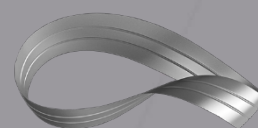


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# DRAFT NATIONAL AUTISM STRATEGY

ISA SUBMISSION

7 June 2024



INDEPENDENT  
SCHOOLS  
AUSTRALIA

## Acknowledgement of Country

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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## 1. ABOUT ISA

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Independent Schools Australia (ISA) is the peak body that represents the Independent school sector on national issues, and engages with the Australian Government, national agencies, media, key stakeholders, and the wider community.

Through our members, the eight state and territory Associations of Independent Schools (AISs), ISA represents 716,800 students, over 1,215 schools and a workforce of 122,000 people.

The latest data shows that one in six Australian school students attends an Independent school, and for secondary students, it is over one in five.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from socio-economic and culturally diverse backgrounds, and live in outer-suburban and inner-suburban communities. Many of these families are making substantial sacrifices for their children's education.

The majority of Independent schools charge annual fees of less than \$6,000 per year, and there are a greater number of schools charging less than \$1,200 per year than those charging over \$20,000. Some Independent schools charge no fees at all.

There is also considerable diversity in the size and location of schools, and the fees they charge. Independent schools serve many Australian students experiencing disadvantage to provide equitable, inclusive education to:

- students with disability.
- students living in regional, rural and remote locations.
- Aboriginal and Torres Strait Islander students.

Many Independent schools educate a high proportion of these students, and there are schools specifically established to meet the often-complex needs of these priority equity student cohorts. Specialist settings may include:

- -Special Schools
- Special Assistance Schools
- boarding schools serving regional and remote families
- Majority Aboriginal and Torres Strait Islander schools, including boarding schools
- schools catering to students from different ethnic and/or cultural backgrounds including migrant and refugee families and students from non-English speaking backgrounds.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education, and often schools have been established by community groups seeking particular education philosophies or to reflect religious values.

Independent Catholic schools are a significant part of the sector, accounting for eight per cent of enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some schools with common aims and educational philosophies are governed and administered as systems, such as Lutheran schools. These systemic schools account for 20 per cent of schools in the sector.

Independent schools are long-established partners in Australia's education system, alongside government and Catholic schools. They make a valuable contribution to society and the learning and wellbeing of Australian children.

## 2. INTRODUCTION

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ISA prepared this submission in response to the Department of Social Services' draft National Autism Strategy (the Strategy). ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

In October 2023 ISA responded to the National Autism Strategy Discussion Paper and we are pleased to see several of our recommendations included in the draft Strategy.

ISA strongly supports the Strategy's vision and goal to improve life outcomes for Autistic people to create a more inclusive society. The Strategy's Guiding Principles provide a sound foundation for its development, and we support the Strategy's approach as being strengths-based and neurodiversity-affirming.

Mainstream schools in the Independent sector educate many Autistic students. In 2023, 21.9 per cent of Independent school students were included in the Nationally Consistent Collection of Data. As the national data collection is based on adjustments and not diagnosis, the sector does not have any data on how many Autistic students are enrolled.

There are currently 47 special schools and 96 special assistance schools in the Independent sector. Many students enrolled in these schools have lifelong neurodevelopmental differences with co-occurring disabilities.

## 3. RECOMMENDATIONS

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ISA's submission emphasises the importance of increasing accessible support services, and improving measures that collectively aim to promote awareness, increase understanding and provide tailored support for Autistic people within educational settings and the community.

ISA makes the following recommendations to inform the Strategy, which are discussed in detail in our submission:

1. Action Plans will need to strategically fit into a complex system of service delivery.
2. A clear roadmap is needed to guide collaboration between government departments, agencies and other organisations that impact the lives of Autistic people. This roadmap must be accessible and clearly communicated to key stakeholders.
3. The term 'acceptance' should be renamed 'understanding' throughout the Strategy, as through understanding comes respect.
4. The term 'culture' should be included in the explanation of the Individualised and Holistic Principle.
5. The explicit inclusion of improving access to primary care, health and mental health services in regional and remote areas in the *Diagnosis, supports and services* section.
6. Provision of guidelines for early childhood settings and schools to incorporate sensory-friendly environmental measures that provide the best possible environment for Autistic students to support their learning.

7. Increasing capital funding for school infrastructure that promotes autism-friendly campuses in all sectors of education.
8. Provision of guidelines to schools so they may strengthen connections with community service organisations and tertiary providers to build awareness of what support or alternate entry programs may be available for Autistic students transitioning into employment or further education and training.
9. The AITSL Professional Standards for Teachers (2010) should be reviewed to align with current expectations of teachers to manage diverse classrooms and inclusive education settings, and to ensure the standards are achievable, supported and sustainable.

## 4. NATIONAL AUTISM STRATEGY DIRECTION

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ISA welcomes the Strategy's emphasis on inclusive practices, support for evidence-based approaches and accountability. In particular, we commend the Strategy for being co-designed, co-produced, co-reviewed and co-delivered with Autistic people, their families, carers and support networks.

The key requirement for the Strategy to meet its desired outcome will be for the Australian Government to have alignment with, and support from, the states and territories, so that a holistic, integrated approach can be implemented. As the Strategy covers many broad areas such as social and economic inclusion, diagnosis, service and support outcomes, and health and mental health, any proposed Action Plans will need to fit into a complex system of service delivery.

Given the potential complexity, it is essential that the Strategy's Action Plans are easy to navigate, well understood and communicated to the Australian community in a way that simplifies and makes accessible the various levels of support offered to Autistic people.

The Strategy aims to include many sectors throughout a diverse set of systems so it will be necessary to clearly articulate the responsibilities and accountabilities of the Australian Government, state and territory governments, local governments and service providers responsible for delivering the Strategy's commitments.

As 'the Australian social sector is made up of many sectors each with their own systems, ecosystems and cultures',<sup>1</sup> creating clarity and transparency will also require collaboration between sectors and all key stakeholders.

The Strategy will need to position itself with other national strategies and priorities, including:

- The National Children's Mental Health and Wellbeing Strategy.<sup>2</sup>
- The Australian Student Wellbeing Framework.<sup>3</sup>
- The Disability Standards for Education 2005 (DSE).<sup>4</sup>
- The Early Years Strategy.<sup>5</sup>
- The National Allied Health Workforce Strategy.<sup>6</sup>

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<sup>1</sup> [Impact at Scale \(socialventures.com.au\)](https://socialventures.com.au)

<sup>2</sup> [National Children's Mental Health and Wellbeing Strategy | National Mental Health Commission](#)

<sup>3</sup> [The Australian Student Wellbeing Framework - Department of Education, Australian Government](#)

<sup>4</sup> [Disability Standards for Education 2005 - Department of Education, Australian Government](#)

<sup>5</sup> [The Early Years Strategy 2024–2034 \(dss.gov.au\)](https://dss.gov.au)

<sup>6</sup> [What we're doing about allied health | Australian Government Department of Health and Aged Care](#)

— The National Disability Insurance Scheme (NDIS) Review.<sup>7</sup>

A clear roadmap is needed to guide collaboration between the government departments, agencies and organisations that impact the lives of Autistic people. This roadmap must be made accessible and clearly communicated to key stakeholders.

#### 4.1 Guiding Principles

Feedback received from Aspect Australia<sup>8</sup> is that the Autistic community prefers the term 'understanding' to 'acceptance', explaining that with understanding comes respect. ISA recommends the 'Acceptance and Inclusivity' principle be renamed 'Understanding and Inclusivity'. The definition could then be reworded to read:

*'This Strategy will acknowledge that every Autistic person has unique strengths, abilities and attributes. This Strategy will seek to foster community understanding and respect of all Autistic people for who they are, are for their many contributions to Australia.'* (p8)

This would also mean changing the theme of 'Acceptance' to 'Understanding' (p16).

In the 'Individualised and Holistic' principle, ISA suggests the term 'culture' could be included in the explanation of this principle, as culture can have a profound influence and impact on a person's identity, needs and experiences.

## 5. KEY OUTCOME AREAS AND COMMITMENTS

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ISA supports the Strategy taking a strengths-based and neurodiversity-affirming approach which values and respects all neurotypes, thereby promoting an understanding of neurodiversity in society and improving outcomes for Autistic people.

ISA welcomes the opportunity to provide feedback to the Outcome Areas and Commitments outlined in the Strategy.

### 5.1 Social Inclusion

Social inclusion, creating connection and belonging, is vital to the wellbeing and positive mental health of Autistic people.

Educators in early childhood settings and schools work hard to provide inclusive settings, yet more specialised support is needed for schools to offer Autistic students greater opportunities for social connections, mentoring and peer support.

To foster a greater understanding of autism and encourage the development of more effective interventions and support services, the Strategy must:

- Increase awareness of autism.
- Provide autism awareness training and support for professionals working with Autistic people.
- Improve inclusive policies and programs across a range of systems and sectors.
- Support further autism research being undertaken.

When we teach young children about diversity, we build greater understanding and respect within our classrooms, playgrounds, schools and society. This is an important step to improve the safety and wellbeing of Autistic people, reducing discrimination and bullying. Having evidence-based, freely

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<sup>7</sup> [Working together to deliver the NDIS. NDIS Review: Final Report](#)

<sup>8</sup> [Aspect Australia | Autism Spectrum Australia \(Aspect\)](#)



available programs that are age appropriate and easy for teachers to include in their education programs is important, e.g. Autism CRC<sup>9</sup> and Positive Partnerships.<sup>10</sup>

It is equally necessary to have trained, specialised staff who have the time and expertise to explicitly teach essential social and communication skills for Autistic young people, so they can navigate social experiences and increase positive social interactions.

ISA supports education initiatives to improve the safety and welfare of Autistic people through the 'reduction of all forms of discrimination, violence, abuse, bullying, vilification and exploitations' as in commitment 5 of the Strategy, and 'to specifically focus on Autistic students in all levels of education' as stated in commitment 11. For these to be equitable, meaningful and achieve maximum impact, initiatives and reforms must be funded across both government and non-government schools.

As highlighted in *Strong Beginnings: Report of the Teacher Education Expert Panel*,<sup>11</sup> a greater focus in initial teacher education programs is required so that early career teachers have greater skills, knowledge and confidence to teach diverse classrooms and create positive classroom environments for all students, including students with disability. This requires ongoing induction, professional learning and mentoring to support early career teachers.

The Australian Institute for Teaching and School Leadership (AITSL)<sup>12</sup> developed the professional standards for teachers in 2010. Since that time there has been further development of:

- the evidence-base for inclusive school practices
- an increased need for educational support and adjustments for students with disabilities in schools
- an increase in the number of students with a diagnosis of autism.

If a student has not received a formal diagnosis, a school team may 'impute' disability for the purposes of the NCCD.<sup>13</sup>

ISA recommends that the AITSL Professional Standards for Teachers be reviewed to align with current expectations of teachers to manage diverse classrooms in inclusive education settings to ensure expectations are achievable, supported and sustainable.

Increasing accessibility and creating sensory-friendly public spaces and education settings increases social inclusion for Autistic people. ISA recognises that there remains significant room for improvement in the provision of relevant sensory environments in educational settings for Autistic students.

Designing public spaces and education settings based on the holistic principles of universal design, increases equity, inclusivity and accessibility for people of all abilities. Universal design principles can increase participation in education, employment and leisure activities by removing or reducing barriers and challenges.<sup>14</sup>

The Strategy could therefore provide guidelines for early childhood settings and schools to incorporate sensory-friendly environmental measures to provide the best possible environment for Autistic students to support their learning. There could also be more guidance provided to schools regarding

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<sup>9</sup> [Home | Autism CRC](#)

<sup>10</sup> [Positive Partnerships | Homepage](#)

<sup>11</sup> [Strong Beginnings: Report of the Teacher Education Expert Panel - Department of Education, Australian Government](#)

<sup>12</sup> [Teacher Standards \(aitsl.edu.au\)](#)

<sup>13</sup> [Imputing disability for the NCCD](#)

<sup>14</sup> [The Future is Accessible - Universal Design | Good Design Australia \(good-design.org\)](#)



the development of infrastructure that promotes autism-friendly campuses as well as additional capital funding to help schools meet the needs of Autistic students.

Autism is often called an invisible disability. Therefore, increasing the visibility of Autistic people in media, stories, schools, sports, the arts, politics, etc would support greater social inclusion for Autistic people and build further understanding and respect.

Promoting the awareness of autism in the wider community supports greater social inclusion. For example, some Autistic people may not make eye contact or may only make brief eye contact; understanding this can foster more positive social interactions. It is also important to remember that every individual with autism is unique and will have different needs, preferences and experiences.

## 5.2 Economic Inclusion

Employment is the pathway to economic inclusion. As the unemployment rate for Autistic people is relatively high,<sup>15</sup> the explicit teaching of transferrable skills and self-advocacy (understanding own needs and being able to communicate needs to others) and being able to use supports independently is necessary. Current research is seeking to further understand the employment experience of Autistic adults and what factors might help identify barriers to employment.

Economic inclusion is an essential Strategy commitment to enable Autistic people to pursue their goals, gain independence and make a valued contribution to society.

Employee training packages, grants and funded programs are available for businesses to employ Autistic people, however access to this information should be made more widely available. Providing awareness training on neurodiversity to employers and employees can improve understanding and create safe workplaces for Autistic people. Guidelines for employing neurodiverse staff should be easily available to ensure Autistic employees are inducted appropriately, adjustments are implemented and to ensure employers are complying with the Fair Work Act and relevant anti-discrimination law when employing Autistic people.

For Autistic people to experience economic inclusion, they should be seen as a valuable part of Australia's workforce. Schools have an important part to play in transition programs for Autistic students to find pathways and opportunities for further study or employment. For this to be successful, greater collaboration, communication and consistency across government agencies, employment agencies, disability support agencies, tertiary organisations and community services is needed.

The Independent school sector is a key contributor to vocational education and training (VET) through the provision of VET onsite as a registered training organisation or through engaging students in external VET courses or school-based apprenticeships. University and VET pathways can provide many opportunities for Autistic people to gain qualifications, certification and skills needed for the workforce.

Independent schools offer careers advice to students and families. On-going professional development for careers advisers, alongside increased staffing and resourcing is required to provide the most up to date information and pathways for neurodiverse students. Schools need guidance to strengthen connections with community service organisations and tertiary providers to build awareness of what support or alternate entry programs may be available for Autistic students transitioning into employment or further education and training.

## 5.3 Diagnosis, supports and services

ISA suggests that specific measures should be embedded into the Strategy to improve services for Autistic people in low socio-economic, and regional and remote areas as they generally have limited access to diagnostic support and access to allied health services. Improved access to allied health

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<sup>15</sup> [Employment profiles of autistic people: An 8-year longitudinal study - Simon M Bury, Darren Hedley, Mirko Uljarević, Xia Li, Mark A Stokes, Sander Begeer, 2024 \(sagepub.com\)](#)

services will also enable schools to collaborate with students and families to determine how to best support them.

ISA supports the commitments listed in this section of the Strategy, especially early screening identification and support. Early intervention support promotes improved outcomes for Autistic children and can provide a smoother transition to early childhood services and schools.

As there is a current workforce shortage and high staff turnover rates for allied health professionals,<sup>16</sup> ISA welcomes the development of the National Allied Health Workforce Strategy to increase the workforce. This needs to be combined with government commitment to increasing specialist training for those working with Autistic people. ISA recommends that this section in the Strategy explicitly include improving access to primary care, health and mental health services in regional and remote areas.

Service integration between the NDIS, foundational supports and 'mainstream services' is a critically important commitment. Minimising the number of times an Autistic person or their family must provide the same information regarding diagnosis and needs to different organisations and government services could alleviate family stress and streamline access. Ensuring government documents and websites are accessible for those experiencing neurodiversity would improve access to information on services available.

Increased training for NDIS case managers would better direct Autistic people and their families to the appropriate support networks and services. Streamlining the NDIS application process to make it easier to navigate and to reduce the administrative burden on Autistic people and their families is necessary as is highlighted in recommendations 3 and 4 of the NDIS Review final report.<sup>17</sup>

Autistic people may struggle to ask for help or support, compounding other issues in accessing support. It is important to ensure that training and support for those working with Autistic people is evidence-based and that reasonable adjustments are provided across all educational settings.

#### 5.4 Health and Mental Health

Mental health challenges affect the wellbeing of Autistic people. Evidence suggests that Autistic adults who have stronger autism social identification have better psychological well-being.<sup>18</sup>

Tailored mental health support for Autistic people should be neurodivergence-informed, fundamentally holistic and evidence-informed.<sup>19</sup>

Research findings highlight the importance of understanding and addressing the mental health needs of Autistic individuals. The development of individualised treatment and support for Autistic adults has been identified as a research priority by the Autistic community.<sup>20</sup>

It is encouraging to see that a National Roadmap to *Improve the Health and Mental Health of Autistic People in Australia* is currently being developed by the Department of Health and Aged Care and from which best practice models of care, support, education and training of health and other professionals can be identified and promoted, with the aim to improve coordination of health, mental health supports and sectors.

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<sup>16</sup> [New report shows critical need for allied health workers, as wait lists grow across the country \(nds.org.au\)](https://nds.org.au)

<sup>17</sup> [Working together to deliver the NDIS. NDIS Review: Final Report](#)

<sup>18</sup> [The impact of a positive autism identity and autistic community solidarity on social anxiety and mental health in autistic young people \(sagepub.com\)](https://www.sagepub.com)

<sup>19</sup> [Mental health challenges faced by autistic people | Nature Human Behaviour](#)

<sup>20</sup> [Mental health in autistic adults: A rapid review of prevalence of psychiatric disorders and umbrella review of the effectiveness of interventions within a neurodiversity informed perspective | PLOS ONE](#)

## 5.5 Governance

ISA welcomes the development of a governance framework that actively involves Autistic people, parents and carers, and professionals within the autism sector. The coordination of a whole of government, cross-sector level and coordinated approach to implementation with strong accountability mechanisms will support the achievement of the Strategy's vision, if funding is secured to deliver the outlined commitments.

## 5.6 Research

ISA strongly supports the exploration of how autism research can best be fostered and applied to policy and service delivery, underpinned by the Strategy's Guiding Principles through the establishment of the National Disability Research partnership. Intentional connection with independent bodies to research outcomes that underpin the Strategy will ensure transparent review.

Feedback to ISA has emphasised the need for more research in areas such as community perceptions of autism, and individual and institutional perceptions of autism in sectors such as education and employment. Further investment in autism research would assist schools, sectors and systems in the development of adaptive measures based on improved diagnosis rates, accessibility, and timing. These measures would also allow for informed decision-making and the development of effective interventions which can be put into practice early in a student's academic journey.

Further research could also assist in the provision of effective transition support from primary to secondary and tertiary education and transition into employment.

## 6. CONCLUSION

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ISA supports a National Autism Strategy that contributes to a greater understanding of autism within our communities. Addressing the multifaceted and individual challenges faced by many Autistic people requires early diagnosis and access to appropriate interventions, inclusive education practices, and upskilling of both our current and future education workforce.

The Strategy could guide a range of initiatives that advocate for all Autistic people. The Independent school sector would welcome further support, resources and guidelines to further build educator capacity, understanding and expertise in providing quality, inclusive, equitable education to Autistic students and to develop more autism-friendly educational environments.

The Strategy could also foster a more inclusive society for Autistic people through active engagement and collaboration among policymakers, healthcare professionals, educators, parents, and the broader community.

Embracing neurodiversity and valuing the unique strengths of Autistic people can provide them with a strong sense of connection, belonging and empowerment. ISA commends the Strategy for modelling this in practice by ensuring Autistic people's views and comments are reflected in the design and delivery of the Strategy.

ISA's recommendations underscore the importance of increasing accessible support services and improving measures that provide tailored support, promote awareness and increase understanding of autism within educational settings and the community.

A one-size-fits-all approach is neither effective nor appropriate, as every Autistic person is unique and has different needs, strengths and challenges. However, a nationally consistent approach could greatly assist in addressing some of the challenges faced by students, families and schools.

ISA would be happy to discuss our submission or be involved in further consultation.

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