

# Annexure A

## RESPONSE TO SUBMISSIONS RECEIVED IN RESPONSE TO CONSULTATION PAPER NO 1: SPECIAL NEEDS EDUCATION - BUILDING AN INCLUSIVE EDUCATION AND TRAINING SYSTEM

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1. In response to this Consultative Paper, 59 written submissions by individuals, organisations, institutions and many national and provincial departments were received. Disappointingly, only one of these submissions advised on higher education, and none on the education sub-systems of early childhood, adult basic and further education and training.
2. Since many of the submissions argued passionately in favour of or against the key principles and policy framework put forward in the Consultative Paper, the Ministry chose to provide these, as well as responses in summary form below.

### **Premature implementation of policy recommendations**

3. Public comment drew attention to the premature and disorderly implementation of the joint policy recommendations of the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services in some provinces despite the absence of national policy, and highlighted the indiscriminate closure and threat of closure of special schools. The Ministry acknowledges that these actions have created uncertainty about the future of these institutions and have worsened the already rapidly declining quality of provision described in the Consultative Paper. The Ministry has already taken steps to reverse this situation.

### **Terminology**

4. Many submissions put forward the view that the Consultative Paper represented a retreat from the joint report of the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services and that it was beset with contradictions. In this respect, the submissions argued that the Consultative Paper embraced the groundbreaking approach of the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services that learning difficulties do not only reside in learners but also reside within the learning system. Typically of this approach, physical plants, curricula, assessment, learning materials and instruction are outdated and provide

inadequate access for most learners, and as many as 70% of learners face such daily 'barriers', resulting in many being pushed out or dropping out of the learning system (Department of Education. Quality Education for All: Overcoming Barriers to Learning and Development. Joint report of the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services. February 1998).

5. Despite embracing this groundbreaking approach, these submissions suggested that the Consultative Paper opts to use outdated terminology such as 'learners with special education needs' and 'learners with mild to severe learning difficulties', which are signifiers of the 'deficit' or 'medical' model in which barriers to learning are assumed to reside primarily within the learner. Also, the strategy of targeting 'learners with mild to severe learning difficulties' put forward in the Consultative Paper was argued to be outdated since most learners within mainstream education experience 'barriers to learning'. Instead of targeting a minority of learners, the focus should be moved to the entire learning system and the 'barriers' that exist there. In this manner, these submissions maintained, the Consultative Paper moves away from the recognition that 'barriers' to learning reside primarily in the learning system where they should be removed. We respond fully to this criticism below.
6. Public comment also indicated preference for the groundbreaking terminology put forward by the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services, arguing that this terminology - 'barriers to learning and development' for signifying that barriers exist primarily within the learning system - was already widely in use by many specialists and practitioners, a reflection of the wide consultation held and consensus developed by the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services.
7. The Consultative Paper proposed an implementation strategy that prioritises the upgrading and conversion of all 378 special schools and specialised settings and their inclusion within new district-based support teams, increasing access to learners outside of the education and training system and the optimal use of limited resources. For these to be accomplished, the Consultative Paper put forward proposals for the revision of all education and training policies and legislation, including curriculum, assessment, quality assurance and funding, the strengthening of the special education needs capacities of all advisory bodies, the creation of barrier-free learning environments, the provision of appropriate professional development to education managers, educators and support personnel and the mobilisation of parents and communities behind inclusion. Most of the public comment focused on the ranking of these priorities and actions.

8. Many submissions supported the idea of giving priority to special schools and specialised settings for qualitative improvement as a first step towards their expanded roles within an inclusive system. These submissions pointed to the premature implementation of the inclusive model resulting from the premature implementation of the policy recommendations of the National Commission on Special Needs in Education and Training and the National Committee on Education Support Services. In this respect, they drew attention to the closure of some special schools and threats to the closure of others, the scaling down of funding to these schools and settings by some provincial departments of education, all of which have created uncertainty about their future, thus exacerbating the declining quality of provision. They suggested that immediate mainstreaming would result in learners in these special schools and settings receiving an even worse education, given the challenges facing mainstream schools such as high learner:classroom and high learner:educator ratios. The submissions suggested that the competencies required to support these learners in mainstream education would represent another barrier to learning for these learners.
  
9. Many submissions put forward the view that strengthening special schools and specialised settings would be a retrogressive approach and that these schools and settings should either be incorporated immediately as resource centres into district-based support teams or be abolished and learners admitted to neighbourhood schools. The submissions suggested that many disabled children are outside of any learning institution; others suggested that most learners who experience barriers to learning and exclusion are within mainstream schooling and receive little or no education support. Accordingly, they suggested that the focus on special schools and specialised settings is misplaced. Instead, policy should target the approximately 400,000 disabled children who receive no education and training and the approximately 70% of learners in mainstream education who receive little or no education support services, yet experience barriers to learning and exclusion. These submissions suggested that learners attending special schools and specialised settings should be accommodated within local neighbourhood schools, thus ending the isolation and stigmatisation of disabled learners. Moreover, the high-cost, high-intensive resources allocated to special schools and specialised settings should be used more efficiently within an inclusive, single, mainstream education and training system. It is suggested that the high costs of hostels and transport associated with special schools and settings would be eliminated in this manner.

10. Several submissions requested clarification about what is meant by ‘an inclusive education and training system’. From one such submission came the following advice that is embraced. Inclusive education and training:

- Are about acknowledging that all children and youth can learn and that all children and youth need support.
- Are about enabling education structures, systems and learning methodologies to meet the needs of all learners.
- Acknowledge and respect differences in learners, whether due to age, gender, ethnicity, language, class, disability, HIV status, etc.
- Are broader than formal schooling and acknowledge that learning also occurs in the home and community, and within formal and informal manners.
- Are about changing attitudes, behaviour, methodologies, curricula and environments to meet the needs of all learners.
- Are about maximising the participation of all learners in the culture and the curriculum of educational institutions and uncovering and minimising barriers to learning.

#### **Other comments**

#### **11. The following are further important suggestions or proposals:**

- ‘Full-service’ schools should be designated in each district for the implementation of the inclusion model, especially since it is unimaginable how all 29,000 public schools could all provide the full range of physical and material resources required - e.g. Braille writers, voice synthesisers, hearing aids and adapted information and communications technologies - and the staff to accommodate the full range of diverse learning needs.
- Learners who require education support through, for example, the tailoring of curriculum, instruction and assessment should be identified early, and for this purpose the Foundation Phase (Grades R-3) should be prioritised.
- Since learners are more independent after the Foundation Phase, implementation of the inclusion model or mainstreaming of learners should begin after Grade 3.
- Special schools and settings should be converted to resource centres that provide specialised professional support in curriculum, assessment and instruction to neighbourhood schools in addition to serving their own expanding learner bases.
- For the inclusive model to work, designated posts should be created in all schools for the development and co-ordination of school-based support for all educators.

- Instead of rhetorically stating that the new outcomes-based curriculum accommodates all learners within a single learning programme, district-based support teams should provide curriculum, assessment and instruction support in the form of illustrative learning programmes, learning support materials and assessment instruments to special schools and specialised settings.
  - The needs of parents of disabled learners or learners at risk should be taken into account and they should be provided with information, counselling and skills to support their children.
12. All these submissions have enriched and contributed valuably to this White Paper.
13. It is worth noting that the policy framework put forward in this White Paper addresses the full range of diverse learning needs within all bands of the education and training system. The policy framework is therefore neither limited to the traditional special education domain nor to general school education. The Ministry believes that, for the agenda outlined in this White Paper to be pursued successfully, we must recognise that learning difficulties are located and experienced within all bands of education and training - general, further and higher education and training - and across the curriculum and instruction.
14. In addressing these matters, we restate what we recorded in the Consultative Paper, namely that, in addressing these matters, the White Paper builds upon those processes that are aimed at facilitating transformation at the critical points of the system. The White Paper is released at a time when policy development is completed or at an advanced stage for all bands of education and training. The intention is therefore not to replace these policies with a new set such as those included here. Rather, it is to revise these, since these policy development processes have not all fully benefited from the review and advisory process on education for learners with special education needs. Accordingly, this White Paper extends rather than replaces critical projects such as Curriculum 2005, the Ministry's five-year Tirisano plan, the development of new quality assurance policies, methods and instruments, the norms and standards for teacher education, the higher and further education planning processes and the development of effective education management and governance capacity across the system.