



VICTORIAN  
STATE  
DISABILITY  
PLAN  
2021-24



SUBMISSION  
I CAN NETWORK LTD

24 June 2020

Office for Disability  
Department of Health & Human Services (DHHS)  
50 Lonsdale Street  
Melbourne, VIC, 3000

**Re: feedback on the next State Disability Plan for 2021 - 2024**

Dear Sir/ Madam,

My name is James Ong. I am the co-founder and currently Evaluations Consultant of I CAN Network, reporting directly to the CEO Chris Varney. My role is to plan and conduct evaluations of I CAN Ltd's mentoring programs in consultation with I CAN Network and the Victorian Department of Education and Training (VDET). I also collect and analyse data from evaluations to generate results that highlight the quality and social impact of I CAN Ltd's services to different stakeholders. In addition, I conduct research and write policy submissions on behalf of I CAN Ltd, including this letter detailing I CAN Network's feedback for the next State Disability Plan for 2021 - 2024.

**Introduction**

I CAN Network is Australia's largest Autistic-led organisation. We deliver face-to-face services in Victoria and Queensland and online services nationally. We run school and online programs to increase the self-acceptance, self-confidence and social connections of Autistic young people and adults. In addition, we organise professional development, speaking engagements and campaigns to increase people's understanding of the strengths of Autistic people.

I CAN Network welcomes the opportunity to provide feedback on what should be included in the next State Disability Plan for the 2021-2024 period. In our submission, we discuss the additions which we're recommending should be made that should be made and the factors we're recommending for consideration to ensure that the next State Disability Plan continues to guide the Victorian Government ('the government') in achieving inclusion for people with disabilities, including Autistic people.

First, I CAN Network would like to acknowledge the Autism State Plan which was released last year. The Autism State Plan, built on the foundations of the 2017-2020 State Disability Plan, underlines the commitment of the government to improving the lives of Autistic people and their families and carers and removing additional barriers which Autistic people face in their lives. We look forward to working with the government in the coming years to improve the lives of Autistic Victorians.

## Summary of Recommendations

1. Dedicate a section in the next State Disability Plan to explain how it will complement Education State targets and initiatives for students with disabilities.
2. Create additional Education State targets which aim to improve the education of students with disabilities.
3. Create a Deputy Secretary for disability and inclusive education in VDET which reports directly to the Secretary.
4. Engage/ and consult with Autistic people who have co-occurring conditions, mental health issues and/or are socially isolated while writing the next State Disability Plan.
5. Inform and train the education and medical workforce to raise awareness of and cater their services more to people with disabilities.
6. Explain strengths-based approaches more in the next State Disability Plan.
7. Renew its commitment to implement strengths-based approaches for people with disabilities.
8. Incorporate the new outcomes of *Intimate Lives* and *Recognition* in the outcomes framework for the next State Disability Plan.
9. Be more transparent in the next State Disability Plan on how the government is building and implementing the outcomes framework.

## Embedding disability in the Education State

### Recommendation 1

*Dedicate a section in the next State Disability Plan to explain how it will complement Education State targets and initiatives for students with disabilities.*

### Recommendation 2

*Create additional Education State targets which aim to improve the education of students with disabilities.*

The government must ensure that students with disability are not overlooked in its pursuit to become the Education State. We would like the government to include a section in the next State Disability Plan which explains how the plan will complement Education State initiatives and targets. Similarly, we recommend the government also include separate Education State targets which address and improve the educational outcomes of students with disabilities, including Autistic students.

The vision of the Education State is to build a public education system where every Victorian student is equipped with the knowledge, skills and capabilities to thrive in their lives and to become valuable members of the workforce. One of the Education State targets relevant to this submission is the *Breaking the Link* target. This target aims to keep at-risk students in school and to close the gap in reading achievement between disadvantaged and non-disadvantaged students. However, there remains no explicit target focusing on the educational outcomes of students with disabilities; a disadvantaged group whose educational outcomes are poor. I CAN Network fears that students with disabilities will be overlooked in the government's pursuit to improve the public education system if they are not given explicit focus in Education State initiatives.

It is important to have explicit targets for students with disabilities as these students face greater barriers and challenges in their schooling and education compared to students without disabilities. Hence, students with disabilities deserve extra attention from the government to ensure that they receive the same benefits from Education State initiatives so that they are as connected to their school community as students without disabilities.

We commend the government for planning and running an Inclusive Education Agenda (under *Key Priority 9* of the previous State Disability Plan) which aims to enhance the inclusion of students with disabilities. However, this can go further by embedding disability more into Education State initiatives. Hence, we call on the government to cross-reference both the State Disability Plan 2021 – 24 and the Education State. We recommend that the next State Disability Plan should dedicate a section to explaining how the plan will complement Education State targets and initiatives for students with disabilities. In addition, we recommend the government create additional Education State targets which aim to improve the education of students with disabilities.

I CAN Network Ltd's partnership with the Queensland Department of Education has demonstrated to us the positive impact of a state government explicitly discussing students with disability in an education agenda. We recommend that the Victorian Government take into consideration the Queensland Department of Education's [\*Every Student with Disability Succeeding\*](#) Plan. This plan aims to improve the inclusion and educational outcomes of students with disabilities and to build the capacity of schools and teachers to support them. The plan not only puts forward what it aims to achieve in schools and with students with disabilities but it also details how these goals will be achieved and how progress towards the desired outcomes will be measured. This plan shows that the education of students with disabilities can and should be a central issue to any education agenda, including the government's Education State. By setting dedicated outcomes, targets and initiatives to improve the inclusion and learning outcomes of students with disabilities in both the State Disability Plan and the Education State, we can signal that Victoria is committed to ensuring that students with disabilities are not left behind in education.

### **Recommendation 3**

*Create a Deputy Secretary for disability and inclusive education in VDET that directly reports to the Secretary.*

Furthermore, we recommend an additional commitment be made in the State Disability Plan for the Victorian Department of Education and Training (VDET) to create a Deputy Secretary role for Disability and Inclusive Education. This role is analogous to the Queensland Department of Education's Assistant Director-General, Disability and Inclusion role which was created to implement the 17 recommendations of the Queensland Disability Review. In the context of Victoria, our equivalent role can go further by mandating that the Deputy Secretary reports directly to the Secretary in order to champion disability and inclusive education across different sections of the department such as:

- Victorian Curriculum and Assessment Authority;
- Early Childhood Education;
- School Education Programs and Support;
- Victorian School Building Authority; and
- Schools and Regional Services.

Given that progress on implementing the recommendations of the 2016 *Review of the Program for Students with Disabilities* has been limited, we would suggest that the Deputy Secretary role be empowered with a mandate to accelerate the implementation of the PSD review recommendations. Beyond the review, this position would also represent the interests of students with disabilities to ensure that their interests are embedded within education initiatives, including the Education State.

### Recommendation 4

*Engage with Autistic people who have co-occurring conditions, mental health issues and/or are socially isolated while writing the next State Disability Plan.*

We recommend that the next State Disability Plan appreciates that people can have multiple disabilities, co-occurring conditions or mental health issues that need to be catered for when providing services. This is particularly important given the ongoing work of the *Royal Commission into Victoria's Mental Health System* in reforming the mental health system to better cater to the needs of all Victorians. As part of this, the education and medical workforce should be informed on the experiences of people with disabilities, including Autistic people, and how they can adapt their services to this group.

In the I CAN Network, we engage Autistic participants who have co-occurring conditions and mental health issues. In a recent survey of participants in our online programs, we found that 82.7% of them have anxiety disorders. A sizable proportion of online participants also have ADD/ADHD (38.6%) and/or depression (27%) and we also engage participants who have suicidal thoughts, self-harm, OCD and intellectual disability. These statistics match what Amaze has found, where [50-70% Autistic people experience mental health issues](#) such as depression, anxiety and OCD. Anxiety is common among Autistic people with [39.6% Autistic young people having at least one anxiety disorder](#).

Our online programs also engage participants who are socially isolated, not engaging with other people or having friends. Social isolation is very common among Autistic people with [52% of them feeling socially isolated](#). Autistic people who are socially isolated have an [increased risk of depression](#) and [self-harm thoughts](#), highlighting the link between mental health issues and social isolation among Autistic young people and adults. If we are to improve the lives of Autistic people, we must work to improve the social connections and mental health of Autistic people.

In I CAN Ltd's submission to the *Royal Commission into Victoria's Mental Health System*, we called on the government to resource Autistic-led and Autistic-focused organisations to better support the mental health of Autistic children, young people and adults as well as their parents. Even though the government has placed a counsellor in every school to support students' mental health, more can be done to improve the mental health of Autistic people and people with disabilities. In writing the next State Disability Plan, we recommend the government consult with Autistic people who have co-occurring conditions, mental health issues and/or are socially isolated. This would allow the government to appropriately respond to the intersection between Autism and mental health issues. Given our thought leadership in the Autistic-led sector, we are available to create a safe space where Autistic young people and adults with co-occurring conditions and mental health issues can voice their views.

### Recommendation 5

*Inform and train the education and medical workforce to raise awareness of and cater their services more to people with disabilities.*

In addition, we recommend that the government to include a commitment in the next State Disability Plan to inform and train the education and medical workforce about disabilities, including Autism. There is evidence that some people in the education and medical workforce are not well-informed or trained on how to interact with people with disabilities and Autism. The [UK National Autistic Society's Every Teacher campaign](#) found that Autistic children and young people would find school better if their teachers understood Autism. Yet 60% teachers said that they were not trained to teach Autistic students and 44% teachers do not feel confident teaching Autistic students. In addition,

[39.5% UK general practitioners](#) have never received formal training on Autism. This highlights a need to train the professional workforce on not only being more aware of what Autism is and how it varies among individuals but also how to implement measures that best support Autistic people. For example, teachers and health professionals could learn from Autistic people during professional development workshops what it is like to be Autistic. This information would be valuable for implementing novel measures or adapting new and existing services to Autistic people. These same ideas can be extended to people with other disabilities so that education and medical services can be better tailored to this group of people.

### **Making strengths-based approaches more explicit**

#### **Recommendation 6**

*Explain strengths-based approaches more in the next State Disability Plan.*

#### **Recommendation 7**

*Renew its commitment to implement strengths-based approaches for people with disabilities.*

We call on the government to explain more about strengths-based approaches in the next State Disability Plan and to renew its commitment to implement strengths-based initiatives for people with disabilities such as Functional Needs Assessment (FNA). We have heard positive feedback from a small number of parents about the Functional Needs Assessment (FNA) pilot in reforming the Program for Students with Disabilities (PSD) funding. The FNA brings together parents, teachers and therapists to identify the aspirations, capacities and strengths of students with disabilities and how government funding can support them in a school setting. The FNA pilot highlights the benefits of moving from deficits-based to strengths-based approaches in enhancing the lives of people with disabilities by making decisions that leverage their strengths and talents.

Under *Key Priority 9: Inclusive Education* of the previous State Disability Plan, the government committed itself to:

*...prioritising strengths-based, person-centred approaches in the design of guidelines and tools to provide more personalised, evidence-based programs...*

However, no rationale was attached behind this commitment. Given the strengths-based approaches the government is trialing, such as the FNA pilot during the last State Disability Plan, it is timely for the government to expand its explanation about strengths-based approaches and principles in a separate section of the next State Disability Plan. Including this section would provide room to explain the background and rationale of strengths-based approaches, forming the basis for the government to renew its commitment on implementing them for people with disabilities.

This explanation and commitment would necessarily provide the government with a platform to dedicate more resources to the acceleration of the piloting and roll out of PSD reforms, including the FNA, as recommended by the *Review of the Program for Students with Disabilities* (2016). In our view, until the results of the 2018 FNA pilot have been released, progress on implementing the PSD reforms remains limited. There is a real need to raise the profile of strengths-based approaches in the next State Disability Plan.

## Further work on the Outcomes Framework

### **Recommendation 8**

*Incorporate the new outcomes of *Intimate Lives* and *Recognition* in the outcomes framework for the next State Disability Plan.*

We agree with the government in adding the outcomes of *Intimate Lives* and *Recognition* in the outcomes framework for the next State Disability Plan. I CAN Network recognises the strengths and achievements of Autistic people and how they can contribute to society and the workforce. Hence, the rights of autonomy and the recognition of strengths and achievements can be applied not only to Autistic people but also to other people with disabilities. These can be accomplished by incorporating the new outcomes in the outcomes framework.

### **Recommendation 9**

*Be more transparent in the next State Disability Plan on how the government is building and implementing the outcomes framework.*

We commend the government for their continued focus on the outcomes framework in its 2018 annual report. These include building measures that can detect short- to medium-term changes in the lives of people with disabilities and implementing a prioritising framework to map out what areas of the outcomes framework should be developed first.

However, there remains work to be done on the outcomes framework. We feel that progress in gathering the baseline measurements in the outcomes framework could be accelerated and that, whilst initiatives are being implemented, the detection and assessment of changes in the data could be clarified more.

The government needs to commit itself in the next State Disability Plan to increase the transparency of how it is building the outcomes framework, including selecting appropriate baseline measures and tracking and achieving outcomes. These should be regularly reported on, not only in its annual reports, but also status reports that describe the progress in building the outcomes framework. These reports should be presented in a way that different stakeholders, including people with disabilities, can understand, including but not limited to AUSLAN, Easy English and infographics. Regular reports on the building of the outcomes framework and how the government is progressing towards its desired outcomes will enable stakeholders to track Victoria's progress on improving the lives of people with disabilities. This will allow stakeholders, such as I CAN Network, to better focus their own initiatives to accelerate progress towards building an inclusive Victoria.

To improve how the government employs the outcomes framework, we recommend that parts of the outcomes framework be tested to measure the effectiveness of interventions. There is currently no statement on how the outcomes framework will be used by the government in implementing the State Disability Plan. The outcomes framework needs to provide the basis for justifying initiatives to support people with disabilities and measuring whether such initiatives are making an impact on these people. Trialing the use of the outcomes framework in different contexts will mean the government is better positioned to track its progress against the framework.

## Conclusion

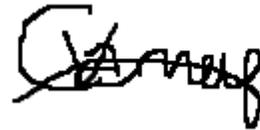
We feel that these recommendations on the new State Disability Plan will provide a rationale for the government to start or continue initiatives that enhance the inclusiveness of people with disabilities and increase the accountability of all stakeholders to measure outcomes for people with disabilities. The recommendations would also allow the State Disability Plan to be cross-referenced in other government initiatives such as the Education State to ensure that people with disabilities are an important stakeholder at the table. This will ensure that they receive the same benefits from government initiatives as those people without disabilities.

I CAN Network is happy to be contacted to provide further information on the above recommendations. Should you like to discuss our submission further, please contact us in the contact details below.

Yours sincerely



Dr. James Ong  
Evaluations Consultant  
[james@icannetwork.com.au](mailto:james@icannetwork.com.au)  
+61 432 865 868



Mr. Chris Varney  
Founder & Chief Enabling Officer  
[chris@icannetwork.com.au](mailto:chris@icannetwork.com.au)  
+61 432 405 384