



Lifting the Standards for Autistic students.

Amaze submission to the Disability Standards for Education review.

November 2025

## CONTENTS

<b>About Amaze .....</b>	<b>2</b>
<b>Executive Summary.....</b>	<b>3</b>
<b>Summary of Recommendations.....</b>	<b>5</b>
<b>Our submission</b>	
<b>1. Background .....</b>	<b>7</b>
A. Recent reviews, inquiries and ABS surveys demonstrate poor experiences and outcomes for Autistic students.....	7
B. Autism Connect data confirms persistent barriers and failures to support Autistic students.....	8
C. Amaze survey data demonstrates widespread gaps in understanding and support...	9
<b>2. Publicly commit to reviewing the Standards on finalisation of the modernised <i>Disability Discrimination Act</i>.....</b>	<b>9</b>
<b>3. Topic 1: Drive understanding and effective implementation of the standards.....</b>	<b>10</b>
A. Build on strengths of existing resources, improving accessibility and relevance across settings.....	11
B. Strengthen educator understanding through co-designed training and professional development.....	12
C. Address personal, practical and systemic barriers to implementation, improving transparency and legal clarity.....	12
<b>4. Topic 2: Embed inclusive decision-making in education.....</b>	<b>14</b>
<b>5. Topic 3: Identify clearer responsibilities for assessment authorities and course developers .....</b>	<b>17</b>

## ABOUT AMAZE

**Amaze is a leading autism organisation driving change so that Autistic people and their families can live their best lives in a more autism inclusive Australia.**

For more than 50 years, Amaze has supported Autistic people, their families, and the broader community. While based in Victoria, our reach is national. We are home to Autism Connect – Australia's first and only national autism helpline – which provides free, evidence-informed support to anyone in Australia.

We work closely with governments, partner organisations, employers, and community groups to deliver vital information, training, and advice to the autism community and beyond. Through Amaze Inclusion, we support workplaces, education providers and service systems to become more inclusive, respectful and responsive to the needs of Autistic people and neurodivergent people. Our work includes tailored training, advisory services and co-designed programs that build capability, shift attitudes and embed inclusive practice.

Across all areas, our work is informed by research, grounded in lived experience, and shaped by what the autism community tells us matters most. Alongside providing high-quality support and building broader understanding of autism, we translate community experiences into policy advice and systems-change efforts that aim to create lasting impact.

Our vision is inspired, and our ambitions significant. Our five strategic priorities (2022–2026) – Autism Assessment and Diagnosis, Education and Training, Employment, NDIS, and Health and Mental Health – reflect the areas where we believe change will make the greatest impact for Autistic people, their families and the wider community.

## EXECUTIVE SUMMARY

**Amaze welcomes the 2025 review of the Disability Standards for Education (the Standards) as a critical opportunity to improve educational outcomes for Autistic students.** However, a further review and community consultation will be essential following the finalisation of the modernised *Disability Discrimination Act*, to ensure the Standards and its associated resources reflect strengthened protections, clearer obligations, and a likely positive duty for education providers to eliminate discrimination.

**At Amaze, we are evidence-informed and ensure Autistic people and their families and carers are at the centre of everything we do.** Our submission draws on data and lived experiences shared through Autism Connect (Australia's national autism helpline) and a national survey of Autistic students, and their parents and carers, conducted to inform this review. Consistent with recent reviews, inquiries and ABS surveys, these insights show that Autistic students and their families/carers face significant and persistent barriers to accessing education on the same basis as students without disability. Education-related enquiries to Autism Connect most commonly concern these barriers to education, and we are particularly concerned that 42% of respondents to our survey were unaware of the Standards.

**Our submission highlights that:**

- **Autistic students continue to experience exclusion and poor outcomes** due to limited awareness of their rights, inconsistent access to reasonable adjustments and support services, and barriers to complaint pathways.
- **Implementation of the Standards is undermined by persistent gaps in accessibility, clarity, and oversight.** While existing community resources have many strengths, their impact is limited by poor visibility and promotion, and the absence of inclusive oversight for regular review. Both community resources and educator supports could be better tailored to the diverse needs of different education settings and student cohorts, including tertiary settings and the diverse needs of Autistic students and students experiencing intersectional disadvantage. Educators currently lack access to consistent, mandatory training and clear, practical resources that reflect this diversity. Systemic issues such as legal ambiguity, limited advocacy support, and complex complaints systems continue to undermine enforcement and transparency.
- **Inclusive decision-making is often absent.** Students and families are frequently excluded from decisions about adjustments and support services, and complaints processes can be inaccessible or poorly understood. The *Draft Principles for consultation, issues resolution and complaints handling* (Draft Principles) are a welcome step but must be strengthened to reflect the Disability Royal Commission's recommendations and embedded within the Standards to ensure enforceability.
- **The responsibilities of tertiary education providers and external authorities (including assessment bodies, course developers, and work experience providers) in supporting Autistic students remains unclear.** Students report inconsistent access to adjustments during transitions, exams, and placements, which can severely impact participation and achievement. Greater coordination, mandatory training, and tailored resources are needed to ensure continuity of support and accountability.

**To lift the accessibility, clarity, effectiveness and enforceability of the Standards for Autistic students, we recommend:**

1. Review and update the Standards (and associated resources) on finalisation of the modernised *Disability Discrimination Act* to ensure alignment with strengthened legal protections and obligations.
2. Strengthen community understanding and implementation of the Standards through improved visibility, accessibility, and promotion via trusted partnerships (including with disability organisations). Ensure these resources are co-designed, practical, tailored to diverse education settings and cohorts, and regularly reviewed by an inclusive oversight group to remain current and responsive.
3. Mandate educator training co-designed with people with lived experience and delivered by accredited trainers, ideally with lived experience. Ensure the training is tailored to diverse education settings and cohorts, and supported by clear, practical resources that strengthen educator understanding and implementation of the Standards
4. Address barriers to implementation by improving access to free, independent advocacy and timely, accessible dispute resolution processes. Empower the Australian Human Rights Commission to audit compliance and publish complaint outcomes to enhance transparency and guide reform.
5. Amend the Draft Principles to embed timeframes, transparent consultation practices, accessibility, trauma-informed practice, inclusive decision-making practices and nationally consistent complaints processes, including rights to independent advocacy.
6. Embed the principles within the Standards to ensure enforceability or amend the Standards directly to include enforceable timeframes and stronger requirements for accessibility and transparency in decision-making.
7. Clarify and coordinate responsibilities across education and external providers to maintain and adapt supports during transitions, exams and placements, supported by tailored resources and mandatory, co-designed training.
8. Strengthen data collection and accountability to monitor student experiences, identify gaps, improve transparency and guide reform.

**We are ready to assist!**

We welcome any further opportunity to discuss our submission and share our expertise, learnings and insights from community (including our de-identified data collected through Autism Connect and our community survey). Please contact me on (03) 9657 1600 or by email at [david.tonge@amaze.org.au](mailto:david.tonge@amaze.org.au).

Yours sincerely,



David Tonge

Chief Executive Officer

## SUMMARY OF RECOMMENDATIONS

1. Publicly commit to reviewing the Standards and associated guidance materials on finalisation of the DDA amendments (prior to their commencement) to ensure alignment and community understanding.

### **Topic 1: Drive understanding and effective implementation of the Standards.**

2. Host information resources on a dedicated, well-publicised website to improve visibility and accessibility.
3. Improve the content and accessibility of information resources by ensuring they are practical and informed by a range of diverse perspectives and experiences, tailored to diverse education settings, available in as many formats and modes as possible, and actively promoted through trusted partnerships.
4. Establish a permanent oversight group to guide and regularly review the development, implementation, promotion, and regular updating of resources and the Standards, ensuring they remain current, inclusive, and responsive to legislative and policy changes.
5. Mandate educator training and professional development that is delivered by accredited trainers, co-designed and co-delivered with people with lived experience, and that is tailored to diverse school settings and cohorts, with collaboration from specialist organisations such as Victoria's Autism Teaching Institute.
6. Require that all training, professional development and information resources are subject to ongoing monitoring, evaluation and public reporting to ensure they are improving understanding, implementation, transparency and outcomes.
7. Improve access to free independent advocacy and system navigation support, and accessible and timely dispute resolution processes.
8. Grant the Australian Human Rights Commission powers to audit and publish findings on Standards compliance and require public reporting of complaint outcomes to enhance transparency and guide future reforms.

### **Topic 2: Embed inclusive decision-making in education.**

9. Amend the draft principles to embed timeframes, transparent consultation practices, accessibility, trauma-informed practice, inclusive decision-making practices and a nationally consistent complaints framework, with rights to independent advocacy.
10. Pursue your Option 3 for implementation and embed the principles within the Standards to ensure they are enforceable and that non-compliance can form the basis of a complaint to the Australian Human Rights Commission.
11. If the principles are not made mandatory, amend the Standards to include enforceable timeframes and stronger requirements for accessibility and transparency in decision-making.

**Topic 3: Identify clearer responsibilities for assessment authorities and course developers.**

12. Identify clear and coordinated responsibilities across education providers and external authorities to maintain supports during transitions, exams, and work placements.
13. Require proactive consultation and planning with students and their support networks to ensure continuity and practical adaptation of adjustments across settings.
14. Establish a nationally consistent framework for evidence requirements, that incorporates flexibility by accepting older assessments and school-provided evidence of existing adjustments for ongoing conditions (reducing unnecessary retesting and associated costs).
15. Introduce mandatory, co-designed training and professional development for tertiary education providers and external third parties (including course developers, certification authorities and work experience providers), supported by tailored information resources to strengthen understanding of rights and obligations under the Standards.
16. Collect and monitor data on the experiences and outcomes of students with disability (broken down by disability type and intersectional identities) to identify gaps and guide improvements.

## 1. BACKGROUND

The Disability Standards for Education are aimed at ensuring students with disability can access and participate in education on the same basis as their peers. However, recent reviews, inquiries and Australian Bureau of Statistics (ABS) surveys have consistently shown that Autistic students continue to face significant, systemic barriers to access and inclusion across all stages of education and experience poor education related outcomes.

These findings are reinforced by our Autism Connect data, and community survey conducted to inform this submission, which reveal widespread lack of awareness of the Standards and persistent failures to provide reasonable adjustments, engage families in decision-making, and adequately support students in classrooms, exams, and transitions.

### **A. RECENT REVIEWS, INQUIRIES AND ABS SURVEYS DEMONSTRATE POOR EXPERIENCES AND OUTCOMES FOR AUTISTIC STUDENTS.**

- ABS data (2022) shows Autistic students are significantly less likely to complete Year 10 and 12 or attain post-secondary qualifications than their peers with and without disability, reflecting systemic failures in meeting their educational needs.
- Autistic students are frequently denied reasonable adjustments, including modifications to curriculum, assessments, and classroom environments and practices, which are essential for equitable and meaningful participation.
- Gatekeeping practices, or enrolment refusal prevent many Autistic students from accessing their local school or preferred education setting.
- Exclusionary discipline practices, including suspensions, expulsions, and reduced school hours, disproportionately affect Autistic students, especially those with complex communication and behaviour support needs.
- Many Autistic students experience “School Can’t,” where unmet needs result in chronic school non-attendance and disengagement.
- Learning environments often lack sensory-friendly design, contributing to distress and reduced capacity to learn for students with sensory related support needs.
- Families consistently identify poor understanding of autism among staff as a key barrier to inclusion.
- Autistic students face high rates of bullying and social isolation, which negatively impact their mental health and ability to engage in education.
- Transition support from school to tertiary education is often inadequate, leaving Autistic students unprepared for academic and social demands in higher education.
- Tertiary institutions lack consistent autism-specific supports and inclusion policies, contributing to high dropout rates and low completion of qualifications among Autistic students.<sup>1</sup>

<sup>1</sup> Disability Royal Commission 2023. Final Report: Volume 7 – Inclusive education, employment and housing. Available at <https://disability.royalcommission.gov.au/publications/final-report-volume-7-inclusive-education-employment-and-housing>; Australian Government, 2025. National Autism Strategy 2025 – 2031. Available at

## **B. AUTISM CONNECT DATA CONFIRMS PERSISTENT BARRIERS AND FAILURES TO SUPPORT AUTISTIC STUDENTS.**

---

In the 2024 – 25 Financial Year, Autism Connect received 979 enquiries about education (as either the primary and/or secondary topic). These queries commonly related to barriers to education (41%), rights information (21%), inadequate support at school (18%) and reasonable adjustments (8%). Notably, 5% of all calls regarding education specifically related to the Standards (as the primary or secondary topic).

A significant number of enquiries involved schools refusing to provide reasonable adjustments, such as declining to develop or implement Individual Education Plans, or educators not meeting student needs. These refusals often led to students experiencing "School Can't" - where a student is unable to attend school due to extreme distress, anxiety and/or unmet support needs. Families frequently sought advice on advocacy, alternative schooling options, or how to lodge complaints.

Parents reported a range of concerning experiences. One parent said their school dismissed their child's autism diagnosis and refused to make reasonable adjustments or apply for individualised funding. Another described their child being excluded from activities like soccer due to perceived behavioural risks. In another case, a parent spoke about their child not being included in a range of school activities. When they requested advanced notice of excursions so that they could support their child, the school stopped communicating with them. Others reported that they were offered only limited options when requesting adjustments, prompting families to consider moving schools or escalate complaints.

Autism Connect also received 44 enquiries involving student suspensions or expulsions. One parent described their child receiving multiple detentions and a suspension within weeks of starting high school. They reported that one detention was simply for not understanding what to do during a class activity. The school refused small adjustment requests, such as allowing extra time to transition between tasks, and declined the parents request to meet and discuss support. These examples reflect the real-world impact of schools failing to meet their obligations under the Standards.

Autism Connect advisors supported these callers by sharing a range of internal and external information and resources, including about advocacy, their rights, school options, reasonable adjustments, and communicating with schools.

---

<https://www.health.gov.au/our-work/national-autism-strategy?language=en>; Australian Government, 2023. Senate inquiry into the national trend of school refusal and related matters. Senate Education and Employment References Committee. Available at

[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Education\\_and\\_Employment/SchoolRefusal](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Education_and_Employment/SchoolRefusal); Autism CRC, 2023. Research evidence, policy and landscape mapping to inform the National Autism Strategy. Available at [https://www.autismcrc.com.au/sites/default/files/reports/6-088\\_Final\\_Report\\_Research\\_evidence\\_policy\\_landscape\\_mapping\\_to\\_inform\\_the\\_National\\_Autism\\_Strategy.pdf](https://www.autismcrc.com.au/sites/default/files/reports/6-088_Final_Report_Research_evidence_policy_landscape_mapping_to_inform_the_National_Autism_Strategy.pdf);

Australian Bureau of Statistics, 2022. Autism in Australia, 2022. Available at <https://www.abs.gov.au/articles/autism-australia-2022#key-statistics>; Australian Government, 2022. Select Committee on Autism: Services, Support and Life Outcomes for Autistic Australians. March 2022. Available at [https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Autism/autism/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Autism/autism/Report)

### C. AMAZE SURVEY DATA DEMONSTRATES WIDESPREAD GAPS IN UNDERSTANDING AND SUPPORT.

To inform this submission, we conducted a community survey of Autistic students and their families and carers to understand their experiences with the Standards.

The survey was open from 7 to 18 November 2025 and received 81 responses. Participants included Autistic students currently enrolled in secondary school or a tertiary education setting (such as TAFE, VET, or university), former Autistic students who were enrolled in these settings within the past five years, and their parents and carers, as well as parents and carers of Autistic kindergarten students.

Our survey results demonstrate that almost half of our community may not be aware of the Standards, and that they are failing to support students, families and carers to engage in decision making processes, obtain the adjustments they need (in classrooms, exams and work experience) and make complaints.

Our survey results are discussed in detail below.

### 2. PUBLICLY COMMIT TO REVIEWING THE STANDARDS ON FINALISATION OF THE MODERNISED *DISABILITY DISCRIMINATION ACT*.

This is a difficult time to provide detailed feedback on the Standards, given the concurrent review of the *Disability Discrimination Act* 1992 (DDA), which is expected to introduce significant changes to the legislative framework underpinning the Standards.

Our submission to the DDA review identified several critical issues that intersect with the Standards. However, these issues must be addressed through reform of the DDA itself to strengthen protections, improve transparency and accountability, and enhance enforcement. If adopted, many of our recommendations, largely aligned with those of the Disability Royal Commission, will have a significant impact on the Standards.

The recommendations identified in our submission to the DDA review include:

- Establish a positive duty for education providers (and all duty holders) to proactively eliminate discrimination, including through active implementation of the Standards.
- Rebalance responsibility by shifting the burden from students and families to education providers to uphold rights and meet legal obligations under the Act and Standards.
- Ensure meaningful participation of students and families in all decision-making processes, including Student Support Group (SSG) meetings.
- Introduce a stand-alone obligation to provide *meaningful* (rather than *reasonable*) adjustments and redefine the unjustifiable hardship exemption to apply only in exceptional, well-evidenced circumstances.
- Clarify the test for determining whether a person can perform the inherent requirements of courses and jobs, including by requiring formal assessments of requirements where capacity is questioned, and requiring meaningful engagement with course/job applicants in decision making processes.

- Explicitly prohibit suspension and exclusion of students on the basis of disability, and require formal, transparent assessment processes informed by meaningful engagement with students, families, and supporters prior to any disciplinary action.
- Enhance transparency and accountability through mandatory data collection and public reporting of complaints and outcomes, including a requirement for the Australian Human Rights Commission (AHRC) to publish all complaint outcomes.
- Strengthen monitoring, enforcement, and compliance mechanisms to ensure consistent and effective implementation of the Standards.
- Expressly ban gatekeeping practices that prevent enrolment or participation on the basis of disability.
- Improve access to justice for people with disability, including through explicit protections from vilification and offensive behaviour.

Once the modernised DDA is finalised, a further review of the Standards will be essential to ensure alignment with the new legislative framework. This will help embed the rights and obligations of education providers, students, and families, and ensure that the Standards (and any associated guidance or resources) clearly reflect and support the new legal framework.

We understand the Department is committed to a post-DDA reform review of the Standards. It is critical that this review occurs promptly, with early and meaningful engagement with the sector and people with lived experience to ensure the reforms are well understood, effectively implemented, and impactful.

**Recommendations:**

1. Publicly commit to reviewing the Standards and associated guidance materials on finalisation of the DDA amendments (prior to their commencement) to ensure alignment and community understanding.

**3. TOPIC 1: DRIVE UNDERSTANDING AND EFFECTIVE IMPLEMENTATION OF THE STANDARDS.**

A lack of awareness and persistent barriers to implementing the Standards are contributing to the exclusion of Autistic students, unmet support needs, and limited access to complaint pathways and outcomes.

Of significant concern, 42% of survey respondents reported that they were not aware of the Standards. Among those who were aware, information about the Standards was received through a variety of channels, most commonly disability organisations (34%) and government websites (32%). Only 7% became aware of the Standards during enrolment in secondary school or another education setting. Additionally, just 14% heard about them from a teacher or support staff, and only 5% through a Student Support Group meeting.

Despite the development of national resources, many Autistic students, and their families and carers remain unaware of their rights under the Standards and how to lodge a complaint when those rights are breached.

## A. BUILD ON STRENGTHS OF EXISTING RESOURCES, IMPROVING ACCESSIBILITY AND RELEVANCE ACROSS SETTINGS.

The current information resources for students, families and educators offer valuable overviews and insights into the Standards. These resources have many strengths: they were co-designed with students, families and educators, ensuring they reflect lived experience and practical information needs. They cover a range of topics, are directed at different audiences and are available in a range of accessible formats, including Easy Read and multiple languages.

However, the resources are not always easy to find or apply across different education settings or student cohorts. Of the respondents to our survey who were aware of the Standards, only 57% reported being aware of online resources to help them understand the Standards and advocate for their rights. Of these respondents, 63% reported that they found the resources very (14%) or somewhat (49%) helpful. 14% reported that they were not helpful and an additional 14% reported that they were aware of them but had not accessed them.

*“More definition regarding what is reasonable — schools always use ‘reasonable’ as a reason not to support (as in they say they do not have enough resources so any additional support is therefore not reasonable).”*

*“It’s hard when there isn’t clear examples for your child’s disabilities listed that would have made it easier to show the school.”*

*“Currently they do not have enough relevant information for students with very high needs who cannot enter the mainstream school system.”*

Amaze survey responses.

The content and accessibility of information resources could be improved by:

- Hosting the resources on a dedicated, easy-to-navigate, well publicised website, to improve visibility of the resources and standards, and improve their accessibility.
- Establishing a permanent oversight group comprising students, families, educators, and disability sector organisations to guide the co-design, review, and implementation of the Standards and resources. This group should reflect a wide diversity of lived experiences, including Autistic experiences and those facing intersectional disadvantage.
- Co-developing and actively promoting accessible resources in partnership with a broad range of disability organisations, education providers, unions, and allied health bodies to ensure materials reflect varied experiences and reach all communities.
- Tailoring resources to different education settings, such as TAFE and tertiary settings, where understanding of the Standards is particularly poor.
- Providing information and resources for students and families via more formats and modes, such as videos, brochures/snapshots and via webinars to meet varied accessibility and communication needs.
- Ensuring resources include practical examples of how to meet diverse student needs, including the diverse needs of Autistic students and students experiencing intersectional disadvantage.

- Developing new resources in response to emerging needs and systemic implementation gaps across education settings

Importantly, the resources must not be treated as static or one-off publications. Regular review is vital to keep resources relevant, accessible and aligned with policy changes. Regular review will help identify gaps, especially in under-served settings and for under-served cohorts, and ensure materials meet diverse needs. Embedding meaningful feedback mechanisms and performance indicators will be vital to measure reach and impact and drive continuous improvement and accountability.

## **B. STRENGTHEN EDUCATOR UNDERSTANDING THROUGH CO-DESIGNED TRAINING AND PROFESSIONAL DEVELOPMENT.**

---

To ensure consistent understanding and implementation of the Standards, educators need access to mandatory, high-quality training and practical resources that are evidence-informed, co-designed and co-delivered, and tailored to diverse education settings and student cohorts.

We welcome the development of new, co-designed training and professional development for educators across early childhood and school settings, as well as new resources to support Registered Training Organisations and training product developers (to be released by the end of next year). We would encourage collaboration with Victoria's Autism Teaching Institute to ensure the training and resources reflect lived experience and specialist expertise in autism education and are grounded in practical, inclusive approaches that support both educators and the diverse needs of Autistic students.

To ensure consistent understanding and implementation of the Standards, prescribed training and professional development should be mandatory for all educators and delivered by accredited trainers, ideally with lived experience. This training should be supported by high-quality, co-designed resources that clearly outline rights and obligations, and include practical examples, such as case studies and examples of adjustments for various student cohorts, including Autistic students and students experiencing intersectional disadvantage.

All training, professional development and information resources should be subject to ongoing monitoring, evaluation and public reporting to support understanding, transparency, continuous improvement and better outcomes for students with disability.

## **C. ADDRESS PERSONAL, PRACTICAL AND SYSTEMIC BARRIERS TO IMPLEMENTATION, IMPROVING TRANSPARENCY AND LEGAL CLARITY.**

---

Students and families and carers of Autistic students face significant practical, personal and systemic barriers to implementing the Standards. The time and energy required to advocate for appropriate supports can be overwhelming. Many report burnout from navigating complex systems, repeated meetings, and prolonged complaint processes. Even when resolutions are reached, they can come too late to be meaningful or helpful for the student involved.

*“Current policy does not adequately allow opportunity to advocate for yourself/your child. Frontline staff often don't understand our rights and asserting them becomes a very time consuming and stressful process.”*

Amaze survey response.

Further barriers to implementation include limitations within the DDA and related systemic barriers. As raised above, and in our submission to the DDA review, these include the definitions of discrimination, reasonable adjustments and unjustifiable hardship, limited access to advocacy support, high costs associated with escalating matters to the Federal Court, and a lack of published precedents to guide families.

The AHRC currently publishes only a small selection of complaint outcomes, and there have been no successful Federal Court cases involving Autistic students under the Standards. This lack of transparency and legal clarity makes it harder for families to understand their rights, assess the likelihood of success, and pursue justice confidently,

As part of a positive duty to implement the Standards, the AHRC should be given powers to audit and assess compliance with the Standards, with findings made publicly available. As recommended in our submission to the DDA, the AHRC should also be required to publish all complaint outcomes to improve transparency and inform future reforms.

**Recommendations:**

2. Host information resources on a dedicated, well-publicised website to improve visibility and accessibility.
3. Improve the content and accessibility of information resources by ensuring they are practical and informed by a range of diverse perspectives and experiences, tailored to diverse education settings, available in as many formats and modes as possible, and actively promoted through trusted partnerships.
4. Establish a permanent oversight group to guide and regularly review the development, implementation, promotion, and regular updating of resources and the Standards, ensuring they remain current, inclusive, and responsive to legislative and policy changes.
5. Mandate educator training and professional development that is delivered by accredited trainers, co-designed and co-delivered with people with lived experience, and that is tailored to diverse school settings and cohorts, with collaboration from specialist organisations such as Victoria's Autism Teaching Institute.
6. Require that all training, professional development and information resources are subject to ongoing monitoring, evaluation and public reporting to ensure they are improving understanding, implementation, transparency and outcomes.
7. Improve access to free independent advocacy and system navigation support, and accessible and timely dispute resolution processes.
8. Grant the AHRC powers to audit and publish findings on Standards compliance and require public reporting of complaint outcomes to enhance transparency and guide future reforms.

#### 4. TOPIC 2: EMBED INCLUSIVE DECISION-MAKING IN EDUCATION.

We welcome the development of *Draft Principles for consultation, issues resolution and complaints handling* (Draft Principles), and recognise their importance in strengthening inclusive decision-making and accountability under the Standards. These principles are a necessary step toward ensuring students with disability are meaningfully involved in decisions that affect their education, and that issues resolution and complaints processes are consistent, accessible and student centred.

The majority of respondents to our survey reported that they, or the person they care for had been excluded from some decision-making processes (including decisions about adjustments, student support group meetings and development of Individual Education Plans).

- Of current and recent secondary school students, and their families and carers, 33% reporting being always included in these decision-making processes, 50% reported being sometimes included and 17% reported being rarely or never included.
- Of current and recent tertiary students, and their families and carers, 20% of respondents reporting being always included in decision making processes, 40% reported being sometimes included and an additional 40% reported being rarely or never included.

Of respondents who were aware of the Standards, only 40% reported knowing how to make complaints. 20% of those respondents reported that they had made complaints under the Standards, with only 33% reporting that they found the complaints process accessible and easy to follow.

*“There should be Disability liaison officers/peer workers/people with lived experience available to guide you.”*

Amaze Survey response.

While we generally support the Draft Principles, we note (as outlined in your Issues Paper) that they were developed prior to the release of the Disability Royal Commission's final report and do not reflect key recommendations, including recommendations 7.6(e) and 7.10(b). These recommendations highlight the need for students to participate in age-appropriate decision-making, for families and carers to be supported by school leadership and staff on decisions relating to school-wide adjustments, and for complaints processes to be student-centric, accessible, trauma-informed, culturally appropriate and nationally consistent.

To strengthen the draft principles and ensure they reflect the DRC's recommendations and are fit for purpose, we recommend that they embed:

**(a) Timeframes and transparent consultation practices.**

The principles should set clear, nationally consistent timeframes for consultation with students and/or their associates (e.g., parents, carers, or support persons), including to identify, deliver and review adjustments and support services. For example, education providers could be required to review support needs with students and/or associates within the first four weeks of each term (such as through a Student Support Group (SSG) meeting in schools). This would ensure that supports for all students with disability are regularly reviewed and each student is set up for success at the start of every term.

During these consultations, the principles should require education providers to provide students and their associates with accessible information about their rights, including to seek reasonable adjustments and support services, request or vary an Individual Education Plan (IEP), and lodge complaints. They should also require education providers to provide all *prospective* students and their associates with accessible information about their rights to enrol and request adjustments and support services, together with information about complaints processes.

All timeframes and obligations related to Standards for participation should apply to all students with disability (not only those receiving individual funding) to promote consistency and equity. We are concerned that in Victoria, SSGs and IEPs are only required for students receiving individual funding. It is essential that the support needs of all students with disability are regularly reviewed and that all students, families and carers are aware of their rights to request supports, including IEPs. A student's eligibility for individual funding should not affect their rights under the Standards.

The Standards should reflect rights and obligations relating to suspension and exclusion, with further guidance included in the principles. For example, where suspension or exclusion is being considered, the principles could require that consultation occur within a defined period (e.g., 24 hours), with education providers required to share accessible, transparent information about the reasons, relevant considerations, and applicable legal tests.

All decisions, including outcomes of consultations or complaints, should be required to be communicated within a set timeframe, such as seven days, rather than within a "reasonable" time that is open to interpretation.

**(b) Accessibility for students and their associates.**

The principles should help ensure that information on consultations, issue resolution, complaints processes, and advocacy supports is not only provided, but is fully accessible to students and their associates. Accessibility must consider disability and any intersectional disadvantage experienced by a student or associate. For example, many Autistic students have Autistic parents or carers, so it is critical that information is presented in ways that meet their communication preferences and support their capacity to engage effectively. Consistent with draft Principle D (which is aimed at ensuring accessibility for First Nations and CALD communities), education providers should be required to actively identify and respond to specific disability related accessibility needs for participating in consultations, issue resolution, or complaints processes, accounting for intersectional disadvantage throughout.

**(c) A trauma-informed approach.**

The principles should ensure students and their associates who have experienced trauma, including school-related trauma, are positively supported to engage in consultations, issue resolution, and complaints processes through trauma-informed practices.

**(d) Transparent decision making.**

The principles should require education providers to share detailed records of consultation outcomes and discussions, including specific written reasons and considerations for any decision to refuse an enrolment, deny a request for reasonable adjustments or support services, or suspend or exclude a student.

**(e) Empowerment of students and associates.**

The Principles should require education providers to include information on issues resolution and complaints processes, and accessible advocacy supports whenever communicating decisions that differ from a student's or associate's request, or that relate to decisions to suspend or exclude students. As suggested by one respondent to our survey, dedicated Disability Liaison Officers, including peer workers and people with lived experience, should be freely available to support students and their families and carers through issues resolution and complaints processes.

**(f) A nationally consistent complaints process, with advocacy support.**

The principles should specify clear, detailed complaint management procedures. As highlighted by the DRC, this is critical to help achieve national quality and consistency, and ensure complaint handling processes are student-centric, accessible, efficient, safe, trauma-informed and culturally appropriate. Education providers should be required to proactively offer accessible, independent advocacy support for students and their associates to engage in consultations, issue resolution and complaints processes, including support for escalations to the Australian Human Rights Commission and the Federal Court of Australia.

**We support Option 3 for implementation, which requires education providers to follow the principles** when consulting, resolving issues, or handling complaints under the Standards. To ensure the principles are consistently applied and enforceable, they should be formally embedded within the Standards, allowing non-compliance to form the basis of a complaint to the Australian Human Rights Commission. Embedding these requirements, and aligning them with any future positive duty under the DDA, will help drive systemic change and improve outcomes for all students with disability.

If the principles are not made mandatory, the Standards themselves should be amended to incorporate the rights and obligations recommended above, including enforceable timeframes and stronger requirements for accessibility and transparency in decision-making processes.

**Recommendations.**

9. Amend the draft principles to embed timeframes, transparent consultation practices, accessibility, trauma-informed practice, inclusive decision-making practices and a nationally consistent complaints framework, with rights to independent advocacy.
10. Pursue your Option 3 for implementation and embed the principles within the Standards to ensure they are enforceable and that non-compliance can form the basis of a complaint to the Australian Human Rights Commission.
11. If the principles are not made mandatory, amend the Standards to include enforceable timeframes and stronger requirements for accessibility and transparency in decision-making.

## 5. TOPIC 3: IDENTIFY CLEARER RESPONSIBILITIES FOR ASSESSMENT AUTHORITIES AND COURSE DEVELOPERS

Clear responsibilities for external providers (including assessment and certification authorities, course developers and work experience providers) are essential to ensure all students, including Autistic students, can fully participate in education and work experience.

*"All staff need better training - not just the disability inclusion staff, but exam supervisors as well."*

*"Increased transparency about available accommodations, structured guidance on the application process, and knowledgeable staff to provide individualized support would greatly assist Autistic students in securing reasonable adjustments. Ensuring staff are trained to recognize and understand autistic needs would further improve access and outcomes."*

*"Exam supervisors need to be aware of the disability they are supervising. One supervisor started saying really rude and mean things about autistic people as I was taking the exam. It was very distressing."*

Amaze survey responses.

Autistic students often face inconsistent support when transitioning between classrooms, education providers, exams, or work placements, where adjustments such as additional processing time, predictable routines, breaks, or communication, behavioural or sensory supports may be overlooked or withdrawn, creating unnecessary barriers to learning and achievement. These transitions can heighten anxiety and reduce opportunities to participate and demonstrate capability, especially when familiar supports are lost.

One parent responding to our survey shared that they requested extra time for their son to complete his HSC exams due to significant writing difficulties. Instead, he was provided with a scribe and the option to take rest breaks—but not extra time. To access these breaks, he was required to make a verbal request, despite clear evidence that he struggles to communicate verbally in stressful situations such as exams. The parents and school asked if he could use a card with “rest break” printed on it to signal his need, but this was refused. Despite strong support from the school, the assessment authority’s rigid approach left the student without practical accommodations that matched his needs.

Families of students with disability can also face costly and repetitive requirements for updated allied health assessments to access exam adjustments. For example, some state authorities only accept evidence less than a year old, even when conditions are lifelong, schools have evidence of reasonable adjustments benefiting students in classrooms and the student is completing exams over many years and pathways. This creates financial and emotional strain and risks denying essential supports.

*"How about make NESA (NSW Education Standards Authority) not be able to dismiss evidence that is more than 8 months old! Our WIAT (Wechsler Individual Achievement Test) testing which was done by a neuropsychologist at the end of year 10 was not accepted by NESA because it was 'too old'. They require it to be done no earlier than term 4 before the HSC. These tests are really expensive and we are poor. We had a bunch of other tests that*

*clearly displayed the slow writing and processing problem but without a 'current' WIAT NESA was able to dismiss the lot. Given our disabled student is doing the HSC on an extended pathways program over a few years we are told we need to do expensive WIAT tests and all the other letters and forms filled in from the therapists and specialists each year (NDIS doesn't cover it). Otherwise we can just let our son not get the provisions and fail and get really depressed".*

Amaze Survey respondent.

Of the Autistic students that are currently or were recently in Year 11 or 12, and their parents and carers that responded to our survey - 42% reported that they did not receive the reasonable adjustments needed to access Year 11 and 12 exams and 75% reported that they did not receive the adjustments needed to access work experience.

*"In the past I was too anxious to ask for adjustments, the school wasn't very discreet about the kids who needed adjustments and if you did, it was social isolation. I wanted to ask for adjustments to have additional time during exams and to ask to reword questions, if I asked a question about the exam I'd be told that they can't tell us how to answer the question, when really all I'm asking is to reword the question so I can better understand."*

*"Adjustments were not promoted. Teachers said they were not needed even if the parent suggested this would be good. Lack of adjustments meant that the student was not able to show his best learning."*

*"The lack of accommodations created additional barriers, especially with timing and focus, which limited my ability to complete the exam to the best of my ability."*

*"Adjustments were not promoted. Teachers said they were not needed even if the parent suggested this would be good. Lack of adjustments meant that the student was not able to show his best learning."*

*"The lack of accommodations created additional barriers, especially with timing and focus, which limited my ability to complete the exam to the best of my ability."*

*"The reasonable adjustments provided supported my communication and sensory needs, which allowed me to participate in work experience more confidently and effectively. They removed barriers that would otherwise have limited my ability to perform and engage."*

*"Never offered work experience. It was never mentioned."*

*"Accessing work experience was more challenging because engaging with external stakeholders meant less understanding. If you undertook work experience you received the same treatment and training as anyone else and instead just had lower expectations of you and your ability to work."*

Amaze survey responses.

Of the Autistic students that are currently or were recently enrolled in a tertiary setting, and their parents and carers that responded to our survey - 26% reported that they did not receive the reasonable adjustments needed to access exams and 86% reported that they did not receive the adjustments needed to access work experience or practical placements.

*"The uncertainty of whether my adjustments would actually be provided made me very nervous leading up to the exams but during, when they were in place, it was extremely successful in providing me the space I needed to complete my exams successfully."*

*"The failure to provide adjustments created barriers that limited my capacity to access and complete the exam effectively. Difficulties with processing speed, sensory demands, and unclear expectations reduced the accuracy and quality of my performance."*

*"They struggle to understand and provide a dimly lit and quiet room - eg. Putting me in a room with fluorescent lights, on a computer where brightness cannot be dimmed, in a room with a noisy generator. The brightness affects my vision and ability to physically focus my eyes, and the noise is incredibly disruptive for me."*

*"In high school I did not have access to adjustments my teachers often commented that the work I produced compared to my contributions in class discussions did not match as I could explain my ideas verbally but struggled to write them down in a way that others could understand. When I attended university the adjustments provided were not actually beneficial to what my needs were which led to me failing and being asked to leave uni. However, I am currently studying at TAFE and the adjustments provided have meant I am excelling and actually learning and retaining content."*

*"When I was at uni I did not receive adjustments for attending pracs this meant I was often overstimulated in classroom environments, and struggled to communicate effectively with educators. It also meant my performance in teaching was not the best I could do as I was overstimulated and barely able to regulate myself. Now I am at TAFE and doing my prac I am able to use earbuds to help reduce noise meaning I do not get as overstimulated, also my mentor understands my challenges".*

Amaze survey responses.

To address this, the Standards should require proactive coordination between all relevant parties, identifying clear lines of responsibility for maintaining supports during transitions, exams and work placements. They should also require timely consultation with students and/or their associates to ensure adjustments are not only retained but are adapted to new settings. Greater transparency around who is responsible for implementing and monitoring supports will help reduce confusion, promote consistency, and ensure students are set up for success across all learning and assessment environments. Liaison officers between schools and work experience placements would also enhance access.

As discussed above under Topic 1, information resources, and mandatory training and professional development specifically aimed at secondary and tertiary education providers and students are urgently needed to support understandings of rights and obligations in these settings. Information resources, and mandatory training and professional development, should also be required (and adapted to the needs and context of) third parties working across these settings, including course developers, certification authorities, exam supervisors and work experience providers

There is a clear need for more data on the experiences and outcomes of Autistic students across schools, assessments, and post-school pathways. Collecting and monitoring this

information will help identify gaps in support, track the effectiveness of adjustments, and guide improvements in policy and practice.

### **Recommendations**

12. Identify clear and coordinated responsibilities across education providers and external authorities to maintain supports during transitions, exams, and work placements.
13. Require proactive consultation and planning with students and their support networks to ensure continuity and practical adaptation of adjustments across settings.
14. Establish a nationally consistent framework for evidence requirements, that incorporates flexibility by accepting older assessments and school-provided evidence of existing adjustments for ongoing conditions (reducing unnecessary retesting and associated costs).
15. Introduce mandatory, co-designed training and professional development for tertiary education providers and external third parties (including course developers, certification authorities and work experience providers), supported by tailored information resources to strengthen understanding of rights and obligations under the Standards.
16. Collect and monitor data on the experiences and outcomes of students with disability (broken down by disability type and intersectional identities) to identify gaps and guide improvements.