

HELEN'S WAY · SUBMISSION

Submission on the NSW Department of Education Interim Disability Inclusion Action Plan 2026–2029

A submission from Helen's Way · July 2026. Prepared as an advocacy resource for the Department's continuing consultation ahead of the final DIAP (expected end of September 2026).

Helen's Way · July 2026 · quotations verbatim, with page references

ABOUT HELEN'S WAY

Helen's Way advocates for neurodivergent learners in mainstream education settings across Australia whose intellectual ability is on par with their peers. These students can meet the curriculum — the 'what' of learning. What holds them back is too often the 'way' learning and support are delivered: the mode of teaching, the adjustments, the understanding of neurodivergence, and the whole-of-school culture around them. Our comments on this plan come from that perspective, and from the shared lived experience of families navigating the system.

1. Overall assessment

We welcome the release of the Interim Disability Inclusion Action Plan ("the Interim DIAP") and the decision to publish it in interim form specifically to allow, in the Secretary's words, "further time for genuine, ongoing and collaborative consultation" (p.5). This submission is offered in that spirit. There is much to commend: the plan's grounding in the social and human-rights models of disability, its explicit naming of ableism, its universal-design framing, and its alignment with the Disability Royal Commission are all genuinely positive.

Our central concern is one of balance. As drafted, the Interim DIAP is markedly stronger for staff than for students. A consistent staff-versus-students double standard runs through the plan: where the Department commits to something for its workforce, the equivalent commitment for students with disability is weaker, vaguer, or absent.

In particular, staff with disability have a dedicated evidence report (*Breaking Barriers*, 2025), disability-segmented performance measures with an explicit target to improve, executive accountability tied to disability-inclusion metrics, and a commitment to a "clear and independent complaints" pathway. Students with disability have no equivalent report, no disability-segmented outcome measure with a target, no comparable leadership accountability, and no independent complaints pathway of their own. The student-facing actions are also the only actions in the plan with no timeframe — listed as "TBC" or "TBD."

This is significant for a large and growing group of students. On the Department's own figures (p.10), 27.0% of NSW public-school enrolments — more than one in four students — received an educational adjustment for disability. The two biggest groups are students with cognitive disability (53.0% of adjustments) and social-emotional disability (36.3%) — 2 of the 3 categories under which autism, ADHD and specific learning disorders are recorded. We note that these NCCD categories also include students with intellectual disability and mental-health conditions; although Helen's Way's focus is neurodivergent learners whose ability is on par with their peers, the case for strengthening the plan for students applies across the cohort.

These figures point to a harder question the plan does not yet answer. The share of students receiving an adjustment for disability has grown steadily — from 18.0% of enrolments in 2015 to 27.0% in 2025 (ACARA, *National Report on Schooling*) — yet over the same period the signs of students being poorly served have grown alongside it. Regular attendance has fallen, with the proportion of students attending 90% or more of the time dropping from 73.1% in 2019 to 61.6% in 2023 (AERO). School refusal — increasingly described as 'school can't' — is rising and is most common among neurodivergent students (Senate inquiry, *The National Trend of School Refusal and Related Matters*, 2023). And in NSW, home-schooling registrations more than doubled between 2019 and 2024, from 5,906 to 12,762, with the share of home-schooled children with disability rising from about 35% to 54% (NSW Auditor-General, *Alternative school settings and home schooling*, September 2025).

More support recorded on paper is not yet translating into students staying and thriving in mainstream school. The plan measures inputs — that an adjustment has been made — but not whether the support actually works for the student, and it does not ask students and

families directly. That gap is precisely why Recommendations 1 and 2 — direct consultation, and outcome measurement segmented by disability — appear first: without them, neither the Department nor the community can see what is failing, or put it right.

There is also a timing concern. In September 2024 the NSW Auditor-General recommended the Department deliver several of these same improvements — at least annual monitoring of outcomes for students with disability, and a clear picture of the demand for and supply of targeted supports — by January 2026, and the Department supported or partially supported every recommendation. Six months past that deadline, the June 2026 Interim DIAP does not yet demonstrate their delivery. We say more about this in our companion status check, but it reinforces why the final DIAP needs firm, dated commitments for students (NSW Auditor-General, *Supporting students with disability*, 2024, p.7; Appendix 1).

The table below summarises the pattern. The recommendations that follow (Section 3) set out, point by point, what we ask the Department to strengthen in the final DIAP.

The same commitment — for staff, but not for students

WHAT THE PLAN COMMITS TO	FOR STAFF WITH DISABILITY	FOR STUDENTS WITH DISABILITY
A dedicated lived-experience evidence report	Yes — <i>Breaking Barriers</i> (2025), 12 recommendations (p.19)	None
Outcome measure segmented by disability, with a target to improve	Yes — "an increase in PMES scores for staff with disability" (p.23)	No — student survey data listed with no segmentation or target (p.23)
Leadership / executive accountability for disability inclusion	Yes — disability-inclusion metrics in executive performance agreements (p. 36)	None for student outcomes
A clear, independent complaints pathway	Yes — committed for staff (Action 3.2, p.36)	None for students or parents
Actions with a firm timeframe	Yes — concrete terms (e.g. Term 4 2026 / Term 2 2027)	No — key student actions are "TBC" / "TBD" (pp.32, 40)

2. How to read this submission

Each recommendation below follows the same structure: what the plan currently says (quoted directly, with the page reference), the gap we see, and what we ask the Department to do. Where a point connects to one of Helen's Way's four reform priorities, we note it. We have kept every quotation verbatim so the Department can locate each point quickly in its own document.

3. Recommendations

Recommendation 1. Include parents, carers and young people with disability in the consultation — not only disability organisations and staff networks

Relates to Helen's Way Priority 1 — parent and student voice.

What the plan says:

"The department sought feedback ... from a diverse range of stakeholders across the department and the broader disability community, including unions, professional associations, staff and student representative groups, and key NSW Government Stakeholders such as the NSW Disability Council and Disability Strategy Reference Group. (p.7)"

The gap: The bodies named are adult, systemic and workforce-facing — the Disability Employee Network, the Disability Strategy Reference Group, the NSW Disability Council, unions and professional associations. We do not see disability-specific young people's organisations, and we do not see parents and carers. For younger students in particular, you cannot reliably capture student voice without including the parents and carers who know and speak for them; expecting a child to self-advocate into a government consultation is not a substitute. This is not a hypothetical: the NSW Government's own statutory advocate, the Advocate for Children and Young People (ACYP), consulted more than 370 children and young people with disability directly for its *Voices of Children and Young People with Disability* work, and its 2024 submission to the parliamentary inquiry recommends increasing "opportunities for children and young people with disability to be heard from directly on issues relating to their education." Direct consultation with students and families is both achievable and already urged by NSW's own children's advocate.

We recommend: For the final DIAP, consult directly with (a) organisations led by or for young people with disability, and (b) parents and carers of students with disability — recognising that for younger children, parent and carer voice is how student voice is heard. The interim status of this plan is the ideal opportunity to do this before the plan is finalised. At a minimum, we recommend consulting Children and Young People with Disability Australia (CYDA), the national representative body for children and young people

with disability, and the NSW Advocate for Children and Young People (ACYP), whose direct consultations with children and young people with disability are already on the public record.

Recommendation 2. Measure outcomes for students with disability the way you measure them for staff

Relates to Helen's Way Priority 1 — accountability and parent/student voice.

What the plan says:

"... evaluates system and cultural change through measurable metrics: An increase in NSW People Matters Employee Survey (PMES) scores for staff with disability. An increase in disability representation in workforce profile reporting. My Say My Way and NSW Public Schools Survey data. (p.23)"

The gap: This is the clearest example of the double standard. For staff, the measure is segmented by disability and has a stated direction: an increase in PMES scores for staff with disability. For students, the plan simply lists "My Say My Way and NSW Public Schools Survey data" — with no segmentation for students with disability, and no target to improve. If it is not segmented, the Department cannot see how students with disability are faring; if there is no target, no one is accountable for it improving. This gap is officially documented: the NSW Auditor-General found the Department "has not consistently monitored outcomes for students with disability," that its own disability outcomes framework — "endorsed by the Department executive in 2022" — "was still not fully operational in September 2024," and that it "does not regularly analyse the Tell Them From Me survey response data" (NSW Auditor-General, *Supporting students with disability*, 2024, pp.2, 5). The NSW Advocate for Children and Young People makes the same point from the student side, recommending that the Department's ongoing Progress Report on improving outcomes for students with disability "feature feedback from children and young people with disability sourced through direct consultations" (ACYP submission, 2024).

We recommend: Segment the My Say My Way and NSW Public Schools Survey results for students with disability, publish that breakdown, and set an explicit target to improve it — mirroring exactly the commitment already made for staff. The Department has already built a student outcomes framework; the task is to make it operational and public. Or create a unique survey for students and parents/carers of students with a disability.

Recommendation 3. Design school environments for sensory and neurodivergent needs, not only physical access

Relates to Helen's Way Priority 3 — whole-of-school support.

What the plan says:

"Update the Educational Facilities Standards and Guidelines to improve design requirements to ensure school infrastructure is inclusive and that school facilities are not a barrier to inclusion ... removing systemic environmental barriers. (Action 2.3, p.33)"

"[Universal design, built environment:] Step free entry, ramps and 'speaking' lifts. Accessible toilets with automated sliding doors. Visual and audio emergency alerts. Quiet rooms. Adjustable lighting. Hearing loops. (p.16)"

The gap: The plan's picture of accessible design is overwhelmingly physical and mobility- or vision/hearing-focused. Beyond "quiet rooms" and "adjustable lighting," there is nothing on the sensory environment that most affects neurodivergent students: harsh fluorescent lighting and glare, noisy corridors and halls, poor acoustics, and hot classrooms.

"Removing systemic environmental barriers" is welcome but too generic to guarantee these are addressed.

We recommend: Name sensory and neurodivergent design explicitly in the updated Educational Facilities Standards and Guidelines — including lighting (reducing glare and flicker), acoustics and noise, thermal comfort, low-stimulation and regulation spaces located throughout schools, not just one isolated room, and predictable, legible wayfinding — so "inclusive design" covers the barriers neurodivergent students actually experience.

Recommendation 4. Build digital systems that manage the quality delivery and ongoing monitoring of both provision and effectiveness of student supports — not just website accessibility and applications

Relates to Helen's Way Priority 1 — verifying that funded support reaches the child.

What the plan says:

"Upgrade the NSW Department of Education website and school website service. ... Embed accessibility requirements into digital design and enterprise architecture standards. (Action 4.1, p.41)"

"Implement a new Access Request system and streamlined process to enable students and families to seek specialised support. (Action 4.2, p.41)"

The gap: The plan's digital actions are about accessibility compliance (websites meeting WCAG) and applying for support. Neither addresses what happens after a support is agreed: there also need to be systems to record, track and quality-assure the supports actually delivered — the adjustments recommended by therapists, the differentiation provided by teachers, and the collaboration with parents. Without this, provision is invisible and unauditable, and teachers are left to manage a complex web of recommendations and adjustments with no practical tool.

We recommend: Commit to IT infrastructure that lets schools record and quality-control the delivery of supports — capturing therapist recommendations, the differentiation and adjustments teachers provide, and structured, two-way communication with parents — in a way that is easy for teachers to manage and that makes provision visible and accountable.

Recommendation 5. Tell us more about disability representation on boards and advisory bodies — and extend it to students and parents

What the plan says:

"[Universal design, representation:] Consulting with people with disability. Boards and advisory bodies have representation from people with disability. (p.16)"

The gap: Representation of people with disability on boards and advisory bodies is listed as an example of good practice, but it is not backed by any action in the plan, and there is no detail: which boards and advisory bodies, what level of representation, how members are chosen, or whether students and parents of students with disability are included. A single line in a universal-design table is not a commitment.

We recommend: Make representation an action with detail: specify the boards and advisory bodies concerned, set representation targets, and — critically — include students with disability and parents/carers, including through school-level advisory mechanisms, not only department-level bodies.

Recommendation 6. Commission a "Breaking Barriers" report for students, as you did for staff

What the plan says:

"In 2025, the department wrote and released internally the Breaking Barriers: The experiences of staff with disability at the NSW Department of Education report. ... The report's 12 recommendations ... directly informed the priorities and initiatives in this Interim DIAP. (p.19)"

The gap: The Department invested in a dedicated, lived-experience evidence base for staff with disability — drawing on survey data and focus groups — and let it shape the plan. Students with disability, and their families, received no equivalent. The plan is therefore built on a rich understanding of staff experience and a comparatively thin understanding of student experience.

We recommend: Commission an equivalent lived-experience evidence report on the experiences of students with disability and their families in NSW public schools, and use its findings to shape the final DIAP — exactly as *Breaking Barriers* shaped this one.

Recommendation 7. Make improvement for students with disability a reportable, accountable measure for executives and school leaders — with parent and student voice as one of the measures

Relates to Helen's Way Priority 3 — whole-of-school continuous improvement, and Priority 1.

What the plan says:

"Embed disability inclusion metrics into executive performance agreements. (Action 3.2, p.36)"

The gap: The plan embeds disability-inclusion accountability into executive performance agreements — but within a workforce/employment pillar, so the metrics are about staff inclusion. There is no equivalent accountability for improving outcomes for students with disability, and school leaders are not held to it. Individual effort is not the same as systemic accountability.

We recommend: Extend executive and school-leadership accountability to student disability outcomes — with clear, reportable measures, and with parent and student voice built in as one of those measures, so leaders are accountable not just for whether policies exist but for whether experience is improving. We note this accountability is only as strong as the mechanisms for capturing and analysing the information it depends on (see Recommendation 12).

Recommendation 8. Give students and parents the same clear, independent complaints pathway you promise staff

Relates to Helen's Way Priority 4 — an independent complaints body.

What the plan says:

"Ensure staff have access to and confidence in clear and independent complaints and reporting pathways. (Action 3.2, p.36)"

The gap: The Department commits to a clear and independent complaints pathway — for staff. Students and parents are offered no equivalent. Elsewhere the plan notes only the general right to "pursue complaints, like any other member of the community" (p.18), which in practice means the very institution being complained about handles the complaint. This is the gap Helen's Way's Priority 4 is about.

We recommend: Commit to an equivalent clear, independent complaints and reporting pathway for students with disability and their families — with the independence, expertise and authority to resolve a dispute about a student's support, not just to review how a complaint was handled.

Recommendation 9. Address the demand–supply gap for specialist supports, not just the application form

What the plan says:

"Implement a new Access Request system and streamlined process to enable students and families to seek specialised support. (Action 4.2, p.40)"

The gap: Streamlining how families apply for specialist support is worthwhile, but it treats the problem as a paperwork problem. The real issue families face is that demand for specialist supports far outstrips supply — and a smoother application process does nothing to close that gap. Making it easier to join a queue is not the same as there being enough support to go around. The NSW Auditor-General found exactly this: the Department "does not maintain waiting lists for students deemed eligible for targeted supports where the support is not available" and "does not monitor the time taken for targeted supports to be provided," so "cannot tell how long students with identified needs are waiting for supports." Its Recommendation 5 calls for "a clear and timely picture of the supply of, and demand for, targeted supports ... to identify and address constraints" (NSW Auditor-General, *Supporting students with disability*, 2024, pp.5, 7).

We recommend: Alongside improving the application process, commit to measuring and managing the gap between demand and supply of specialist supports — publishing demand and wait-time data, and planning capacity — including monitoring demand and supply in mainstream classrooms, not only in support units and Schools for Specific Purposes (SSPs) — so that access reflects need, not just a better form.

Recommendation 10. Put firm timeframes on the student-facing actions

What the plan says:

"[Action 2.2 — professional learning on disability and neurodiversity:] TBC. (p.32)"

"[Actions 4.1 and 4.2 — digital systems and the new access-request system:] TBD. (p.40)"

The gap: The actions most directly about students — teacher professional learning on disability and neurodiversity, better digital systems, and the access-request process — are the only actions in the plan with no timeframe. Staff-facing actions, by contrast, have concrete terms. Unscheduled commitments are the easiest to defer. This is a documented pattern, not a one-off: the NSW Auditor-General found the Department's reforms "have not been implemented in a timely way," and that for its previous Disability Strategy it "did not establish a time horizon by which the strategy vision and success measures were expected to be realised" (NSW Auditor-General, *Supporting students with disability*, 2024, pp.2, 6).

We recommend: Give every student-facing action a firm, dated timeframe in the final DIAP, so these commitments carry the same weight and accountability as the staff-facing ones.

Recommendation 11. Make professional learning robust and sustained — and expected — rather than merely "promoted"

Relates to Helen's Way Priority 3 — teacher capability.

What the plan says:

"Promote uptake of professional learning on disability, neurodiversity and inclusive education, including a suite of professional learning on intellectual disability. (Action 2.2, p.32)"

The gap: Committing only to promote uptake of professional learning makes it voluntary and light-touch. Australia's national education evidence body has shown, in a randomised trial, that one-off and light-touch professional learning does not meaningfully change teaching practice; what changes practice is training that is substantial and sustained (AERO, *Sustaining professional learning outcomes*, 2025). Given that families, educators and successive inquiries all agree teachers do not yet know enough about neurodivergence, "available" is not strong enough. The NSW Auditor-General reinforces this: it lists "gaps in professional learning and practice guidance for school staff" among the longstanding issues the Department has been aware of for almost two decades and has not resolved (*Supporting students with disability*, 2024, pp.2–3).

We recommend: Commit to robust, sustained and expected professional learning on neurodivergence and inclusive practice — not one-off sessions that staff may or may not take up — so it actually changes classroom practice.

Recommendation 12. Use complaints and data to find and fix systemic problems — not just to resolve one case at a time

Relates to Helen's Way Priority 1 (accountability) and Priority 3 (whole-of-school continuous improvement).

What the plan says:

"The department will compile an annual progress report that ... outlines the actions taken in the year to date [and] provides a status update for each initiative. (p.23)"

The gap: A complaint, or a survey response, is not only an individual matter to be closed — it is a signal about what is going wrong across the system. The plan reports activity to internal committees, but it builds no loop from what families raise to what the system changes. The NSW Auditor-General found this is a real gap: the Department holds rich, linkable data on students with disability (attendance, suspensions, NAPLAN, wellbeing) but "is not using the datasets to regularly monitor school practice, identify and address emerging issues, or identify and promote 'what works'" (p.5). On complaints, even when disability-related matters were among the top five issues raised, the Department "did not

identify potential systemic issues," and "it is unclear how the Department uses complaints data to inform and drive system-wide improvements ... It did not provide any examples of using disability-specific complaints data in this way" (pp.62, 64).

We recommend: Commit in the final DIAP to systematically analyse complaints and linked data about students with disability — to identify systemic issues, act on them, and share what works across schools — so that individual complaints and survey responses actually drive system-wide improvement. This is the Auditor-General's own Recommendation 1: monitor the experiences and outcomes of students with disability at least annually "to identify and address emerging issues" and "identify and promote good practice."

Recommendation 13. Rebalance the final DIAP so students carry comparable weight to staff

What the plan says: —

The gap: Taken together, the points above reflect one structural issue: across 30 actions, the plan's centre of gravity is workforce and staff inclusion, with students — the reason the school system exists — addressed by a smaller set of actions that are also the vaguest and least scheduled. Staff inclusion matters and we support it; but it should not be the part of a school system's disability plan that is most fully developed.

We recommend: Ensure the final DIAP gives students with disability a strand of comparable weight, specificity, measurement and accountability to the staff/workforce strand — so the plan is, first and foremost, a plan for the students it serves.

4. In closing

Helen's Way welcomes the Interim DIAP and the Department's commitment to further consultation. Our recommendations are offered constructively and share a single theme: the standard the Department has set for its staff with disability — dedicated evidence, segmented and targeted measures, leadership accountability, and an independent complaints pathway — is the right standard, and it should be matched for students with disability — including the large and growing group of neurodivergent learners in mainstream classrooms. We would welcome the opportunity to contribute further as the final 2026–29 DIAP is developed.

Helen's Way — turning shared lived experience into meaningful change for neurodivergent learners. Prepared July 2026. Quotations are from the NSW Department of Education Interim Disability Inclusion Action Plan 2026–2029 (June 2026) and, where noted, the NSW Auditor-General's *Supporting students with disability* (2024) and the Advocate for Children and Young People's submission on children and young people with disability in NSW educational settings (2024), with page references as shown. helensway.au