



ACT Council of Parents & Citizens Associations

The parent voice on public education

Council Comments on Safe and Supportive Schools Policy and Guidelines

The ACT Council of Parents & Citizens Associations (Council) is the peak body for government school parents and citizens associations in the ACT. Council's objective is to foster a quality public education system, provide support services for affiliates and make representations to government on behalf of parents.

Council welcomes the opportunity to comment on the new safe and supportive schools policy and guidelines. Council recognises that these changes are a huge step forward and are a vast improvement from previous frameworks. Council's concerns are mainly limited to what is not currently included in these documents. The bulk of the proposed changes are currently adequate.

Reporting and Oversight requirements

As currently outlined in the guidelines, whenever a restrictive practice is approved as part of a Positive Behaviour Support Plan and Protective Action Plan and used to intervene in an emergency situation, the relevant School Network Leader is to be notified. While Council believes it is appropriate for the School Network Leader to be included in the reporting framework, in the interests of transparency and accountability an independent (that is, external to the Education Directorate) body/individual should be notified. Existing government frameworks could be utilised. For example, the Community Services Directorate has a Human Services Registrar (http://www.communityservices.act.gov.au/disability_act/national_disability_insurance_scheme/safeguards-and-quality) who is an individual charged with responsibility for administration of the amendments to the *Disability Services Act 1991* and *regulating the disability sector to ensure compliance with standards established under law*. Alternately, the Children and Young People Commissioner may be a more appropriate person.

Withdrawal spaces

While withdrawal spaces are mentioned in the policy and guidelines, Council believes they should be further defined and addressed. For example, what are these spaces used for? What are they supposed to look like? Parents must provide permission for their child to use this space. The spaces should be used within a broader plan to teach emotional regulation. That is, the withdrawal space is not just for time out and seclusion should not be misconstrued by teachers as a form of punishment. The role of the withdrawal space and how it should be used appropriately should be outlined more clearly in the official guidelines. In order to

effectively regulate their use system-wide it is imperative these questions are addressed.

Functional behavioural analysis

The guidelines should state that Functional Behaviour Analysis should be undertaken by psychologists or other professionals with the same level of professional accreditation and training in the area.

Mechanical and chemical restraint

Currently mechanical restraints aren't expressly banned in the policy or guidelines. Council recognises that there are a wide range of practices that could fall under this definition. For example the use of therabands around chairs. Usually they are a sensory aid to tie around chair legs and for the child to bounce their legs with, however they have also been used to secure a child in their chair by stretching them over a child's lap like a seat belt. If the pressure of the theraband on a child's lap helps them sit happily, and the child can pull it off any time, then this is probably acceptable. However, this area is open to misuse. Therefore Council seeks clarification in regards to definition of mechanical restraints, scope of use, the role of an occupational therapist (or similar allied health therapist) in the training in the use of particularly sensory aides and supports, and particulars as to parental approval.

Council seeks similar clarification around the use of chemical restraint.

Further assistance for teachers

Commitment to assist and train teachers with understanding and implementing the policy and guidelines. Ideally, Council believes it should be mandatory for all teachers to undertake professional development in this area on a regular basis. At a minimum teachers regularly in contact with students who have a Protective Action Plan or Positive Behaviour Support Plan should be appropriately trained in restrictive practices and body mechanics. All teachers should be offered debriefing or counselling after events and this should be entrenched within the guidelines. It should be acknowledged that teachers require significant and ongoing support if they are managing a child with complex needs.

What if parents do not sign off on the protective action plan?

The question remains: what if parents do not sign off on the protective action plan? This is an eventuality that needs to be planned for. Council suggests that someone from the directorate level should be invited to the school to mediate a session between the school and parent/s in order to reach an agreement. Council recognises that if a protective action plan is not able to be enacted, that staff, students and the individual child may not be safe. However, Council prefers mediation as a means to find a solution for the family and school.

Templates and flowcharts

As in other Directorate policies and guidelines, a series of templates should be developed and included in this framework. For example, what does a protective action plan look like? What does a positive behaviour plan look like? What needs to be included in each? Currently every school needs to come up with it's own version and the quality varies. Additionally, flowcharts can assist staff members and parents in understanding the complex reporting procedures. By outlining the steps that need to be taken by certain individuals, duties and responsibilities can be easily tracked.

Implementation

Council highlights the importance of effective implementation. While words on a page are a good start, they need to be backed up by real action. Monitoring and review mechanisms are included in the policy and Council requests further consideration is given to other ways in which the implementation of the policy framework can be tracked and assessed.