



to the

Special Education Review

March 2010

1. Introduction

- 1.1. The PPTA is the union representing around 18,000 teachers in state secondary, area, manual training and intermediate schools, as well as tutors in community education institutions and principals in secondary and area schools. PPTA represents the professional and industrial interests of its members, including those working in alternative education centres and activity centres. More than 90% of eligible teachers choose to belong to the union.

2. Consultation Questions

2.1 Question 1a

What is needed to help schools succeed?

Critical to school success is a national policy framework that is coherent and equitable. This is not easy to achieve under the atomised structures that are a feature of Tomorrow's Schools. As a consequence, the system relies more heavily than previously on bureaucratic processes to provide consistency – both in terms of negotiating GSE regions/systems and in relation to application and funding processes.. Clear, nationally consistent systems, logical rules and comprehensive processes are required to ensure that the SE goals are able to be met.

MOE needs to provide clearly mapped, transparent networks and information strands. This includes names and contact details of various managers, sections, regions, offices; lines of authority, relationships between different parts of the SE service, etc. This is currently not the case, as our own consultation process demonstrated, with members from different parts of the country experiencing markedly different systems and responses from GSE and other sections within MOE.

PPTA, in general, supports the current model of SE provision, with suggestions for improvements as described throughout this submission.

Special and residential schools

With regard to the suggested models for SE provision on page 19 of the discussion document PPTA affirms that it is essential for the support of the SE network that we maintain special and residential schools.

PPTA opposes the suggestion that these become resource centres and/or bases for itinerant staff. This arrangement would increase the potential for increased

bureaucratisation and inefficiencies and does not address the concerns of schools and families in isolated areas – many of whom are currently well-served by residential and special schools. In particular, we reject the superficial appeal of vouchers which, rather than empowering parents as is sometimes naively imagined, provides a strong motivation for schools to exclude students who have expensive educational, health, pastoral and social needs.

Professional Learning

PPTA sees the need for the Special Teaching Needs (STN) course to be available to SE teachers on a funded, nationally standardised basis, with time allowances to enable participants to embed and implement their skills and knowledge.

Initial teacher education (ITE) courses and in-service professional learning and development (PLD) for practising teachers need to include compulsory SE theory and practicum components. It is difficult to see how this could be achieved within current one year Grad Dip Sec programmes, which raises the question about the extent to which it is reasonable or realistic to expect teachers with little or no training in this specialist field to run inclusive programmes in mainstream schools.

PPTA supports pre- and in-service PLD for teacher aides and learning support assistants that are resourced, standardised and available across the country.

Information

The only comprehensive SENCO handbook currently available is privately produced and costs \$90. There is demand for common practice and good practice to be articulated in ways that are readily (and nationally) accessible. This means that GSE has a responsibility to provide written frameworks and guidelines – such as this book provides.* PPTA recommends that a set of SENCO frameworks and guidelines – including requirements and best practice examples – be published, publicised and distributed to all schools and ITE providers and updated regularly.

* <http://www.learningnetwork.ac.nz/shared/products/productBook.aspx?id=book545>

Resourcing

While PPTA understands that this review does not include budget increases within its terms of reference it should be noted that the current level of ORRS funding, for example, does not allow schools to cover current PLD and related environmental

adaptation requirements to ensure full and ongoing inclusion and safe instruction for all students.

To help mainstream schools succeed, appropriate environments, class sizes, space and equipment are needed, so that all classrooms and areas of a school are equipped to support inclusion and integration for all students and, where appropriate, to support students with very high and/or multiple needs in a homeroom environment. This includes equipment and resources that would not normally be found in secondary schools (except where there are students with specific learning/communication/mobility needs. Schools are not currently funded to this level.

Inclusion

The multi-teacher model of secondary education makes inclusion challenging and complex. This needs to be recognised in managing and maintaining funding, staffing and support for SE in the secondary context.

For secondary schools trying to offer inclusion the costs are increasingly outweighing their ability to do so effectively. Schools find it increasingly difficult to make ends meet – let alone maintain quality service provision and learning programmes, offer safe and inclusive learning environments and ensure that staff are given reasonable working conditions. In a system that has always relied to some extent on balancing ‘unders and overs’, the ‘overs’ now heavily outweigh the ‘unders’. This adds up to significant stress for schools and teachers with fund holding responsibilities. It is critical that schools are supported to manage this responsibility. Ideally, this support would take the form of adequate funding, time allowances that enable SE unit managers and SENCOs to oversee staffing, liaise with parents, specialist and other agencies, and manage the related administrative load.

2.2 Question 1b

How could schools work together to succeed?

A key message from PPTA is that local solutions work well when schools are supported by strong, coherent, national frameworks. Inclusion and collaboration take significantly more time than the current resourcing (staffing and funding) allows. Account needs to be taken of the complexity of SE work, particularly in the context of secondary schools and their communities.

SENCOs and other SE staff in secondary schools value opportunities to network, problem-solve and to share good practice. However, the organisational time for this does not sit within schools' current staffing resources. GSE could fulfil this role by providing networking at the regional level for SE teachers, SE units and schools.

There is also a lot of variation in practice between different regions and different clusters of schools, particularly with regard to service delivery by GSE, some of which is both unnecessary and undesirable.

Within secondary schools there is a clear need to ensure there is one designated middle, and one senior, manager (other than the principal) with a thorough understanding and overview of SE provision, funding and need. This happens currently in some schools, but not others. Once each school is confident in its overview of SE and key people are known, schools will be better able to liaise and work across in co-ordinated, coherent ways.

Schools need support to ensure that all students are offered suitable pathways and transitions from school. This holds true for SE and mainstream students. However, SE students generally have complex needs making this process more demanding. It is also sensible to have brokering/support services available to all schools in an area, rather than having this type of work replicated by every school or provider. Again, examples of this type of practice already exist, but are not necessarily available across the country.

Non-ORRS-verified students with moderate to high needs do not receive support. This remains an area of significant pressure on schools.

PPTA members would like to see GSE regional offices being more pro-active in their leadership of SE and in creating opportunities for cross-school, cross-sector and inter-agency communication and collaboration. This may mean that additional resourcing is required in regional offices.

2.3 Question 2

What needs to be done to make transitions work better?

Not all ORRS-verified students cope well with extra transitions (eg, from primary, to intermediate, to secondary, within two years). For those students, the option to stay at

primary school instead of transitioning to intermediate school until they are ready to begin secondary school would be useful.

Extended transition and familiarisation visits to new schools (as are increasingly the norm, eg, regular attendance on a weekly basis over a term or more) rather than a couple of visits prior to enrolling are not funded. Schools agree that extended transition arrangements are often beneficial, but need flexibility around the ways in which transitions between schools are funded and staffed. Ideally, PPTA recommends supplementary transition funding.

MSD is funded to support transitions from secondary school yet schools do the bulk of the work. This would suggest that the funding either needs to be moved from MSD to schools (or to GSE), or that the funding arrangement is flexible enough to cover staffing and other costs across agencies/schools.

Rural areas face hidden costs in all the work they undertake. Much of this is not covered by current funding mechanisms. When it comes to transitions, little if anything actually exists in smaller and more isolated parts of the country that is appropriate/available for some SE students.

Improved transparency of and information about transition pathways, services, funding, etc for transitions from secondary is needed. Who are the key agencies and providers? How are they contacted? Who are the key contact people at local and national levels? What links already exist? Who has responsibility for co-ordination in a particular area? What national overview exists? The development of a user-friendly interactive website that covers SE systems, people and processes from years 1-13+ would be a step in the right direction (a virtual one-stop-shop).

There is currently no provision made for students with moderate needs to make transitions from secondary school. PPTA suggests that this is a huge gap, with long-term potential benefits that far outweigh the short-term costs of addressing this need.

A case management system might offer improved coherence in transitions from secondary. Given that transitions and pathways are issues for the whole community and not simply for schools, community based case-management might be a way

forward. This approach might then allow for the type of flexibility around transition funding mentioned above.

A transparent system, with unified data recording, would improve information-sharing and coherence between schools and other agencies.

2.4 Question 3

How could services be better coordinated and focused on the needs of students and families?

Schools are typically 'by default' resource centres for SE families and can often fulfil the role of lead agency/key worker. While this can make sense, schools do not necessarily have the staffing or the time to manage this easily.

Where regions report effective GSE services they feel supported in this work. However, PPTA gets more negative than positive feedback about regional GSE services to schools. Areas of good practice should become a benchmark of, and template for, replication around the country. Again, local solutions can work well, but need to be supported by strong, coherent, national frameworks. GSE forms a critical part of this national framework.

Again, PPTA is interested in the notion of a case management approach to SE students and their families, with a view to ensuring that seamless handovers occur, timely liaisons are effected between different providers, and that continuity of care enables students' learning opportunities to be maximised. Which agency/provider becomes responsible for developing and operating case managers is moot (although GSE might be an obvious choice), but the current situation that allows for double-handling, overlaps, lack of timely information exchange and high levels of variation around the country is not satisfactory. We recognise that units/schools with large numbers of ORRS-verified students generally do an excellent job of this and may currently be comfortable with the status quo. However, places with few students, particularly when they are scattered between different schools, might benefit from this.

PPTA considers that protocols and overviews along the lines of those used within the 'strengthening families' model might be worth consideration in the SE context.

2.5 Question 4

What arrangements for funding, decision-making, verification, and fund holding should we have?

PPTA recommends that the SE budget could be increased by redistributing existing funding streams:

- 1) Take the funding for private schools and redeploy it into SE to support more inclusive practice
- 2) Move the money from contestable funding pools into the SEG grant (see SEG recommendations below)
- 3) Evaluate current bureaucracies in SE with a view to redistributing funding to secondary schools.

While PPTA supports special and residential schools as part of SE provision, we note that mainstream secondary schools offering more inclusive models of education are not funded to support their level of need. We applaud the funding of special and residential schools and suggest that MOE investigate equivalent funding models for SE in mainstream and inclusive secondary environments.

Students with moderate needs have been disenfranchised by recent funding decisions. More attention needs to be paid to ensuring that all students' needs are met and that non-ORRS students are not disadvantaged.

It is critical that fund holding schools are supported and adequately funded. The real value of SE funding per student continues to drop as costs continue to increase. The compliance requirements that form part of the specialist service provider standards place schools under further stress.

SEG and TFEA funding should be more transparent and systems put in place to ensure that secondary schools use these funds (and associated MUs, MMAs) appropriately. PPTA would prefer to see LSF moved into the SEG pool.

SEG funding needs to be targeted more closely to each school's actual needs.

With regards to the RTLB 11-13 funding, PPTA also recommends more transparency and accountability on schools to show that it is being used as intended. With these in mind we reiterate the suggestion that schools ensure there are middle and senior staff

with specific responsibility for and oversight of SE and that time allowances for this are adequate for the expectations of the roles.

PPTA questions the effectiveness of the SLS s system for non-ORRS students. Their needs justify better funding and more coherent support. We understand that there will always be some children whose needs do not meet the ORRS criteria, and who do need extra support. The current method of SLS delivery does not work efficiently in secondary schools.

Verification

PPTA contends that the bar for ORRS verification is currently set too high. There is a clear, paper-driven process in place, and secondary schools would prefer to have contact with regional advisers to assess and support during the verification process.

The high and complex needs funding process is unfair, inaccessible and needlessly complex.

The curriculum adaptation criterion is seldom if ever accepted in secondary ORRS applications – yet this is at the heart of what schools are doing. Teaching and learning should still be at the heart of the work of secondary schools, yet funding to support this for SE students – particularly where inclusion is a serious goal for the learner – is routinely denied.

On an educational basis, any learner aged 13+ years still functioning at curriculum level one should qualify for ORRS funding. Currently few of them do.

Many students are currently slipping through the cracks – this includes students whose complex needs include mental health issues. There is almost nothing to support students and schools in this area – and what exists does so with prohibitive and concerning waiting times.

PPTA acknowledges that the one-off increase in SE funding through ORRS extension was a welcome contribution to raising the standard of support for SE students. However, schools report a certain discomfort in the manner by which this fund was distributed. Questions remain as to whether the process benefited those with most

need. Again, transparency was lacking. There are also concerns that the proportion tagged for specialists in the ORRS extension is too high.

The verification process as it stands is not sensitive to ASD students. These are a growing group within SE whose learning needs place huge demand and stress on schools. Their needs are often met at the expense of learning opportunities for other students. Without the extra funding that comes with ORRS verification schools have limited (if any) resources available to ensure that the learning needs and wellbeing all students can be met.

The provision of sign language interpreters is another area of need. First, schools are not funded to employ interpreters. Second, their conditions of work do not easily fit secondary school timetables. Thirdly, even should funding be available interpreters are a scarce resource and not always available when needed. Without this resource it is impossible for mainstream secondary schools to offer even the most basic learning programmes to deaf students.

Finally, some criteria in the verification process do not allow for differences in age/stage to be considered (for example, sexuality and mental health issues can become significant once students enter puberty, but are not considered)

2.6 Question 5a

How can individually targeted services and supports be made more efficient?

The current system does not enable sufficient differentiation between the needs/costs for different conditions and ASD, hearing, vision and mental health are areas that are not adequately met.

Response times for some specialist referrals can vary from eight weeks to more than six months. When schools identify a case as urgent they need responses within days, not weeks or months.

Again, there are problematic levels of variability in access to information, guidelines, frameworks, support and services for different conditions and in different areas. PPTA wants to see more coherent provision across the country and clearer lines of information and communication.

2.7 Question 6

How can the quality of services be improved?

Secondary schools take the challenge of providing inclusive education and of making community connections very seriously. However, the complexity and time involved in progressing these mean that they pose significant costs to schools, both in staffing hours and financial costs. Inclusion and forming and maintaining community links are expensive, labour intensive, time-consuming, require specialist support and pose significant extra infrastructure requirements.

Examples of effective practice, such as school-based transition centres for 19-21 year olds could be built on in other schools and centres, with appropriate funding and support. Current provisions mean that sites of good practice may not offer realistic models for smaller areas or for schools with relatively few verified students. Support from the centre would make a positive difference in enabling the spread of innovations and programmes that are already effective.

The NZ Curriculum (NZC) is a rich document that has the potential to frame excellent teaching and learning practice in SE. However, the current funding does not support this. PPTA reiterates the desirability of better funding for the current system – including clearer requirements on schools in their use of tagged funding (including SEG, TFEA) – and diverting money from contestable funding pools into a more effectively targeted SEG. Money currently spent on private schools would offer a far greater return should it be redirected into public secondary school-based SE.

2.8 Question 8

What does successful SE look like and how should we measure it?

PPTA wishes to affirm the current work being done in secondary schools to support students with very high, high and moderate special education needs. PPTA places a high value on the work done by teachers and other staff in secondary schools to support student learning and calls for improved frameworks and funding to match.

Secondary schools value the NZC – in particular the key competencies – in relation to charting progress for students with high and very high needs. PPTA recognises that IEP and narrative assessment tools are useful; PPTA rejects the suggestion that the national standards will be of any use to schools, but, in particular, to students and teachers in SE.

The changes to NCEA and phase out of many unit standards are of significant concern to SE teachers and students. Viable pathways for all SE students will need to include relevant and suitable qualifications at a range of levels.

Specialist Service Provider Standards

While these standards are, in some ways, useful additions to SE, there are areas of concern:

- SSPS reviews should not fall in the same year as an ERO review
- The SSPS seems designed to fit the GSE fund holding model better than for fund holding schools. This mismatch means increased workload for fund holding schools
- PPTA has heard mixed reports of PLD and/or communications about the standards – these vary from region to region. All fund holding schools must receive the same information and opportunities for PLD if we are to have consistency of education delivery across the country.

Moderate Needs

PPTA contends that the current RTLB provision does not easily fit secondary schools and calls for a minimum of one RTLB per secondary school. With access to more trained and qualified RTLB secondary schools should have better access to PLD and support around differentiation, IEPs, teachers aides, etc.

Use of the RTLB learning support fund varies from one cluster to another. PPTA calls for the good practice that has been identified in effective use of this resource to become mandated for use across clusters.

PPTA suggests that much work needs to be done around provision for students with moderate needs. The relative lack of support for these students has negative flow-on effects for teaching and learning outcomes across secondary schools.

Along with clearer guidelines and frameworks about use of a better targeted SEG, schools need exemplars of appropriate and good practice in the use of this resource. While teacher aides form a valuable part of learning support in SE, this is by no means the only resource for which SEG should/could be used. Better information to schools will enable them to use the SEG flexibly and appropriately.

PPTA requests the opportunity to make an oral submission to the SE review panel.