

**Australian Autism Alliance**

# **Submission to Department of Education**

## **2025 Review of the Disability Standards for Education consultation**

**Education is key to life chances**

### **Acknowledgements**

We acknowledge the First Nations and Traditional Owners of the land, sea and waterways and pay respects to Elders past, and present and recognise those whose ongoing effort to protect and promote Aboriginal and Torres Strait Islander cultures will leave a lasting legacy for future Elders and leaders.

We recognise the enduring connection that First Nations peoples have to land, waters, culture, and community. This land was, is, and always will be Aboriginal land.

We acknowledge the individual and collective expertise of those with a living or lived experience of disability, as well as the lived experience of people who have been carers. We recognise their vital contribution at all levels and value the courage of those who share their unique perspective for the purpose of learning and growing together to achieve better outcomes for all.

**21 November 2025**

via online submission portal

Dear Department of Education Consultations team,

The Australian Autism Alliance (Alliance) welcomes the opportunity to make this submission on the Review of the Disability Standards for Education. We have considered recommendations in the context of the questions identified in the Department of Education consultation paper.

## About the Australian Autism Alliance

[www.australianautismalliance.org.au](http://www.australianautismalliance.org.au)

The [Australian Autism Alliance](http://www.australianautismalliance.org.au) (the Alliance) was established in 2016 and aims to be a strong voice for autism and improve the life chances of autistic people and facilitate collaboration within the autism community. The members represent a cohesive national network of key organisations with a diverse focus on autism – that is led by autistic people, advocacy groups, peak bodies, service providers, and researchers.



We:

- are Australia's first diverse collaborative network of autism organisations bringing together a range of autism interests.
- are a funded Disability Representative Organisation (DRO) since 2024 advocating reach well over half a million people through our communication channels and provide support to Autistic people across the lifespan from early childhood to adulthood. Most importantly, our work is informed by Autistic people and the Australian Autism community
- have significant national and international linkages for advocacy, research and service delivery.
- worked with government to secure pre-election commitments for the National Autism Strategy and National Health and Mental Health Roadmap
- continue to support government through being active in various roles and representations, including: DHDA DRO forums, the NDIA Autism Advisory Group, the NDIA DRCO Co-Design Advisory and Reform groups, NDIS Commission Disability Sector Consultative group, National Autism Strategy Oversight Council member, National Health and Mental Health Roadmap for Autistic people, and Children's Expert Advisory Group
- have been a witness at a number of inquiries including the Senate Inquiry into Autism and the NDIS Capability and Culture of the NDIA.
- commissioned the largest and most comprehensive community consultation survey of Autistic people and their families and carers in Australia to inform the Senate Inquiry into Autism with over 3,800 responses received.

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# 1.0 EXECUTIVE SUMMARY

## 1.1 Introduction

Autistic students comprise a significant and diverse cohort within Australian education systems. Despite the Standards being in place for twenty years, the lived experiences of Autistic learners, their families, and the broader Autism community demonstrate that the Standards are not delivering equitable, contemporary educational access, participation, or outcomes.

The weight of evidence from Autistic-led organisations, the Disability Royal Commission, the Senate Select Committee on Autism, the National Autism Strategy consultations, Autism CRC research, universities and extensive lived experience testimony demonstrates persistent systemic failures.

These include a range of issues such as discrimination, unmet adjustment needs, informal exclusions, unsafe sensory environments, inconsistent decision-making, inaccessible complaints pathways, and significant inequities across jurisdictions and educational sectors. Autistic learners requiring very substantial support have a compounding disadvantage and are frequently invisible in existing educational frameworks.

This Review provides a critical opportunity to modernise the Standards, so they reflect contemporary Autism knowledge, embed enforceable obligations, and align with the Australian Government's commitments to disability rights, inclusive education, and the National Autism Strategy.

## 1.2 A Strong Voice for Autism

Within this submission, the Alliance recommends a strengthened, Autism-informed Standards framework that moves beyond guidance to mandatory obligations, supported by a national oversight mechanism and consistent national data collection.

In its role as the national Disability Representative Organisation (DRO), providing a strong voice for Autistic individuals and the autism community, the Alliance urges the Australian Government to adopt a modernised, neuroaffirming Standards framework that shifts responsibility away from Autistic students and families/carers and places it firmly on education providers, educators and regulatory systems.

This must include enforceable obligations, consistent implementation, national oversight, accessible real-time resolution pathways for raising concerns, and measurable accountability.

Autistic students deserve safe, supportive, neuroaffirming and inclusive learning environments where they can participate, learn, thrive and transition safely into the rest of their lives. A reformed Standards framework must reflect this commitment and ensure that Autistic learners across Australia can access education opportunities on the same basis as their peers.

## 1.3 Summary of Key Reform Priorities for this Review

Australia's Disability Standards for Education must be rewritten to provide clear, enforceable protections for Autistic students and also be supported by a National Human Rights Act. The evidence is consistent across the Disability Royal Commission, the Senate Select Committee on Autism, the National Autism Strategy consultations and the Alliance's own research:

### **Autistic students continue to face serious and preventable barriers to safe, equitable and meaningful education.**

While this submission includes many more recommendations for reform, the Alliance recommends the following key reforms as priorities:

#### **1. Introduce Enforceable Obligations Across the Standards**

The Standards must move from optional guidance to **mandatory, enforceable requirements**. Schools and systems should be legally required to identify and remove barriers, implement adjustments consistently, ensure sensory-safe environments, and prevent discrimination.

#### **2. Establish a National Education Inclusion Regulator**

A national body must oversee compliance, collect data, conduct audits, investigate systemic failures, and require improvements. Without oversight, obligations cannot be upheld.

#### **3. Embed a Positive Duty to Prevent Discrimination**

Education providers must be required to proactively identify and eliminate barriers, rather than rely on families to defend their rights after harm has occurred. This can be supported by a National Human Rights Act.

#### **4. Mandatory Autism-Informed Workforce Capability**

All staff across early childhood, schools, VET, universities and assessment authorities must receive co-designed, Autism-informed training in sensory regulation, communication diversity, co-regulation, trauma-informed practice and inclusive classroom support. A tiered competency framework for every level of interaction.

#### **5. National Standards for Reasonable Adjustments**

Adjustments must be clear, timely, documented and enforceable. Continuity across transitions must be guaranteed, with transparent criteria and review mechanisms.

#### **6. Autism-Informed, Accessible Decision-Making and Complaints Pathways**

The Standards must require accessible consultation with Autistic students and families, documented decision-making processes, and complaint pathways that are safe, transparent and trauma-informed. This includes requiring education providers to act on concerns promptly and effectively.

#### **7. Stronger Responsibilities for Assessment Authorities**

Senior secondary, ATAR, VET, university and accreditation bodies must be required to provide consistent, Autism-informed adjustments; maintain continuity of supports; publish criteria; and report on approvals and refusals.

#### **8. Eliminate Seclusion and Make Restraint Extremely Limited and Regulated**

Seclusion should be prohibited. Where restraint is used in immediate emergencies, it must be documented, reported and reviewed. Schools must adopt preventive, trauma-informed behaviour supports.

### **9. Address School Distress, Bullying and Informal Exclusion**

The Standards must recognise attendance distress as an accessibility issue, require early intervention, prohibit informal exclusion, and mandate Autism-specific bullying prevention measures.

### **10. Guarantee Sensory and Communication Accessibility**

Sensory safety must be treated as a core accessibility obligation. Adjustments must include predictable routines, quiet spaces, communication supports, and co-regulation tools.

### **11. Recognise and Respond to Intersectionality**

The Standards must explicitly address the needs of Autistic students who identify as:

- girls, women or gender-diverse
- First Nations
- CALD
- intellectually disabled
- requiring very substantial support
- living in rural or remote communities.

Culturally safe, gender-responsive and accessible practices must be mandatory.

### **12. Strengthen Data Collection and National Reporting**

Governments must collect and report data on:

- adjustment provision
- bullying
- restraint and seclusion
- attendance
- transitions
- pathways and outcomes
- intersectional groups

Public reporting is essential for transparency and accountability.

### **13. Align the Standards With the National Autism Strategy and DRC Recommendations**

The revised Standards must operationalise NAS Action 4.2 and implement relevant Disability Royal Commission recommendations, including eliminating restrictive practices and addressing segregation.

### **14. Ensure Flexible and Supported Learning Pathways**

Schools must be required to provide supported blended, part-time, distance or specialist options. Autistic students must not be forced into unsupported home education due to unsafe or inaccessible mainstream environments.

## **Conclusion**

These reforms are necessary to ensure that Autistic students can access education on the same basis as their peers. The revised Standards must deliver enforceable protections, strong accountability and practical change across every part of Australia's education system.

## 2.0 INTRODUCTION

The Australian Autism Alliance (the Alliance) welcomes the opportunity to provide this submission to the Review of the Disability Standards for Education 2005 (the Standards). We represent Autistic people, their families, advocates, service providers, community organisations, and allies across Australia. The Alliance's position is grounded in Autistic-led expertise, lived experience, and the principles of human rights, dignity, and full participation in education.

Autistic students represent a significant and diverse cohort within Australian education systems. Autism is a lifelong neurodevelopmental disability with varied impacts across communication, sensory processing, executive functioning, emotional regulation, social interaction, and learning styles. The Alliance emphasises that Autism is **not** a linear continuum from "mild" to "severe". Instead, Autistic people experience a **multidimensional spectrum** of strengths and support needs. This understanding is essential for educators, governments, and assessment authorities when designing systems that enable equitable access and participation.

The Standards have been in place for twenty years. While their intent is strong, the evidence shows that Autistic students continue to experience discrimination, informal exclusion, unmet adjustment needs, unsafe environments, and inconsistent decision-making across jurisdictions and education sectors. The result is a persistent gap between the rights of Autistic students and their lived experiences in classrooms, playgrounds, specialist units, alternate settings, universities, and VET pathways.

This Review provides a rare and critical opportunity to modernise the Standards, so they reflect contemporary Autism knowledge, align with the National Autism Strategy, and embed enforceable obligations to prevent discrimination within educational settings rather than responding to it after harm occurs. The Alliance strongly supports the inclusion of **clear, mandatory, enforceable obligations**, complemented by a national oversight mechanism to ensure consistency and accountability.

Our submission draws on the following categories of testimonies describing the lived experiences of Australian Autistic individuals and the nation's Autism community and evidence drawn from the following sources:

- Autistic-led organisations
- Findings of the Disability Royal Commission
- Government responses to the Senate Select Committee on Autism
- Research from the Autism CRC and other published academic sources
- Consultation reports from families, carers, and Autistic communities
- Alliance-commissioned studies on inclusive education
- Cross-sector evidence from mainstream, Catholic, independent, and tertiary providers.

We propose reforms to ensure that Autistic students - across the full spectrum of support needs - can learn, participate, and thrive in safe, respectful, and inclusive environments

## 3.0 PRINCIPLES AND FOUNDATIONS

The Alliance recommends that the revised Standards explicitly embed the following principles, drawn from Autistic-led evidence, Government commitments, and human rights frameworks.

### 3.1 Autism as a multidimensional spectrum

The Standards must recognise that Autism is **diverse**. Each Autistic student has a unique profile of strengths, sensory needs, communication preferences, and support requirements. A linear “severity” spectrum fails to capture this. A multidimensional understanding - similar to a circular or radial model - is more accurate and better reflects lived experience and contemporary research.

This principle supports the requirement that education providers assess **individual student needs**, and not rely on diagnostic labels, stereotypes, or assumed characteristics.

### 3.2 Safety and dignity

Sensory safety is as fundamental as physical safety for many Autistic students. Learning environments must proactively address lighting, noise, crowding, temperature, and sensory unpredictability. For some Autistic students, an unsafe sensory environment is disabling and creates immediate barriers to participation.

Dignity requires that Autistic students be treated with respect, assumptions of capacity, and autonomy in communication. Non-speaking Autistic students must be explicitly recognised as requiring communication supports without assumptions about competence.

### 3.3 Rights-based education

Autistic students have the right to access and participate in education on the same basis as non-disabled students, consistent with the Disability Discrimination Act 1992 (DDA). Complaint-driven enforcement is insufficient.

It is absolutely essential that a modernised Standards framework must:

- prevent discrimination before it occurs
- mandate implementation of adjustments
- ensure all providers and educators understand their legal obligations
- embed monitoring, accountability, and continuous improvement.

### 3.4 Visibility of Autistic students requiring very substantial support

Evidence from National Autism Strategy (NAS) consultations and the Disability Royal Commission shows that Autistic learners requiring very substantial support are often hidden within generic disability categories. This invisibility results in inadequate adjustments, restrictive practices, and inconsistent access to safety, communication supports, and skilled staff.

The Standards must explicitly reference and consider the needs of Autistic students with high and complex support requirements.

### **3.5 Co-design and lived experience leadership**

All reforms to the Standards must be co-designed with Autistic people and with families and carers of Autistic students, including those using AAC or non-speech communication and/or requiring very substantial support. Co-design must be ongoing, respectful, representative and accessible.

### **3.6 Alignment with national policy**

The Standards should align with:

- the National Autism Strategy and its First Action Plan (particularly Action 4.2)
- the Australian Government's response to the Senate Select Committee on Autism
- relevant Disability Royal Commission recommendations
- national and state commitments to inclusive education.

This alignment will ensure that expectations across systems are consistent, Autistic-informed, and enforceable.

## 4.0 ALIGNMENT WITH THE ToR

This submission directly responds to each Term of Reference (ToR) of the 2025 Review, firmly grounding its recommendations in the evidence base and lived experience of Autistic students and the Australian Autism community.

### 4.1 ToR 1- Effectiveness of the Standards

Sections 4, 5, and 6 detail the significant gaps in implementation, including inconsistent provision of adjustments, informal exclusion, lack of sensory safety, poor teacher capability, and absence of monitoring or enforcement. Evidence from Autistic-led organisations, the Disability Royal Commission, NASOC consultations, and government sources demonstrates that the Standards are **not achieving their intended purpose** for Autistic students.

### 4.2 ToR 2 - Experiences of students, families, carers, and educators

Autistic students and families consistently report barriers including:

- bullying and discrimination
- lack of adjustments
- trauma from restrictive practices
- exclusion from excursions, camps, playgrounds, workplace learning, and assessments
- poor transition planning
- limited consultation.

These experiences are integrated throughout Sections 4–8 with direct lived experience testimony.

### 4.3 ToR 3 - Effectiveness of obligations and requirements

Current obligations are vague, inconsistently understood, and unequally applied across jurisdictions and sectors. Sections 4 and 6 demonstrate the need for:

- clear duties
- mandated implementation
- national consistency
- continuity of adjustments
- Autism-specific guidance
- transparent monitoring and reporting.

### 4.4 ToR 4 - Opportunities for improvement

Each section of this submission includes evidence-backed reforms - including mandatory obligations, sensory safety, national oversight, strengthened consultation, and alignment with national Autism and Disability policy.

## 4.5 ToR 5 - Implementation and support

Sections 4, 5, and 9 outline requirements for systemic enablers including:

- Autism-informed professional development
- teacher capability frameworks
- accessible complaints pathways
- national data collection
- accountability mechanisms
- co-designed guidance and resources.

## 5.0 TOPIC 1: EFFECTIVE IMPLEMENTATION OF THE STANDARDS

### 5.1 Overview

Despite being in place for two decades, the Disability Standards for Education have consistently failed to deliver equitable access and participation for Autistic students. Evidence from Autistic-led organisations, the Disability Royal Commission (DRC), national inquiries, and multiple reports demonstrate ongoing systemic failures including:

- failure to identify, implement, and monitor reasonable adjustments
- inconsistent and subjective application of obligations across jurisdictions
- discrimination and bullying
- restrictive practices, seclusion, and unsafe environments
- informal exclusion (“soft suspensions”, partial attendance without consent)
- lack of Autism-informed teacher capability
- absence of systemwide monitoring and enforcement
- reliance on complex, adversarial complaints processes.

The Alliance considers that the central flaw in the Standards is that they **do not operate as enforceable obligations**, but instead as interpretive guidance that places the burden on families and Autistic students to advocate, escalate, and dispute.

A modernised Standards framework must create enforceable duties, Autism-informed practices, and systemic oversight to ensure that Autistic students can access and participate in education on the same basis as their non-disabled peers.

### 5.2 Implementation barriers faced by Autistic students

#### 5.2.1 Informal exclusion and part-time attendance

Autistic students are frequently subject to:

- reduced school hours
- early pick-ups
- flexible timetables imposed without genuine consent
- “soft suspensions” (sent home due to behaviours arising from unmet needs).

These practices are largely invisible in current reporting systems and often contravene the Standards, yet they continue unchecked because implementation obligations lack enforceability.

Meeting notes from consultation with providers and family groups confirm that reduced attendance is often used instead of providing appropriate adjustments, sensory safety, or Autism-informed behavioural support.

#### 5.2.2 Sensory safety as a fundamental requirement

For Autistic students, sensory overload is not “discomfort”; it is a **barrier to access** and a **threat to safety**.

The Standards currently frame physical safety as fundamental but fail to recognise sensory safety as equally essential.

Evidence from Autistic lived experience, Autistic-led research, and previous Alliance submissions and Autism community consultations repeatedly demonstrates that sensory environments in

educational/learning settings (e.g. noise, lighting, crowding, temperature, unpredictability etc.) can cause:

- distress
- shutdown or meltdown
- physical pain
- loss of communication capability
- school refusal
- behavioural escalation, often misinterpreted as defiance.

Sensory safety must be treated as a core access requirement.

### **5.2.3 Implementation depends on teacher capability - which is inconsistent (to frequently)**

Teachers of Autistic students consistently report feeling:

- under-prepared
- unsupported
- unclear about Autism and adjustment requirements
- unsure how to resolve conflicting advice between NDIS clinicians and education policy
- ineffective and unaware about ways to support Autistic students
- unsure of their responsibilities for Autistic students' learning outcomes, and if not theirs... then whose?

Autistic students rely on teachers who understand:

- sensory regulation
- co-regulation
- communication diversity
- executive functioning challenges
- the impacts of trauma
- Autistic learning profiles.

Teacher capability cannot be left to chance or local discretion. Autism-informed training must be national, mandatory, and embedded in both educator qualifications and ongoing professional learning.

### **5.2.4 Inconsistent documentation and decision-making**

Adjustment decisions are often:

- informal
- undocumented
- not revisited
- not communicated in accessible ways
- based on individual preference/s rather than rights.

Autistic students with high support needs are the most likely to experience educational gaps because they frequently rely upon structured planning, consistent routines, clarity and continuity across settings.

### **5.2.5 Bullying, discrimination, and traumatic experiences**

Data from Alliance-commissioned research and the GCG Presentation repetitively shows that:

- Autistic students face significantly higher rates of bullying compared to non-Autistic peers
- discrimination (teacher and peer-based) is widespread

- lack of supervision in playgrounds and common areas increases risk
- exclusions from excursions, camps, and practical subjects occur frequently and inconsistently at all levels of education.

Lived experience evidence from the Alliance's 2020 Senate Inquiry Submission consistently documented repeated accounts of the following occurring in educational settings:

- restraint and seclusion
- being isolated due to sensory needs
- punishment for communication challenges
- trauma associated with school experiences
- long-term impacts and trauma leading to avoidance of further (e.g. tertiary) education.

These experiences clearly reflect systemic issues, not isolated incidents.

### **5.2.6 The five-domain Autism needs framework**

The GCG Reports identify a five-domain framework critical for understanding Autistic student support needs, as follows:

1. **Social competence**
2. **Behavioural distress and support**
3. **Cognitive and learning needs**
4. **Sensory processing and regulation**
5. **Family context and previous interventions.**

This framework should inform all future guidance for national adjustments and educator training.

## **5.3 Implementation varies between systems**

The many and varied differences across Australia's national and state education systems and providers, i.e.

- government
- Catholic
- independent schools
- universities
- VET providers
- training and assessment authorities.

...result in highly inconsistent experiences.

Without a national regulator or oversight body, the Standards cannot ensure consistent implementation.

## 5.4 Recommendations for reform

### ***Reform 1: Introduce a National Positive Duty***

The Alliance strongly recommends embedding a **legislated positive duty** requiring education providers to proactively:

- identify adjustments
- prevent discrimination
- ensure safe and inclusive learning environments
- consider sensory and communication needs
- monitor and document adjustments.

This shifts responsibility to education providers, where it belongs.

### ***Reform 2: Establish a national regulator for monitoring compliance***

It should now be obvious all involved in the Review that complaints-driven enforcement is inadequate.

A regulator should:

- monitor compliance
- collect national data
- publish annual reports
- investigate systemic breaches
- issue improvement notices
- provide Autism-informed guidance.

This aligns with Federal Government recognition that Autism-specific systemic improvements are urgently needed.

### ***Reform 3: Mandatory Autism-informed training***

Training must be national, mandatory, and co-designed with Autistic people and the Autism community, ensuring ALL teachers and staff can:

- understand and identify sensory environments
- communicate effectively with Autistic students across the diversity of the spectrum
- understand and use co-regulation strategies
- design Autism-informed learning adjustments
- understand trauma impacts and their responsibility to avoid these.

### ***Reform 4: Implement the national standard for reasonable adjustments***

The revised Standards should include:

- clear timeframes
- required documentation standards
- minimum of Autism-informed adjustments
- processes for review
- continuity across transitions of all types, across all educational settings and levels.

### ***Reform 5: Annual reporting of adjustments and outcomes***

Representational, audited and verified data should include:

- adjustment approvals and refusals

- informal exclusions
- restraint and seclusion
- attendance patterns
- playground and co-curricular inclusion
- demographic and intersectional insights.

## 6.0 TOPIC 2: INCLUSIVE DECISION-MAKING

*The Australian Autism Alliance supports Option 3: Mandatory obligations.*

### 6.1 Overview

Consultation, issues resolution, and complaints processes are essential to ensuring Autistic students can access and participate in education on the same basis as others. However, current processes are inconsistent, non-transparent, and *frequently* inaccessible to Autistic students, most particularly non-speaking students and those with very substantial support needs.

The Alliance strongly supports **Option 3: Mandatory Obligations** because:

- compliance cannot rely on goodwill
- Autistic voices must be recognised as central, not optional
- parents and carers must be included in decision-making, especially in high-support contexts
- existing informal practices exclude and/or silence Autistic learners and the Autism community
- mandatory structures are designed to prevent performative or tokenistic engagement with Autistic learners (which is again, all too common).

### 6.2 Barriers to inclusive decision-making

#### 6.2.1 Autistic students and their families/carers are rarely consulted meaningfully

Incontrovertible and repeated evidence shows that:

- Autistic students are often excluded from informed, meaningful individual planning
- non-speaking Autistic students are frequently assumed to be incapable of participation
- consultation is usually shaped around adult convenience and preferences
- sensory and communication needs, along with unequal power distribution(s) limit participation in poorly designed meetings.

Mandatory obligations must specify how Australia's education providers meaningfully involve Autistic students using accessible and alternative communication methods.

#### 6.2.2 Parents and carers face adversarial and dismissive processes

The NASOC Focus Groups highlighted the following, further contributing to poor educational outcomes for Autistic students:

- parents' expertise is frequently dismissed/gaslit
- inconsistent communications between educators and families/carers
- lack of documentation/evidence of communications, undertakings, actions etc.
- increased conflict when requesting adjustments
- limited understanding of cultural and linguistic needs
- unequal distribution of power within meetings/discussions
- Fear of repercussions aimed at the student when educators are "in control", e.g. classroom bullying, poor educational outcomes, exclusion, punishment/cruelty etc.

The families of the Autistic students requiring very substantial support report the greatest barriers and stressors. It does not follow that the experiences of those requiring fewer adjustments and supports are any less limiting and/or traumatising and injurious.

### 6.2.3 Complaints systems are inaccessible and unsafe

There is much evidence to support the finding that current complaints systems and processes:

- are complex and legalistic
- require literacy and advocacy skills
- re-traumatise Autistic students and parents/carers
- rely on informed school leadership and goodwill
- lack transparent review or outcome reporting
- are effective... at all.

A trauma-informed, autism-informed, inclusive and accessible complaints pathway is essential at all levels of education.

### 6.2.4 The “double empathy problem” can impact communication in all settings and levels of education

Published research (frequently - but not exclusively - Autistic-led) highlights the importance of recognising the increased risks and occurrences of communications breakdowns between Autistic and non-Autistic people due to **mutual differences**, not Autistic deficits. This is known as the “double empathy” problem.

All Australian education providers must be trained to:

- avoid interpreting communication differences as defiance
- adapt communication styles
- incorporate supports such as AAC, visual aids, scripting and written options at all levels of education (and other accessible supports, when and where required).

## 6.3 Required reforms

### ***Reform 1: Introduce mandatory consultation obligations***

Education providers must:

- consult Autistic students directly
- use accessible communication methods
- involve parents/carers appropriately
- document consultations and decisions, confirm and share these, and be accountable to these documents
- demonstrate how Autistic perspectives meaningfully shaped decisions.

### ***Reform 2: Co-design decision-making guidance with Autistic people***

Guidance should include:

- templates
- accessible processes
- examples of power-balancing and avoiding imbalances
- examples of Autism-informed practice
- sensory-safe (and personally safe) meeting procedures
- trauma-informed approaches.

### ***Reform 3: Establish an Autism-informed, trauma-informed complaints pathway***

Complaints processes must:

- be simple, accessible, and transparent
- allow for advocate support (and enable its accessibility and availability)
- record processes and outcomes
- disallow punitive responses toward students who raise concerns
- include review mechanisms and their auditing/verification.

### ***Reform 4: Strengthen alignment with the National Autism Strategy and existing Government commitments***

The Australian Government has already committed to the following modernisation of policies and practices to improve life outcomes for Autistic individuals and the Autism community:

- improving consultation
- reducing discrimination
- building Autism capability
- ensuring safe learning environments

These commitments must be operationalised throughout the nation's education system(s), via mandatory obligations (and measurement) in the Standards.

## 7.0 TOPIC 3: RESPONSIBILITIES OF ASSESSMENT AUTHORITIES

### 7.1 Overview

Assessment bodies, including senior secondary curriculum and certification authorities, higher education institutions, vocational education and training (VET) providers, and professional accreditation bodies, play a critical role in determining Autistic students' access to further education and employment.

However, the obligations of these bodies under the current Standards are unclear, inconsistently applied, and as the weight of evidence suggests, largely unenforceable. As a result, Autistic students face:

- inconsistent provision of adjustments
- discriminatory assessment rules or formats
- uncertainty about eligibility for accommodations
- refusal of adjustments based on misinterpretation of Autism
- disrupted transitions between schooling and post-school pathways
- a lack of continuity in adjustments already proven to be effective.

The Alliance strongly supports introducing **clear, enforceable responsibilities** for all assessment authorities across schooling, tertiary, and vocational systems.

### 7.2 Current challenges faced by Autistic learners

#### 7.2.1 Inconsistent access to assessment adjustments

Evidence from GCG Reports, consultation notes, and lived experience submissions indicates:

- Autistic students who receive adjustments in school often lose them for NAPLAN, SACE/ATAR subjects, university exams, or VET competency assessments
- Approval processes vary widely between jurisdictions, educational sectors, and institutions
- There is no consistent national definition of Autism-informed adjustments within the education sector(s)/levels
- Documentation requirements differ greatly between schools, levels, providers and so forth, creating inequity and increasing the nation's administrative burden.

This inconsistency disproportionately affects many Autistic students who rely on fairness, predictability and continuity to maintain learning and emotional regulation.

#### 7.2.2 Assessment adjustments are denied due to misunderstanding of Autism

Unfortunately, thousands of testimonials support this finding across Australia. In the interests of brevity, common examples focusing upon examinations include:

- refusal of extra time because Autism is “not a learning disability”
- refusal of alternative formats (e.g. oral exams, smaller rooms, breaks, sensory reductions)
- inflexible behaviour policies being applied in assessment rooms
- failure to understand that sensory overload/attacks may significantly impact cognitive performance

Many students report that assessment authorities, settings and processes do not understand:

- sensory regulation needs
- executive functioning challenges
- the role of predictable routines and expectations
- the impact of anxiety and co-occurring mental health issues can have on performance.

### 7.2.3 The transition gap: school → tertiary → employment pathways

Recent Government responses to the Senate Inquiry into Autism acknowledge that Autistic graduates face major transition barriers. These include:

- loss of supports
- eligibility confusion
- inconsistent documentation expectations
- reduced willingness to accommodate learning style differences
- lack of proactive outreach or Autism-informed planning between stages.

These transition failures contribute to poor outcomes for Autistic individuals and the Autism community in the forms of:

- low tertiary attainment rates
- unemployment and underemployment
- reduced participation in apprenticeships and traineeships
- disengagement from lifelong learning.

The losses to Australia's economy and avoidable costs to taxpayers are incalculable.

## 7.3 Required reforms

### ***Reform 1: Clear, enforceable duties for assessment authorities***

The revised Standards must:

- explicitly name ATAR, senior secondary authorities, universities, TAFEs, RTOs, and accreditation bodies
- require these organisations to provide reasonable adjustments
- require the application of Autism-informed principles
- ensure consistent interpretation of equal access provisions

### ***Reform 2: Mandatory continuity of adjustments***

If an adjustment is:

- already in place,
- documented, and
- effective for an Autistic student,

...assessment authorities **must** continue that adjustment unless there is a clear, evidence-based reason not to.

This prevents “resetting” adjustments at each transition between **school → tertiary → employment pathways**.

### ***Reform 3: National consistency and reporting requirements***

Assessment authorities should be required to:

- adopt national Autism-informed adjustment standards
- publish transparent criteria
- report annually on approvals and refusals
- record reasons for refusals
- include sensory, communication, and executive functioning considerations.

This reporting aligns with the Alliance's broader call for a national regulator and transparent compliance monitoring and verifications.

#### ***Reform 4: Accessible, autism-informed assessment formats***

Adjustments must include:

- alternative formats (written, oral, multimodal)
- sensory-safe assessment environments
- supervised breaks
- flexible timing
- predictable structure and clear instructions
- access to AAC or communication supports.

In addition, professional accreditation bodies must also recognise that non-standard assessment practices can still demonstrate competence.

#### ***Reform 5: National Autism-informed transition policy***

To be effective, all transitions should be supported by:

- consistent national forms
- Autism-informed planning meetings
- dedicated transition staff
- written continuity plans across systems
- collaboration between schools, universities, RTOs, and assessment authorities, etc.

## 8.0 ADDITIONAL ISSUES AFFECTING AUTISTIC STUDENTS

Autistic students continue to experience systemic barriers that prevent them from accessing education on the same basis as their non-Autistic peers. Evidence provided to the Disability Royal Commission, the Senate Select Committee on Autism, the National Autism Strategy consultations, and the Alliance's own submissions demonstrates that these barriers arise not from the individual characteristics of Autistic learners, but from environments, policies and practices that remain inaccessible, unsafe or inconsistently implemented. These issues span every part of the educational experience, including sensory safety, behaviour supports, attendance and participation, the use of restrictive practices, bullying, adjustment provision, transitions, pathways, data and reporting, and the availability of alternative learning options.

The problems identified across these domains share common features: a lack of Autism-informed practice; inconsistent or insufficient implementation of adjustments; weak accountability mechanisms; and inadequate recognition of sensory, communication and regulatory needs. Many Autistic students are exposed to environments that heighten distress, reduce engagement and, in some cases, cause significant trauma. Families frequently describe being left responsible for ensuring basic safety and accessibility, with limited recourse when systems fail. The increasing number of Autistic students experiencing school distress, informal exclusion, seclusion or forced withdrawal into home education further reflects systemic shortcomings rather than individual preference or capacity.

This section outlines many structural, environmental and cultural barriers faced by Autistic learners and highlights the reforms required to address them. The issues raised here intersect with the broader objectives of the National Autism Strategy and the Disability Royal Commission's findings, including the need to eliminate restrictive practices, prevent bullying, ensure consistent adjustment implementation, and move towards educational systems that are truly inclusive, neuroaffirming and human-rights aligned.

The reforms recommended in Section 8.14 respond directly to these concerns and reflect the Alliance's position that Autistic students deserve safe, regulated, predictable and supportive learning environments in every setting. Addressing these issues is essential to ensuring that Autistic learners can participate, learn and thrive not only academically, but socially, emotionally and throughout their lives.

### 8.1 Sensory Safety

Autistic learners consistently report that sensory overload is one of the most significant barriers to equitable participation in education. Sensory distress can be triggered by unpredictable noise, crowded environments, harsh lighting, strong smells, uncomfortable uniforms, or the absence of quiet, regulated spaces. These environments are not benign—they directly impair learning, attendance, communication, behaviour regulation, and emotional wellbeing.

Evidence from the Disability Royal Commission and Autism CRC indicates that Autistic students facing chronic sensory overload show reduced engagement, higher anxiety, increased school avoidance, and elevated use of restrictive practices. Despite this, sensory safety is not explicitly recognised in the current Standards, resulting in inconsistent school responses and an overreliance on informal adjustments that depend on individual teacher goodwill rather than enforceable obligations. The revised Standards must articulate a **clear, positive duty** for education providers to identify, minimise, and prevent sensory barriers, grounded in contemporary Autism research and Autistic-led expertise.

Sensory safety should be embedded in school design, classroom practices, curriculum delivery, and behaviour support frameworks. Mandatory requirements should include predictable routines, visual

supports, noise mitigation strategies, adjustable lighting, sensory-friendly environments during assemblies and assessments, access to assistive technologies, and formal sensory plans co-designed with Autistic students and families.

Sensory considerations must be treated as **core accessibility measures**, equivalent in importance to ramps, accessible toilets, or hearing loops. Without sensory safety, Autistic learners cannot access education on the same basis as their peers.

## 8.2 Behaviour Supports

Autistic students are disproportionately subjected to behaviour management models that misunderstand the drivers of distress. Evidence from the Disability Royal Commission, Autistic-led organisations, and multiple government inquiries demonstrates that behaviour is frequently interpreted without regard for sensory overload, trauma, communication mismatches, or unmet adjustment needs.

As a result, Autistic learners face punitive responses, seclusion, suspension, and informal exclusion at far higher rates than other students. The widespread use of compliance-based programs, token systems, and restraint-like practices stands in stark contrast to contemporary Autism research, which emphasises co-regulation, predictable environments, neuroaffirming approaches, sensory adjustments, and relationship-based support.

The revised Standards must explicitly require Autism-informed behaviour supports based on human rights, trauma-informed practice, and the “least restrictive” principle. Behaviour support should be treated as a form of **educational access**, not discipline.

Schools must be obligated to address the environmental or systemic contributors to behaviour first, including sensory triggers, communication barriers, unmet adjustment needs, or inaccessible curriculum. Where behaviour support plans are required, they must be co-designed with families, integrate Autistic communication preferences, and prohibit the use of punitive or harmful practices.

The Standards must also mandate staff training that reflects modern Autism understanding, including the double empathy problem, the impact of sensory dysregulation, and the role of co-regulation. Without reform, behaviour frameworks will continue to exclude, bully and punish students for their “autism”, reproducing trauma and removing opportunities for Autistic learners.

## 8.3 Attendance

Attendance patterns for Autistic students cannot be understood without reference to environmental barriers, sensory distress, bullying and punishment, and unmet adjustment needs. Nationally, data shows that Autistic learners experience significantly higher rates of school absence and part-time attendance than their non-Autistic peers.

The Disability Royal Commission and Senate Select Committee heard extensive testimony revealing that many so-called “attendance problems” reflect school environments that are overwhelming, unsafe (indeed demonstrably harmful), or inaccessible for Autistic students.

Families repeatedly report that attendance pressures are placed on them while the root causes—sensory triggers, inflexible expectations, inaccessible curriculum, social exclusion, or punitive behaviour responses—remain unaddressed.

The revised Standards must require education providers to treat attendance difficulties as indicators of **unmet accessibility needs**, not family/carer or student failure. Schools should be required to investigate environmental factors contributing to attendance barriers, ensure adjustments are fully implemented, and document proactive steps taken to address root causes.

Part-time timetables must not be used as informal exclusion or behaviour management tools. Attendance policies should explicitly reference sensory and personal safety, co-regulation, predictable routines, Autism-informed transition supports, and flexible pathways throughout the learning day. Clear obligations are needed to ensure Autistic students receive early, appropriate, and trauma-informed support when attendance becomes challenging.

## 8.4 Bullying

Bullying remains one of the most significant and consistently reported barriers to educational participation for Autistic learners at all levels of the educational system. Autistic students experience bullying at substantially higher rates than non-Autistic students, including physical bullying, psychological bullying and social exclusion, cyberbullying, and subtle forms of relational aggression.

The Disability Royal Commission recorded extensive testimony from Autistic children, young people, and adults describing lifelong impacts of bullying that went unaddressed or was minimised by schools. Bullying disproportionately affects Autistic girls, Autistic LGBTQIA+ students, Autistic First Nations students, and Autistic learners requiring very substantial support.

Fear of bullying is a major driver of school avoidance and emotional distress, and often intersects with sensory overload, communication barriers, and unsafe environments.

The revised Standards must impose a **mandatory duty** on education providers to implement Autism-informed bullying prevention and response frameworks. Generic anti-bullying programs are insufficient; Autistic learners require approaches that address communication differences, sensory triggers, social misunderstandings, and power imbalances. Schools must ensure early intervention, transparent reporting, trauma-informed follow-up, and accountability when bullying is ignored or mishandled.

Data on bullying involving Autistic learners should be collected nationally, with clear obligations for analysis, action, and continuous improvement. No Autistic individual should be denied access to education because a school lacks the structures, capability, or oversight to ensure their safety.

## 8.5 Restraint

Autistic students are disproportionately subjected to restrictive practices, including physical restraint, mechanical restraint, and chemical restraint through the inappropriate use of medication to manage distress or behaviour. The Disability Royal Commission documented repeated instances where restraint was used in response to sensory overload, communication differences, or behaviours arising from inaccessible environments rather than risk of harm.

In essence, this means that many Autistic students are being subjected to harmful, uninformed practices for being “too autistic”.

These practices are deeply traumatising and can lead to long-term psychological, physical, and educational harm. Autistic learners requiring very substantial support, non-speaking Autistic students, and Autistic children without access to robust advocacy are at the greatest risk. Despite strong recommendations from national inquiries, the current Standards do not explicitly prohibit or regulate restraint, resulting in inconsistent state responses, inadequate protection and serious harm from the very institution with responsibilities in loco parentis.

The revised Standards must embed a clear, enforceable prohibition on restraint (in all of its many definitions) except in genuine, immediate threats to physical safety, consistent with human rights

principles and Disability Royal Commission recommendations and under supervision of appropriate duty holders.

Any use of restraint and other harms must trigger mandatory reporting, review, and independent oversight. Education providers must be required to implement Autism-informed, trauma-informed alternatives including co-regulation, sensory accommodations, predictable routines, communication supports, and environmental modification. Staff training in de-escalation, co-regulation, and early intervention must be compulsory. Restraint is not a behavioural strategy; it is a restrictive practice that must be tightly regulated and minimised through systemic reform.

## 8.6 Adjustments

Reasonable adjustments remain one of the most inconsistently delivered aspects of the current Standards. Autistic students frequently experience delays, refusals, or partial implementation of adjustments essential to learning, assessment, communication, and participation.

Families often carry the burden of repeatedly requesting, documenting, and advocating for supports that should be routine. Adjustment decisions in education settings are frequently based on subjective judgments, variable local policies, or outdated Autism knowledge rather than consistent, Autistic-informed national criteria.

The Disability Royal Commission and Autism CRC both found that Autistic learners rarely have timely, documented adjustment plans that reflect their sensory, communication, and regulatory needs. As a result, many Autistic students experience unnecessary academic barriers, behavioural escalation, and exclusion from (and fear of) full participation in education.

The Standards must require education providers to implement **documented, Autism-informed adjustment plans**, reviewed at least twice annually and co-designed with families and the student (where appropriate). Adjustments should include sensory accessibility measures, flexible assessment formats, predictable instructional routines, quiet spaces, clear communication supports, and access to assistive technologies.

Schools must demonstrate that adjustments are *implemented*, not merely planned. Education systems should be required to monitor adjustment decisions, identify patterns of refusal, and ensure national consistency. Adjustment continuity must extend across transitions (e.g., primary to secondary, secondary to post-school pathways). Without enforceable adjustment obligations, Autistic students will continue to face significant structural barriers to equitable education.

## 8.7 Transitions

Transitions are among the most high-risk periods in an Autistic student's educational journey, including transitions between classrooms, teachers, year levels, school settings, and post-school pathways.

Research consistently shows that Autistic learners experience heightened anxiety, sensory distress, and academic disruption during transitions when support is inadequate or inconsistent. The Disability Royal Commission highlighted the distress caused by poor transition planning, especially when adjustments and supports fail to carry over between settings. Many Autistic students lose essential supports when moving from primary to secondary school, entering senior secondary pathways, or

transitioning to university or VET. In some cases, transition failure leads to disengagement, trauma, reduced participation, or complete withdrawal from education.

The revised Standards must mandate **structured, predictable, Autism-informed transition processes** across all educational settings. This includes early planning, cross-setting collaboration, continuity of adjustments, dedicated orientation activities, familiarisation visits, visual schedules, communication supports, and explicit teaching of new routines... and so forth.

Assessment authorities must be required to recognise prior adjustments and ensure continuity into senior secondary pathways and further education. Transitions must not depend on family/carer advocacy alone; they should be a systemic responsibility backed by clear obligations and oversight. Proper transition support is essential to preventing school distress, disengagement, psychological harm and long-term inequities in education and employment outcomes.

## 8.8 Persistent Absence (School Distress and Avoidance)

Persistent absence, often referred to in the Autism community as school distress, school avoidance, or emotionally based school refusal, is a significant and under-recognised issue for Autistic students. Evidence from the Disability Royal Commission, Alliance consultations, and numerous research studies indicates that Autistic learners are far more likely than their non-Autistic peers to experience prolonged school avoidance linked directly to unmet sensory, communication, environmental, or relational needs.

**These absences are not indicators of disinterest or disengagement (cruelly referred to as ‘refusal’), but of systemic failure to provide safe, predictable, and accessible environments.**

Many Autistic students experience distress stemming from sensory overload, bullying, inflexible routines, unadjusted learning demands, and punitive behaviour responses. Families frequently report being blamed for attendance patterns, despite the underlying drivers being rooted in the school environment rather than the home.

In some cases, schools respond by imposing part-time timetables, early pickups, or informal “soft exclusion”—practices that fall outside formal attendance reporting and therefore remain invisible in system-level data.

The Standards must require education providers to recognise persistent absence as a barrier caused by the environment, mandate early Autism-informed intervention and appropriate supports, and prohibit the use of part-time attendance as a behavioural management tool.

## 8.8 Seclusion (Withdrawal Rooms and Restrictive Environments)

Seclusion remains a critical concern for Autistic students across Australian jurisdictions, despite its well-documented harms and the strong human-rights guidance issued by the Disability Royal Commission. Seclusion includes the use of withdrawal rooms, isolation spaces, or separated environments where a student is placed alone—or effectively isolated—with limited ability to leave or communicate. Such practices are often justified as “calming strategies”, “time out”, or “sensory breaks”, yet Autistic students, families, and Autistic-led organisations consistently report that these spaces are used as behavioural control, not legitimate support.

For many Autistic students, seclusion exacerbates trauma, heightens distress, and reinforces negative associations with school. This practice also models exclusion and seclusion as being acceptable ways for others to treat neurodivergent peers.

Autistic learners with limited or no speech, or those requiring very substantial support, are at the greatest risk, often unable to communicate fear, discomfort, or objection. The Royal Commission found repeated examples of seclusion being used instead of providing Autism-informed supports such as co-regulation, sensory adjustments, communication aids, social support and predictable routines.

The revised Standards must explicitly define and prohibit seclusion, establish clear expectations for Autism-informed alternatives, modelling of neuroaffirming inclusion, and require educators and providers to report any use of isolation-like practices as critical incidents. Seclusion is not an educational support—it is a restrictive and discriminatory practice that undermines student safety, mental health, social inclusion, equity, diversity and participation.

## 8.9 Data and Reporting

National data on the educational experiences of Autistic learners remains fragmented, inconsistent, and in many cases non-existent. Critical areas such as adjustment implementation, sensory accommodations, bullying, restrictive practices, informal exclusions, and post-school pathways are either poorly recorded or not recorded at all.

This lack of visibility prevents governments, systems, and schools from identifying structural barriers, monitoring compliance, or driving improvement. The Disability Royal Commission repeatedly highlighted the absence of reliable national data on Autistic students, including under-reporting of restraint and seclusion, inconsistent categorisation of disability in attendance records, and limited reporting on educational outcomes beyond enrolment. Without robust data, Autistic students remain largely invisible in educational policy and practice design, educator training and the development of accountability processes.

The revised Standards must mandate transparent, nationally consistent data collection across all school sectors and education levels, including public, Catholic, independent, and specialist settings. Minimum requirements should include reporting on adjustment approvals and refusals; frequency and reasons for part-time timetables; bullying incidents involving Autistic students (including that perpetrated by educators); use of restraint or seclusion; sensory-related incidents; co-curricular access and participation; and learning outcomes disaggregated by disability type, gender, First Nations status, and location.

Data must be shared with families and publicly reported in aggregate to support sector transparency. A national oversight mechanism should analyse trends and recommend system-level interventions. Autistic students cannot be supported effectively if the system cannot see them.

## 8.10 Pathways

Autistic learners require clear, supported, and flexible pathways through education and into further study, training, and employment. However, current systems often create barriers at key transition points, particularly in senior secondary years, VET entry, university admissions, and work-integrated learning.

Many Autistic students lose essential adjustments or supports when transitioning between educational settings or entering new qualification frameworks. Senior assessment bodies frequently apply restrictive criteria for adjustments such as extra time, rest breaks, or alternative formats, sensory aware environments etc., resulting in inequitable assessment conditions that do not reflect learners' abilities. These inconsistencies disproportionately affect Autistic students who require genuine adjustments to support their learning and assessment outcomes.

The Standards must require assessment authorities, universities, and VET providers to adopt **nationally consistent and Autism-informed adjustment policies**. This includes recognising sensory and regulation needs as legitimate criteria for assessment adjustments, ensuring continuity of supports across all pathways, and removing administrative or diagnostic barriers that impede access.

Pathways should be flexible and neuroaffirming, allowing Autistic learners to move between academic, vocational, and alternative education settings without losing supports. Schools and systems must be required to provide structured transition planning for learners preparing to enter tertiary education, apprenticeships, or employment, including connection to disability support offices, orientation visits, assessment adjustments, and communication supports. Equitable pathways are essential to preventing lifelong disadvantage.

## 8.11 Alternative Pathways to Fair, Equitable and Neuroaffirming Education Opportunities

Home education and other alternative learning pathways are increasingly being used by Autistic students and their families in Australia, not as a free and positive choice, but as a last resort when mainstream and special schools are experienced as unsafe, traumatising, or persistently inaccessible.

Research and lived experience accounts show that many Autistic students are “forced” into home education when primary and secondary schools fail to provide appropriate adjustments, respond effectively to bullying, or create sensory-safe and neuroaffirming environments. Autism-specific organisations report that Autistic learners can and do thrive in home education when learning is adapted to their interests, sensory needs, pacing and communication preferences; however, families frequently describe the pathway into home education as occurring after extended periods of school distress, exclusion, and conflict with education systems rather than as an early, supported option. ([Autism Spectrum Australia \(Aspect\)](#))

Evidence from the Senate Select Committee and media reporting has highlighted that some Autistic students are withdrawn from school entirely because they are bullied, misunderstood, or subjected to harmful practices such as seclusion and restraint, with parents stating that homeschooling is the only way to keep their child safe. ([ABC](#))

Qualitative research with mothers of Autistic children has found that mainstream schooling can be profoundly anxiety-provoking and difficult to navigate, and that home education is often adopted after repeated failures by schools to meet basic needs for support, belonging and predictability. ([IIER](#)) The Home Education Association notes that a substantial proportion of home-educating families are supporting neurodivergent children, including Autistic learners, and that many families turn to home education because conventional schooling models do not work for their child. ([hea.edu.au](#))

National-level data about home education rarely disaggregates students by disability type, but where more detailed information is available, a pattern of disproportionate representation emerges. In New South Wales, for example, the Auditor-General reported that the number of home-schooled students

doubled between 2019 and 2024 to more than 12,700, with a growing proportion being children with disability and Aboriginal children. Among families registering for home education, “special learning needs” accounted for around 22 per cent of stated reasons, with bullying also identified as a driver. ([The Australian](#)) This aligns with broader national inquiries into school refusal and school distress, which have identified neurodivergent students as being at heightened risk of disengagement when schools fail to provide appropriate supports. ([Department of Education](#))

Home education can offer clear benefits for some Autistic students when it is **chosen** and supported, e.g.

- the ability to tailor learning to Autistic interests, strengths and pacing
- flexible scheduling that respects energy levels, sensory needs and medical/therapy commitments
- control over sensory environment (noise, light, crowds, clothing, food)
- reduced exposure to bullying, restraint and seclusion
- opportunities for Autistic-led, neuroaffirming learning and peer connection in community-based groups.

However, when home education is effectively *forced* by system failure, it increases risks and inequities, e.g.

- loss of access to funded supports or specialist staff available in school settings
- loss of access to curricula and learning supports, frequently because the education system refuses to provide offsite access or approvals to exit the mainstream system
- increased financial, emotional and time burden on families/carers (most often mothers)
- reduced access to peer connection, co-curricular activities and community participation if supports are not provided, leading to social withdrawal and loss of skills
- limited or inconsistent oversight of educational availability, quality and student wellbeing in some jurisdictions ([The Australian](#))
- reinforcement of segregation, where Autistic students must leave formal schooling to remain safe and able to learn
- poor modelling of social inclusion and neuroaffirming practices among schools and peers
- reduced opportunities for improved educational outcomes due to inadequate capabilities/capacities of home educators (again, most often mothers without teaching/subject knowledge).

From the Alliance’s perspective, the current pattern of Autistic students being “pushed” into home education is **strong evidence of a systemic failure of the Standards and education systems**, not a neutral expression of student or parental choice. When families report that their only safe option is to withdraw a child from school, often after long periods of unaddressed bullying, sensory overload, denial of adjustments, and harmful behaviour responses, this indicates that schools and systems are not meeting their obligations to provide safe, inclusive, and neuroaffirming education on the same basis as other students.

The Alliance supports all forms of education and curricula when they are genuinely chosen, properly supported, and neuroaffirming for the Autistic learner. However, the Alliance strongly rejects the notion that Autistic students should have to leave formal schooling in order to access safe and appropriate learning conditions.

The Standards must be reformed to ensure that:

- mainstream and special schools uphold a positive duty to provide sensory-safe, neuroaffirming environments for all Autistic learners
- bullying (by peers and educators), restraint, seclusion and informal exclusion are prevented, monitored and treated as serious human-rights issues

- reasonable adjustments are consistently implemented and reviewed, so Autistic students can remain enrolled and engaged
- flexible, part-time, blended and distance education options are available **within** the public system, without forcing families/carers to assume full responsibility for teaching and administration
- home education, where chosen, is supported by accessible resources, Autism-informed guidance, and appropriate oversight that respects family autonomy while safeguarding student wellbeing and educational opportunities.

In summary, the Alliance calls for reforms that **make neuroaffirming, safe and equitable education the norm in all school settings**, so that home education is a supported option rather than a default refuge from harm, forced upon Autistic individuals and the Autism community.

A reformed Standards framework must recognise the growth of home education among Autistic and other neurodivergent students as a key indicator of system failure. Reforms should require governments and providers to act decisively to address the underlying drivers; particularly sensory environments, physical and psychological safety, unending bullying (from peers AND educators), unfair assessments, restrictive practices, and inconsistent delivery of adjustments.

## 8.12 Alignment with the National Autism Strategy

The National Autism Strategy (NAS) establishes a whole-of-government commitment to improving the lives of Autistic Australians, including through **Action 4.2 in the First Action Plan: ensuring Autistic learners experience inclusive, respectful, and supportive education environments**.

The Strategy emphasises co-design with Autistic individuals and the Autism community, recognition of sensory and communication accessibility, investment in workforce capacity and capability, and the removal of systemic barriers across all education settings. The revised Standards must reflect and operationalise these commitments. Without alignment, implementation of the Strategy will continue to be inconsistent, fragmented, disconnected from the obligations already expected of educational settings and harmful to Autistic students.

The Standards Review provides a critical opportunity to embed the NAS vision into enforceable requirements. This includes ensuring: Autism-informed educator capability; consistent transition supports; sensory accessibility; strengthened complaints pathways; reduction of restrictive practices; early intervention in attendance distress; and national accountability mechanisms.

The Standards should explicitly reference the NAS and require education systems to integrate NAS actions into planning, reporting, and continuous improvement processes. Alignment between the two frameworks ensures Autistic learners are supported consistently from early childhood through adulthood and that national leadership translates into real improvements in classrooms.

## 8.13 Alignment with the Disability Royal Commission (DRC)

The Disability Royal Commission's findings are particularly relevant to Autistic learners, who were disproportionately represented in evidence about discrimination, restraint and seclusion, restrictive behaviour practices, school distress, harm and unsafe environments.

The DRC called for systemic reform, including the long-term phase-out of segregated education (Recommendation 7.5), stronger oversight of restrictive practices, improved educator capability, and

the creation of safe and inclusive learning environments. Autistic-led organisations and individuals gave detailed testimony describing trauma, exclusion, unmet adjustments, and failures of complaints systems. These findings cannot be separated from this Review; they must directly inform reform of the Standards.

The revised Standards must also incorporate the DRC's human-rights framework and reflect its conclusions about accessibility, safety, and systemic accountability. This includes explicit obligations to eliminate seclusion, minimise restraint, ensure sensory accessibility, prevent informal exclusion, and move towards genuinely inclusive education systems. Oversight mechanisms must be strengthened to ensure compliance and enforcement, and families must have access to transparent, trauma-informed complaints pathways.

Aligning the Standards with the DRC ensures that the lived experiences of Autistic students and families—so powerfully represented in evidence—result in concrete, enforceable change in Australian education systems.

## 8.14 Required reforms

The evidence across all subsections of Section 8 demonstrates persistent structural barriers that prevent Autistic learners from accessing safe, equitable and neuroaffirming education on the same basis as their peers. The following reforms are required to address these barriers and ensure alignment with the National Autism Strategy and the Disability Royal Commission.

### ***Reform 1: Sensory Safety as a Core Accessibility Obligation***

Education providers must be required to identify, prevent and remove sensory barriers in classrooms, playgrounds, assessment spaces and co-curricular environments. Sensory accessibility should be treated as equivalent to physical accessibility, with mandatory sensory plans, predictable routines, noise/light adjustments, quiet spaces and co-designed supports.

### ***Reform 2: Autism-Informed Behaviour Support Frameworks (No Restrictive Practices)***

The Standards must require the elimination of punitive behaviour models and embed trauma-informed, relationship-based, co-regulation approaches. Restrictive practices — including seclusion and restraint — must be explicitly prohibited except in genuine, immediate safety emergencies and subject to mandatory reporting and oversight.

### ***Reform 3: Mandatory, Documented and Enforceable Adjustments***

Adjustment plans must be Autism-informed, co-designed, reviewed at least twice annually, and consistently implemented. Providers must demonstrate that adjustments occur in practice, not only on paper. Adjustment continuity across transitions must be mandated nationally.

### ***Reform 4: Attendance Distress as an Accessibility Issue, Not Non-Compliance***

Schools must treat persistent absence, school distress and partial timetables as indicators of unmet accessibility needs. The Standards should prohibit informal or soft exclusion, require early Autism-informed intervention, and mandate environmental investigation before attendance pressures are applied to families.

### ***Reform 5: Elimination of Seclusion and Tight Regulation of Restraint***

Seclusion must be explicitly defined and prohibited. Any use of restraint must trigger immediate reporting, independent review and clear accountability. Autism-informed alternatives must be embedded in all educational settings.

***Reform 6: Bullying Prevention and Response Frameworks Specific to Autistic Learners***

Anti-bullying policies must be Autism-specific, ensuring early identification of relational aggression, sensory-triggered conflict, communication misunderstandings and power imbalances. Providers must be accountable for reporting, responding to, and preventing bullying involving Autistic students.

***Reform 7: Autism-Informed Transition Frameworks Across All Educational Stages***

The Standards must require structured, predictable transition supports for classroom, year-level, school and sector changes. All adjustments must transfer automatically unless reviewed and updated with family involvement.

***Reform 8: National Consistency for Senior Assessment, VET, University and Accreditation Bodies***

Assessment and credentialing authorities must apply Autism-informed criteria for adjustments, ensure continuity of supports, remove diagnostic barriers, and publish transparent adjustment policies. No Autistic learner should lose supports when moving into senior secondary, tertiary or vocational pathways.

***Reform 9: National Data and Reporting Requirements Disaggregated by Disability Type***

The Standards must establish minimum national data requirements including: adjustment approvals/refusals; bullying incidents; attendance patterns; restraint and seclusion; sensory-related incidents; and outcomes. Education systems must report these publicly in aggregate and be held accountable for responding to trends.

***Reform 10: Supported, Not Forced, Home Education and Alternative Pathways***

The Standards must recognise that home education is often adopted because schools are unsafe or inaccessible for Autistic learners. Systems must prevent “forced home schooling” by ensuring sensory safety, bullying prevention, adjustment implementation and trauma-informed practice in all schools. Where home education is chosen, governments must provide Autism-informed resources, connection to community learning, and appropriate oversight.

***Reform 11: Alignment with the National Autism Strategy (NAS)***

The Standards must operationalise NAS Action 4.2, embedding Autism-informed workforce capability, consistent adjustments, safe environments, co-design with Autistic people and national accountability mechanisms. Alignment must be explicit, mandatory and measurable.

***Reform 12: Implementation of Disability Royal Commission Findings***

The Standards must incorporate human rights-based obligations that reflect the DRC findings, including: eliminating restraint and seclusion; phasing out segregation (Recommendation 7.5); improving complaint systems; strengthening workforce training; and ensuring Autistic learners are safe, respected and included in all settings.

***Reform 13: Establishment of a National Education Inclusion Regulator***

A new oversight body is required to monitor compliance, investigate systemic issues, collect and publish national data, ensure adjustment implementation, enforce standards and provide clear accountability for educational providers across all sectors.

***Reform 14: Embedding a Positive Duty to Prevent Discrimination and Remove Barriers***

The Standards must place a positive, proactive duty on education providers to identify, prevent and remove barriers for Autistic learners, rather than relying on families to self-advocate or initiate adjustments. This aligns with broader reforms proposed in anti-discrimination law.

## 9.0 INTERSECTIONALITY

### 9.1 Overview

Autistic students are not a homogeneous group. Intersectional experiences - including gender, culture, language, disability, trauma history, and geography - profoundly shape access to education.

The Standards must explicitly recognise and respond to the diverse experiences of:

- Autistic girls and women
- Autistic gender-diverse students
- Autistic First Nations learners
- Autistic students from culturally and linguistically diverse (CALD) backgrounds
- Autistic students with co-occurring intellectual disability
- Autistic students requiring very substantial support
- Autistic students in rural and remote locations.

### 9.2 Autistic girls, women, and gender-diverse students

Evidence from the National Autism Strategy and the Alliance's 2020 submission shows:

- Autistic girls and women are often under-recognised or misdiagnosed
- their needs are overlooked due to masking, and indications of sociability etc.
- gender-diverse Autistic students face disproportionately high incidences of bullying, both psychological and physical
- behavioural assumptions, and poor recognition of Autistic indicators masks sensory overload and burnout.

The Standards should embed specific attention to these groups, including training for educators to understand masking and gendered presentation of Autism.

### 9.3 First Nations Autistic learners

In addition to many forms of racism, First Nations Autistic students face:

- cultural misunderstandings
- lack of accessible assessment pathways
- higher rates of suspension and exclusion
- limited culturally safe Autism services
- reduced access in remote communities.

The Standards must embed culturally safe practice, co-designed with First Nations Autistic people and families/carers.

### 9.4 CALD Autistic learners

Also, in addition to racism, CALD families/carers report:

- language barriers
- communication difficulties with schools
- limited understanding of Autism in culturally specific contexts
- stigma within communities
- reduced access to Autism-informed resources and supports.

The Standards must require accessible communication, interpretation, and culturally responsive engagement.

## **9.5 Autistic students with intellectual disability**

These students face:

- dual discrimination owing to co-occurring “disabilities”
- assumptions about capacity
- lack of communication supports and resources
- more frequent use of restrictive practices
- more frequent placement in segregated settings.

Reasonable adjustments must be high-quality, Autism-informed, and consistently embedded across academic, economic and social participation.

## **9.6 Autistic students requiring very substantial support**

NASOC findings and family consultations highlight the following barriers and limits to receiving appropriate educational opportunities and supports:

- invisibility in data and policy
- inconsistent access to AAC
- lack of appropriately trained staff
- exclusion from planning meetings
- increased risk of physical and psychological safety incidents.

The Standards must explicitly recognise these students and ensure high-support-needs adjustments are non-negotiable.

## **9.7 Rural and remote Autistic learners**

Evidence-based and lived experience informs that many challenges and barriers to these students (at all levels) include:

- limited access to Autism-informed professions
- reduced access to support services
- geographical barriers to participating in specialist programs
- reduced teacher capability due to isolation and turnover
- inflexibility and/or inability to provide adjustments to enhance learning outcomes..

The Standards must require adapted delivery models to support rural and remote Autistic learners.

## 9.8 Required Reforms

To uphold equity and comply with human-rights obligations, the revised Standards must address the overlapping forms of discrimination and structural disadvantage experienced by Autistic learners with intersecting identities.

### ***Reform 1: Explicit Recognition of Intersectional Autistic Identities***

The Standards must explicitly recognise that Autistic learners are diverse and experience different barriers depending on gender, culture, language, disability, trauma history, and geography. Obligations must require schools and systems to identify and respond to intersectional disadvantage through planning, policy design, adjustment provision and monitoring.

### ***Reform 2: Autism-Informed, Gender-Responsive Practice***

Educators, leaders and school-based wellbeing teams must be trained to understand gendered Autism presentation, including masking, burnout, social camouflaging pressures and the distinct risks faced by Autistic girls, women and gender-diverse students. Behaviour responses, adjustments and safety planning must be informed by gender-specific evidence and lived experience.

### ***Reform 3: Embed Culturally Safe Practice for First Nations Autistic Students***

The Standards must require culturally safe, trauma-informed and community-led responses for First Nations Autistic learners, co-designed with First Nations Autistic people, families and organisations. Reforms must mandate:

- culturally safe assessment pathways
- anti-racism and cultural capability training
- collaborative partnerships with First Nations communities and services
- accountability for disproportionate suspension and exclusion rates.

### ***Reform 4: Require Accessible, Culturally Responsive Engagement for CALD Families***

Education providers must ensure communication and engagement strategies are accessible to CALD Autistic learners and their families, including interpretation, translated materials, Autism-informed cultural liaison roles, and culturally safe complaints pathways. Schools must be required to demonstrate proactive, inclusive communication practices.

### ***Reform 5: Strengthen Protections for Autistic Students With Intellectual Disability***

The Standards must explicitly protect Autistic students with co-occurring intellectual disability from discriminatory assumptions about capacity, exclusionary practices and over-use of restrictive practices. Obligations must mandate access to high-quality communication supports, Autism-informed adjustments, and inclusive learning environments across all settings.

***Reform 6: Guarantee Recognition and Support for Autistic Students Requiring Very Substantial Support***

The revised Standards must require schools and systems to deliver non-negotiable, high-support-needs adjustments, including AAC, co-regulation supports, predictable routines, sensory accessibility, trauma-informed practice and specialist staffing. These students must be visibly represented in data, policy design and system monitoring.

***Reform 7: Adapt Delivery Models for Rural and Remote Autistic Learners***

Education providers must implement delivery models that address geographic barriers, such as:

- hybrid and distance learning models that remain Autism-informed
- tele practice for specialist adjustments and AAC support
- targeted teacher capability programs
- regional coordination to reduce service gaps
- mobile or visiting specialist teams.

Obligations must ensure that Autistic learners in rural and remote areas are not disadvantaged by location.

***Reform 8: Mandate National Data Disaggregation and Monitoring Across Intersectional Groups***

National data must be collected and reported by disability type, gender, First Nations status, CALD background, intellectual disability, support needs and geographic location. This will enable governments and systems to identify inequities, intervene early and evaluate outcomes for intersectional groups.

***Reform 9: Embed Co-Design With Autistic People From Intersectional Groups***

All policy, training and implementation activity under the Standards must be co-designed with Autistic people representing the full diversity of the community, including First Nations Autistic leaders, Autistic people from CALD backgrounds, Autistic girls, women and gender-diverse people, and Autistic people with intellectual disability or very high support needs.

***Reform 10: Strengthen Complaints, Oversight and Accountability for Intersectional Discrimination***

The Standards must require education providers to demonstrate that complaints involving intersectional discrimination are handled promptly, sensitively and with cultural and gender safety. Oversight bodies must be empowered to investigate systemic issues affecting intersectional groups and mandate corrective action.

# 10.0 OVERSIGHT, GOVERNANCE AND DATA TRANSPARENCY

## 10.1 Overview

The Alliance's consistent position across multiple inquiries, reviews, and policy processes is that the Disability Standards for Education cannot fulfil their purpose without strong, Autism-informed systems of oversight and accountability.

Currently, the Standards rely almost entirely on **complaints-based enforcement**. All evidence and lived experience points to the fact that this approach is ineffective because it:

- disproportionately burdens Autistic students and families/carers
- requires high advocacy capacity
- retraumatizes complainants
- creates harmful power imbalances and (real) fears of retribution
- results in inconsistent outcomes across jurisdictions
- fails to identify systemic issues
- leaves informal exclusion, sensory safety breaches, adjustment failures, and discriminatory practices unmonitored.

The Australian Government has repeatedly acknowledged systemic failures in education for Autistic learners. This Review must now produce a Standards framework that is fit for purpose, does not perpetuate harm to Autistic individuals and the Autism community, and creates positive outcomes for all learners.

## 10.2 The case for a national oversight mechanism

The Alliance strongly recommends that a **National Education Inclusion Regulator** (or equivalent oversight body) be established to:

- monitor compliance with mandatory obligations
- investigate complaints and systemic issues
- support the consistent interpretation of “reasonable adjustments” across all settings and levels
- publish national data and annual reports, including auditing and verification
- issue improvement notices and mandate compliance directions
- provide Autism-informed guidance and professional development.

This aligns with:

- the National Autism Strategy
- the Government Response to the Senate Select Committee on Autism
- Disability Royal Commission recommendations
- Australian and international evidence on best-practice regulatory frameworks.

## 10.3 Transparent national data collection

Without data, inequity remains invisible. As do the short-, medium- and long-term consequences of the perpetuation of exclusion from education opportunities.

The Alliance recommends that the revised Standards require the following data relating to Autistic students (as a minimum):

### **Nationally consistent data on:**

- adjustment approvals and refusals
- reasons for refusals
- requests for sensory and communication supports
- restraint and seclusion incidents
- informal exclusions (partial attendance, “soft suspensions”)
- bullying incidents involving Autistic students (by educators and peers)
- transitions between educational stages
- access to co-curricular learning
- intersectional data (First Nations, CALD, gender-diverse, rural/remote, intellectual disability).

### **Annual public reporting should include:**

- compliance performance for each jurisdiction
- trends and changes in requests and approvals
- identification of systemic barriers
- progress towards inclusive education targets
- breakdowns by educational sector (government, Catholic, independent, tertiary, VET).

This will enable governments, providers, communities, and Autistic individuals, the Autism community and Autistic/Autism organisations to monitor progress and hold our systems accountable.

## 10.4 Autism-informed quality and capability frameworks

Maintaining relevant, appropriate and consistent quality and capability framework is also essential to the success of Australia’s educational standards. Competent and informed oversight must be supported by:

- national teacher capability standards specific to Autism
- mandatory Autism-informed professional learning
- inclusion of sensory safety, communication diversity, co-regulation, and trauma-informed practice
- accountable performance indicators for principals and leadership teams
- national guidelines co-designed with Autistic individuals and the Autism community.

This ensures that compliance is not only a legal requirement but also a positive and neuro-affirming cultural and practice shift within Australia’s education systems.

## 10.5 Alignment with the National Autism Strategy and whole-of-government reforms

It is a national imperative that the modernised system's Governance mechanisms must:

- align with NAS Action Plan 4.2 (Inclusive Education for Autistic Australians)
- incorporate DRC findings and recommendations
- reinforce reforms made under the Disability Discrimination Act review
- be developed through co-design with Autistic individuals, the Autism community and appropriate representative organisations.

## 10.6 Eliminating regulatory confusion across jurisdictions

In Australia, responsibility for education is complex and shared across:

- Commonwealth
- State/Territory governments
- Non-government systems
- Independent providers
- Tertiary and VET regulators
- And increasingly, employer and industry bodies.

Clear national consistency is essential to support the much needed neuroaffirming shift in our culture and approach to inclusive education. The revised Standards must articulate **explicit, non-negotiable duties** that apply regardless of jurisdiction, ownership model, or educational setting.

## 10.7 Recommendations for System-Level Reforms Across the Standards

The following reforms are required to ensure the revised Disability Standards for Education provide enforceable protections, clear obligations, and a nationally consistent framework that supports Autistic learners across all educational settings.

### ***Reform 1: Introduce Mandatory Obligations, Not Guidance***

The Standards must shift from optional guidance to enforceable requirements. Providers must be obligated—not encouraged—to implement adjustments, ensure sensory safety, prevent discrimination, respond to complaints, and remove barriers for Autistic learners. Voluntary guidance has failed to meet the needs of Autistic students.

### ***Reform 2: Establish a National Education Inclusion Regulator***

Australia requires an independent oversight body with powers to:

- monitor compliance with the Standards
  - investigate systemic failures
  - publish national data
  - enforce improvement actions
  - support schools to implement Autism-informed practice
- Without oversight, obligations cannot be meaningfully upheld.

### ***Reform 3: Embed a Positive Duty to Prevent Discrimination***

The Standards should incorporate a proactive obligation requiring education providers to identify, prevent and remove barriers for Autistic students. This shifts responsibility away from families towards systems and aligns with broader discrimination reforms.

### ***Reform 4: Strengthen Complaints, Issues Resolution and Review Pathways***

Complaints processes must be Autism-accessible, trauma-informed, transparent and timely. Providers must be required to:

- co-design issues resolution pathways with Autistic students and families
- record and track complaint outcomes
- offer independent review
- demonstrate action in response to concerns.

These must be mandatory obligations (Option 3).

### ***Reform 5: Require National Consistency Across All Education Sectors***

The Standards must apply equally across early childhood settings (once included), public schools, Catholic and independent schools, specialist settings, distance and blended learning, VET, higher education and professional accreditation bodies. Adjustment criteria, assessment supports, complaints processes and safety standards must be consistent nationwide.

### ***Reform 6: Autism-Informed Workforce Capability Requirements***

The revised Standards must mandate Autism-informed training for:

- teachers
- school leaders
- teacher aides
- counsellors
- assessment authorities
- university and VET disability support staff.

Training must reflect modern Autism research, Autistic-led knowledge and neuroaffirming practice, including sensory regulation, co-regulation, communication supports and trauma-informed approaches.

### ***Reform 7: Require Co-Design With Autistic People and Families***

Education systems must be obligated to:

- design policies and programs with Autistic-led organisations
- consult Autistic students on matters affecting them
- embed lived experience in training, planning and evaluation

Co-design ensures reforms are grounded in the realities of Autistic learners.  
Reform

### ***Reform 8: Mandate Comprehensive, Disaggregated National Data Collection***

Governments must collect and publish data on:

- adjustment provision and refusal
- bullying incidents
- restraint and seclusion
- attendance patterns

- sensory-related incidents
- pathways and outcomes.

Data must be disaggregated by disability type, gender, First Nations status, CALD background, and location. This allows early identification of inequities and supports accountability.

### ***Reform 9: Align the Standards With the National Autism Strategy (NAS)***

The Standards must operationalise NAS commitments, including:

- safe, respectful and supportive environments (Action 4.2)
- Autism-informed workforce capability
- sensory accessibility
- effective adjustments
- accessible complaints pathways
- transition supports.

Alignment ensures national leadership translates to real-world change.

### ***Reform 10: Implement Disability Royal Commission Findings***

The Standards must reflect the human rights obligations and systemic reforms recommended by the Disability Royal Commission, including:

- eliminating restraint and seclusion
- reducing and phasing out segregation (Recommendation 7.5)
- preventing bullying and unsafe environments
- strengthening workforce capability
- embedding accountability and oversight mechanisms.

Autistic students must be protected from practices already recognised as harmful and discriminatory.

### ***Reform 11: Guarantee Adjustment Continuity Across Transitions***

All adjustments must carry over automatically across classrooms, schools, sectors and into senior secondary, VET and higher education unless formally reviewed with family involvement. Assessment authorities must adopt Autism-informed criteria for adjustments and publicly publish their policies.

### ***Reform 12: Ensure Flexible, Supported Learning Pathways Within the School System***

The Standards must require schools and systems to offer blended, part-time, distance or alternative learning options for Autistic students within the public education system. This prevents Autistic students from being “pushed” into unsupported home education due to system failures.

## 11.0 SUMMARY OF REQUIRED REFORMS

The Alliance proposes a modernised, Autism-informed, enforceable Disability Standards for Education framework with the following (summarised from each section) core reforms:

### 11.1 Reforms from Topic 1 — Effective Implementation

#### ***Reform 1: Introduce a National Positive Duty***

The revised Standards must embed a proactive legal obligation requiring education providers to identify, prevent and remove barriers for Autistic learners. This includes:

- proactively identifying needed adjustments (not waiting for requests)
- ensuring sensory and communication accessibility
- delivering Autism-informed support before crises occur
- monitoring implementation and outcomes
- preventing discrimination by design rather than reaction.

A positive duty shifts responsibility from families to systems.

#### ***Reform 2: Establish a National Regulator for Monitoring Compliance***

A national body is required to:

- monitor compliance
- collect and publish national data
- conduct audits and investigations
- issue improvement notices
- require remediation
- provide Autism-informed guidance to schools and systems.

Voluntary compliance has failed to deliver equitable outcomes.

#### ***Reform 3: Mandatory Autism-Informed Workforce Capability***

Training must be mandatory, ongoing and co-designed with Autistic people. It must address:

- sensory regulation
- communication diversity
- co-regulation and trauma-informed practice
- rejection of punitive behaviour approaches
- Autism neuroscience and lived experience.

Workforce capability is a core accessibility requirement.

#### ***Reform 4: Implement National Standards for Reasonable Adjustments***

The Standards must define:

- clear timeframes for adjustment decisions
- minimum Autism-informed adjustments
- expectations for documentation
- required review cycles
- continuity across transitions
- escalation pathways when adjustments are refused.

Adjustments must be enforceable and consistent.

### **Reform 5: Annual National Reporting on Adjustments and Outcomes**

Governments must report data on:

- adjustment approvals and refusals
- informal exclusion
- restraint and seclusion
- attendance patterns
- participation in co-curricular activities
- outcome gaps between Autistic and non-Autistic students
- intersectional groups (First Nations, CALD, gender-diverse, high support needs).

Transparency drives accountability.

## **11.2 Reforms from Topic 2 — Inclusive Decision-Making**

### **Reform 1: Introduce Mandatory Consultation Obligations**

The Standards must require education providers to:

- directly consult Autistic students using accessible communication
- include families/carers in decision-making
- document consultation processes
- demonstrate how the Autistic learner's views influenced decisions
- ensure sensory-safe, trauma-informed consultation conditions.

### **Reform 2: Co-Design Decision-Making Guidance with Autistic People**

Guidance must be co-written with Autistic-led organisations and include:

- templates
- sensory-aware processes
- cultural safety requirements
- trauma-informed methods
- visual supports.

Co-design ensures relevance and legitimacy.

### **Reform 3: Establish Autism-Informed, Trauma-Informed Complaints Pathways**

Complaints systems must be:

- transparent
- safe
- accessible
- advocate-supported
- non-punitive
- monitored for systemic patterns.

Documentation obligations must be mandatory.

### **Reform 4: Align the Standards with the National Autism Strategy**

The Standards must operationalise NAS Action 4.2 by embedding:

- inclusion
- sensory accessibility
- workforce capability
- structured transitions
- early intervention in school distress
- national accountability.

## 11.3 Reforms from Topic 3 — Responsibilities of Assessment Authorities

### ***Reform 1: Clear, Enforceable Duties for Assessment Authorities***

Explicit obligations must apply to:

- ATAR authorities
- state/territory senior secondary bodies
- universities
- VET and RTOs
- accreditation and professional licensing boards.

Duties should include ensuring fair, Autism-informed assessment conditions.

### ***Reform 2: Mandatory Continuity of Adjustments***

The Standards must state that adjustments travel with the student automatically unless reviewed collaboratively with evidence.

### ***Reform 3: National Consistency and Reporting Requirements***

Assessment authorities must:

- adopt national criteria
- publish adjustment policies
- report data on approvals and refusals
- ensure sensory-safe assessment environments.

### ***Reform 4: Accessible, Autism-Informed Assessment Formats***

This includes:

- alternative formats
- assistive technology
- flexible timing
- quiet rooms
- rest breaks
- AAC
- reduced sensory load.

### ***Reform 5: National Autism-Informed Transition Policy***

Transition planning must be structured, predictable and continuous from school to senior years, VET, university and employment.

## 11.4 Reforms from Section 8 — Additional Issues Affecting Autistic Students

### ***Reform 1: Sensory Safety as a Core Accessibility Obligation***

Sensory accessibility must be mandatory, including:

- predictable routines
- lighting/noise adjustments
- quiet spaces
- sensory plans
- Autism-informed classroom design.

Sensory safety is equivalent to physical accessibility.

**Reform 2: Autism-Informed Behaviour Supports (No Restrictive Practices)**

Mandatory behaviour frameworks must reject punitive responses and prioritise:

- co-regulation
- trauma-informed practice
- predictability
- sensory adjustments
- communication support.

**Reform 3: Mandatory, Documented and Enforceable Adjustments**

All Autistic students must have:

- a written adjustment plan
- biannual reviews
- co-designed processes
- clear responsibilities for implementation
- automatic transfer across transitions.

**Reform 4: Attendance Distress as an Accessibility Issue**

The Standards must:

- prohibit soft exclusion
- require environmental investigation
- mandate early Autism-informed intervention
- treat school avoidance as a sign of unmet needs.

**Reform 5: Prohibit Seclusion and Tightly Regulate Restraint**

Seclusion must be banned.

Restraint must be:

- only for immediate, serious danger
- reported
- independently reviewed
- overseen externally
- replaced with Autism-informed alternatives.

**Reform 6: Autism-Specific Bullying Prevention and Accountability**

Schools must adopt:

- Autism-specific anti-bullying approaches
- early intervention
- transparent reporting
- trauma-informed follow-up.

**Reform 7: Autism-Informed Transition Frameworks**

Transitions must be predictable, sensory-safe, structured, and universal.

**Reform 8: National Consistency for Senior Assessment, VET, University and Accreditation Bodies**

Authorities must adopt Autism-informed criteria, remove diagnostic barriers and publish transparent adjustment policies.

**Reform 9: National Data and Reporting Requirements**

Data on:

- adjustments
- attendance
- bullying
- restraint/seclusion
- sensory incidents
- pathways...

... must be collected nationally and publicly reported.

**Reform 10: Safe, Supported and Non-Coercive Home Education Pathways**

The Standards must prevent “forced homeschooling” and ensure schools are safe and accessible. Home education, when chosen, must be:

- supported
- resourced
- monitored appropriately.

**Reform 11: Alignment with the National Autism Strategy**

NAS commitments must be embedded in enforceable requirements.

**Reform 12: Implement Disability Royal Commission Findings**

This includes:

- eliminating restraint and seclusion
- reducing segregation
- strengthening complaints systems
- removing discriminatory practices.

**Reform 13: Establish a National Education Inclusion Regulator**

A single body must oversee compliance, data, investigations and enforcement.

**Reform 14: Embed a Positive Duty to Prevent Discrimination**

Providers must act proactively to remove barriers—not react after harm occurs.

## 11.5 Reforms from Section 9 — Intersectionality

**Reform 1: Explicit Recognition of Intersectional Identities**

The Standards must acknowledge diverse Autistic learners and require intersectional planning.

**Reform 2: Gender-Responsive Autism Practice**

Educators must understand:

- masking
- burnout
- gendered social expectations
- risks to LGBTQIA+ Autistic learners.

**Reform 3: Culturally Safe Practice for First Nations Autistic Students**

Includes:

- culturally safe assessment
- anti-racism
- community-led practice
- addressing disproportionate exclusion.

**Reform 4: Culturally Responsive Engagement With CALD Families**

Must include:

- interpreters
- translated materials
- cultural liaison
- Autism-informed community outreach.

**Reform 5: Strengthen Protections for Autistic Students With Intellectual Disability**

Must guarantee:

- communication supports
- inclusive environments
- elimination of restrictive practices
- capacity-presuming approaches.

***Reform 6: Guarantee High-Support-Needs Adjustments***

AAC, co-regulation, sensory supports and specialist staffing must be non-negotiable.

***Reform 7: Adapt Delivery Models for Rural and Remote Autistic Learners***

This includes:

- blended learning
- mobile specialist teams
- tele practice
- regional coordination.

***Reform 8: Mandate Data Disaggregation Across Intersectional Groups***

Data must be disaggregated by disability, gender, First Nations, CALD, support needs and geography.

***Reform 9: Co-Design With Autistic People From Intersectional Groups***

Policy, training and implementation must be co-designed with intersectional Autistic representation.

***Reform 10: Strengthen Complaints and Oversight for Intersectional Discrimination***

Oversight bodies must monitor systemic inequities affecting intersectional groups.

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