completions’, in its general argument for a major overhaul of Access and Equity in SWSI. It is demonstrated here that the course completion measure, in its present form, significantly depresses actual course completion ratios in SWSI and likely other institutes. It is also shown that this has particular significance for Equity sections, most notably Disabilities. TAFENSW urgently needs to address its capacity for generating serious statistics and to dispense with the Public Service design of reviews and, instead, embrace an analytical approach more akin to scientific methodology. Failure to adopt methods that are designed to minimise, not maximise, circularity will put TAFENSW on a path with a very steep slope in the competitive, outcomes-funded, market-driven future.

## Two Positions for 'Best Practice'

### **Position 1: The Report**

The Ford Report points to identified needs for VET to increase the pool of skilled workers and increase the skills of those currently employment. It notes that the future will entail an entitlement funding model that will be a competitive, market-driven and outcomes funded. The report claims that, to meet these challenges, SWSI must move to an 'integrated' approach in supporting 'disadvantaged' students, where learner support is delivered exclusively through 'embedded' units of Foundation Skills Training Package.

The Ford Report says that improving 'foundation skills' of students, whether they are in the workforce or seeking entry into the workforce, will produce an overall improvement in VET outcomes. There does not seem to be anything controversial about this narrow claim. However, the report then asserts that improving the acquisition of foundation skills requires the delivery of an 'embedded Foundation Skills' Training Package universally for students with support needs<sup>1</sup>. The report proposes, therefore, that the delivery of Foundation Skills is a necessary and sufficient mode of support for all students with identified support needs in SWSI.

The report claims that a new model is required to provide a more 'integrated approach' than current practice in SWSI. The report implies that the given Learner Support sections have not kept pace with the changing needs of the students, the changing employment needs of the country or the Social Inclusion approach to 'disadvantage'.

The report states that SWSI's overall course completion rate was 44%, with completions at Certificate 3 and above levels only 37%. The Institute Manager stated at the end of the last semester that SWSI urgently needs to increase participation and completions at Certificate 3 and above levels to be competitive in the entitlement funded future.

The Ford Report states that the Employment Preparation (which includes the Disability Teacher/Consultancies) and Vocational Access Faculties not only have low course completion rates but their enrolments are overwhelmingly at Certificate 2 and below levels.

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<sup>1</sup> When lower-case 'foundation skills' is used, the reference is to skills acquired or to be acquired. 'Foundation Skills' is referring to the proposed Training Package.

Disability 'support' in the recommended 'model' will primarily be that Teacher/Consultants and the students design individual plans. The Teacher/Consultants then 'broker' delivery of embedded Foundation Skills and may also supply Disability Assistants, Interpreters and adaptive technology as required, as well as specific 'Disability Awareness' training to vocational teachers. The 'model' removes the current capacities for:

- Disability Teachers to provide learner support, as their selection criteria are unlikely to meet the requirements for delivering the Foundation Skills Training Package.
- Teacher/Consultants to implement or monitor the actual delivery of support.

As such, the model is a radical shift from the current provision of support for students with disabilities in SWSI. This point will be elaborated in the next section.

### **The Disability Position**

Within the category of 'disadvantaged students', there are distinct groups of students that are supported by different sections or consultancies; i.e. ABE, Multicultural, Disability etc. Clearly, there are gross differences in support needs between these groups; for example, a student from a non-English Speaking Background is likely to have markedly different support needs to a student with Mental Health issues. This will be the case even if both students would benefit from further acquisition of foundation skills. The Disability perspective in SWSI has always been based on identifying individual learning needs, which consequently require distinct approaches to learner support, including teaching skills and styles.

The Disability service position is that the 'best practice' in Disability education, to 'put the student in the centre', is that support must be generated by an Individual Education Plan and that that Plan be implemented by the Teacher/Consultant. Teacher/Consultants would argue, as a rule of thumb, that Disability Teachers:

- Have, generally, the right skill sets to best implement the Plans, in terms of efficient use of resources and outcomes. This applies whether or not the main support needs identified in the Plan broadly fall within the notion of 'acquiring foundation skills'.
- Assist the Teacher/Consultant's capacity to implement, monitor and review the Plan.

The Ford Report does not define 'foundation skills' or describe what the delivery of 'embedded Foundation Skills' is likely to entail. The SCOTese (2012) paper "National Foundation Skills Strategy for Adults" defines 'foundation skills' as:

English language, literacy and numeracy (LLN) – listening, speaking, reading, writing, digital literacy and use of mathematical ideas; and employability skills, such as collaboration, problem solving, self-management, learning and information and communication technology (ICT) skills required for participation in modern workplaces and contemporary life."

The National Quality Council (2010) paper "Foundation Skills in VET Products for the 21<sup>st</sup> Century" focuses on the delivery of Language, Literacy and Numeracy and Employability Skills.

The Teacher/Consultants would argue that students with disabilities may have individual learner support needs that are unlikely to be defined within an 'embedded' Foundation Skills Training Package. Teacher/Consultants are not promoting a position that is contrary to the aim to increase acquisition of foundation skills but, rather, they recognise that the impediments to the acquisition of either foundation skills or the main course content can be far more subtle than that which might be overcome by the mere intervention of strategies that fall under Language, Literacy and Numeracy or Employability Skills Units or that which could be overcome by the delivery teacher of the units having attended a 'disability awareness' training session.

The Ford report states that "it's imperative that good practices are captured and built on" (p. 13). This sounds all well and good but as the recommended model removes on-going support through Teacher/Consultancies, it would hardly be 'building on' the current model of support; rather, it would represent a radical shift in the provision of support for students with disabilities. If the recommendations are not 'best practice', the report's model will fail dramatically for students with disabilities, a situation that could not be repaired within a minimum of a decade because of the removal of Disability Teachers. With this in mind, it is noteworthy that the Foundation Skills Training Package has yet to be released, and the report failed to present any evidence of efficacy of the approach with students with disabilities.



## **What was required to test the ‘embedded Foundation Skills’ proposal as a model for supporting students with disabilities?**

There exist two claims of ‘best practice’ for Disability support, ‘embedded Foundation Skills’ and the ‘Individual Education Plan’ approach, which are radically different. Given this, it was critical that the research presented a strong case that specifically addressed the specific issues of supporting students with disabilities.

The key questions regarding the report with respect to the Disability consultancies are:

- Has the report produced sufficiently powerful arguments and powerful evidence that ‘brokered’ delivery of Foundation Skills will be a better use of resources, in terms of outcomes and efficiency, compared to current modes of support?
- Is this shift necessary and sufficient to meet the specific educational needs of students with disabilities in SWSI?

To meet the ‘necessity’ criteria, an embedded Foundation Skills Training Package would have to be demonstrably the best practice of support for all students with disabilities to acquire foundation skills.

To meet the ‘sufficiency’ criteria, the delivery of embedded Foundation Skills would have to cover all of the learner support needs of all students with disabilities.

### **Analysis of How the Report Dealt with the Two Positions**

#### **The argument for the proposal in the Ford Report**

The Ford Report outlines its case for its new model built around delivering embedded Foundation Skills Training Packages to replace current models of support with a literature review on pages 9 to13.

National VET documents are referred to, including Smart and Skilled, to indicate the importance of skills training and upgrading current skills. There is a priority on completing higher VET levels because of limited growth in low skilled jobs. The low level of foundation

skills in much of the work force is seen as a major impediment to achieving these goals. This push is coming from multiple sources including government and employers.

The Ford Report sees 'add-on' support as being counter to this drive for the development of 'contextualised' foundation skills and also social inclusion guidelines. According to the Report 'add-ons' create marginalised groups of disadvantage. The wraparound model with the student in the centre supported by all the stake holders will make sure that the student is on the right pathway to employment.

The literature review completely avoids the issue of what is the current best practice for supporting students with disabilities in VET. It does this by taking a true 'social inclusion' position. Social inclusion is not a prescription for the removal of specialised services. The Report quotes the NVEAC Equity Blueprint pointing to the need for "embedding equity into the DNA of VET" to support the argument against 'add-on support'. The problem is that the report then ignores the actual thrust of the NVEAC Equity Blueprint with regard to disabilities. Embedding equity in the DNA of VET is an ideal worth striving for. It is a philosophical stance that must be embraced at all levels from policy to delivery. This cannot be interpreted as no longer requiring specialist or differentiated training options for people with disabilities. In the NVEAC Equity Blueprint, Tyga Bayles, the Chair of NVEAC, states that "There is no question that supporting those who are disadvantaged to gain skills, qualifications and jobs takes time, additional resources and support." (p.2)

The Report emphasises the 'holistic student centred wrap around' approach as though it is a new innovative concept. In fact, it describes the processes that have always been used by Teacher/Consultants. We have always used individual education processes built through an exhaustive collaboration with the student and all relevant stakeholders including families, schools, Disability Employment Services and employers. It has always been a strong pathways model and has contributed to the amazing advancement of prospects of students with disabilities in SWISI. Evidence will be presented for this assertion later.

The key component of the Individual Education Plan process is the initial interview. At this stage all stakeholders are involved and the Teacher/Consultant and the student collaborate to design a plan that meets the students' needs and aspirations. Anyone that does not work in disabilities would be thoroughly shocked at the depth of this process. It would stun the

Review 's Control Group to realise what the report's buzz words actually mean when put in to practice. Placing the student in the centre requires having a continuum of supports based on the students identified strengths needs and preferences.

Once the Individual Education Plan has been designed, the Teacher/Consultant has the responsibility of carrying the stages of implementation, monitoring and review. These processes require strong collaboration with the given vocational teaching sections and selecting the most suitable mode of support. Support teaching through 9999 Learner Support is generally delivered by Disability Teachers, as most Teacher/Consultants find that they provide the most efficient use of resources, have the best skills for reporting support progress and achieve the best outcomes. However, if the support plan is best delivered by a vocational teacher then this is arranged in collaboration with the vocational head teacher.

The proposed service delivery model in the Ford Report makes recommendations that will dramatically restrict how students with disabilities will access and participate in vocational training in SWISI. This is because the planning, implementation and monitoring phases of the Individual Education Plan are separated; the Teacher /Consultant will no longer have directional control over the plan. This is a radical departure from what is considered to be best practice for supporting students with disabilities.

The concept of Foundation Skills Training has been around for a long time. The Ford Report presents it as novel due to the notion of 'embedding'; yet it is not clear how this concept will achieve the desired educational outcomes. In the absence of a strong educational basis, it can only be a tool for administrative simplicity.

Particularly lacking in the report is citing of any research on "embedding" and "contextualising" foundation skills as a useful instructional strategy. The Ford Report may have missed the point made by Roberts and Wignell (2012) that **it is the foundation skills** "given that they are not understood, not measured , are not valued by employers and **create a problem**, often referred to as "churn", sees some groups of learners as repeating programs at the same level." (p.12) Learners with disabilities bring with them unique individual needs. People with disabilities require different and specific programs for engagement in training. The value added to these services is neither recognised nor respected in the report. This value is recognized in Skills for Prosperity –Roadmap:

*“Making a difference in increasing workforce participation is not about attracting learners to the system; it is also about providing appropriate support to retain learners and thereby improving their chances of successful completion. This translates to the kind of programs that are offered, the way they are delivered and the inclusion of mentoring and other supports for learners”.*

### **‘Course completion’ as a ‘performance indicator**

The table below presents the numbers and percentage ratios of enrolments at Certificate and Statement levels, as well as the numbers and ratios for ‘course completions’ in 2011. The ratios were presented by the Institute Director and a succession of meetings at each college at the end of Semester 1. The Director emphasised the need to raise certificate levels, general course completions and completions at the higher certificate levels.

<b>Certificate Level</b>	<b>Certificate Enrolments (numbers)</b>	<b>Certificate Enrolment (%)</b>	<b>Course Completion (numbers)</b>	<b>Course Completion (%)</b>
<b>Diplomas</b>	7709	10.6%	3376	43.8%
<b>4</b>	9236	12.7%	3667	39.7%
<b>3</b>	18544	25.5%	6101	32.9%
<b>2</b>	8945	12.3%	2988	33.4%
<b>1</b>	3272	4.5%	1201	36.7%
<b>Below C1</b>	25016	34.4%	14660	58.6%
<b>Totals</b>	72722	100.0%	31992	44.0%

The Ford Report states that course completions in 2011 of the Employment Preparation Faculty were 29%, compared with SWSI (44%) and the Vocational Access Faculty (59%). The implication is that Employment Preparation (including the Disability Teacher/Consultancies) is not keeping up the SWSI and VET requirements to improve course completions.

The course for delivering learner support, 9999 Learner Support, in practice cannot be completed. If it were, the student could not re-enrol, i.e. could not re-apply for learner

support. Therefore, 9999 has 100% non-completion. Employment Preparation has 81% of the SWSI enrolments in 2011 (ABE 40%, Disabilities, 33%, ESOL 8%) and 9999 represents 7.2% of all SWSI enrolments. Hence, 9999 is a significant enrolment for SWSI and even more significant relatively for Employment Preparation.

As 9999 cannot be completed, it should never be entered into a table or comparison when course completion is the dependent variable. Including 9999 renders the above 'course completion' table statistically meaningless as a 'performance indicator'. That the ratios were generated from the DataWarehouse or that it is common practice across institutes to include 9999 in course completions is irrelevant to this point. Common use does not convert incorrect statistical practice into correct practice. Thus, the comparison between Vocational Access (and SWSI) and Employment Preparation on course completions was illusory.

It should also be noted that this problem affects the SWSI completion rate, see the table below, which shows that the adjusted rate without 9999 rises to 47.4%.

<b>Certificate Level</b>	<b>Certificate Enrolments Without 9999 (numbers)</b>	<b>Certificate Enrolment Without 9999 (%)</b>	<b>Course Completion Without 9999 (numbers)</b>	<b>Course Completion without 9999 (%)</b>
<b>Diploma</b>	7709	11.4%	3376	43.8%
<b>4</b>	9236	13.7%	3667	39.7%
<b>3</b>	18544	27.5%	6101	32.9%
<b>2</b>	8945	13.3%	2988	33.4%
<b>1</b>	3272	4.8%	1201	36.7%
<b>Below C1</b>	19789	29.3%	14660	74.1%
<b>Totals</b>	72722	100.0%	31992	47.4%

The problem with 9999 and course completion also affects the capacity to make comparisons across institutes; see table below based on 2011 figures.

Institute	'Raw' Course Completion Rate	9999 Enrolment Rate	Adjusted Course Completion Rate
Hunter	49.7%	3.5%	51.5%
Illawarra	44.5%	1.2%	45.1%
New England	42.6%	1.9%	43.4%
North Coast	43.2%	4.8%	45.4%
Northern Sydney	40.3%	3.3%	41.7%
OTEN	10.4%	0.8%	10.5%
Riverina	44.3%	3.3%	45.8%
SWSI	44.0%	7.2%	47.4%
Sydney	39.9%	8.3%	43.5%
Western NSW	47.4%	1.0%	47.9%
Western Sydney	43.7%	6.6%	46.8%

One example of the problem that this creates can be given using the Illawarra Institute. In the years from 2009 to 2011, the unadjusted Course Completion rate for the Illawarra Institute stayed around 45%, even though 9999 enrolments dropped from 5.2% to 1.2%. This suggests that students could be successfully supported without whatever were the previous practices under 9999. However, under the more correct, adjusted rate, the figure in 2009 was 47.9% and the figure in 2011 was 45.1%, a drop of almost 3%. This does not prove that whatever new model is being used is a failure, as deeper analysis is required; rather, it says the unadjusted rate cannot be used to show the new model is working. However, even the adjusted rates, when 9999 is removed, are not correct. Course completion as a 'performance indicator' faces other problems; for example:

- Course completions with apprentices are generated by dividing the number of completions in a given year by the total number of apprentices enrolled. That is, it uses the same method as for other courses, even though apprentice courses can only be completed over multiple years. Not surprisingly, SWSI's completion rate under this method is 21%!! This problem is acknowledged in the 'Course Completions Report' but

this hardly changes the fact that the 21% completion rate is meaningless as 'performance indicator' of the teaching of apprentices. The Course Completion Report, using a 'cohort method', suggests that the rate is more like 45%. The 21% rate is clearly depressing the Certificate 3 and SWSI completion rates.

- Many TVET students are enrolled in courses where they cannot complete the given certificate level, no matter how well they perform. TVET's requirements are set by the Board of Studies and not the completion of VET certificates. Again, this will depresses course completions at the relevant certificate levels and the overall SWSI rate.
- Full-year courses that commence in the second semester cannot be completed and will depress completion rates.

There may be other factors that are depressing completion rates. If course completion is to be the 'performance indicator' in TAFENSW, there are major administrative issues to be solved, which should not be confused with educational issues. Some deleterious effects of using course completion, in its current form, as a 'performance indicator' include:

- It presents the performance of TAFENSW in a depressed light, at a time it needs to show that is competitive.
- It prevents any meaningful comparisons across institutes, for example, to find evidence of 'best practices', which was shown with the Illawarra Institute.
- It prevents meaningful comparisons within institutes.
- It is demoralising to TAFENSW's employees to see such poor representation of their efforts.

It is also worth stating here that the 'Course Completion' rate for students with Disability was 29.2%. This figure, firstly, would have again included 9999Learner Support. As 9999 was around 25% of the enrolments for students identifying with a disability, the course completion rate is severely depressed. Also, the Course Completion Report states that 7308 students identified as having a disability on enrolment forms. Even when one deducts the 1736 disability students on 9999, it still indicates that were 5572 students with a disability in SWSI in 2011, which is a massive overstatement of the number of students registered with the Disability Consultancies. This is a problem our section has been pointing out to

management for many years; i.e. DataWarehouse is not, and has never been, a reliable indicator of the status of the Disability Consultancies.

### **Specific criticisms of Disability support practices**

The report contained one criticism from the literature of current practices of disability support in the general community and only one criticism of the specific disability support model in SWSI.

The general criticism (p. 13) was:

*“Despite an increase in the number of VET students undertaking higher qualifications, some disadvantaged groups (including disability and indigenous) in the community are not achieving outcomes, particularly those that relate to employment.” (from Skills for Australians)*

The Ford Report then commented: *“VET is the post-school destination for indigenous people and students with disabilities, however too many of these students continue to choose lower level programs and do not achieve the same employment outcomes of other students.”*

One assumes that the Ford Report comment implies that issue cited from Skills for Australians is a significant one in SWSI. However, the Ford Report failed to provide either qualitative or quantitative evidence from the review to support the comment. Moreover, it did not report the input from members of the Disability Consultancies that contradict the comment. For example, it was pointed out emphatically in the review’s meeting with the Social Inclusion Unit that the situation for students registered with the Teacher/Consultancies for Students with Intellectual Disability has shown remarkable progression over the last decade. Some evidence of this progression is shown next.

Data from SWSI’s three Teacher/Consultancies for Students with Intellectual Disability from 2012 Semester 1 will be used to test this claim<sup>2</sup>. The breakup across the students in TVET and non-TVET is shown in this table:

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<sup>2</sup> I chose the Intellectual Disability Section because this is where I work and feel most comfortable in representing its status and practices.



<b>TVET</b>	<b>Non-TVET Mainstream</b>	<b>Non-TVET discrete</b>	<b>Total</b>
165	499	67	731

The Intellectual Disability Consultancies had 566 non-TVET, or 'post-school', students registered. Of those students 162 (29%) were in Certificate 2 or below level courses, 566 (71%) were in Certificate 3 or above level courses. In 2011, 53% of all students in SWSI were enrolled at Certificate 2 and below, 47% were in Certificate 3 and above courses.

	<b>Students with Intellectual Disability (2012, Semester 1)</b>	<b>All SWSI Students, 2011</b>
<b>Cert 2 and below</b>	29%	53%
<b>Cert 3 and above</b>	71%	47%

In other words, the ratio of students registered with the Intellectual Disability Consultancies in Certificate 3 and above courses in 2012 was 24% higher than the overall institute in 2011! Suffice to say that this comparison, at least with regard to the Intellectual Disability Consultancies in SWSI, gives no credence at all to the Ford Report's implied inference comment about 'lower level programs' for 'post-school destinations'.

As for outcomes, in 2010, 85 of the 124 apprentices that had reached Stage 3 completed the course that year, with a further 31 of the original 124 completing in 2011. Apprentices registered with the Intellectual Disability Consultancies have increased from less than 30 in the late 1990s to around 270 to 300 through recent years. The apprentices registered with the Intellectual Disability section in SWSI are employed in a wide range of trades and have a good chance at completing their trade with right support structure based on the Individual Education Plans. For many of these apprentices, the most important aspect in maintaining employment and successfully completing the VET component of their trade was developing confidence in their abilities through the Individual Education Plan process. This required

strong partnerships between Teacher/Consultants, Teaching Sections, Employers, Apprenticeship Centres, Group Training Companies and Disability Employment Services, as noted in the previous section.

There was not the time or resources to do a complete analysis for this paper of outcomes in the first semester 2012 for the approximately 150 students enrolled in non-apprenticeship mainstream courses who were registered with the three Intellectual Disability Consultancies. However, the outcomes of students enrolled at Granville College show that the students received 94% AC assessments versus NC assessments. Note again that enrolments in the category were overwhelmingly in Certificate 3 and above, with a number of students enrolled, and performing successfully, at Diploma levels. The support for these students was an average of one hour per week.

The SWSI-specific criticism (p. 16) was:

*“An area of concern raised in the Review was the high number of discrete classes conducted for people with disability in various vocational areas.”* The report then cited its only support for this concern the NVEAC Blue Print Priority Areas 2011-6 talking about the importance of embedding equity in VET (i.e. ‘embedding’, as against ‘adding-on’, under which the report assumes a discrete course falls).

The Ford Report did not cite data to test this criticism, nor, to my knowledge, was this data requested from the Social Inclusion Unit.

Again, data from students registered with the three Intellectual Disability Consultancies in SWSI for Semester 1 2012 will be used here. As stated above, 165 students were from TVET and, for the most part, were enrolled in discrete courses. TVET enrolments for students with disabilities are managed by a Regional TVET Reference Group and are funded by the School Region budget and reflect the transition support requirements of students with disabilities undertaking the Life Skills curriculum. The selection and delivery mode of the TVET course is negotiated and prioritised according to an individual planning process involving student, school, parents, and Support Teachers Transition. TVET courses must also strictly adhere to Board of Studies guidelines.

In other words, the TVET discrete courses were funded externally, the structure was desired by those who were funding them and the discrete structure was deemed appropriate for each student not only by the Teacher/Consultant but by the schools, the families and by the students themselves. The TVET program for students with disabilities is highly valued by the schools, in large part due to the quality of the support that SWISI has been able to provide.

Of the 566 non-TVET students registered with the Intellectual Disability Consultancies, only 67 (12%) students were enrolled in discrete courses, mainly at Certificate 2 and below. In the genuinely individualised approach taken by Teacher/Consultants, many considerations inform decisions about the best way of making the transition to TAFE. The students placed in discrete courses were in a support unit at school undertaking a Life Skills Curriculum. There has been a truly collaborate approach to customising courses which involves negotiation with Faculty Directors for the specific courses.

The discrete courses have provided a genuine transition to work or further studies. For many students with higher support needs, it is the only way to access post school training. Discrete courses also provide a structured and supported transition to higher level courses.

Discrete courses, both TVET and non TVET, have a high level of unit completion. Furthermore the courses generally have impeccable attendance records to the finish. Experienced Vocational Teachers, together with Disability Teachers, work to give each student every opportunity to succeed in their learning.

As noted above, the Intellectual Disability Consultancies pointed out with vigour to the Ford review in the Faculty meeting and also the on-line survey the amazing changes that have occurred in SWSI for the students over the last decade. These changes go vastly beyond what even we would have imagined ten years ago. They include:

- increased levels of employment in 'real' jobs, especially apprenticeships
- increased enrolments in mainstream Certificate 3 and above courses
- dramatically improved outcomes
- reduced ratios of students enrolled in discrete courses
- improved efficiency in allocation of resources for student support

We have always been grateful, and have always acknowledged, the significance of the role played by the many wonderful vocational teachers in SWSI in these changes. It was both sad and an indictment of the Ford Report that it failed to acknowledge these changes or the efforts of those involved. Moreover, there is nothing in the arguments of the Ford Report to suggest that 'embedded Foundation Skills' will maintain the improvements in outcomes of students with disabilities that have occurred in SWSI over the last decade.

### **Non-specific criticisms**

The report contained a number of criticisms of learner support practices that were made generally of the Employment Preparation Faculty or that were made even more generally of Access and Equity sections. The report did not clarify whether or not the criticisms were directed at the specific learner support practices of the Disability sections.

- The average age of the students in the Employment Preparation and Vocational Access Faculties is significantly higher than the SWSI ages. "For SWSI, over 55% enrolments are less than thirty years of age."

Again, there was not time to do a full analysis of this issue for disabilities, but that there would not have been more than a 6 students over 30 years of age of the 262 students who were registered with the Intellectual Disability Consultancy at Granville. Again, the claim in the Ford Report was made with requesting specific information from the Disability Consultancies.

- Confusion in how to refer students with support needs to the appropriate Access or Equity sections.

A large percentage of students registered with the Intellectual Disability section are interviewed by the Teacher/Consultants before they enrol. The referrals may come through external partners such as Apprenticeship Centres, Disability Employment Services and Support Teachers Transition. Often students and/or families seek out the disability sections themselves. The other consultancies also have strong, specific external partnerships; e.g. the Deaf and Hearing Impaired consultancies work intimately with the

Deaf Society of NSW to develop pathways for the relevant students. For the Intellectual Disability Section at Granville in Semester 2, 2012, all the students who ticked 'intellectual disability' at enrolment have been registered with section and only four students who ticked 'learning disability' needed to be followed up. This is evidence that students in this area at least are finding the appropriate support section.

- Support effectiveness is 'hit or miss' not 'holistic'.

Support for students with disabilities is holistic in nature as all issues are identified and addressed in the Individual Education Plan. An Individual Education Plan identifies Personal Details, Disability Support Details, Support & Course Recommendations, Medical Information, Educational History, Employment History, Course/Unit Details, Reasonable Adjustments, Work Placement and Review Details. Support for a student with a disability may include, but is not limited to, the use of sign language interpreters, disability assistants (note takers), disability teachers, vocational teachers and any combination of the above, as well as the external partners as previously mentioned. There is no guarantee that any student will always be successful and certainly no model of support can guarantee that it will always be successful. The issue here remains whether the 'Individual Education Plan' or the 'embedded Foundation Skills' model is more likely to be successful for students with disabilities. The Ford Report does not address this issue at all.

- Duplication of programs.

The Ford Report (p. 14) stated that *"There is clear evidence of duplication across the Employment Preparation and the Vocational Access Faculties."* A table was then presented that showed that 12 courses were delivered by both Faculties. The Disabilities Consultancies only deliver 9999 Learner Support, so the remaining 11 courses are an issue for the other sections in the two faculties. Disabilities delivered 33% of 9999 enrolments and Adult Basic Education delivered 40%, with the remainder mainly shared between ESOL, Humanities, General Education, IMEC and Maths sections. As 9999 is the only vehicle to deliver learner support and there are obvious gross differences between the needs of the students supported by those distinct sections, it is perfectly reasonable that there is 'duplication' at the 'first glance' level of investigation conducted by the

review. There might have been reason for criticism if there was evidence of widespread 'duplication' of support for individual students between the sections. Looking across 9999 course on SIS for the students registered with the Intellectual Consultancy at Granville, there is precious little evidence of 'duplication', other than when the students with disability applies for a mainstream course where all the students applying are screened by ABE, as requested by the given vocational teaching section. This hardly qualifies as 'duplication' of support. Again, the Ford Report provided no evidence that Disability Consultancies are involved in 'duplication' of support, nor did the review request data.

- Limited collaboration between the Employment Preparation and Vocational Access Faculties.

Students with Disabilities rarely enrol in Vocational Access courses because they are usually designed for students from diverse cultural backgrounds not those specifically with disabilities. However, the occasional students with disabilities who do enrol have been supported where necessary. These students then tend to pathway to higher level mainstream courses with continued disability support. Adult Basic Education has not generally been able to assist students with disabilities, for example students that are Deaf generally have literacy issues due to not being able to access language auditorially so their support programs are designed to cater to the specifics of the impact of a life-long disability. In the case of Granville and Wetherill Park, there is an understanding between the Adult Basic Education Head Teachers and Intellectual Disability Consultants that Language Literacy and Numeracy support provided by ABE is generally of limited benefit for students with intellectual disabilities. This does not imply limited collaboration but an effective delineation of roles.

- Sections sometimes chase students to enrol in 9999 Learner Support to achieve ASH targets, rather without any plan to actually supply support. Disability Consultants do not engage in this practice. Maintaining our administrative requirements of getting an additional enrolment is sufficiently challenging.

## General Criticisms of the Report

- The report includes extensive use of jargon, such as ‘embedded Foundation Skills’, ‘wrap around approach’ etc, without either defining the terms or describing what they really mean in practice (the diagram on page 25 does not come close to fulfilling this need). In particular, the report makes confusing use of the terms ‘holistic’ and ‘siloining’, assuming that any reference to ‘siloining’ is a mark against current practice and ‘holistic’ is for the report’s recommended model.
- As noted throughout here, the Ford Report is thin in quantitative analysis, even when the data would have been relatively easy to provide, if requested.
- It is a major violation of research procedure to claim, as the Ford Report does, that ‘analysis’ of qualitative information has been completed, and to then present quotes and descriptions as representative without describing either the analytical procedure or the categorical results. This is particular an issue with qualitative research, as it tends to produce much higher levels of variance than quantitative research, a difficulty that would be exacerbated by the methodology of the review.

## Concluding remarks

The many interpretations of ‘inclusive education’ indicate that it is now a confusing concept as noted by Miles and Signal (2009). It is now used to say many different things and not how it was initially used to reject the medical explanation of disabilities and educational difficulties.

*“Essentially it is a process of challenging exclusion in schools and communities and of being vigilant about whatever threats to equity arise”* (p8, Miles, Susie, & Signal, Nidhi (2010) The Educational for All an inclusive education debate: conflict, contradiction or opportunity? International Journal of Inclusive Education, (14:1, 1-15)

A genuine student centred approach must provide a continuum of support services for individual needs and it must have the capacity to differentiate instruction as

necessary for students with intellectual disabilities. Unless it is managed well, a student centred approach will be impossible to implement under future budget constraints. The efficiencies currently afforded by a team of Disability Teachers that are currently in place will be eradicated.

The problem with the Ford Report is that it simply did not consider disability services in SWSI. It did not consider the best practice in disabilities generally, i.e. the Individual Education Plan, nor did it consider the how successful this approach has been. This paper provides the evidence of this that was not requested and thoroughly contradicts the few disability specific assertions made in the Ford Report.

SWISI has always been proud of its reputation for its ability to provide training opportunities to enable people with disabilities to fulfil their goals in an inclusive learning environment. This has been possible by the commitment of many head teachers and teachers both specialist and vocational who have seen and promoted the capabilities of people with disabilities.

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