

INCLUSIVE & SPECIAL EDUCATION 2013 – GETTING IT RIGHT FOR EVERY CHILD

CONSULTATION SUBMISSION JONATHAN STARLING

I welcome the consultation document, process and general direction of the MoEd in pursuing a renewed commitment to special needs and inclusive education, and making reforms to improve this.

In general, I am in support of this move and the policies put forward in the consultation document.

What follows below are my answers to the individual questions posed in the consultation document, to the degree that I feel able to address them, as well as some more general comments concerning the subject which I think are relevant for consideration.

Consultation Questions

- 1) *Do you agree that a new approach to inclusion and special education is needed for the public school system?*

Yes, I agree that a new approach to inclusion and special education is needed for the public school system. As noted in the consultation document, while the attempts to introduce a more inclusive education model in the 1990s was well-intentioned, the practical execution of the move was uneven and in some aspects counter-productive. Additionally, there have been advances (primarily technological, but also pedagogical/sociological) which have (or can) inform a renewed push for a truly inclusive and special education model. As such, the current consultation is welcome and opportune.

- 2) *Do you have confidence that the Ministry of Education is providing appropriate education for all students? Please explain.*

No, I do not have confidence that the Ministry of Education is currently providing appropriate education for all students.

I believe it is improving and that moves to realise the execution of the Blueprint for Reform in Education, along with initiatives such as this consultation, are steps in the right direction. However, I believe that there are limitations to what the Ministry of Education can do in and of itself. There are structural issues within our society, racial, class and gender, which continue to complicate the ability of the Ministry of Education to successfully provide appropriate education for all students. Increased cross-ministerial coordination (overcoming entrenched 'silos') is one important step towards overcoming some of these structural obstacles.

This is especially the case in as much as most, if not all, therapists (Physical Therapists, Occupational Therapists, Speech Therapists/Language Pathologists, etc.) fall under the jurisdiction of the Ministry of Health. Additionally, there needs to be a commitment from the Ministry of Finance to ensure inclusive reforms are adequately resourced; the Department of Planning has to ensure that accessibility is at the core (along with sustainability) of the built environment, the Ministry of Transport has to ensure that accessibility is central to the provision of transport for all, and the Department of Works & Engineering has to ensure that they are helping construct an accessible built environment.

I also believe that there is a need to increase our indigenous capacity as regards local educational research.

Developing a local capacity to conduct educational research will reduce intellectual dependencies on external agencies and foreign consultants, and allow questions related more directly to local needs to be asked, with more 'tailor-made' solutions developed for our context.

Education is a democratic and human right, and should have the aim to create critically conscious, empowered citizens, regardless of their background or abilities. Education and schooling must be transformed to include diverse ways of knowing that inform, challenge and affirm self, culture and community – including the differently abled. Such a pedagogy constructs and celebrates diversity and difference, respecting and honouring everyone's difference; difference here speaking about identities that connect to how we come to know ourselves, understand the world and act within it.

3) Do you have specific concerns about the current provision of special education and/or related services that you think would help inform the development of the inclusive and special education policy?

My particular concerns are primarily as regards the built environment of the education system, but also the wider built environment too. Additionally, I believe that there are ongoing misconceptions or, rather, prejudices, within society as regards differently abled individuals which we, as a society, need to address. I will expand on my concerns regarding the built environment below.

4) Do the policy priorities address the concerns that you may have about the current provision of special education and/or related services? If so, how?

I think they address many of my concerns outside of the built environment and those external to the educational system proper. I believe the consultation document makes a clear argument as regards their need and how the proposed policy priorities will improve the system.

5) What do you think of how inclusion and special education are defined? Would you define them differently? If so, how?

I believe they are appropriate and relevant definitions, which I welcome in general. At most I would suggest they could be expanded to include people of all ages, rather than being restricted in the definitions solely to school-age children, with the intention of signifying life-long learning, but overall I think they are good.

6) What do you think about the proposed philosophy for inclusive and special education?

As with question number five, I am generally in support of them and think they are progressive contributions to developing education for all. I particularly note, and commend, the support for a social model of disability approach.

7) What do you think can be done to help change beliefs about inclusive and special education?

I think much of the proposed policy priorities will go a long way to achieving this. I would also suggest that it may be useful to engage in a series of community engagement events, be it participative workshops or radio and television features.

A national conversation regarding the differently abled and the challenges that our society creates as obstacles to their realising their full potential (namely the de facto segregation system within the built environment, but also social prejudices) will help transform existing beliefs in a progressive direction. Social action to address at least the segregation effects of an able-ist built environment will also contribute to social consciousness, as well as enhancing and empowering the differently abled, allowing for an inclusive and accessible society for all.

Facilitating differently abled teachers and other workers within the education system will also help change social conceptions of the differently abled, while also providing role-models for differently abled students.

8) Do you support the proposed amendments to the Education Act 1996? Are there additional changes that you would like to see? If so, please explain.

I support the proposed amendments to the Education Act 1996 as outlined in the consultation document. Additional changes that I would propose would be providing statutory commitments to providing an accessible built environment within the educational system and those services which support and complement the educational system, primarily as regards public transportation, street design, playgrounds and sport facilities. A commitment within the Education Act 1996 to diversity training and a commitment to ensuring American Sign Language (the dominant sign language system in Bermuda) as a second language in all public schools should also be considered and would be welcome additions.

9) What are your views on the current approach to early learning (from birth to eight years) in private homecare, nurseries, preschool and in public primary school?

My primary concern here, beyond the issues/proposals raised in the consultation document, is the importance of ensuring playgrounds cater to the differently abled. Play is a key aspect of early social and educational development, and is all too often overlooked, especially as regards inclusive and special needs education. This should also extend to ensuring that the differently abled are fully empowered to participate in school sports too, although this is perhaps more relevant to middle and senior schools.

I commend the commitment in the consultation document to ensuring early detection of special needs and what I understand to be a commitment to assisting families of differently abled children outside of the school environment proper.

10) What barriers do you see to full inclusion and establishing appropriate special education and related services?

As noted above (question three) my main concern regarding barriers to full inclusion and establishing appropriate special education and related services are in regards to the built environment and transport issues, of which I expand on below. There are also, as noted above also (question seven) social structures (beliefs/prejudices) regarding the differently abled that require a national conversation to raise awareness and develop a more inclusive and progressive society.

11) Do you think that more accountability is needed for special education? If so, what do you suggest?

I broadly support the recommendations contained within the consultation document as regards this. The only additional thought I have on this is, as noted in my answer to question two, that there is a need to develop a greater indigenous capacity as regards local educational research rather than relying on external agencies and consultants.

An independent but local research capacity (involving human capital in the fields of pedagogy, sociology, psychology, the built environment/architecture and design, transport, health and even criminology – noting that the differently abled have particular challenges and threats as regards crime) would be able to advance research questions and knowledge particular and sympathetic to local context, as well as allow for an independent review of special education provision.

12) Do you believe that a whole-school approach and whole-system approach are feasible ideas for the

public school system?

As I understand them in the context of the consultation document, yes, I believe that whole-school and whole-system approaches are feasible ideas for the public school system. Indeed, I believe they are a critically necessary part of the solution.

13) How do you think that you can contribute positively to the policy proposals?

Primarily through responding to this consultation, but also by contributing to a national conversation as regards these issues, highlighting the de facto segregation system that our society perpetuates (both in the built environment and in social structures) and advocating appropriate reforms to counter this segregation.

14) What types of performance indicators or measures would you like to see regarding inclusion and special education?

I would like to see an audit of the built environment of the public education system, as regards accessibility, and subsequent reports to improving this aspect (specifically as regards access to schools, classrooms and laboratories, also adequate changing and toilet facilities, and inclusive playgrounds and sport facilities).

Also perhaps the numbers of special needs students graduating? Number of staff with adequate special needs training? I would also like to see each School Improvement Plan released to the public.

15) What types of non-personal information would you like the Ministry of Education to make public regarding inclusive and special education?

As with my response to question fourteen above.

16) Do you have any specific recommendations on how the Ministry of Education can collaborate with the public regarding the development of the inclusive and special education policy framework?

See my response to question seven.

Additional Comments

Reading over the consultation document, and responding to the consultation questions, I feel it necessary to add some additional comments I would like to contribute as regards the consultation.

The Built Environment

Throughout the consultation document there appears to be a general lack of mention regarding the built environment. The built environment can have a key part to play in ensuring inclusive education – there is, after all, no point in having key special needs programs in place if the built environment prohibits or impairs students properly utilising them!

While the accessibility of the built environment is primarily of importance for the differently physically abled, it is still a consideration in general for providing an adequate educational environment for all students, differently abled (of whatever type) or ‘normally’ abled.

Nonetheless, I will restrict my comments here primarily to concerns relating to ensuring an accessible built environment for the differently physically abled. These design features should be considered at the very beginning of new builds, and existing buildings should be audited and retrofitted when and where necessary.

Buildings/Classrooms – Classrooms (and laboratories) must be physically accessible to all, particularly taking into consideration allowing for admission and accommodation for wheelchairs and mobility scooters. Similarly, desks and work surfaces need to be designed in such a way to allow for ease of access to all to work without hindrance. Signage (identifying the class or other room, along with school directions) must be clear, preferably in large print and braille as well. At least primary entrance and exit routes should be clearly marked and either automatic or power assisted to facilitate entrance. All other doors should be sufficiently light-weight and with accessible handles to ensure ease of access. When lockers are present, these should be universally designed to be accessible for all and able to accommodate additional equipment that may be required by special needs students. All stairs should be clearly labelled in a way to alert visually impaired of their presence, and have contrast colour markings (preferably with anti-slip properties also) for the low-vision users. Where stairs exist, either a wheelchair accessible ramp or lift must be present to allow full accessibility to all areas of the building in question.

Changing Facilities/Toilets – The lack of suitable changing facilities and toilets is a key obstacle faced by differently abled individuals, particularly for those with profound and multiple learning disabilities or those with serious impairments such as spinal injuries, muscular dystrophy, multiple sclerosis or an acquired brain injury; this can lead to undignified and unhygienic situations. Readily accessible toilets must be available alongside ‘regular’ toilet facilities. In addition to standard accessible toilets (greater space, emergency alarm, grab rails, accessible washbasin) within ‘regular’ public toilets, at least one high quality accessible toilet should be available alongside ‘regular’ toilets (See [Figure 1](#)). These should include:

- A height adjustable adult-sized changing bench;
- A tracking hoist system, or mobile hoist if this is not possible;
- Adequate space in the changing area for the differently abled person and up to two carers (i.e. 3m by 4m);
- A centrally placed toilet with room either side for carers;
- A screen or curtain to allow for some privacy;
- Wide tear-off paper roll to cover the bench;
- A large accessible waste bin;
- A non-slip floor;
- A height-adjustable washbasin – or at the very least a washbasin positioned for wheelchair users;
- For gym changing facilities, a shower and floor drain should also be installed;
- Emergency alarm;
- Grab rails;



Figure 1 Example of a fully accessible toilet/changing facility¹

Playgrounds/Sports Facilities – All playgrounds should be designed to accommodate the differently abled; catering for children with impairments should not be an afterthought in playground design, but, rather, central to it. Playgrounds should be designed to ensure that children of all abilities allow for healthy risk taking, graduated challenges, a variety of play types and provision of opportunities to manipulate their environments. Inclusively designed playgrounds, factoring in these characteristics, can be of benefit to all children, regardless of their abilities. Playgrounds should be designed according to the principles of the architectural movement of 'universal design' (UD), namely: equitable use (design is useful and marketable to people with diverse abilities); flexibility in use (the design accommodates a wide range of individual preferences and abilities); simple and intuitive (the use of the design is easy to understand regardless of the user's experience, knowledge, language skills or concentration level); perceptible information (the design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities); tolerance for error (minuses hazards and the adverse consequences of accidental or unintended actions); low physical effort (can be used efficiently and comfortably and with a minimum of fatigue); size and space for approach and use (appropriate size and space is provided for approach, reach, manipulation and use regardless of the user's body size, posture or mobility). Similarly, sports facilities should be designed to allow for accessibility. See **Figure 2** for an example.

¹ <http://www.pamis.org.uk/page.php?id=28>

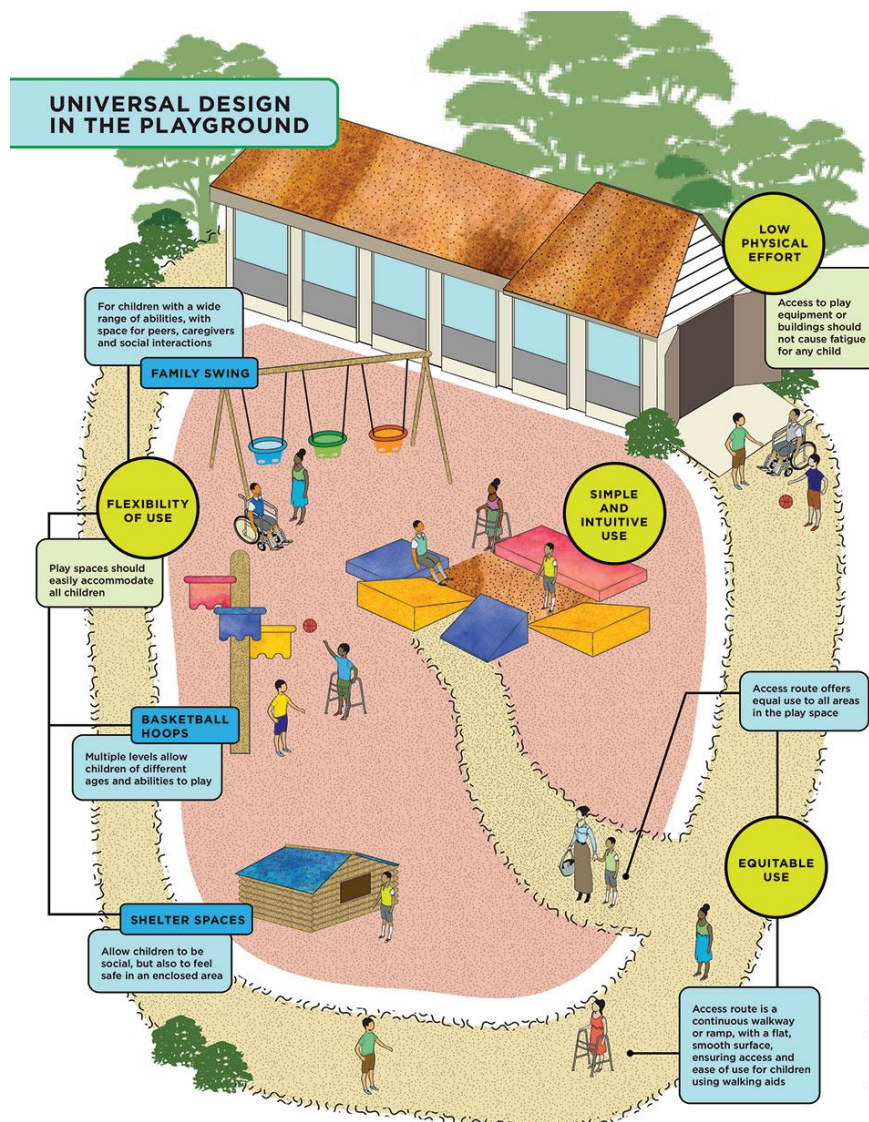


Figure 2 Example of an accessible playground²

Transport – There is no point having a properly designed inclusive school facility and special needs education system in place if students cannot travel to the school in the first place. While segregated transport options are possible, this can lead to exclusion and a loss of independence for differently abled persons. Rather, the entire public transportation system, along with streets, should be designed with the principle of inclusiveness as a key design principle. While the ferries are generally accommodating for the differently abled, the bus system is not. There are only a handful of buses with the capacity to accommodate wheelchairs and mobility scooters, but they do not appear to be used in this capacity to date. Furthermore, the physical infrastructure of the bus system, specifically bus stops and accompanying pedestrian access of streets, are generally poorly designed to be inclusive. Additionally, signage and information displays can be improved, such as having information available at wheelchair height, clear signage including large print, dynamic information (at least at the bus/ferry terminal and on busy routes) indicating timings or notifications (breakdowns, work stoppages, etc.), including audio notification of key stops (schools, community amenities, attractions). See Figure 3 for some examples of accessible bus features which could be incorporated into Bermuda’s public transportation system.

² See UNICEF - http://www.unicef.org/sowc2013/universal_design.html



Figure 3 Examples of accessible bus features

It is important to note that redesigning streets and public transport with the central principle of inclusiveness (along with sustainability!) benefit not only students and the principles of inclusive education, but also the wider society, including tourists and locals. Additionally, wheelchair accessible buses are also accessible for minders of young children that require the use of prams or buggies.

Building on the final note of the section on *Transport*, while my primary focus has been on the built environment as regards the education system, the built environment of our wider society remains largely segregationist regarding the differently abled. While there are ongoing improvements, particularly in the phased redesign of Hamilton streets, the principles of inclusive design and accessibility have yet to fully transform our society away from de facto segregation. Not even the Senate is physically accessible for example! The lack of adequate transport aids and abets the isolation of differently abled members of society, presenting a very real barrier to their full active participation in society, as well as regards working. Also, the lack of adequate and accessible toilet facilities is a particularly distressing barrier in this regards. At a minimum, every public building should be designed with the principles of inclusion and accessibility at the very beginning, and existing buildings retrofitted to overcome these barriers. Public toilets should incorporate both standard and enhanced amenities for differently abled (as noted above) and these should be provided for in every public building. Similarly, commercial buildings should adopt these principles at the design phase for new builds, and be retrofitted otherwise.

Quite frankly, failure to do so (for both public transport/buildings/streets and commercial buildings) should be seen as a violation of human rights, and subject to prosecution accordingly.

Graduation Certification

It is not clear to me to what degree the graduation certification process, primarily the transition from secondary school (or equivalent) to 'post-education' will be adequately equivalent/equitable between special needs students and others; in this context in reference to those students with profound and multiple disabilities. I feel this aspect needs explored in greater detail.

American Sign Language Instruction

American Sign Language (ASL) is, for historical reasons, the dominant signing language for the deaf and/or hearing impaired in Bermuda. It is also classified as a 'foreign language' in at least forty states of the USA³. As such, ASL is accepted as a fulfilment of foreign language requirements for hearing as well as deaf students in

³ See for example <http://www.ncssfl.org/links/ASL.pdf>

these states⁴. Additionally, instruction in ASL may heighten awareness of human diversity, as well as allow for signing students to interact more fully with her peers. As such, ASL should be introduced as a second-language option within the public school curricula. Also, all front-line public service workers should be trained in at least basic American Sign Language, and interpreters made available within the criminal justice system, while local television production (especially news) should feature an interpreter or, at the very least, closed captioning. These introductions will help with transforming social attitudes towards special needs education, as well as break down some barriers that the deaf and hearing impaired routinely face.

Sports

There did not seem to be any mention of incorporating inclusive and special needs education principles to that of sports. Sports, and exercise more generally, like play, are a key part of child development and social interaction, as well as part of a healthy lifestyle. School sports programs need to fully incorporate the principles of inclusiveness and special needs education in order to involve all students and avoid segregation, stigma and lack of exercise. Perhaps it is necessary to initiate a National Strategy for Sport and Play which incorporates inclusivity as a key principle and one that will complement the current consultation regarding inclusive and special needs education?

Active Participation of Relevant NGOs

It is not clear to what degree key relevant NGOs/charities (such as the Bermuda Islands Association of the Deaf, the Bermuda Society for the Blind or the Bermuda Autism Support and Education Society) are to be involved as active participants going forward (beyond the consultation process itself). Specifically, there would appear to be a role for these organisations to be actively involved in an ongoing sense as regards the development of individual School Improvement Plans, the Complex Needs Plans (Policy Priority Eight) and the Special Education Advisory Committees (Policy Priority Twelve). These organisations should be involved not in a passive or tokenistic sense but as equal and active partners with the schools and the Ministry of Education in developing, implementing and continuing inclusive and special education.

Post-Secondary Education

It is not clear to me to what degree the consultation document is fully addressing the transition from secondary education to post-secondary education, either at the Bermuda College or overseas. As regards the Bermuda College the concerns noted above regarding the built environment are relevant (I note in the introductory pages to the consultation document that mention is made of instituting automatic doors there to enhance accessibility).

It is important that, as with any young person leaving school, the young adult with learning disabilities/differently abled gets the opportunity to use further and higher education to learn skills that relate to social skill development, daily living skills and continuing education and begin what could be a long journey for preparation for work. Due to the challenges that certain impairments/special needs students face, there are additional costs involved in pursuing post-secondary education, be it at Bermuda College or elsewhere.

To help compensate for these added costs, students attending Bermuda College should be eligible for additional discounts regarding tuition or incidentals. Additionally, funds should be set aside to serve as scholarships specifically for differently abled/special needs students wishing to pursue further education opportunities overseas.

Additionally, it is not clear to me to what degree Bermuda College is able to support special needs students. A search of their website provides only a brief mention in the Code of Conduct regarding students having a 'right to'

⁴ See for example http://www.cal.org/resources/digest/digest_pdfs/ASL.pdf

‘resources in support of identified special needs’ and that the College has a ‘responsibility to’ ‘initiate attention to special needs’⁵. It would be useful for the College to provide more accessible details about what services they currently provide in this regards, and an annual review of how to ensure they are living up to their responsibilities in this area. In other jurisdictions there are support staffs who are dedicated to helping special needs students in the academic environment, including specialised services such as classroom assistants – if this is not already the case in Bermuda then this might be something worth considering.

Carers

I feel that the consultation document should provide more attention to the role of carers, and their rights and responsibilities within the education system. At a wider level, there is no legislation which I am aware of which provides protection and support for carers in our society, be they for the differently abled, the infirm or the aged. There is legislation in external jurisdictions, such as the UK⁶, which could be consulted and adapted for a Bermudian context, in partnership with relevant entities in Bermuda.

Careers Advice

While the consultation document makes clear reference to the importance of transition planning for special needs students, it is not clear to what degree this transition planning incorporate career advice on employment, training and further education. I believe this is an aspect which can be clarified and improved upon, and, if necessary, programs to offer a place in training or work placement for special needs students could be developed.

Role Models

Too often our society views special needs or differently abled persons as victims or non-productive members of society, a view which reflects and reinforces prejudice and damages the self-esteem of special needs or differently abled persons. In extreme cases this can lead to mental health problems (such as depression or self-harming) or substance abuse. It is important, therefore, to demonstrate positive images and role models of differently abled individuals. This could involve facilitating differently abled teaching staff or school workers, guest speakers or even a public campaign highlighting the successes of differently abled individuals in our society. Not only could this contribute to overcoming social biases but it could also contribute to greater self-esteem and confidence for current students.

Terminology

There is some concern that while the various terms are adequately defined at the very beginning of the document, they are at times interchanged throughout the document and it is not always clear, arguably, what, in particular, is being referenced. No doubt my own submission is guilty of the same, but it is worth taking extra care with in the final development of the policies in question.

⁵ See: <http://www.college.bm/orientation/files/Code%20of%20Conduct.pdf>

⁶ See, for example: <http://www.nhs.uk/carersdirect/guide/rights/pages/carers-rights.aspx>

Final Remarks

In concluding, I would like to reaffirm once more that I welcome the renewed focus by the Ministry of Education in committing to inclusive education, and I particularly commend the Ministry for engaging in public consultation on this matter. This can only help to ensure that the rights of the differently abled are truly considered, and that the challenges they face in our society can be identified and removed.

There remains much that needs to be addressed regarding the way our society treats the differently abled in our society. Throughout this document I have used the term 'segregation' and 'prejudice' to refer to the discriminatory nature of our built environment and social structures and mentalities. I realise some will perhaps take exception to these choices of words. However, I can think of no more adequate words to describe the barriers (social and physical) that our society produces and maintains.

There are different reasons why our society should be taking action to remove these barriers and to develop a truly inclusive society. There are economic reasons, be it in ensuring all members of society are productive and contributing economically, or not being treated as dependents 'draining' the resources of society, or even in recognising that a truly inclusive society and environment could capture the 'silver' or 'disabled' dollar in terms of potential tourists. There are social reasons too, such as ensuring everyone is able to reach their full potential; that everyone is contributing actively to our social culture; that our society is in active celebration of human differences.

All these are good reasons for taking action. However, even without these reasons, removing social and physical barriers and developing a truly inclusive society is a human right; it is, quite frankly, the right thing to do and it is our duty as a society to realise these human rights.

I look forward to reading the final policy document and I am hopeful that this will contribute to a wider commitment to building a truly inclusive society in the future.

Yours sincerely,

Jonathan Starling.