Thank you for the opportunity to comment on the implementation of the new reforms. This response has been prepared recently to give initial feedback by our President Tamsin Jowett who is available for further consultation and involvement in these important reforms for our community.

Our initial reaction was surprise that no disability organisations or providers have been consulted until now in preparing this, especially independent organisations with lived experience of disabilities which are supporting students with learning differences in the current system. It is fortunate that we can contribute as you finalise the way forward for these reforms. I can see in the Firth Report that various ‘special’ schools have been included but not specifically many of the diverse students you are educating or those who support students with disabilities in schools. We request more extensive consultation beyond a survey, a short meeting and more than a month to gather our community’s feedback if possible as this is a welcome and major reform and we would like to contribute to its success.

**Autistic Students:** Autistic students are in all of the cohorts impacted by these reforms so we will provide some background on their experience. Many of our students struggle with the restrictive requirements of school and especially VCE, and though they are highly academically capable, their difficulties with social and communication requirements at school and their ways of presenting their knowledge are not adequately assessed or realised by current VCE practices. Schools struggle with finding or providing suitable supports and our Autistics have difficulty getting VCAA accommodations that meet their needs. Many of our students therefore are in the VCAL system, VET, TAFE, or VDASS which offers different learning approaches – or they drop out of the education system, do homeschooling, or cease their formal education, impacting their lives and potentially their social and economic inclusion.

It is important for our learners to have access to different types of education providers, assessment options and alternative settings as they each learn so differently. This includes different environment needs, teaching styles and types of required supports. VET and TAFE have many of our autistic learners who complete their courses successfully as a format.

Autistics have the **highest unemployment rate** of any disability group with only 6% of Aspergers employed (Amaze), despite many having tertiary qualifications. Current education and employment practices contribute to creating barriers to entry as well as barriers to retention in the workforce. If our Aspergers autistics remain in school, they often leave school without suitable career experiences, work understanding or an understanding of their future options. This is where the school curriculum structure, engagement of their thinking abilities, assessment of their knowledge and skills as well as career based school supports are important to create change in the pathways towards employment and economic inclusion. As the Firth Report writes: “The development of workplace capabilities is particularly important to prepare students for the future world of work as well as to succeed in personal and civic life.”

At Aspergers Victoria, supporting and empowering Aspergers autistic social inclusion and employment are the key priorities in our services.
More research about different learners’ specific needs: This Firth Report and the materials reveal a lack of research information on the implication of these pathway and assessment changes for autistic students and with their hidden learning differences in the proposed VCAL/VCE assessment system and specialist learning needs going forward – there is no specific mention about this and impacts on them of these changes. We would recommend more research is required into this aspect of the changes.

VCAL benefits retained & funded: There are definitely aspects of VCAL outlined in the report which we would like to retain, including the competency-based assessments approach and funded wraparound support. However, as the Firth Report (the Report) outlines, the reputation of VCAL needs specific review and improvement. Given research from the Foundation of Young Australians and other economic research shows how having hands-on learning approaches to work experience will be critical to career success in the Future of Work. “Access to wraparound support” sounds ideal but recent funding reductions have not enabled this in practice, which means that funding for that would need to be supported (see below). The Foundation Pathways Certificate option will need specific reputation building as well, and this will ensure our students are not pushed into that pathway as simply being an easier option for schools than supporting autistic students’ learning challenges.

School as a vocational pathway for all students: Career knowledge needs to be built into the curriculum for all students starting far earlier than year 10 so they all realise the relevance of school to their future. These reforms move us towards that, which is welcome. Many autistics don’t generalise their learning at school as relevant to their future and hence drop out with a lack of realisation of the resulting pathway. Vocational competencies need to be included in the secondary schooling curriculum more explicitly much earlier than year 10, and with that earlier understanding of their VCE/VCAL pathway options. As the Firth Report mentions:

“Research shows that as well as developing critical skills for life and work, work-based learning is linked to increased school completion rates, better employment prospects and higher wages. In addition to being interesting and valuable for students, work-based learning complements other learning (Dommers et al., 2017). Industry exposure provides young people with a realistic understanding of their potential career pathway (Brooks et al., 1995; Klatt et al., 2016) and improves access to labour markets in which work experience is often a prerequisite for many jobs (Committee for Economic Development of Australia [CEDA], 2016). That work-related learning is a key strength of VCAL, has also been corroborated in stakeholder consultations:

Another key strength of vocational and applied learning is access to on-the-job experience and industry exposure. Students gain an insight into potential career pathways, while learning practical skills that they can apply to future studies, training or work.” (VCOSS submission)

This project needs more recognition that all students including those with learning differences are on a vocational learning pathway in reality: school is just the start. However, many of those with disabilities are made to feel that they are on a different, lesser pathway to the rest of the student cohort. They often miss out on opportunities such as work experience due to lack of suitable supports and understanding of their needs, especially their vocational needs. As the Firth Report mentions:

“...VCE which is instead believed to help progress children to a university entrance score via theory- based learning and not preparing them for life after study. Di Marzio et al. (2020, p. 7)

VCAA assessment & reasonable adjustments: Our students need far more clear and fair processes in the new approach to allow them to access VCAA reasonable adjustments to recognise their learning and in their assessments. At the moment, students must prove need beyond providing confirmation of a diagnosis and other allied health reports to VCAA. This is detrimental to keeping
them engaged in VCE and school, and they often don't receive the supports required. The process for this needs serious review as more and more students are struggling with the assessment processes, especially for VCE, and often move to VCAL for this reason. VCAA also needs to introduce KPIs and accountability in how this can be managed to keep students engaged and learning.

**Specific Feedback to AV from VCE/VCAL Teachers:**
- don't have a separate name/stream within VCE (don't label it VCE Vocational Specialisation). Just have everyone do VCE, then have them select their units (if they are vocational units then they won't get an ATAR and if they are academic units then they will)
- If a separate stream name is absolutely necessary then remove the context of 'special' from the name and replace it with VCE Vocational or VCE Industry, etc.
- ensure mandatory units in each year level
- ensure there is a great deal of flexibility within the delivery and reasonable adjustments are made more accessible than they are currently
- don't have any scored assessment for Vocational Unit, or rankings - it will defeat the purpose of having vocational study (which is competency based - you can or you can't do something). Having a ranking such as poor, good, excellent is against everything that Vocational study is. It is up to the teacher to assess at the appropriate level and individualise where needed, to ensure the student is able to and if necessary challenge them with further learning.

**Communicate VCE length options:** VCE already can be completed over several years - more than just years 11 and 12 that many schools offer, with VCE units 3&4 over two or more years. This Report does not capture that and it is not communicated by schools or the education system to those who learn differently, and this is something we often advise unaware VCE families. This is a great option that really assists our learners to complete VCE in their own time and with less stress. There have been suggestions that a Year 13 could be an option that is more understood. This is an opportunity to build that communication.

**Community vocational understanding through schools:** Schools and their surrounding communities need more communication to all students to build parent understanding about the New Work Reality, which is currently rarely discussed or provided in specific learning before year 10. Schools need to be part of the communication campaign to build parent/guardian career understanding and supports, especially for parents of those with learning challenges.

**Teacher education improvements:** We are pleased the government is investing in more teachers gaining the Graduate Certificate in Career Education and Development. We need these teachers to be tasked to:
- to liaise with the disability supports in the school to ensure autistic students are supported better towards careers with suitable adjustments
- to be tasked with regularly clearly communicating to the whole school how these workforce changes may impact students’ future careers
- regularly update this for teachers, students and especially parents
- use strength approaches towards career options

This should be combined with their clear role of building understanding of the vocational supports and reasonable accommodations autistics require for employment. Could this be something that VCAA becomes responsible for measuring with these changes?

**Pathways to cater to spiky profiles:** Autistics often have a spiky profile of ability where they will have talent and high ability in one subject such as maths, but possibly below S level in English. The
new system needs to cater better for such variability in how it assesses our students competencies—many students without diagnosis also have similar profiles and challenges. How is this catered for in this new assessment process as it is not outlined?

**Student Driven:** These changes must be student driven and include the voice of those who learn differently and require adjustments. Majority of these students end up in VCAL and VET system and their specific learning needs in the new system are not discussed. There is mention of only one or two students being involved in the Firth Report— you need several co-design committees of current students students representing specific disabilities and learning needs to provide ongoing feedback as you develop this new curriculum.

**Social & emotional learning as competency:** The outline mentions two units of teamwork, communication and leadership as units. All three of these are key areas of learning difficulty for our learners being key challenges of autism, and current assessments for this creates student school stress and would have to be updated. Social and emotional skills are the most critical learning areas for school students, creating a basis for the rest of their approach to their lives, including for autistic students. The content of these units needs to ensure fellow students also have higher SEL and understanding of peer learning differences: this has been proven to support neurodivergent learners. This is a hidden part of the school curriculum that needs to be explicitly recognised, and this update gives us an opportunity to recognise this in these competencies schools are required to build that are also critical in the Future of Work—not just digital skills with literacy and numeracy. It is also a chance to assess how this part of the curriculum will be adjusted for those who communicate differently.

‘VCAL nurtures capabilities that are indispensable for a modern workforce. These capabilities include resilience, creativity, problem-solving and critical thinking. According to stakeholders, these capabilities are ‘front and centre’ in the Work Related Skills and Personal Development Skills strands, and VCAL ‘enables young people to acquire “in-demand” technical, foundational and “soft” personal skills’ (Brotherhood of St. Laurence, submission).’

**More alternative places to learn, not fewer:** The Firth Report recognises the importance of providing alternative approaches such as TAFE and possibly RTOs where many of our autistics thrive in learning. The overview has a short mention that it aims to cater for the many students who learn differently. Understanding of neurodivergence is only just starting to highlight the many ways students can learn and how important it is to cater to their individual learning styles to maintain their self confidence, engagement and progress. **VCE/VCAL focused schools are an option, and** having more schools such as Swinburne Secondary College that only focus on VCE and VCAL learning options would support many of our neurodivergent learners.

**Improved funding** is an issue across all the sectors involved and touched by these funding changes, especially if these changes are to include supports for the needs of neurodivergent learners. The mention of ‘wraparound supports’ sounds wonderful, and we welcome a change towards simplification of our students’ access to such supports in all schooling options. The recent Disability in Tafe Inquiry highlighted a lack of funding for their VCE/VCAL students support needs.

**Work experience supports for all students:** Research by the Foundation for Young Australians outlines how critical such employment experiences are for all students’ future career success: whether VCE or VCAL. As an organisation that provides supports to ensure autistic students are provided work experience like other students, we recommend this aspect needs far more focus in practical VCE lead-in and VCAL experiences. Our students often miss out on work experience opportunities as schools are under-resourced and don’t have suitable or relevant connections, or the ability to find or support suitable employer placements. Our learners need specialist supports like
our work readiness modules and coaching to complete placements, which are not necessarily costly but need specialist knowledge – disability organisations can provide this. With this, we all need more supports to gain employer engagement for these work placements as suggested in the Report – such as part of Tender awards and KPIs for government departments.

**Risk management supports:** To build the work experience and apprenticeship/VET pathways, both schools and industry will also need more resources and training in how to manage the risks of students in workplaces, including students with learning differences and disabilities. These include Working With Children Check requirements, insurances and more, which currently deters many schools as well as employers. The current supports are minimal and create a risk-averse mindset in both schools and employers to taking on students, especially neurodivergent students.

**Placement supports for autistic learners:** Currently schools have minimal resources to support employers with neurodivergent work experience students. Employers are also reluctant to take on such students without support. To avoid workplace neurodivergent student trauma, AV sees the need to provide employers with:
- training of staff and managers working with specific students
- coaching and support for neurodivergent students as needed
- support to career counsellors
- resources to support these (there are minimal available outside our specialist autistic resources)

**Introduce the ‘Holistic Snapshot’ of student’s education:** The holistic snapshot of non-academic and academic achievement needs to be for all students including VCE and VCAL, including those who don’t complete school. The Digital Education Passport is an excellent concept in the Report—which will need to recognise neurodivergent student achievements.

**VET champions initiative** sounds appropriate but we would need more detail about how this is assessed and how it includes our autistic student accomplishments, which may require a different approach to capture their strengths.

**Need for clear & transparent learning outcomes** to follow the student journey. Having the student learning Digital Education Passport could facilitate this concept of a life of learning and growth into adulthood. Our community are often life-long learners, which is not valued and recognised. This passport would also assist employers to understand the skills behind them. It will be critical for schools to have links in their funding and recognition linked to KPIs which include their teaching of VCE including vocational competency.

**Review VCE & blended learning models:** The mention of blended learning models is important to cater for many students’ learning differences. VCE is currently heading towards a very limited learning model for those with learning differences and also needs review.

**Accountability of schools** mentioned in the Report for those who drop-out and transition supports to their next best option must be emphasised and need measures and accountability. This includes independent schools. It also needs to include schools which expel students, often for behaviours caused by school stress and bullying. The measurement and tracking of school performance on these supports could be reported for real transparency in all outcome reporting.

**Coaching:** There is no mention of the global move towards teachers becoming vocational coaches as part of their role in educating secondary students. This is especially the case for senior secondary students. All teachers need to have an understanding of the careers and world of work they are
preparing their students for. This should not just be for a career counsellor or a new vocational coordinator – all teachers will need to understand this.

**Inquiry Recommendations:** Just to finish, we note that education was a key and large section in the 101 Report Recommendation following the *Victorian Inquiry into Services for people with Autism in 2017* yet this Report fails to mention any of these recommendations for our students. The recent Inquiry into *Students with Disability in Tafe (Vic)* should also be relevant to the development of this change.

Thank you for reading this outline and we welcome further opportunity to ensure the success of this education initiative.

*6th August 2021*