ACD

Submission: 2025 Review of the Disability Standards for Education

November 2025

Background

ACD is the Victorian advocacy service for children with disability and their families. We are a not-for-profit organisation led by, and for, families of children with disability.

Our vision is an inclusive community where children with disability and their families thrive.

We welcome the opportunity to contribute to the Department of Education's 2025 Review of the Disability Standards for Education.

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ACD acknowledges the Traditional Owners of this land. We recognise their continuing connection to land, waters and community. We pay respects to Elders past and present.

Recommendations

- Strengthen national pre-service training requirements so all new early learning educators and teachers enter the profession with the skills to support children with disability and a clear understanding of their obligations under the Disability Standards for Education.

- Introduce mandatory, high-quality disability and inclusion training for Education Support staff, recognising their critical role in delivering and supporting reasonable adjustments.

- Develop and resource practical training, resources and implementation supports to help educators understand, apply, and embed reasonable adjustments across learning environments, social settings, and the whole-school context. This should include access to ongoing feedback loops that enable educators to trial strategies, reinforce learning, and seek guidance as new needs emerge.

- Provide principals and school leaders with dedicated training to build their capability to lead inclusive cultures and uphold the intent of the Disability Standards for Education.

- Embed clear, accessible information about the Disability Standards for Education and students' rights across school, early learning and community settings, including through enrolment and transition processes, routine school communications and local information sessions, to improve awareness among families.

- Ensure the new Australian Government's Individual Disability Advocacy Program includes dedicated, adequately funded child and family-focussed disability advocacy services, to protect children's rights in education.

- Require state and territory education departments to track and monitor the reasons families change schools, strengthening accountability where families are informally pressured to leave or discouraged from enrolling. Departments should follow up with families known to have a child with disability when a school move occurs.

- Require states and territory education departments to track and report student non-attendance (including partial-day attendance), with disaggregated data that includes disability.

- Ensure the new principles for consultation, issues resolution and complaints handling lead to real change by both:
    - Embedding the principles as a mandatory requirement in the Standards
    - Requiring education providers to develop and publish their own policies for consultation, issues resolution and complaints handling that align with the principles.

- Expand the remit of the Victorian Independent Office for School Dispute Resolution to include independent and Catholic schools, providing impartial oversight and advice for complex and unresolved complaints across all school sectors. This would ensure consistent, high-quality dispute resolution for all students and families. This may serve as a model for complaint resolution in other states and territories.

Executive summary

ACD welcomes the opportunity to contribute to the 2025 Review of the Disability Standards for Education. Our submission draws on evidence from ACD's Support Line, which provides advocacy for families of children with disability in Victoria. Since the last Review, community demand for support has continued to grow, with education advocacy issues accounting for nearly two thirds of cases in 2024–25. Within these cases, reasonable adjustments were the most common concern raised by families.

Insights from our Support Line shows significant gaps in awareness of the Standards across early learning, childcare and school settings. Many educators hold only a basic understanding of obligations, and deeper knowledge is usually limited to a small number of staff. Common misunderstandings include who the Standards apply to, what constitutes disability, and the requirement that inclusion applies across all aspects of school participation, including and beyond classroom learning. Families frequently report exclusion from camps, excursions, playground activities and toileting support, highlighting a limited understanding of holistic participation. Broader school communities, including other parents and students, also have limited awareness of disability and inclusion, further contributing to inconsistent practice.

Challenges with implementation are widespread. Many educators are motivated to be inclusive, but lack the practical skills, confidence and guidance required to identify and apply reasonable adjustments across academic, social and extracurricular settings. Implementation varies both between and within schools, and is particularly inconsistent in secondary settings where students interact with multiple teachers. School leadership plays a critical role in shaping students' experiences and influencing educators' capacity to provide adjustments that support equitable access. ACD has also observed selective use of the Standards and gatekeeping practices that discourage enrolment or full participation, sitting outside formal reporting mechanisms and limiting accountability.

Most families are unaware of the Standards before engaging with ACD and require substantial advocacy support to understand and use them in their self-advocacy and planning with education providers. Despite increased staffing, more than 50 families remain on the Support Line waitlist at any time, highlighting ongoing unmet demand. Stronger proactive information provision by education providers, together with greater investment in independent advocacy, is essential to improving implementation and accountability.

Communication and consultation processes, including Student Support Group or Program Support Group meetings and Individual Education Plans, vary in quality and consistency across education settings. ACD supports introducing national principles for consultation, issues resolution and complaints handling, and recommends embedding them as obligations in the Standards and requiring education providers to publish aligned policies. Independent complaint mechanisms, such as Victoria's Office for School Dispute Resolution, should also be available across all school sectors.

Overall, families want consistent, practical and accountable implementation of the Standards so children with disability can participate in all aspects of education on the same basis as their peers. Strengthening workforce capability, leadership, proactive communication, accountability and independent advocacy are central to achieving this.

Introduction

ACD's Support Line

ACD's Support Line is a free advocacy service for families of children aged 0–18 with any type of disability or developmental delay in Victoria. The service assists families to understand their child's rights and provides tailored support to help them advocate effectively for their child and family.

The Support Line operates within a practice framework grounded in a strengths-based, family-centred approach that emphasises empowerment and capacity building. Through coaching, guidance and information provision, families are supported to build the knowledge, skills and confidence required to self-advocate and achieve positive outcomes.

Growth in demand and education advocacy issues

Our service reach and staffing have grown to meet increasing community demand. In 2020, when the Disability Standards for Education (the Standards) were last reviewed, we received 1047 calls to our Support Line. Around half (51%) of these were related to education advocacy issues. By 2025, calls had risen to 1606, with education-related calls accounting for 62% of all contacts. This is a 12-percentage-point increase, showing that education issues have not only remained a major concern for families since the last review, but have continued to grow.

This submission draws on insights gathered through our Support Line and our work with families in early learning and school settings across the state.

Snapshot of ACD's Support Line cases related to education advocacy issues in 2024–25

Advocacy issues

- 786 cases received Empowerment or Enhanced advocacy support

- Nearly one quarter (23%) of all advocacy cases involved concerns about reasonable adjustments. This was the most common education-related issue

- 21% of cases involved children attending education on reduced hours

- 6% of cases related to suspensions or expulsions

Demographics

- 62% of cases involved a primary diagnosis of autism

- 18% of cases were from rural and regional areas

- 30% of children were culturally and linguistically diverse

- 3% of children were Aboriginal and/or Torres Strait Islander

- The average age of children supported was 9 years old

Education workforce awareness of the Standards

Awareness and understanding of the Standards remains inconsistent and patchy across the sector. Our staff have observed a range of challenges with awareness, which in turn affects the quality and consistency of students' experiences.

Inconsistent awareness within education environments

While most early learning settings and schools have a basic awareness of the Standards, in-depth knowledge is typically limited to a small number of staff. Although the Standards are a cornerstone for ensuring fair and equitable access to education, their scope and obligations are not consistently recognised or understood across all staff, even within the same education setting.

Misunderstanding the range of disability and who the Standards apply to

There remains confusion among some education providers about the definition of disability, including misunderstandings about how a wide range of conditions can impact learning. These misunderstandings also influence how providers think about reasonable adjustments, such as not recognising that offering breaks can support sensory regulation.

There is also persistent confusion that the Standards only apply to children who receive inclusion funding. This knowledge gap is a notable and pervasive issue encountered through ACD's Support Line.

Gaps in holistic understanding of the Standards

While many schools have a general awareness of the Standards, there remains limited understanding of the breadth and complexity of the obligations placed on education providers. These obligations require that children with disability can participate, learn and benefit from education on the same basis as their peers across all aspects of school life, not only in academic learning.

Our Support Line commonly receives calls about children being denied equal access to the social and community aspects of education, such as camps, excursions, sports carnivals and playground activities. In some cases, schools have placed responsibility back on parents and carers to attend these activities to provide the support their child needs as a prerequisite for participation.

Families also report being told that toileting or continence-related supports will not be provided at school, effectively excluding their child from participation in education.

At times, actions taken to promote inclusion in learning can unintentionally undermine inclusion and belonging. We have seen situations where a student spent most of the school day in one-on-one support in a separate environment. While this approach was implemented with the intention of improving academic inclusion, it had the opposite effect on the child's social inclusion and their ability to learn in group settings by reducing opportunities to learn alongside peers.

Greater efforts are needed to strengthen education providers' holistic understanding of the Standards and the protections they provide. The Standards are designed to ensure

that children with disability are included in the full school program, not just classroom learning, and that adjustments support both learning and participation.

Limited general awareness of inclusion

The Standards and educators' obligations are often only referred to when something has gone wrong, rather than being used as a tool for proactive inclusion planning. There is considerable pressure on the Standards to uphold the rights of students with disability because broader understanding of disability and inclusion remains limited across many school and early learning communities, including among other children and parents.

Strengthening whole-school understanding and acceptance of inclusion would reduce the need for families to rely on the Standards to resolve problems. Embedding inclusive practices across the school would also make the implementation of reasonable adjustments more routine, as proactive universal design reduces the need for additional, individualised adjustments.

Family awareness of the Standards

Need for greater individual advocacy support

Most families who contact us have never heard of the Standards before engaging with our service. A core feature of ACD's work is lifting families' awareness of their rights and building their confidence to advocate. However, there is a significant gap between knowing about the Standards and feeling able to use them in conversations, advocacy and planning with education providers. This can be particularly challenging where there are power imbalances or where families have had negative experiences with education settings, including in their own schooling.

For many families, bridging this gap requires more than information and written resources alone. Coaching, interpersonal support and guided problem-solving through individual advocacy are essential.

ACD is funded through a mix of state government and Commonwealth programs to deliver this support to families in Victoria. Unmet demand remains with more than 50 families waiting for advocacy support at any point in time.

To improve implementation and accountability of the Standards nationally, greater investment in child, youth and family disability advocacy services is needed.

Shifting the systems navigation burden off families

There needs to be a shift away from the current approach, where students and families are expected to actively search for information about their rights in education and the Standards. Instead, education providers should offer this information proactively as a routine and embedded part of their practice.

In practice, this could include schools sharing Department of Education resources alongside school policies and other key information at enrolment, as well as offering information sessions at the start of each school year through the school or local area. Embedding information provision in these processes would remove the onus from students and families to find this material themselves.

This approach would help establish a more collaborative environment from the outset, supporting open communication and shared understanding between schools and families.

Implementation of the Standards

Supporting educators in delivering inclusive education

ACD Support Line education-related cases with the primary advocacy issue of reasonable adjustments has grown 39% in the past two years

In many instances, there is a genuine motivation among educators to support students with disability on the same basis as their peers – but there remains a significant gap in knowledge and skills around the 'how'. Educators and support staff often struggle to identify appropriate reasonable adjustments, understand disability-related needs, or apply adjustments consistently across classroom, social and extracurricular settings. Without clear, practical guidance, inclusive practice is applied inconsistently and does not reliably meet the requirements of the Standards.

This is consistent with feedback ACD received earlier in the year during a consultation with teachers who are also parents of children with disability. Many reported that it was not until they had personal family experience of disability that they learned practical ways to adapt their teaching practices and learning environments to promote inclusion.

"I've been teaching for 21 years and since having children it's only now that I've actually learned more about disability in education and reasonable adjustments just from my personal perspective of being a mum."

- Parent and teacher, ACD consultation, March 2025

Greater investment is needed to equip educators with practical training and support, so they feel skilled and confident in differentiating their practice to meet the diverse or additional needs. This investment must be matched by sufficient time and resources to implement inclusive approaches effectively. Sustained support is also critical. Educators need access to ongoing feedback loops where they can trial strategies, reinforce skills acquired through training, and seek guidance for emerging challenges. In practice, this could involve expanding access to high-quality, in-setting inclusion coaching, establishing Communities of Practice, and creating disability student advisory committees to provide structured feedback to schools or education regions.

Selective use of the Standards and gatekeeping practices

In 2024–25, 16% of ACD's education advocacy cases involved concerns about education providers discouraging access, including enrolment and reduced hours

Cases concerning discouragement of access to education has increased by 42% over the past two years

Our team has observed instances where school leadership demonstrates strong knowledge of the Standards. However, this knowledge is sometimes used to pre-empt family concerns and position the school as having 'covered its bases' rather than as a foundation for actively supporting tailored inclusive practice.

We have also seen cases where schools understand their obligations under the Standards but do not communicate this to students and families until our Support Line becomes involved. Once families are equipped with the technical language needed to assert their rights, schools often become noticeably more forthcoming and responsive in acknowledging their responsibilities under the Standards.

While processes exist for education providers to demonstrate if and why they are unable to meet an obligation under the Standards, in practice these processes, including the requirement to provide evidence of unjustifiable hardship, are rarely followed. Instead, families are often given subtle (and at times not so subtle) messaging that the education early learning setting or school may not be the 'best place' for their child. These forms of discouragement typically fall outside formal reporting mechanisms, making them significantly harder to monitor, challenge, or prevent.

The role of independent advocacy in monitoring and accountability

Across a range of situations, ACD supports families to work with education providers to implement changes that better support the inclusion of their child's needs. Many educators are receptive, adapt their approaches, and act on feedback. However, there are also cases where education providers are more reluctant to change. In these situations, independent disability advocacy can play an important role by helping to mediate tensions and hold education providers accountable.

Due to high demand for individual advocacy, the support we offer families is necessarily time-limited. This can make it difficult for our staff to determine whether agreed changes are sustained over time. Appropriate resourcing of independent disability advocacy services is essential, not only to assist families at the point of need but also to enable ongoing monitoring, follow-up and oversight of how agreed adjustments are implemented and maintained.

Leadership and consistency in applying the Standards

As outlined earlier, inconsistent application of the Standards continues to create barriers for students with disability. ACD has observed that these inconsistencies occur not only across different schools, but also within the same school community. In some situations, a student's access to adjustments and their overall school experience changed significantly following a change in leadership, even though the student's needs remained the same. This highlights the important role that school leaders play in shaping how the Standards are interpreted and applied in practice.

While teachers and support staff are responsible for enacting reasonable adjustments in the classroom, leadership sets the tone, expectations and operational framework that enable consistent, inclusive practice. Where leadership prioritises inclusion, educators are more likely to collaborate with families, seek guidance, and respond flexibly to student needs.

To achieve a more equitable and consistent application of the Standards, targeted capacity building for school leadership is essential.

Our team has also observed that experts outside the education system, such as allied health professionals, can sometimes misinterpret the Standards or misunderstand the context in which early learning settings and schools operate. This can lead to advice that

is not accurate or feasible, and may contribute to misunderstandings and tension between families and education providers.

Differences across school settings and types

Our team has observed that primary schools are generally more receptive to implementing reasonable adjustments than secondary schools. Some families are also unaware that they can request reasonable adjustments in high school settings. This is often influenced by the greater complexity of secondary school environments, where students have multiple subject teachers rather than one main classroom teacher. This results in some teachers implementing adjustments and collaborating with families, while others do not, creating inconsistency in how inclusion is applied for the student.

The Department should consider its role in developing setting-specific information and supports to help bridge this gap.

We have also observed that government schools tend to demonstrate greater awareness and acceptance of the Standards and their obligations than independent and Catholic schools. Clear expectations, guidance and supports provided by the state government, as well as attitudes within schools about serving all students, contribute to this difference.

Communication, consultation and complaints

In 2024–25, 13% of ACD's education-related cases had a primary advocacy issue related to communication, Student Support Group/Program Support Group meetings or Individual Education Plans

Communication and genuine consultation as a foundation for inclusive practice

Communication, and genuine consultation and participation in decision-making by students and families, is critical to ensuring that the right adjustments are in place to support a student's learning and participation needs, and that these adjustments are reviewed and updated as required. We regularly hear from families seeking advocacy support to address communication issues with education providers, and to ensure that formal processes are followed, of high quality and documented. This includes Student Support Group or Program Support Meetings and Individual Education Plans. Conversely, many families are unaware of these processes entirely until receiving support through our services, and there is little oversight from the Victorian Department of Education regarding how many education providers are not implementing these key consultation and planning processes.

ACD therefore welcomes the proposed introduction of principles for consultation, issues resolution and complaints handling, which have the potential to strengthen consistency and accountability in inclusive decision-making. We recommend that these principles are both:

- A requirement for education providers embedded within the Standards

- Education providers are required to develop and publish their own policies for consultation, issues resolution and complaints handling that are consistent with the principles

It is the combination of the two proposed options that will support the realisation of the principles and avoid the risk that they have limited practical impact.

Importance of independent complaint resolution pathways

Embedding the proposed principles as obligations for education providers will help reduce the escalation of complaints in many cases. However, there will still be situations where issues are complex and require intervention by an independent body. In Victoria, the Independent Office for School Dispute Resolution serves as a critical safeguard when complaints cannot be resolved between students and families and schools or the Department of Education. The Office operates impartially and provides a restorative, alternative dispute resolution process to help parties reach workable solutions. It also offers expert advice to support system improvements for long-term benefits.

This Office is a strength of Victoria's education system and its model and approach promote inclusive decision-making and effective complaint resolution. However, its current scope is limited to government schools. We recommend expanding its remit to include Catholic and independent schools, ensuring all students and families and education providers have access to independent advice and support for complex complaints and issues.