

EDUCATION FOR ALL

**Special Needs and Inclusive
Education in Malta**

External Audit Report

European Agency for Special Needs and Inclusive Education



This document is the final EDUCATION FOR ALL *Special Needs and Inclusive Education in Malta – External Audit Report*.

This report has been prepared by the European Agency for Special Needs and Inclusive Education on behalf of the Ministry for Education and Employment, Malta.

The report has been developed as a result of work conducted throughout 2014 by staff and consultants from the European Agency for Special Needs and Inclusive Education.

External Audit Team members:

- Dr Amanda Watkins, Assistant Director, Agency
- Dr Verity Donnelly, Project Manager, Agency
- Professor Serge Ebersold, National Higher Institute for Teacher Training and Research on Special Needs Education (INS HEA), Paris and University of Strasbourg, France
- Professor Richard Rose, University of Northampton, UK (England)
- Dr Per Skoglund, National Agency for Special Needs Education and Schools, Sweden

European Agency for Special Needs and Inclusive Education, 2014

Secretariat

Østre Stationsvej 33

DK-5000 Odense C Denmark

Tel: +45 64 41 00 20

secretariat@european-agency.org

Brussels Office

Rue Montoyer, 21

BE-1000 Brussels Belgium

Tel: +32 2 213 62 80

brussels.office@european-agency.org

www.european-agency.org



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List of acronyms used in the Report and Annexes

BMJ – British Medical Journal

CPD – Continuous Professional Development

DES – Directorate for Educational Services

ESL – Early School Leaving

GDP – Gross Domestic Product

ICT – Information and Communication Technology

IEPs – Individual Education Plans

INCO – Inclusion Co-ordinator

ITE – Initial Training and Education

LSA – Learning Support Assistant

NGO – Non-Governmental Organisation

PIRLS – Progress in International Reading Literacy Study

PISA – Programme for International Student Assessment

SEN – Special Educational Needs

SMTs – Senior Management Team members

SMP – Statementing Moderating Panel

SSD – Student Services Department

TIMSS – Trends in International Mathematics and Science Study

UDL – Universal Design for Learning

UNCRC – United Nations Convention on the Rights of the Child

UNCRPD – United Nations Convention on the Rights of Persons with Disabilities



FOREWORD

In November 2013, Mr Evarist Bartolo, the Minister for Education and Employment for Malta approached the European Agency for Special Needs and Inclusive Education (the Agency) with an initial enquiry about possible input to an examination of Special Needs Education (SNE) provision in Malta.

The Agency is an independent association of European member countries¹, acting as a platform for collaboration in the field of special needs and inclusive education. The Agency's aim is to improve educational policy and practice for learners with disabilities and special educational needs.

Following discussions with members of the Directorate for Educational Services (DES), the Agency put forward proposals to the Ministry in December 2013. In January 2014, the Ministry confirmed their intention to conduct an External Audit of their SNE resourcing procedures and formally asked the Agency to act as consultants.

The External Audit took place from February to December 2014. The Agency conducted it by working in co-operation with, but independently from, any stakeholders within Malta. The External Audit Team comprised Agency staff working with additional consultants. As Agency Director, I oversaw the overall Audit activities.

This document presents the findings and recommendations arising from all the External Audit activities. These activities included:

- An extensive desk-based literature review.
- An analysis of the background information provided by the Directorate for Educational Services on the education system in Malta.
- An analysis of 1,184 responses to an on-line survey circulated to all state, church and independent schools.
- An analysis of qualitative data collected during 11 school visits, 21 focus group discussions involving 145 participants and 14 face-to-face interviews conducted during the fieldwork in May 2014.

The Agency wishes to formally acknowledge the contributions of the many stakeholders in Malta to the Audit activities. In particular, thanks to the staff

¹ As of December 2014, the Agency member countries are: Austria, Belgium (Flemish and French speaking communities), Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Switzerland and United Kingdom (England, Northern Ireland, Scotland and Wales).



members of the Directorate for Educational Services for their extensive practical and technical assistance in implementing the Audit.

This report aims to provide a comprehensive picture of the current special needs and inclusive education system in Malta. It is anticipated that, in the longer term, this information will be used as the basis for in-depth discussion with all stakeholders in the Maltese education system.

Dr Cor Meijer, Agency Director



EXECUTIVE SUMMARY

This section presents an executive summary of the full report prepared for the Ministry for Education and Employment in Malta by the European Agency for Special Needs and Inclusive Education (the Agency), as part of the External Audit of Special Needs and Inclusive Education conducted during 2014.

This summary presents the main findings, recommendations and ways forward. The full Reporting Package consists of this Report and seven associated Annexes.

The External Audit approach

The work conducted by the Agency has taken a standards-based audit approach that focused on: planning – identifying the topic and objectives, reviewing literature and setting Standards; data collection – designing the Audit, collecting and analysing data; and reporting. (The full Audit methodology is described in Annex 1).

The Agency Audit Team carried out Desk Research (presented in Annex 2) to place the Audit work in a wider policy context and provide a framework of underpinning principles. A team from the Ministry for Education in Malta provided a Critical Review of current policy and practice (presented in Annex 3). The Desk Research was then used to support the development of the key areas highlighted by the Critical Review into the Framework of Standards used as a basis for the Audit (and presented in Annex 4).

The Framework covered seven areas:

- legislation and policy;
- building capacity within mainstream schools;
- specialist provision as a resource for the mainstream sector;
- training and professional development for school leaders, teachers and LSAs;
- teaching, learning, curriculum and assessment;
- identification of needs and allocation of support; and
- monitoring and evaluation.

In total, 137 Standards were identified within the framework.

Five critical issues underpinning the Standards were identified and used as basis for data collection from a wide range of stakeholders:

1. How well are schools enabled to implement inclusive education?
2. How adequately are school staff enabled to meet learners' diverse needs?



3. Do the official needs identification and statementing procedures promote an approach to meeting individual learning needs that is based on children's rights?
4. How effectively do systems of support enable all stakeholders in education?
5. How effective and enabling are educational quality assurance processes?

The data collection phase involved:

- *examination of background information* on the education system in Malta;
- *fieldwork* including 21 *focus groups* involving a total of 145 participants, 14 face-to-face *interviews* – ten were 1-to-1 and four were small group interviews – involving a total of 22 respondents, and 11 *school visits*;
- an on-line, anonymous *survey* with 1,184 responses from key stakeholders at school level (an exemplar survey is presented in Annex 5 and the full report of survey results in Annex 6).

Evaluation of policy and practice against the identified Standards

All data was analysed against the Standards identified for the Audit that were judged as:

- *To be initiated* – planning is at an early stage or practice is yet to be started.
- *Requiring development* – implementation is partial, or inconsistent across schools.
- *Embedded in policy and practice* – work in this area is established and sustainable in the majority of schools.

The outcomes can be summarised as follows:

- Just over a quarter of the Standards (37) were identified as being *to be initiated*.
- The vast majority of Standards (100) were identified *as requiring development*.
- None of the Standards were identified as being *fully embedded* in policy and practice in the majority of schools.

(The full evaluation is presented in Annex 7.)

This evaluation demonstrates that, while work is underway in many aspects of the seven areas covered by the Standards, further development is needed in order to embed this work firmly within practice at all levels of the education system.



Findings

For each of the five critical issues considered in the Audit, *areas of strength* in the Maltese system that potentially provide a basis for further work have been identified, as well as *areas for development* to address challenges for current policy and practice.

In relation to *how effectively schools are enabled to implement inclusive education*, the Audit data indicates that various system factors result in schools being only partially enabled to effectively implement inclusive education. Many system factors reinforce an integrative approach for some learners, rather than an inclusive approach for all learners.

In relation to *how adequately school staff are enabled to meet learners' diverse learning needs*, school-level stakeholders do not feel sufficiently enabled to meet individual learning needs and various critical system-level factors – training, provision of support and the degree of centralisation – appear to reinforce school-level practice that does not foster inclusion.

In relation to *the ability of the official needs identification and statementing procedure to promote an approach to meeting individual learning needs that is based on children's rights*, it can be argued that for the majority of learners, their right to access mainstream education is being met, but this is not sustainable in the long term as the current system does not provide equity and full participation for all, or promote mainstream capacity building.

In relation to *how effectively systems of support enable all stakeholders in education*, many stakeholders view support services as being relatively effective in providing for individual learners with SEN, but their role needs to be re-focused towards providing more enabling support for mainstream schools and staff.

Finally, in relation to *how effective the educational quality assurance processes are in enabling stakeholders to implement inclusive education*, it can be seen that the current quality assurance system provides a good basis for further developments that will ensure transparency and accountability, as well as high quality education for all learners.

Recommendations

The Audit findings indicate that current challenges in a number of key areas can be addressed by:

- Ensuring that inclusive education becomes an integral part of all legislation and is consistent with the United Nations Convention on the Rights of the Child (UNCRC) and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Policy and practice should focus on maximising



learning opportunities for all learners based on a clear vision for inclusive education shared with all stakeholders.

- Developing a longer-term approach to policy-making to reduce fragmentation, outline clear roles and responsibilities and provide support at all system levels.
- Developing strong leaders to build the capacity of mainstream schools and to implement policy and practice that reduces barriers to learning and participation through greater collaboration among all stakeholders.
- Developing a continuum of support in schools/classrooms and providing support for teachers and other staff through specialist services that focus on upskilling school personnel.
- Providing training in inclusive education for all education stakeholders – policy makers, leaders, teachers and other professionals.
- Developing flexible curriculum and assessment frameworks and introducing teaching approaches that engage all learners. All staff must take responsibility and work with all learners to ensure that the assessment process informs future learning with less emphasis on the summative examination system.
- Ensuring that needs identification and allocation of support emphasise early support and prevention rather than compensatory approaches. Parents and learners should be involved and links established between the classroom and the formal assessment process.
- Further developing monitoring and evaluation at all system levels to ensure that quality assurance procedures support capacity building for including all learners.

All the abovementioned recommendations are inter-connected, but the quality of teaching and learning – within a relevant curriculum and effective assessment procedures – is at the centre of all other recommendations.

Ways forward

The Audit identified a number of inter-dependent priority steps that will be necessary to further develop effective policy and practice for inclusive education. These are:

- creating clarity around the concept of inclusion through national dialogue, leading to a review of legislation and policy;
- re-focusing support to increase the capacity of colleges and schools to meet the needs of all learners;



- establishing a national training body to ensure the development of appropriate skills, knowledge and understanding for all education leaders, teachers and support personnel;
- providing support to schools to help them to develop a curriculum to engage all learners and to use evidence-based assessment, teaching and learning approaches to meet diverse needs; and
- promoting self-review at all system levels and using information to inform further improvement.

Three critical levers

The Audit highlighted three critical levers considered as essential actions in the shorter term. These actions will underpin all future development.

1. Develop a stakeholder platform for discussion and agreement on key issues for inclusive education.
2. Audit current resourcing levels and identify possible models for more flexible resourcing.
3. Develop pilot projects to examine inclusive teaching and learning approaches.

Finally, the Audit suggested the development of a ten-year plan for education with wide stakeholder consultation and cross-party agreement to ensure that current plans for an inclusive system are implemented and sustained in the longer term.



INTRODUCTION

This report has been prepared for the Ministry for Education and Employment by the European Agency for Special Needs and Inclusive Education, as part of the overall **Reporting Package** for the External Audit of Special Needs and Inclusive Education. The Reporting Package consists of this report and seven associated Annexes, all submitted to the Ministry for Education and Employment in draft form in November 2014.

This report draws on all information collected from February to November 2014 and the subsequent analysis. It aims to present the main findings and recommendations emerging from the External Audit work and should be read in conjunction with the accompanying Annexes: External Audit Methodology, Desk Research Report, Critical Reflection Document, Framework of Standards, Exemplar Survey, Survey Results Report, and Evaluation of Policy and Practice against the Standards.

Throughout the report the terms 'Ministry' and 'Audit' Teams are used. The Ministry Team refers to staff members working in the Directorates for Educational Services and Quality Standards, the Ministerial adviser for the Audit work and staff members from the Student Services Department. The Audit Team refers to Agency staff members and external consultants appointed to work on the Audit.

The External Audit approach

The External Audit of Special Needs and Inclusive Education in Malta has been conducted by a team of Agency staff members and external consultants working in co-operation with, but independently from, any stakeholders from Malta.

The initial request from the Minister for Education and Employment was for an independent, external audit of the special needs referral and resource allocation procedures leading to a set of clear recommendations for future action and development work in the short, medium and long term. However, during the early discussions with key Ministry stakeholders, it was apparent that the required focus of the External Audit was wider than the SNE referral and resourcing system. The Audit work has therefore considered the system for inclusive education in Malta – with a particular emphasis on special needs resourcing and effectiveness issues.

The work conducted by the Agency during 2014 has taken a standards-based audit approach. Such an approach was proposed as it has the potential to:

- promote an improvement cycle of review and reflection, and
- support evidence-based practice and decision-making.

The approach is based on a cycle of different phases and actions, as presented in Figure 1.

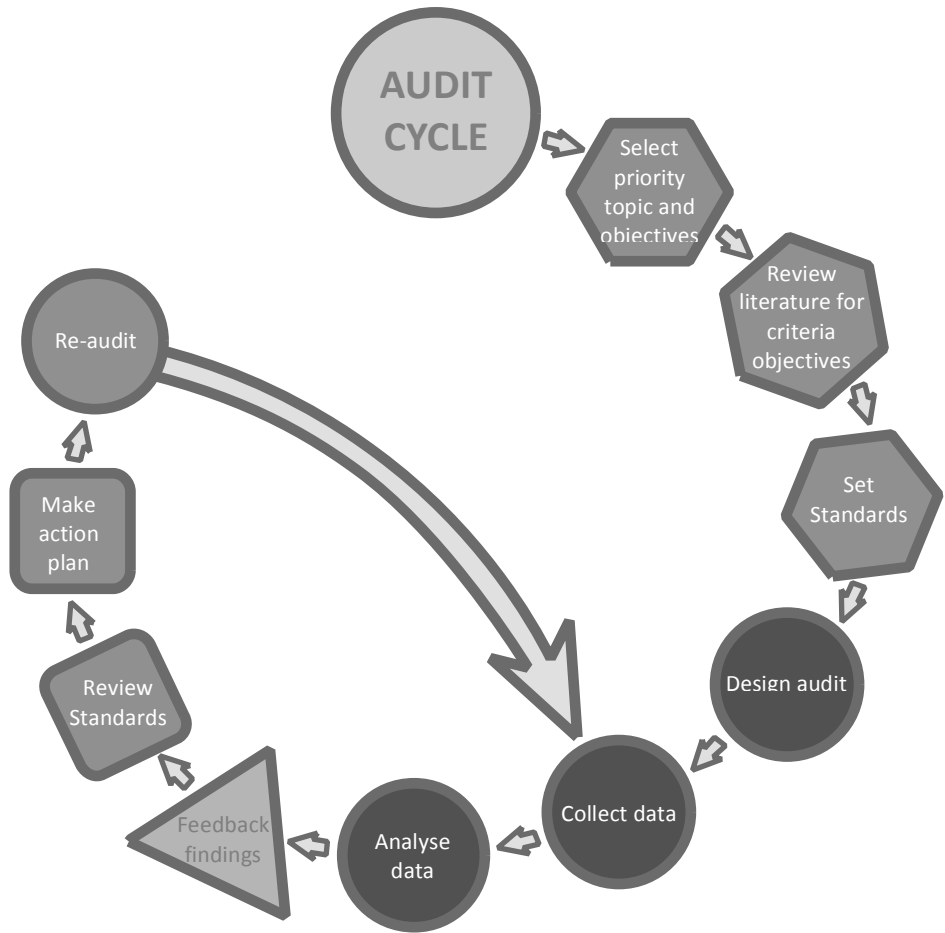


Figure 1. Audit Cycle

[Adapted from BMJ Informatica]


The External Audit in Malta focused on the first three of the five Audit phases:

- Planning – identifying the topic and objectives, reviewing literature and setting Standards.
- Data collection – designing the Audit, collecting and analysing data.
- Reporting.

All activities conducted during the Audit aimed to inform the implementation of two further phases of the complete Audit cycle in the longer term: implementation and monitoring, and review and re-audit.

Audit objectives

Discussions between the Ministry for Education and Agency Audit Teams led to the identification of ten objectives for the work:

- 
1. Situate the current special needs referral system in Malta within a wider European context of policy and practice for special needs and inclusive education.
 2. Work with the Ministry for Education and Employment in Malta to identify a framework of process and outcomes Standards for the SNE referral and resource allocation procedures.
 3. Work with the Ministry for Education and Employment in Malta to undertake a process of critical reflection on current practice, leading to a document presenting the reflections.
 4. Prepare independent data collection methods in line with the Framework of Standards.
 5. Collect data to inform issues of alignment between the agreed Standards and practice in schools and supporting services.
 6. Explore short- and long-term sustainability, investment and added value issues, with particular emphasis upon the cost-effectiveness of Learning Support Assistant (LSA) provision.
 7. Consider the impact of the referral and LSA resource allocation system on learners, their families and schools.
 8. Identify examples of high quality practice in utilising resources for special needs and inclusive education in Malta.
 9. Identify key levers for change to improve effectiveness in the resource allocation system.
 10. Prepare specific recommendations for the implementation and monitoring of future action plans aimed at further developing special needs and inclusive education policy and practice in Malta.

All of the activities conducted during the Audit have contributed to the fulfilment of these objectives.

Key milestones within the Audit

A full description of the methodology used in the Audit is presented in **Annex 1: External Audit Methodology**. A summary of the key tasks undertaken within the Audit is presented in Figure 2 – the main milestones are indicated in italics:

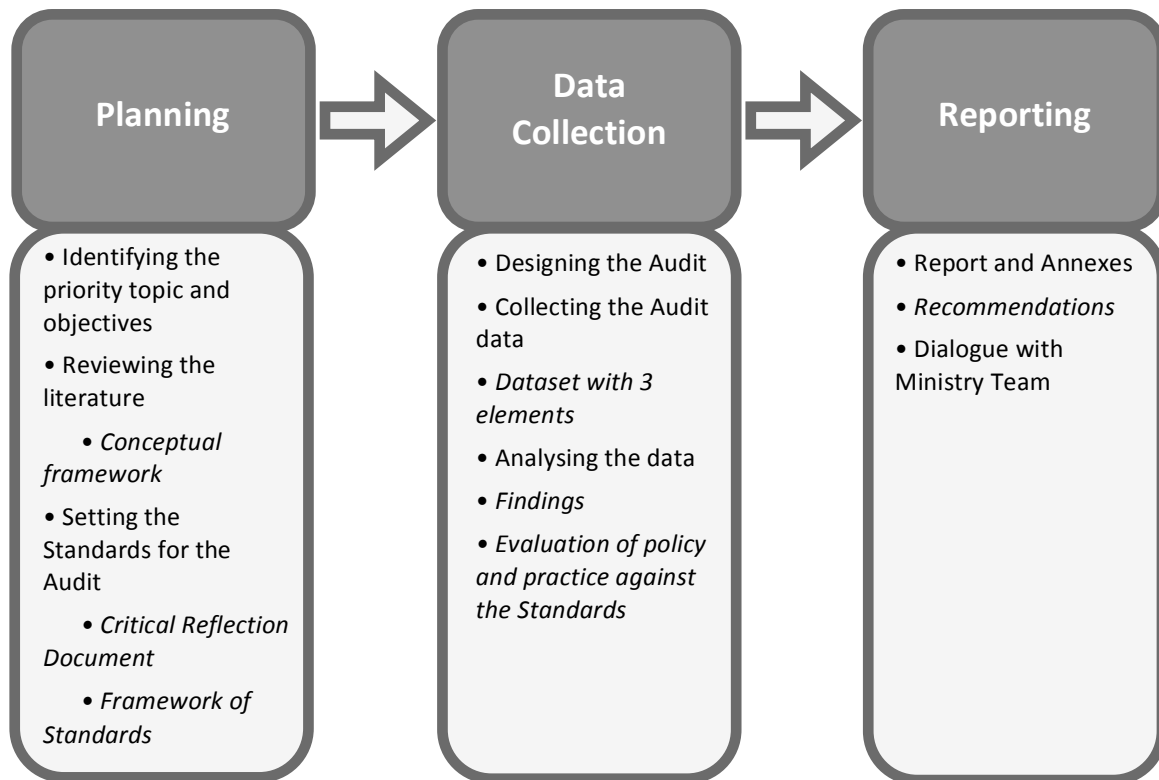


Figure 2. Summary of Audit Methodology

The main milestones are the focus of different sections of this Audit Report. Each one is briefly described below, with sources of further information indicated in bold text in order to provide a route map to the overall Reporting Package.

Conceptual framework

From the initial stages of the study, the Audit Team carried out a review of recent research literature to inform the Audit activities. This desk research places the work in Malta in a wider research and policy context and directly supported other activities by:

1. verifying and expanding upon the main areas to be considered as Standards for the Audit;
2. providing a conceptual framework for data collection; and
3. highlighting key factors to be considered in final reporting.

The desk research document was worked on throughout the main Audit period. It has been finalised as a stand-alone document and is presented as **Annex 2: Desk Research Report**.



Critical Reflection Document

In February 2014, the Ministry Team members undertook a key preparatory activity for the Audit – a process of Critical Reflection on the current SNE system. The documented outcomes of this work provide the Ministry Team’s perception of strengths and weaknesses of key areas within the inclusive education system.

The Critical Reflection Document enabled the Ministry Team to clearly articulate what, in their view, were the main issues to be examined in the Audit. The document highlighted these priority areas and then proposed Standards linked to each one. The Standards identified at this stage can be described as ‘stakeholder aspirations for the system’.

The final document is presented in full in **Annex 3: Critical Reflection Document**.

Framework of Standards

The main areas identified by the Critical Reflection Document were used as the basis for the Framework of Standards and aligned with the key issues for the education system identified in the desk research. The seven components are:

1. Legislation and policy
2. Building capacity within mainstream schools
3. Specialist provision as a resource for the mainstream sector
4. Training and professional development for school leaders, teachers and LSAs
5. Teaching, learning, curriculum and assessment
6. Identification of needs and allocation of support
7. Monitoring and evaluation.

Chapter 2 of this report presents information on the development of the Standards. The full set of Standards used in the External Audit is contained in **Annex 4:**

Framework of Standards.

Audit dataset

As a framework for data collection and analysis work, the Ministry and Audit Teams identified five critical issues that were common to all stakeholders and underpinned the Standards.

- | |
|---|
| <ol style="list-style-type: none">1. How well are schools enabled to implement inclusive education?2. How adequately are school staff enabled to meet learners’ diverse needs? |
|---|



3. Do the official needs identification and statementing procedures promote an approach to meeting individual learning needs that is based on children's rights?
4. How effectively do systems of support enable all stakeholders in education?
5. How effective and enabling are educational quality assurance processes?

Audit data collection focused upon three separate, but mutually supporting activities:

1. *Background information* on the education system in Malta by the Ministry Team
2. *Fieldwork* including *focus group* discussions, face-to-face *interviews* and *school visits* and involving a broad range of stakeholders in the education system
3. An on-line, anonymous *survey* for key stakeholders at school level.

A full description of the methods used to collect data is presented in **Annex 1: External Audit Methodology**. An example of one of the on-line surveys is presented in **Annex 5: Exemplar Survey**. The discussion of the survey results is presented in **Annex 6: Survey Results Report**. This extensive report provides a detailed analysis of all 1,184 survey responses and presents the main opportunities and challenges in relation to implementing daily inclusive education in Malta.

Within this report and the Annexes, all data sources are anonymous. For purposes of confidentiality, it is not possible to track responses back to individual respondents.

Findings

Evidence from the three data collection activities was analysed at individual team member and then full team levels. All analysis work considered system, process and outcome factors and contributed to the overall goal for the Audit – identifying findings and then recommendations that can be used to plan systemic improvements in the short, medium and long term.

All findings have been used to explore the five key issues underpinning the Audit. **Chapters 3 to 7** of the report present a synthesis of findings related to each of the issues in turn.



Evaluation of policy and practice against the Standards

The data collection by the Audit Team was used to examine current policy and practice against the agreed Standards. Based on all available evidence, each Standard was identified as being:

- To be initiated – planning is at an early stage or practice is yet to be started.
- Requiring development – implementation is partial, or inconsistent across schools.
- Embedded in policy and practice – work in this area is established and sustainable.

More details on the final evaluation process are presented in **Chapter 8** of this report and the full outcomes are presented in **Annex 7: Evaluation of Policy and Practice against the Standards**.

Audit recommendations

The development of recommendations linked to the Audit Standards has been based upon a combination of three elements, as shown in Figure 3.

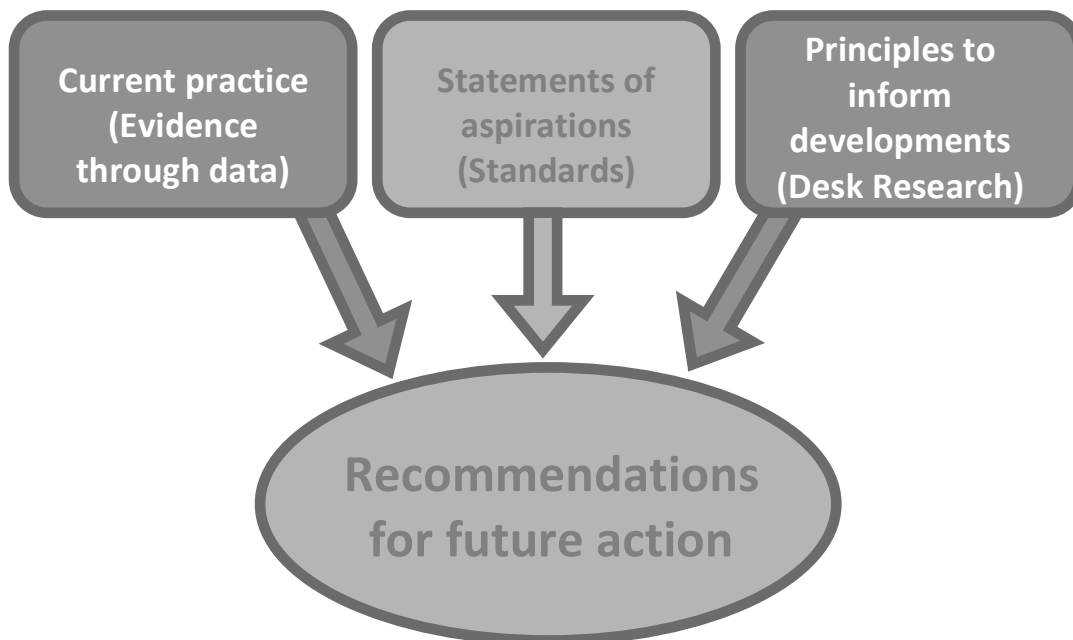


Figure 3. Developing Audit Recommendations

The Audit Team drew on relevant information from each of these elements in order to formulate the recommendations linked to the Standards, presented in **Chapter 9** of this report.

The recommendations identified within the Audit have led to a chapter considering **Ways Forward**. This final chapter highlights the critical areas for change that can be



used to support system developments in special needs and inclusive education in Malta in the short and medium term.

In order to put all of the Audit information, findings and recommendations into a clear context, **Chapter 1** of this report presents an overview of the cultural and system factors (past and present) that appear to have influenced and may still impact upon the development of special needs and inclusive education in Malta.



1. THE EDUCATIONAL CONTEXT IN MALTA

This chapter provides some background to set the External Audit in a wider historical and cultural context. Information in this section has been taken from the desk research (Annex 2) and the background information provided by the Ministry Team.

The aim is not to provide a history of Maltese education, but rather highlight the cultural and system factors and developments – past and present – that have affected the development of special needs and inclusive education in Malta.

1.1 Historical background

During the second half of the 20th century, Malta developed from a relatively poor country to one with a modern economy based on manufacturing, services and tourism. During the 1980s and 1990s, Malta experienced relatively rapid economic growth. However, Malta has felt the effects of the global economic downturn, although not to the same extent as many other European Union (EU) Member States. In part, this was due to the diversification of the Maltese economy in recent years.

Since Malta has few natural resources, economic growth is dependent on the skills of its population and Malta spends over 5.9% of GDP on education – slightly above average spend in EU countries. The Maltese Government views public expenditure on education as a way to foster economic growth, enhance productivity, contribute to citizens' personal and social development and as a means to reduce social inequalities. Accordingly, it increased spending in 2014.

The Government of Malta is also committed to making lifelong learning and mobility a reality and to achieve greater equity and more active citizenship. With regard to recent social change, a report by the Equality Research Consortium (Pisani et al., 2010) notes that the past decade has been marked with important social changes including the arrival of people seeking asylum, greater visibility for particular minority groups, and greater awareness of discrimination and remedies to combat it. The report notes that the education system plays a key role in promoting mindsets open to a diverse society.

In 2007, Malta was one of the first United Nations (UN) member states to sign the UN Convention on the Rights of Persons with Disability. It ratified it in 2013. Over the years, there have been efforts to increase the understanding of the concept of inclusion to all marginalised groups and to introduce more respectful terminology.

In Malta, education is provided in state, church or independent (fee-paying) schools, with the vast majority of learners attending state or church provision.

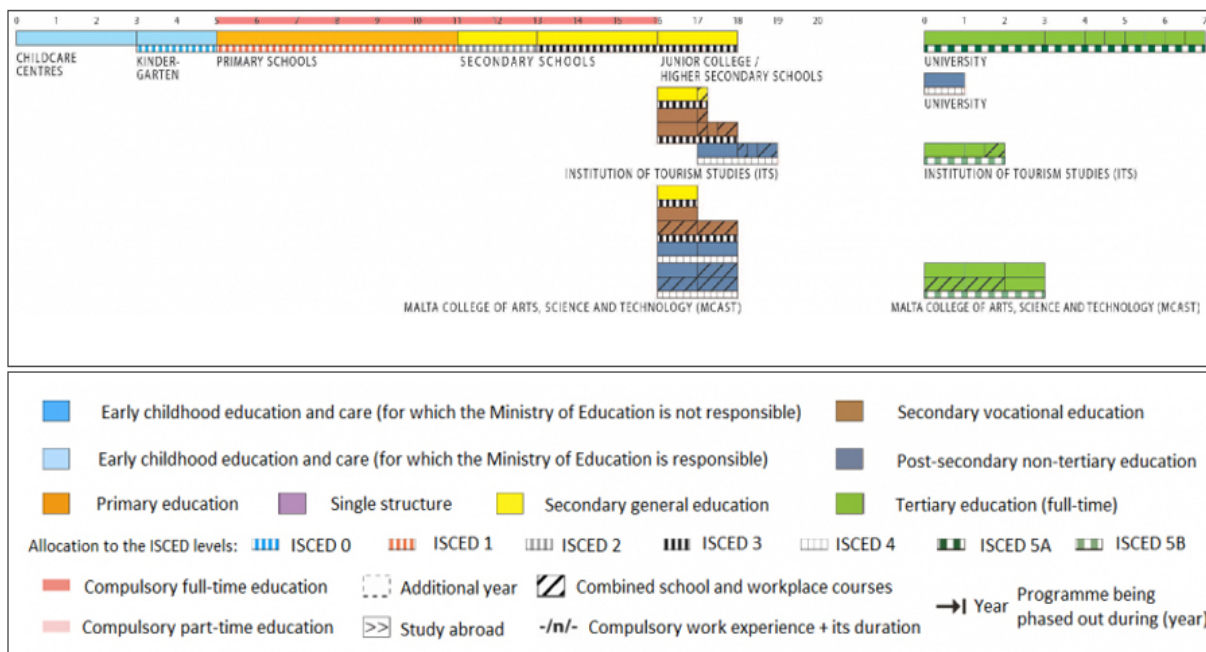


Figure 4. Overview of the education system

(Source: Eurypedia, 2014)

Overall, the education system in Malta has been characterised by formal structures (including selection, competition and banding/streaming), traditional teaching methods, strict discipline and high stakes examinations. The firm belief that homogenous groups provide the best learning environment persists among many stakeholders and there has only recently been a move to co-educational schooling in the state sector (to be phased in over five years from 2013).

Between 1972 and 1981, the government attempted to introduce comprehensive education, but this led to an increase in learners attending the church and independent schools that had retained selection. As a result, streaming and the 11-plus examination were re-introduced. The 11-plus examination has since been discontinued in all schools, but the ‘backlash’ against mixed-ability teaching has led to the (temporary) introduction of ‘banding’ in 2014.

Many other changes have taken place in recent years that provide an insight into current policy and practice.

In 1995, the Consultative Education Committee published *Tomorrow’s Schools – Developing Effective Learning Cultures* (Wain et al., 1995). This document proposed the development of schools as learning communities that would cater for learners’ well-being and bring teachers and parents together.

In 1999, the National Minimum Curriculum (NMC) set out the knowledge and skills needed by learners and, although seen as too prescriptive by some stakeholders, it had inclusion as a main principle and was introduced with broad national consensus.



The strategic plan for the NMC (Ministry of Education, 2001) not only outlined the need for new structures and approaches, but also underlined the necessity for schools to collaborate and share good practice. It also highlighted the importance of allowing space for autonomous initiatives to facilitate school-based curriculum development.

In 2005, the publication *For All Children to Succeed* set out proposals for reorganisation to promote decentralisation and increase collaboration among schools to ensure that the individual needs of learners were catered for. The document also underlined the concept of collaboration with parents or guardians, recognising the benefits parents and others can gain from networking with the schools (Ministry of Education, Youth and Employment, 2005).

As a basis for these developments, networks were characterised as ‘purposeful social entities characterised by a commitment to quality, rigour, and a focus on standards and student learning’ (Hopkins, 2005; cited in Ministry of Education, Youth and Employment, 2005, p. 37).

The Education (Amendment) Act (2006) brought into place the current college structure. Each of the ten colleges are made up of a cluster of secondary schools with their feeder primary schools and this development introduces a vision of change from a ‘top-down’ system to ‘learning communities’ that also involves members (e.g. at board level) from outside the school community.

However, a study of the impact of the college system (Borg and Giordmaina, 2012) has suggested that, to that point in time, the reforms had not served as a vehicle for decentralisation in the way originally intended. Some respondents to the 2012 survey suggested that another tier had been created in the educational hierarchy and many others felt that colleges/schools still needed greater autonomy to empower them to develop policy and practice at school level. Many senior managers expressed the view that bureaucracy had increased and teachers felt that opportunities for greater collaboration were limited.

Although the difficulties of balancing decision-making while moving towards more participatory approaches are widely appreciated, Bezzina and Cutajar refer to the college reform as taking a ‘big bang’ approach to change and stress the need for evolution, not revolution (2012, p. 21). As a small community, the Maltese Islands can potentially communicate and consult with stakeholders, but this requires fewer hierarchical structures and necessitates formal systems for feedback and comment that give all stakeholder groups the chance to be heard.



1.2 Recent developments

A new *Framework for the Education Strategy for Malta 2014–2024* (Ministry for Education and Employment, 2014a) was launched in February 2014, aiming to address all cycles of education from early years to adult learning. This Framework aims to unify the different frameworks and strategies, such as the [National Curriculum Framework](#), the [National Literacy Strategy for All](#), [A Strategic Plan for the Prevention of Early School Leaving](#) and the Strategy for Lifelong Learning. Measures aim to reach across all socio-economic sectors and different cultural, ethnic, religious, gender and sexual statuses and the Ministry is seeking to improve learners' learning experiences by encouraging creativity, critical literacy, entrepreneurship and innovation at all levels.

The *Framework for the Education Strategy for Malta 2014–2024* has four broad goals that are in line with European (i.e. Education and Training 2020) and world benchmarks:


- to reduce the gaps in educational outcomes between boys and girls and among learners attending different schools; decrease the number of low achievers and raise the bar in literacy, numeracy, and science and technology competence; and increase learner achievement;
- to support educational achievement of children at risk of poverty and from low socio-economic backgrounds; and reduce the relatively high incidence of early school-leavers;
- to increase participation in lifelong learning and adult learning; and
- to raise levels of learner attainment and retention in further, vocational and tertiary education and training.

1.2.1 National Curriculum Framework

The *National Curriculum Framework for All* (Ministry of Education and Employment, 2012a) is seen as an important tool for inclusion and employability that aims to empower learners to achieve their full potential as lifelong learners. Building on the NMC (Ministry of Education, 1999), the new National Curriculum Framework replaced selective educational arrangements with comprehensive ones, and began the development of a curriculum that promotes progress for all learners.

Following consultation, the latest framework sets out to:

- enable young people to work towards the acquisition of a formal qualification in key competences as the foundation for lifelong learning;
- provide more flexible and diverse pathways for all learners, increasing engagement in education;

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-
- address the gaps in the education system that have led to absenteeism, high rates of early school leaving and low skills and competences for a proportion of learners; and
 - create a Learning Outcomes Framework that moves away from stand-alone subjects to learning areas that form the entitlement for all learners towards inclusivity, citizenship and employability.

However, a report on the reaction of the Malta Union of Teachers to the Curriculum Framework (Malta Union of Teachers, 2011) suggests that it does not take into account the wider definition of inclusion (moving beyond disability) and also raises the need to distinguish between mixed-ability teaching and inclusion.

1.2.2 The National Literacy Strategy

A National Policy and Strategy for the Attainment of Core Competences (Ministry of Education, Culture, Youth and Sport, 2009a) focused on literacy (Maltese and English), e-literacy and numeracy in primary education. The new National Literacy Strategy for All (2014–2019) seeks to consolidate and extend this, supporting dual literacy and digital literacy and covering all phases of education (Ministry for Education and Employment, 2014b). In order to deliver the Strategy, a National Literacy Agency has been established and Literacy Teams have been formed in every state college in Malta and Gozo. These are led by the Heads of Department for Literacy and will bring together in a team the literacy-related staff of that college to implement literacy assessment and intervention procedures together with classroom teachers.

The literacy strategy is a high priority due to the fact that levels of basic skills are below average, as shown by recent international studies (PIRLS, TIMSS and PISA) with girls out-performing boys in all areas. However, the population's ICT skills are close to the EU average and the Maltese government has invested heavily in ICT-related infrastructure and hardware in schools that are all connected to the web. In 2014 a pilot was launched to provide tablets to learners in primary schools, starting from year 4.

1.2.3 A strategic plan for the prevention of Early School Leaving in Malta

Despite a recent fall in the rate of early school leaving (ESL), it remains at 20.8% (2013) – the second highest in the EU. A higher rate of males (23.2%) drop out of school than females (18.4%). A strategic plan for the prevention of early school leaving in Malta was published in 2014 (Ministry for Education and Employment, 2014c) and an early school leaving monitoring unit has been set up in the Ministry for Education and Employment, together with an inter-ministerial committee to co-ordinate policy in this area of work.



This strategy will act to reduce early school leaving to 10% by 2020 through a range of measures, including: attention to early childhood education and care; making schools more relevant and meaningful; supporting at-risk children through innovative teaching and learning tools and through school- and community-based solutions; reintroducing vocational education in secondary schools as an alternative learning pathway; improving career guidance; strengthening parental involvement; and supporting teachers through training. There will also be some compensation measures, such as second-chance education, reintegration programmes and the Youth Guarantee Scheme.

1.2.4 Integration of migrant children

To improve the integration of migrant children in the educational process, in 2013 a Third Country National (TCN) co-ordinator was appointed to advise schools. A number of teachers were provided with additional training in language learning through an EU co-funded project, while other EU-funded projects developed an on-line assessment tool, reading and spelling software and materials to support language learning and support for parents of migrant children.

1.3 Special needs and inclusive education

Malta has one of the highest proportions of learners with disabilities and/or special educational needs attending mainstream education among the EU Member States. Agency data from 2012 shows that from a population of 46,947 learners of compulsory school age (data from school year 2011–2012), 2,572 were formally recognised as having SEN, i.e. statemented (European Agency for Development in Special Needs Education, 2012). This is an identification rate of 5.5%, which is relatively high in comparison to other EU countries (the EU average is approximately 4.2%).

Some 2,507 learners with SEN were placed in mainstream schools, giving a mainstream placement rate of 5.4%.

Fifty-four learners were placed in special schools and 11 in a special unit.

This gives a segregated placement rate of just over 0.1%, which is one of the lowest across EU countries.

Public special education services started in the 1950s and continued expanding until the 1980s. The early integration of children with disabilities into mainstream schools resulted from British influence through the Warnock Report (1978). A British-style 'statementing' process was also introduced in 2000 to identify and assess children experiencing difficulties in the education system. The statementing procedure involves a formal multi-disciplinary assessment, while the Statementing Moderating Panel (SMP) advises on the special provision required.



In 1998, an independent evaluation of the *Inclusive Education Programme in Maltese Schools* was conducted (Borg, Borg, and Martinelli, 1998). This was followed in 2005 by the *Inclusive and Special Education Review* (Spiteri et al., 2005). This report provided an evaluation of learning support and the statementing process and proposed a break with the expectation that learning support must be given by LSAs. It also made recommendations regarding training and support for class teachers and the role of specialist teachers.

Following this report, the Student Services Department (SSD) in the Directorate for Educational Services (DES) was set up in 2007, followed in 2008 by the appointment of Service Managers to manage the Inclusive Education Section, Special Education and Resource Centres and Psycho-Social Service.

Up to 2005, few learners with special needs were included in secondary or upper-secondary education. However, many learners now join lower-secondary schools while some also move into tertiary education.

In 2009, the Student Services Department published proposals for special school reform (Ministry of Education, Culture, Youth and Sport, 2009b). The four special schools were subsequently changed into a resource centres: one primary, two secondary and one for young adults. Each centre is incorporated within a college and aims to offer services to mainstream schools, as well as providing full-time education for a small number of learners with complex needs.

In summary ... a clear understanding of the current context of the Maltese education system has been essential for undertaking the Audit. The national context is critical because it shapes ideas about the purpose of education and desired outcomes. It influences stakeholders' aspirations and expectations and the vision of what good quality education looks like in practice. These ideas in turn influence the development of systems of accountability put in place to 'measure' what is thought to be important – this may include examination results signifying academic attainment and/or wider achievement in inclusive settings.

These issues are discussed in the following chapters.



2. STANDARDS FOR THE AUDIT

A crucial task for the Audit work was the development of the Standards by the Ministry and Audit Teams which, in early in discussions, agreed upon the following working definition:

A Standard is a statement that articulates agreed ways of working and indicates levels of quality or attainment that can be used as a measure, norm or benchmark in comparative evaluations.

The Standards within the Audit are considered 'statements of aspiration' for the special needs and inclusive education system in Malta and, as such, they were developed by drawing on information from two areas of Audit activity, as shown in Figure 5.

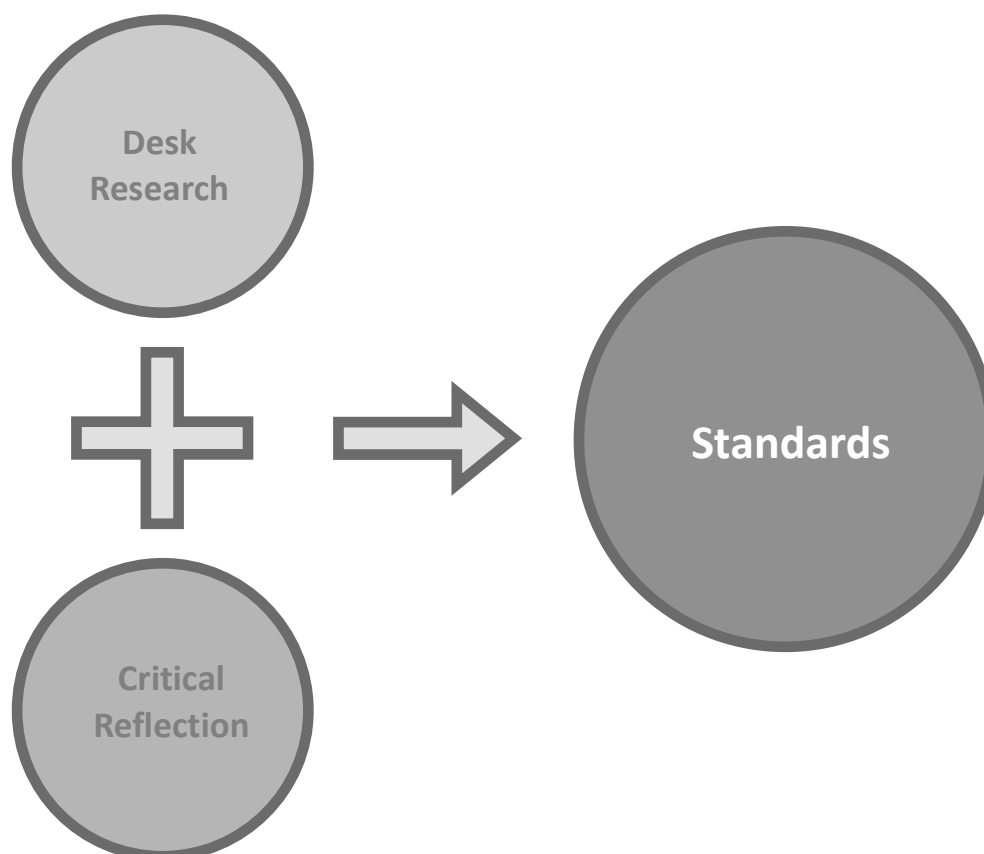


Figure 5. Development of the Standards

2.1 Desk Research

Desk research was undertaken in order to review recent literature that would inform the study activities and also place the work in Malta in a wider research and policy context. The desk research document was worked on throughout the main



Audit period. It was finalised as a stand-alone document and is presented in full as **Annex 2: Desk Research Report.**

The desk research identified important areas of policy and practice to be explored in the Audit, as well as a framework of key principles that underpin an inclusive education system. The Audit Team agreed that these principles needed to be considered in the development of the Standards and in the collection and analysis of Audit data.

2.1.1 Principles underpinning an inclusive education system

The research evidence presented in the desk research was synthesised into a conceptual framework highlighting seven critical areas of policy and practice in inclusive education. Within each of these seven areas, a number of key principles were identified to guide developments.

The framework of principles underpinning inclusive education used within the Audit is presented below:

Legislation and policy:

- Promote a rights-based approach to support the active participation of all learners in line with international agreements.
- Create conceptual clarity around the idea of inclusion to ensure correspondence/consistency between levels of the system and all stakeholders.

Building capacity of mainstream schools:

- Develop strong leaders able to communicate a vision and create a culture at national/policy and local/school levels in order to:
 - ensure that all stakeholders take responsibility for all learners – at all levels of the system (national, local college, school and classroom);
 - enable flexibility to encourage innovation and support collaboration between policy makers and between national/local education leaders and local communities; and
 - provide professional development and support for learning at all levels (staff and learners).

Specialist provision as a resource for the mainstream sector:

- Create a continuum of support for teachers, learners and their families by developing the role of specialist provision as part of a coherent inter-disciplinary support service around each mainstream school community.



Training and professional development for school leaders, teachers and LSAs:

- Provide training in inclusive education for all teachers to develop positive attitudes, values, knowledge and skills.
- Develop a network of college-based teacher educators and school-based mentors with knowledge/experience of inclusive education to ensure quality ITE/CPD, including practice in inclusive settings.

Teaching, learning, curriculum and assessment:

- Raise awareness of inclusion as a mainstream issue that is about quality education and raising the achievement of all learners.
- Draw on research evidence to develop policy and practice in assessment for learning and inclusive pedagogy.
- Provide a flexible curriculum framework to engage all learners and support active participation.

Identification of needs and allocation of support:

- Support teachers/LSAs to develop an understanding of the assessment process and the effective use of a range of approaches and tools.
- Create flexible ways to resource schools that provide an 'incentive' to include all learners in mainstream schools without labelling.
- Develop a 'continuum' of possible supports for learning – from in-class support (e.g. through flexible organisation and differentiated teaching) to support through external agencies (within the school community).

Monitoring and evaluation:

- Develop a model of monitoring and evaluation for all new initiatives to learn from experience and build evidence-based practice in context.
- Ensure that all stakeholders are involved in the development and implementation of a quality assurance system that goes beyond 'easy-to-measure' areas and covers (as an integral part) inclusive policy and practice.

These seven areas of principles were used as the conceptual framework for developing all other Audit activities, including the development of the Audit Standards.

2.2 Critical Reflection process

In preparation for the Audit, the Ministry Team members reflected on the current special needs and inclusive education system in Malta. This process of critical



reflection provided an opportunity to highlight the perceived strengths and weaknesses of key factors within the system and identify areas for further exploration in the Audit. The results of the reflection process are presented in **Annex 3: Critical Reflection Document**.

The Critical Reflection was crucial, as it enabled the Ministry Team to articulate its views on the main areas to be examined in the Audit. It is worth noting at this point the high degree of consistency between the areas identified by the Ministry Team and the principles identified via the desk research.

The areas identified within the Critical Review process were:

- Conceptions of inclusion
- Policy and guidelines
- Placements
- Colleges and schools
- Roles and accountability
- Assessment
- Early identification
- Individual Education Plans (IEPs)
- Recording and reporting procedures
- Statementing
- Parental involvement
- Student Services Department (SSD)
- Co-ordination between state and non-state services.

For each of these areas, priority issues were highlighted and Standards proposed for each area. The initial Standards listed in the Critical Reflection Document were then used as the starting point for developing the final Standards to be used as the basis for the Audit. Joint work between the Ministry Team and the Audit Team focused upon how the Standards could be operationalised in order to be used as the basis for data collection.

2.3 The framework for Audit Standards

The final Audit Standards were developed by synthesising the key issues for the education system in Malta identified in the Critical Reflection Document with the findings of the desk research. The final Framework of Standards centred upon the seven areas and the related principles identified via the desk research. Within each



area, a number of components were identified, many of which were taken from the Critical Reflection Document. Standards were then developed and agreed for each of the components listed below:

1. Legislation and policy

- 1.1 International normative instruments
- 1.2 EU policy guidelines
- 1.3 National policy
- 1.4 Conceptions of inclusion
- 1.5 Consistency of policies
- 1.6 Inter-Ministerial work

2. Building capacity within mainstream schools

- 2.1 School organisation
- 2.2 Partnership with parents
- 2.3 School leadership
- 2.4 Co-ordination between state and non-state services
- 2.5 Collaboration with other agencies

3. Specialist provision as a resource for the mainstream sector

- 3.1 Support services
- 3.2 Teacher support

4. Training and professional development for school leaders, teachers and LSAs

- 4.1 Professional development routes
- 4.2 Roles and responsibilities

5. Teaching, learning, curriculum and assessment

- 5.1 Raising achievement for all
- 5.2 Learner engagement and participation
- 5.3 Monitoring all learners' progress
- 5.4 Transition opportunities

6. Identification of needs and allocation of support



- 6.1 Early identification
- 6.2 Assessment of individual learning needs
- 6.3 Statementing procedures
- 6.4 Placements
- 6.5 Support allocation
- 6.6 Individual Education Plans (IEPs)
- 6.7 Recording and reporting procedures
- 6.8 Multi-agency collaboration

7. Monitoring and evaluation

- 7.1 Monitoring and evaluating action plans for educational policy implementation
- 7.2 Data availability
- 7.3 Quality assurance standards
- 7.4 Compliance with Standards

In total, 137 specific Standards were identified. For the full set of Standards used in the Audit, please refer to **Annex 4: Framework of Standards**.

2.4 Critical issues for data collection

The External Audit aimed to evaluate current policy and practice within the Maltese system against the agreed Standards. However, the Standards' level of detail and complexity prevented them being used directly for data collection.

Detailed discussions between the Ministry and Audit Teams led to the identification of five critical issues that underpinned the overall Framework of Standards and were common to all stakeholders in the education system. These critical issues were re-phrased into five questions that were then used as the foundation for all data collection within the Audit:

1. How well are schools enabled to implement inclusive education?
2. How adequately are school staff enabled to meet learners' diverse needs?
3. Do the official needs identification and statementing procedures promote an approach to meeting individual learning needs that is based on children's rights?
4. How effectively do systems of support enable all stakeholders in education?

5. How effective and enabling are educational quality assurance processes?

2.5 Data collection to inform the Standards

The Audit Team used the five aforementioned questions to plan three main data collection activities. This work was also informed by the *background information* that helped the Audit Team to understand the Maltese context and highlight policy issues to be explored during the fieldwork.

For a detailed description of all the data collection activities, please refer to **Annex 1: External Audit Methodology**.

The *fieldwork* for the External Audit was carried out from 26 to 29 May 2014. Over the course of four days, the Audit Team members conducted:

- 21 *focus groups* involving a total of 145 participants
- 14 face-to-face *interviews* – ten were 1-to-1 and four were small group interviews – involving a total of 22 respondents
- 11 *school visits*.

An on-line (web-based) *survey* in English and Maltese was circulated to all state, church and independent schools. It targeted five key stakeholder groups: parents of children with statements of SEN; LSAs; teachers; kindergarten staff; and school Senior Management Team members (SMTs). As an example, the survey for SMTs, in English, is presented in **Annex 5: Exemplar Survey**.

Survey questions focused on closed attitudinal/level of agreement ratings in order to gather stakeholders' perceptions and attitudes in relation to the five core issues for investigation.

There were 1,184 responses to the survey in total across all surveys and language versions. The details of the survey responses and results are presented in **Annex 6: Survey Results Report**.

Evidence from the three data collection activities was analysed at individual team member and then full team levels in line with the three objectives of identifying:

- areas of strength in policy and practice that could be built upon;
- areas of policy and practice requiring attention and development; and
- the extent to which the Standards are being met.

Information from all data sources was analysed and synthesised into a series of main Audit findings that are discussed in **Chapters 3 to 7**. Each of the five critical issues relating to the questions in section 2.4 is discussed in detail in these chapters.



All data was also used to complete the evaluation of policy and practice against the Standards. This evaluation is discussed in **Chapter 8**.



3. ENABLING SCHOOLS TO IMPLEMENT INCLUSIVE EDUCATION

This chapter explores the findings from all data sources relating to *how effectively schools are enabled to implement inclusive education*. This section mainly focuses on the *system-level issues* that support inclusive education (areas of strength), or present potential barriers to school-level implementation of inclusive education in Malta (areas for development).

3.1 Findings – areas of strength

3.1.1 Culture and geography that supports stakeholder engagement

Malta's culture, size and geography mean it is well placed to develop a positive model of stakeholder engagement and debate. Current good practice in involving different stakeholders in the education system informally could be the basis for development work where participation is formalised and made equitable so all stakeholders have an equal voice in making decisions that affect them.

3.1.2 The college system as a potential framework for collaboration

The college system in Malta has been organised in order to facilitate networking among schools. This reform supports partnership working, sharing of resources and joint problem-solving as a way to create innovative practice. The college system also aims to improve learner transition between different phases of education.

The potential networking opportunities offered by the college system may provide a useful vehicle for further collaborative professional development. There is great potential for sharing expertise and developing collaborative team working within this structure.

3.1.3 Opportunities and system flexibility for delivering 'joined-up' initiatives

There is a degree of flexibility within the overall educational system and decision-making structure that supports innovation and 'joined-up' policy thinking. An example of this can be seen with the recent pilot of tablet-based ICT for a sample of eight-year-old learners across state, church and independent schools. The desk research conducted for this Audit points out that learners with SEN feel that ICT is less stigmatising than other forms of support. Learners also prefer to work as much as possible without the support of an adult helper.

In order to ensure that all learners are able to access ICT, the Directorate for Educational Services should take the outcomes of this pilot into account when developing school and ICT accessibility strategies.



3.1.4 School leaders' positive view of policies fostering inclusion

The on-line survey indicates that nearly all Senior Management Team members (SMTs) feel that their school policies, in line with national policy, promote inclusive education. Over half of them estimate that their policies increase learning and participation for all learners. Two thirds of SMTs indicate that school policies fully promote good standards of behaviour and respect for others, inclusive school ethos, attitudes and professional values based on learners' rights to inclusive education and well-being and quality of life.

3.2 Findings – areas for development

3.2.1 The need for coherence of policy goals for inclusion at national level

The analysis of background information suggests that, at national level, there often appears to be lack of clarity regarding learners' rights within legislation, as well as inconsistent approaches to social and educational inclusion across policy sectors and policy documents. An example of this is seen in the fact that the UNCRPD, notably Article 24, is not used as a reference document within current legislation for education.

There appears to be an emerging vision for inclusive education at the national level, but it is not always presented in key documents as a horizontal, cross-sector issue that should be stated, implemented, monitored and evaluated in all relevant social policies. Fieldwork activities indicate that, for some stakeholders, the policy vision for inclusive education is often lost and there are perceptions in schools of too little effective communication and too much paperwork.

Malta is experiencing a period of quite dramatic changing demographics – birth rates are falling in some areas, but growing in others. The effects of migration – notably, over 1,000 newly arrived learners enrolled in the education system in school year 2013–2014 – cannot be underestimated. Findings from the fieldwork suggest that while current initiatives to address diversity issues within education are welcomed, the education sector is considered to be at risk of lagging behind other policy sectors in its response to recent societal changes. A key element within this finding is how respondents feel inclusive education should be understood and then worked towards: is it a system response for meeting the diverse needs of all learners, or is it an approach for supporting the individual learning needs of a minority?

The pressures for an inclusive education system are seen by a range of stakeholders as being far wider than taking an 'integrative' approach, essentially geared towards meeting the needs of learners with disabilities or SEN. Focus group and interview data highlights repeated calls for re-focusing the educational system towards



inclusion as an approach for meeting all learners' needs, including those who may be vulnerable to exclusion for a range of social and/or academic reasons. Survey data suggests that SMTs do not feel adequately supported in effectively implementing inclusive education within their schools.

3.2.2 Ensuring the implementation of a policy vision for inclusive education

A vision for inclusive education as an approach for all learners is increasingly being recognised at the Ministry level. This is evidenced through interview as well as focus group data. However, what is also apparent in the data is that this vision is not always effectively communicated to stakeholders. The policy vision for inclusive education as an overarching strategy to improve the quality of education for all learners is not being implemented in practice.

The analysis of all data sources – background information, fieldwork data and the on-line survey findings – highlights a number of inter-related factors contributing to this policy-practice implementation gap.

The national policy for special needs and inclusive education is not adequately tailored to the Maltese context. Policy is described by some stakeholders as 'copy and paste from UK or elsewhere' with initiatives that are 'borrowed' from other countries. As these policies and initiatives lack a clear rationale in line with the Maltese context, they are not entirely fit for purpose. Inclusive education policy is seen by many school-level stakeholders in particular as being fragmented and not sufficiently coherent to be effectively implemented.

There is a lack of clarity and common vision around key concepts such as inclusion or diversity within key educational policies. The Audit data suggests that while there is a clear commitment on the part of policy makers and many school leaders to the promotion of inclusion, its definition and purpose have not been adequately debated and many stakeholders still see it as a locational issue. Terminology within policies has changed, but practice has not and the focus is still on fitting individual learners into the existing system. Inclusion is mainly linked to physical access to mainstream schools – an integrative rather than an inclusive approach that does not focus on rights as outlined in the UNCRPD and other international instruments.

Evidence from focus groups in particular suggests there is a pressing need to undertake a process of 'de-constructing' key concepts, such as inclusive education and diversity, with all stakeholders in order to develop a shared understanding of what inclusion means for all learners, their families and the educational professionals who support them.

Policy for inclusive education is not always accompanied by pedagogical guidance that can be used to support school-level development. For many stakeholders,



policy for inclusive education does not focus clearly enough on pedagogical issues. There is a perceived lack of guidance on the teaching and learning issues that underpin various procedures – for example, formal assessments, the statementing process and the development and implementation of IEPs. Survey data indicates that this tends to lead schools to follow prescriptive procedures rather than to consider opportunities for learning and participation.

This perceived lack of pedagogical guidance is linked to what many stakeholders considered limitations in policy implementation plans and strategies at Ministry level. Data from focus groups and interviews suggest that many stakeholders see initiatives for inclusive education ‘rolled out’ without adequate monitoring or evaluation of implementation at school level. Crucially, monitoring is not in place to identify the synergy between initiatives and how they might impact upon one another in practice.

3.2.3 Ensuring funding mechanisms support equity

Educational expenditure in Malta is on a par with, if not slightly higher than, other EU countries. Between 2011 and 2013, educational expenditure remained steady at 5.14% of GDP, representing an overall increase in spending on all education of just under €40.5 million.

However, spending on special needs and inclusive education during this period rose by just under €6.416 million or 0.73% of total educational expenditure. Between 2011 and 2013, there was an €820,000 reduction in spending on special schools/centres, but an increase in spending on LSAs in state schools of €5.919 million. There was also an increase in spending on LSAs in private schools of €1.26 million, representing a rise of 0.09% of total government expenditure.

Funding of the special needs and inclusive education system was a recurring issue during school visits and focus groups, but particularly during interviews. Evidence collected from the focus groups and interviews suggests that there are three interconnected issues in relation to current funding mechanisms for special needs and inclusive education:

- Funding mechanisms are not linked to effectiveness issues.
- Funding does not provide incentives to mainstream schools to include learners.
- Funding mechanisms are not perceived by stakeholders as being equitable across all learners and all schools.

Overall, the present funding system appears to be inequitable in terms of distribution of national resources and is, in the short to medium term, unsustainable.



This assertion is supported by Audit data, with respondents from policy and practice levels calling for more evidence on the effectiveness of the current funding systems, as well as evidence of the efficient use of available resources. The current increase in expenditure on special needs and inclusive education is seen as problematic and a number of key stakeholders suggested that future increases could not be justified without clearer evidence of effectiveness.

Many stakeholders feel that current modes of funding for special needs and inclusive education do not foster adequate accountability at school level. They see the overall system as inefficient and many question whether the current resourcing levels could be used in different ways to better effect.

Competition among schools for funding appears to cause major difficulties with the way that provision is organised. In particular, many stakeholders see the current spending on benchmark test and examination access arrangements as poor value for money and an ineffective use of resources.

For many stakeholders, there appears to be a lack of transparency in resource allocation. This results in some school-level stakeholders believing that there are funding differences among sectors (state, church, independent) and that some schools are treated more favourably than others. In addition, a number of stakeholders have questioned the issue of some schools raising additional funding for learning support.

Inequitable funding is also reported at individual learner level, with a perception among both parents and professionals that families from low socio-economic backgrounds have difficulty accessing support from professional agencies. As a result, some parents feel that their children are disadvantaged. Examples of this are private tuition and the funding of private psychological assessments in order to access resources and/or benchmark tests and examination access arrangements. Many parents and professionals highlighted these practices as being inequitable.

3.2.4 Developing school-level policies for inclusive education

Information from the survey, as well as focus group discussions and school visits, indicates that there is a general lack of school-level policies that reflect national-level policy goals for inclusive education. As outlined in section 3.2.1, in the way that at national level inclusive education is not seen as a horizontal issue, this is also the case within school policies. There is not a culture of innovation in school-level policy development – schools often use national policy without debate or adaption to their own context. Schools do not take ownership of policies for inclusive education or see them as a tool to be agreed upon, implemented, monitored and evaluated by all school stakeholders.



The on-line survey suggests that school policies tend to be underpinned by an integrative approach to inclusion. They are more likely to focus on placement in mainstream rather than on fostering equal opportunities based on full participation in the school community. This is supported by interview information, which suggests that many school-level stakeholders view inclusion as ‘just another initiative’ or some sort of ‘charitable’ imperative, rather than seeing it as a learners’ rights issue.

Survey results indicate there may be a need to improve the way that national policies are embedded in schools’ daily work. Survey results indicate different perceptions about school policies for inclusive education between teachers, LSAs and SMTs, with SMTs appearing to be more confident than teachers or LSAs in the effectiveness of school policies. This may suggest that SMTs delegate the responsibility of implementing inclusive education policy to other school stakeholders with little monitoring of implementation. This may result in ‘meeting diversity issues’ being seen as an additional responsibility – or even a burden – by professionals who feel unsupported and unprepared for the task.

The survey responses suggest that parents of children with statements are more optimistic than professionals about schools’ overall ability to be inclusive. The findings suggest that many school policies can be questioned regarding the extent to which they provide learners with SEN with equal learning and participation opportunities. School policies are seen to support social issues above academic opportunities, with teachers, LSAs and parents emphasising the ability of current school policies to foster social inclusion.

However, current school ethos and practice promoted by school policies for inclusive education tends to pay less attention to pedagogical issues. SMTs in particular are less certain of the ability of school policies to promote universal design for learning and promote learner involvement. Half of the SMTs who replied to the survey estimate that policies only partially empower the school community to develop high quality teaching for all learners, including those with special educational needs.

Data from focus groups and interviews call into question the effectiveness of school-level leadership for inclusive education. There appears to be limited school-level policy development for inclusive education, with a number of negative effects.

The national-level vision for inclusive education is not ‘owned’ at school level and many SMTs and teachers still consider that a few (specialist) professionals should be responsible for children with SEN, rather than requiring a commitment from everyone. ‘Delegating inclusion’ to LSAs is the norm in many schools. The majority of stakeholders at school level do not fully understand, implement or evaluate policy tools developed at national level (National Quality Assurance framework, etc.).



Overall, the policy culture in education is primarily seen as ‘top-down’ and school-level stakeholders report a lack of consultation coupled with limited guidance/action planning for implementation. This top-down approach results in a lack of ownership of national-level policies that are then translated into school-level policy and practice.

3.2.5 Addressing the tension between increasing academic outputs and meeting individual learning needs

Looking across all the data sources from the Audit, it becomes evident that the educational system in Malta is essentially characterised by competition. This competition is evident among sectors, as well as among schools and individual learners. Many stakeholders see this competition as detrimental to both individual learners and to the development of a truly inclusive education system.

Within the education system, there is an overemphasis on high stakes, summative assessments that impact upon learners’ educational opportunities and long-term life chances from an early age. This is evidenced by:

- a high school drop-out rate that requires special programmes and measures to offer meaningful provision for the high numbers of learners who leave school early;
- the difficulties arising from the introduction of mixed-ability teaching in all schools that have led to the introduction of a ‘banding’ system for subject teaching;
- the unsustainable system of access arrangements for benchmark tests and examinations; and
- the over-use of private psychologists to secure access arrangement dispensations.

The current focus on benchmark tests and examinations within the school curriculum can be seen as leading to a disconnect between teaching and learning. A school system driven by examinations offers limited opportunities for learners to demonstrate social learning or wider achievement. Focus groups highlighted that there is little distinction between achievement and attainment in schools and that many schools do not monitor the quality of teaching provision for learners with SEN.

The education system reinforces formal teaching of a prescribed curriculum and traditional teaching methods are used above collaborative teaching, group teaching, etc. There is very little evidence of assessment for learning across schools and limited possibilities for learners to have any control over their learning, as the curriculum is closely linked to summative assessments. Personalised learning approaches, which develop more interactive approaches and group work, are not



seen as a priority by many school-level stakeholders, as the system of formal benchmark testing and examinations drives many class teachers' practice.

Alongside this, there are limited professional development opportunities for teachers in meeting diverse learning needs. This results in them being ill-prepared to address the tensions that the current curriculum places upon their work. (**Chapter 4** returns to this issue).

These factors have a major impact on the development of inclusive processes at school and system level. Evidence from focus groups, interviews and most school visits indicates that 'meeting individual learning needs' is often interpreted as supporting learners to achieve externally set academic learning goals. Acceptance of diversity in learning varies across schools and is often dependent upon the interpretation and willingness of key school personnel. Such an approach reinforces the view that learners with diverse needs must fit into an existing system, rather than the system being adapted to meet learners' individual needs.

In summary ... in terms of *how effectively schools are enabled to implement inclusive education*, the data analysis suggests that *areas of strength* in the Maltese system centre upon:

- A culture and geography that supports stakeholder engagement
- The potential of the college system as a framework for collaboration
- Opportunities and system flexibility for delivering 'joined-up' policy initiatives
- School leaders who hold a positive view of policies fostering inclusion
- Parents who are optimistic about schools' inclusiveness.

Areas for development indicated within the data analysis include:

- The need for coherence of policy goals for inclusion at national level
- Ensuring the implementation of the policy vision for inclusive education by:
 - developing a national policy that is tailored for the Maltese context;
 - ensuring clarity around key concepts within policies; and
 - ensuring that education policy is accompanied by pedagogical guidance
- Supporting the development of school-level policies for inclusive education
- Ensuring that funding mechanisms support equity and are linked to effectiveness issues
- Addressing the tension between increasing academic outputs and meeting individual learning needs.



Overall, the Audit data indicates that various system factors result in schools being only partially enabled to effectively implement inclusive education. Many system factors reinforce an integrative approach for some learners, rather than an inclusive approach for all learners.



4. ENABLING SCHOOL STAKEHOLDERS TO MEET LEARNERS' DIVERSE NEEDS

This chapter explores the findings from all data sources relating to *how adequately school staff are enabled to meet learners' diverse learning needs*. This section focuses on *individual-level issues* in relation to meeting learners' needs. As with **Chapter 3**, areas of strength and areas for development are presented.

4.1 Findings – areas of strength

4.1.1 Shared belief in the democratic value of inclusive education

There is clear evidence from across all data sources that the majority of stakeholders in Malta believe that inclusive education is the right approach for their education system. Some stakeholders expressed concerns regarding the implementation of inclusive education for all learners, but very few stakeholders had doubts about inclusion as a guiding principle for all learners and for all professionals.

Many stakeholders reported that the achievements of learners with SEN are improving. Data from the interviews in particular highlighted that increasing calls for support can be interpreted positively, as they show that parents and professionals are more aware of learners' rights and entitlement to support.

The range of learning support initiatives provided by the Ministry for Education in recent years – including developments in specialised support, nurture groups, training for LSAs, etc. – is testament to different administrations' clear, long-term commitment to inclusive education as an approach for all learners.

4.1.2 Motivated and committed educational personnel

The Audit fieldwork demonstrated that within the educational system there are professionals who genuinely believe in inclusion and who are already working towards making it a reality. Their work may be at local – school or classroom – level, but it often involves undertaking different forms of continuous professional development using personal resources. The Audit Team members noted the high number of educational professionals who were committed to undertaking specialised studies and courses at a distance or overseas.

Evidence from the interviews in particular highlights the degree to which Ministry Team staff members show a willingness to learn from 'looking outside' Malta to consider policy and practice from other contexts and situations. There is a strong commitment within the Ministry Team to professional review and evaluation in order to develop and improve practice. This fact is linked to a clear expectation among many Ministry personnel that self-review activities – such as this External



Audit – need to be built upon in order to move towards a learning education system, rather than a top-down, centrally-directed education system.

4.1.3 Examples of innovative practice that can be built upon and scaled-up

The Audit fieldwork highlighted that there are examples of innovative practice in inclusive education at class and school level that need to be evaluated and supported. These innovative examples exist despite the pressures of the current system that can at times work against the implementation of inclusive education.

Very often, individuals who can be recognised as ‘inclusion champions’ are pushing forward these examples with an impact on the inclusion agenda. They are trying things out in their own classrooms or schools on a relatively small scale. These innovators may be in a minority in some areas and/or schools, but where they are present, their commitment should be recognised, supported and ‘nurtured’ by the system, so as to ensure that their work has a wider impact.

4.2 Findings – areas for development

4.2.1 School professionals who feel unprepared for inclusive education

The analysis of data from all Audit activities highlights that the issue causing the most concern for the majority of stakeholders is that of training and preparation of all education professionals. According to the data collected, no stakeholder group considers that the initial or in-service training for SMTs, teachers, LSAs or other educational professionals fully meets the demands that these professionals face in schools.

Data from the on-line survey indicates that the integrative approach promoted by different system-level factors (as discussed in **Chapter 3**) is further reinforced by the content and focus of existing professional training routes. Most respondents – SMTs, class teachers, LSAs and kindergarten staff – feel only partially enabled to implement inclusive education as a result of their initial training.

Teachers in particular do not feel adequately prepared through their training to implement inclusive education. Less than 20% consider that their initial training has fully enabled them to effectively meet learners’ diverse needs. Their initial training also failed to empower them to work collaboratively with others, including working effectively with parents.

Most respondents feel only partially prepared and skilled by their in-service training. Both teachers and LSAs were critical of the opportunities provided, as well as both the focus and content of continuous professional development.

SMTs tend to be more critical of their in-service training than their initial training, but overall they feel only partially prepared to implement effective inclusive



education policies. As a result, SMTs do not feel adequately prepared to foster inclusive education and to promote inclusive schools. Very few SMTs – less than 10% – are fully satisfied with specific opportunities for leadership training and development.

An analysis of the findings from the focus groups and interviews indicate that two inter-related issues are driving the current situation:

- The limited availability of initial and in-service training which adequately prepares stakeholders for working in inclusive classrooms.
- The perception that training in inclusive education is not something all education staff should be concerned with and is therefore not a high priority.

These two factors mutually reinforce each other and lead to the perpetuation of training opportunities that do not meet professionals' needs and are essentially not fit for purpose.

Stakeholders suggest that much of the initial training provided to teachers and LSAs remains rooted in a medical-deficit model, with little attention paid to inclusive pedagogical practice. In addition, most stakeholders involved in Focus Group discussions reported that the initial and in-service teacher training they experienced paid little attention to diversity issues and/or inclusive education as an approach for all learners.

The limited availability of in-service training in inclusive education results in a relatively high number of teachers going outside Malta for further training and qualifications. While these individuals should be commended, at a system level, such action leads to fragmentation and a lack of co-ordinated professional development routes.

Overall, the data suggests that the initial and in-service training currently available fails to support stakeholders. The training institutions and services do not provide the programme focus or content that teachers, LSAs and SMTs feel they need to help them to implement inclusive education.

At present, training does not promote the attitude that inclusive education is the responsibility of all education professionals. This fact – coupled with many of the factors outlined previously – reinforces a situation where teachers, SMTs and other decision makers do not see training in inclusive education as a priority for all teachers or school leaders. As a result, teachers are not expected to gain a greater understanding of inclusion and SEN issues. The responsibility placed upon LSAs for this area of work (an issue that is expanded upon in section 4.2.3) further reinforces these low expectations.



The desk research suggests that high quality initial and in-service training for all education professionals can be seen as the critical lever for taking forward an inclusive education system. This assertion appears to be supported by the views of the majority of stakeholders involved in the Audit.

In reviewing the background information from Malta, it is obvious that there have been some attempts to change training possibilities in the past. However, the current Audit work suggests that the whole system of professional training in Malta requires reform, based on a coherent needs analysis involving all relevant stakeholders in the education system.

4.2.2 School stakeholder perceptions of limitations in classroom support

Alongside training, the provision of practical support in classrooms is a major factor in enabling professionals to meet learners' needs. The desk research presents a range of research findings indicating that the provision of classroom support is a key area for the development of inclusive practice.

The analysis of focus group and interview data highlighted two perceptions of the current system of classroom support that appear to be shared by many stakeholders.

- A lack of coherence. Many stakeholders felt that some initiatives/services were potentially redundant as they overlapped with others (for example, behaviour support). In contrast, they felt that there was too little support in other areas (for example, rehabilitation services in mainstream schools). Other pointed out the difficulties of 'role uncertainty', with parents, LSAs and class teachers often unsure as to which professional – INCO, support service staff, etc. – should be approached and when.
- Limited support options for addressing individual learning needs. In order to meet the needs of learners with recognised SEN, LSA support is usually seen as the most flexible and appropriate option. Many stakeholders questioned whether the allocation of an LSA can meet all learning needs and, within a bigger picture, whether this type of support can meet the needs of teachers or school teams in the best way.

Chapter 6 returns to these issues and examines them in more detail.

The on-line survey explored how well supported professionals feel in meeting learning needs. The results from the survey indicate that, overall, schools and school staff are only partially enabled to meet learners' diverse needs. All four professional stakeholder groups involved in the survey – SMTs, teachers, kindergarten staff and LSAs – generally felt supported in their 'day-to-day' work. Teachers indicated they feel supported in practising in line with key tasks in their job description, in



contributing to monitoring learners' learning progress and in ensuring that all learners participate in all the learning opportunities the school has to offer.

However, teachers also indicated they need more practical support to cope with diversity issues in their classrooms. A minority (just over 20%) consider that they are fully supported to respond positively to learner diversity.

The survey suggests that teachers also feel isolated in their tasks and need more opportunities to work collaboratively. Less than a quarter believed that they were fully supported by a highly competent multi-professional team to solve problems. Similarly, only a quarter of them considered themselves fully supported to monitor the effectiveness of LSAs' work.

Teachers also feel that they require further support in order to differentiate their teaching and effectively contribute to assessing learners' educational needs. Only one third felt that they were fully supported to use different support approaches to meet individual learning and development needs.

LSAs appear to feel better supported than teachers in their day-to-day work, especially when practising in line with key tasks in their job description – most notably in responding positively to learner diversity and in contributing effectively to assessing learners' educational needs. However, the survey indicates that less than one third of LSAs feel adequately supported in finding answers to practical questions on a daily basis.

The analysis of the on-line survey highlights two key issues in terms of perceptions of support that should be noted:

- Teachers and LSAs feel more supported in primary education than in secondary education.
- Teachers and LSAs feel more supported in church and independent schools than in state schools.

The possible reasons for these perceptions were not indicated in the survey and so require further examination. The perceived differences in the quality of provision – teacher quality, class size, provision and availability of support – across state, church and independent sectors, whether perceived or real, must be acknowledged and further explored.

4.2.3 The effects of an LSA role focused upon supporting individual learners

Data from all Audit sources clearly indicates that the main role of an LSA is most often that of supporting one or more individual learners with statements. Many class teachers and SMTs see LSAs as being 'the experts' in supporting individual



learners, as they have the requisite training in meeting individual learning needs, as well as the official mandate to provide the stated learning support.

Data from the interviews and focus groups indicates that stakeholders see two negative consequences arising from this situation:

- The responsibility for meeting the overall learning needs of stated learners is seen to lie with the LSA. The task of delivering learning opportunities for learners is therefore often delegated directly to LSAs. Class teachers and SMTs are able to abdicate their professional responsibility for meeting the needs of learners with SEN to LSAs.
- LSAs are not seen as class teaching team members and therefore do not act as such. Many of them report that they often feel isolated and lack clear direction from class teachers. The potential for LSAs to contribute to a collaborative teaching approach and act as a valuable resource for supporting the learning of all learners in a class, is often overlooked.

This situation stems partially from the fact that teachers themselves do not feel adequately prepared to meet individual learning needs (see section 4.2.2). This results in the use of a limited range of SEN in-class support strategies and a lack of whole school approaches to addressing diversity in classrooms.

Information from the analysis of background information indicates that this situation may also be reinforced by the training of LSAs, which remains focused on meeting individual SEN rather than on supporting inclusion and addressing wider diversity issues in classrooms. The training of teachers and LSAs is wholly separate, with the result that each group does not fully understand the roles and responsibilities of the other, or the ways in which effective teams could be developed.

The Ministry Circular of 16 February 2012 stressed the need for LSAs to work with other learners in classes and promote independence in the learners they support (Ministry of Education and Employment, 2012b). The desk research conducted for the Audit highlights a range of research findings to support this position. Many of the research findings on the deployment of LSAs highlighted in the desk research are supported by evidence from Audit focus groups, interviews and school visits.

These include:

- The relationship between learners and LSAs who may be seen as carers, protectors, friends or teachers and the potentially negative effects of the 'discourse of care' and nurturing role.
- The role confusion experienced by classroom teachers when there are other adults in their classrooms, leading to them to delegate the 'problem' of



meeting learning needs to LSAs. LSAs are then seen to protect teachers from the ‘burden’ of such learners and subsequently become the expert on that learner.

- The ‘separation’ of learners with SEN from their class teacher, resulting in a possible reduction in teacher-led learning.
- The existence of potentially detrimental effects, including learner dependency, stigmatisation and interference with peer interactions.
- Learners themselves considering close adult support to be a barrier to their wider participation in school life.

While there are positive effects of 1:1 LSA support, research is highlighting increasingly negative effects. High levels of 1:1 support can be seen to lead to a form of ‘micro exclusion’ of individual learners in mainstream classrooms.

The critical issue of LSA support as a potential barrier to learner independence is also evidenced by findings from the on-line survey. Parents of children with statements – especially in primary education – are less optimistic than school professionals about their child’s involvement in decision-making for their learning and self-determination opportunities.

4.2.4 A highly centralised system that leads to ‘learned helplessness’

Information from all Audit sources leads to the assertion that the education system in Malta can be described as highly centralised and ‘top-down’. Many decisions regarding school-level organisation and practice are guided by the Ministry or taken at Ministry level.

The introduction in 2006 of the current college structure aimed to move from a ‘top-down’ system to ‘learning communities’ of schools. However, the 2012 study of the impact of the college system suggested that the college system had not resulted in the envisaged decentralisation (Borg and Giordmaina, 2012). Respondents in that study felt that another tier of the educational hierarchy had been created, but without the level of autonomy needed to fully empower schools or promote opportunities for increased collaboration.

Information from the current Audit indicates that stakeholders do not feel engaged in policy development, implementation and evaluation.

Centralised policy for inclusive education is often ‘adopted’ by colleges and schools with limited discussion of policy issues. Opportunities for discussion would give school teams greater ownership and support development of a school-level policy that would be better matched to individual school contexts.



Opportunities to share and expand the knowledge and understanding of all education professionals about key policy issues surrounding inclusive education are currently limited. This reinforces an approach where responsibility for addressing learner diversity issues can justifiably be abdicated/delegated to others at college, school leader and class teacher levels.

Within such a highly centralised system, ‘the centre’ (i.e. the Ministry for Education and in particular the two education directorates) is seen to have ultimate responsibility for addressing school-level issues and ‘the centre’ must find and provide the necessary solutions.

In relation to meeting individual learning needs, an ‘SNE expert’ culture predominates. The system of centralised support provision further reinforces the views of school leaders and class teachers who see learners with statements and other forms of learning needs as being the responsibility of other professionals.

Some respondents in focus groups and interviews suggested that the SNE expert culture can easily transform into a ‘blame culture’ when there are perceived difficulties or problems – addressing such issues is not always seen as a collective responsibility.

Looking across the data collected particularly through the fieldwork activities, it is interesting to note the apparent over-representation from respondents who have experienced problems with inclusive education and who therefore provide negative examples. The loud voices heard when some stakeholders consider that inclusive education is not working effectively detracts from the many examples of effective practice (as discussed in section 4.1.3). In many instances, the focus on negative examples was at an individual ‘case’ or learner level, rather than on the system level issues that require action in order to improve practice for all stakeholders.

Such a situation may arise from the ‘learned helplessness’ that exists among some professionals who are unsure of their responsibilities and unclear about how to address negative situations in the best way.

The Audit data suggests that the highly centralised system in Malta results in a lack of dialogue and collaboration between different system levels – Ministry, support services, colleges and schools. The Audit data also shows that consequently there are limited opportunities for collaboration among all stakeholders at school level – SMTs, other professionals, class teachers, LSAs and parents.

In summary ... in terms of *how adequately school staff are enabled to meet learners’ diverse learning needs*, the *areas of strength* in current work can be identified as:

- A shared belief in the democratic value of inclusive education



- Motivated and committed educational personnel
- Examples of innovative practice that can be built upon and scaled-up.

Areas for development so as to further enable school staff to meet learning needs include:

- Addressing the unmet training and development needs of school professionals who feel unprepared for inclusive education
- Exploring the limitations in classroom support options
- Recognising and addressing the effects of the LSA role focus being upon supporting individual learners
- Reducing the over-reliance on a highly centralised system that leads to a form of ‘learned helplessness’.

School-level stakeholders do not feel sufficiently enabled to meet individual learning needs and a number of critical system-level factors – training, provision of support and the degree of centralisation – appear to reinforce school-level practice that does not foster inclusion.



5. AN OFFICIAL NEEDS IDENTIFICATION AND STATEMENTING PROCEDURE THAT PROMOTES RIGHTS

This chapter uses the data from all sources to explore the question of whether *the official needs identification and statementing procedure promotes an approach to meeting individual learning needs that is based on children's rights*. The focus is essentially on the *SNE resourcing system*. Areas of strength and areas for development are presented in relation to how SNE resourcing supports and/or hinders a rights-based approach to meeting individual needs.

5.1 Findings – areas of strength

5.1.1 Positive examples of learners' rights being met

During the fieldwork, Audit Team members were able to identify clear examples of effective inclusion at individual learner, class and school level. For the vast majority of learners with SEN in Malta, their right to access inclusive education and be educated with their non-disabled peers is being met – Malta has one of the highest mainstream placement rates in Europe.

Parental responses to the on-line survey indicates that, for many learners, their right to participate in all the learning opportunities the school has to offer is also being met. A willingness to meet individual learning needs is evidenced by the availability of high levels of resourcing within the system.

Such examples of the system successfully meeting individual learners' rights should be more systematically recognised and 'nurtured'. There is real potential for these positive examples to be analysed, supported and built on to encourage transfer of practice to other contexts.

5.1.2 Highly structured needs identification procedures

Malta has a highly structured set of procedures for first identifying individual learning needs and then considering support allocation. These procedures have developed over time and involve a range of professionals as well as – increasingly – parents and learners themselves. There are clear attempts to ensure that the procedures are transparent and understood by all stakeholders.

The importance of early identification of needs for learners' long-term achievement is also recognised. Steps are being taken to support schools and teachers to implement screening and needs assessment processes that take a preventative rather than a compensatory approach.



5.1.3 Awareness of the need to further develop procedures

Attempts to improve the system for supporting learners with disabilities and SEN in Malta have been on-going since the process of integration and then inclusive education was introduced in the 1990s. Many steps have been taken in order to improve the formal needs identification and resource allocation procedures, including the introduction of a review process and 'moderation' by the Statementing Moderating Panel (SMP) and Student Services Department (SSD).

These developments indicate a desire to ensure an equitable and transparent process, as well as an ambition to improve multi-agency working and ultimately learners' access to inclusive education.

5.2 Findings – areas for development

5.2.1 The gap between school-based assessment and formal needs identification procedures

Both fieldwork and on-line survey data suggest that there is a gap between school assessment and the formal assessment process that leads to a statement. School-based assessment and recording does not inform or support the formal assessment process, as it is focused on academic curriculum goals and is mainly summative in nature. It is unclear how school-based formative assessment is used to effectively identify learning needs and to enable the provision of appropriate support for learners.

An analysis of the survey results clearly shows that there is a need to:

- Embed formative assessment in schools' practice so it is more effective in supporting stakeholders to deliver appropriate support and adapt teaching practices to learners' educational needs.
- Provide clearer information on formal assessment procedures and opportunities for closer involvement so that all school stakeholders fully understand the eligibility criteria, statementing and review procedures and the roles of the professionals involved. The results of official needs assessments could then be used, together with the recommendations made by the Statementing Moderating Panel, to inform teaching and learning in the classroom.

An examination of the background information, supported by evidence from the focus groups and interviews, indicates that the approach and thinking underpinning the needs identification and assessment processes is still dominated by a deficit (essentially medical) model. The statementing process emphasises the diagnosis of difficulties and then the provision of individual support that often takes a



rehabilitation approach. The system is geared towards a ‘certifying’ function and relies heavily on ‘expert assessments’ – mainly clinical tests by psychologists. This has a number of potentially negative consequences:

- Individual learners are given a label that may mean that their rights to resources are met, but which may stay with them for their school career and beyond.
- There is a risk that classroom teachers and school staff become de-skilled as the information that they contribute on learners’ learning is not the main focus of formal assessment. The emphasis on ‘difficulties’ and remediation, rather than flexible pedagogical approaches and other forms of learning support, reinforces the need for expert input.
- IEPs based on formal assessments may not be fit for purpose in terms of informing teaching and learning. IEPs may be seen by school stakeholders as a ‘paper exercise’ rather than a working tool that supports their activities.
- The SMP and the state psychological service are under increasing and unsustainable pressure to conduct sufficient high quality assessments within a reasonable timeframe.

Overall Audit data suggests that the current needs assessment procedures are not adequate in terms of identifying the complex learning needs of all learners and then proposing ways forward that enable school staff to meet those needs. The procedures are geared towards a compensatory approach, rather than increasing the capacity of mainstream schools.

5.2.3 The continuing rise in numbers of learners referred for statementing

Ministry data shows that the student population in state primary and secondary schools is decreasing:

2008 – **30,893**

2011 – **26,921**

2013 – **25,377**

However, data covering the period 2008 to 2013 shows that there has been a steady increase in the number of learners being referred for statementing and support. The increase is shown in Table 1.

Year	Primary	Secondary	Total
2008	406	28	434
2009	375	55	430



2010	500	90	590
2011	458	61	589
2012	884	297	1181
2013	566	52	618

Table 1. Learners statemented by year

Ministry data from 2014 shows there are 2,567 learners with statements across all sectors and phases.

Information provided by the SMP indicates that, during this period, the number of referrals of learners identified as having learning difficulties or sensory or physical disabilities has remained fairly constant. However, there has been a marked increase in the number of learners referred for support due to autistic spectrum or attention deficit related disorders, with 81 referrals in 2008, more than doubling to 173 in 2010, and increasing by a further 60% to 270 in 2012.

Focus groups and interviews highlighted that not all stakeholders believe that this rise is due to a fundamental change in the student population. Rather the increase in referrals for support is seen as being the result of strategic behaviour – for example, some parents and schools referring for SEN support learners who are failing to meet benchmark and examination assessments.

The increase in referrals for statementing is accompanied by an increase in the referral rate for access arrangements. The fieldwork highlighted examples of schools where up to 15% of learners had a statement of SEN and up to 30% of learners had formal access arrangements for benchmark tests and examinations.

5.2.4 Over-reliance on statementing procedures as a means of securing support

The desk research highlights the fact that statementing should be a system-level ‘tool’ to ensure that the rights of learners with the highest levels of needs are being met. Any form of statementing procedure should be for a small minority and should be based on a process that both involves and then supports all the key stakeholders in each individual child’s education.

The Audit data indicates that currently in Malta, statementing is being used by parents and school staff as the main – if not the only – means of accessing support for learners in mainstream schools. This seems to be due to a number of factors:

- Needs identification is based on a deficit model and support is seen as a means to ‘fit’ a learner into the existing system.



- There are limited classroom-based support options available for schools to access. LSA allocation is the preferred support option, but it does not always empower learners or class teachers.
- There is no national-level multi-disciplinary support service that has capacity building in mainstream schools as its main function. Such capacity building would provide inputs to increase each school's ability to flexibly meet learners' needs and therefore reduce formal referrals for statementing.
- The present situation of increasing referrals, with statementing being the only way to access support can be seen as a 'vicious circle'. If this situation remains, it will lead to more referrals and further increase over-reliance on statementing.

Ensuring that the system accommodates learners' needs and does not expect the child to 'fit' into the system requires action to be taken to re-focus SNE support on teachers and schools, rather than on individual learners.

5.2.5 System-level factors are not equitable for all learners

The overall education policy in Malta aims to promote the rights of all learners and ensure that they are met. However, a number of factors can be identified that may mean that equity for all learners is not yet being fully achieved.

Within national legislation and policy, there is a lack of clarity regarding inclusion and rights-based approaches. The United Nations Convention on the Rights of the Child (1989) and United Nations Convention on the Rights of Persons with Disabilities (2006) are not integral to national legislation. The rights-based approach underpinning these normative instruments is not therefore clear within education policy. This lack of clarity leads to situations that can be interpreted as an infringement of rights. For example, there are reports of some instances where learners with SEN were excluded from school when an LSA was absent and no replacement could be found.

The Audit fieldwork highlighted the strong influence of 'market forces' within education. This is evident not only in relation to the high proportion of independent schooling in Malta, but also in relation to parents who access support for their child by paying for private educational psychologists' reports. These market forces raise issues of inequity for learners, that are compounded by some stakeholders' perceptions that the quality of provision differs between education sectors in relation to teacher quality, class size, support availability and degrees of flexibility schools have for decision-making (for example, SMTs have to form their own teaching teams – across state, church and independent sectors).



Whether these matters are perceived or real, the Audit findings suggest that these equity issues must be acknowledged and addressed if all learners' rights are to be effectively met in the long term.

In summary ... in relation to the ability of the *official needs identification and statementing procedure to promote an approach to meeting individual learning needs that is based on children's rights*, the areas of strength can be identified as:

- Positive examples of learners' rights currently being met
- The existence of highly structured needs identification procedures
- An awareness of the need to further develop procedures.

Areas for development highlighted by the Audit focus on:

- The gap between school-based assessment and formal needs identification procedures that results in a need to:
 - embed formative assessment in schools' practice;
 - provide clearer information on formal assessment procedures for all school stakeholders; and
 - support school stakeholders – particularly class teachers – to be fully involved in the statementing process.
- Needs identification and assessment procedures that take a learning rather than a diagnostic approach, in order to avoid:
 - individual learners being given a label that stays with them throughout their school career;
 - the risk of de-skilling classroom teachers and school staff due to the lack of emphasis on pedagogical approaches;
 - IEPs based on formal assessments that may not be fit for purpose in terms of informing teaching and learning; and
 - the increasing and unsustainable pressure on the SMP and the state psychological service.
- The continuing rise in the number of learners referred for statementing
- The over-reliance on statementing procedures as a means of securing support as a result of:
 - needs identification based on deficit models;
 - limited classroom-based support options available for schools to access; and



-
- the lack of national-level multi-disciplinary support services that aim to build the capacity of mainstream schools.
 - A number of system-level factors – market forces and perceptions of sector differences – that are not equitable for all learners.

It can be argued that for the majority of learners, their right to access mainstream education is being met, but this is not sustainable in the long term as the current system does not provide equity and full participation for all, or promote mainstream capacity building.



6. SYSTEMS OF SUPPORT THAT ENABLE ALL STAKEHOLDERS IN EDUCATION

This chapter examines the issue of *how effectively systems of support enable all stakeholders in education*. The focus is essentially on *support service effectiveness issues* and how far support is focused on capacity building in mainstream schools.

6.1 Findings – areas of strength

6.1.1 Parents who believe in the benefits of inclusive education for their children

The on-line survey suggests that parents of children with statements are the most positive of all stakeholder groups regarding the level of school inclusiveness. According to the majority of parents, the support provided to their children enables them to participate in all school activities, to be fully involved in the school community and to have the same learning opportunities and the same progress and development opportunities as their non-disabled peers.

The survey also shows that for the majority of parents, inclusive education has quite a strong affiliation effect in terms of their child's quality of life and social participation. Parents feel confident in schools' ability to enable their children to be respected by other learners, to feel happy about themselves, to have the same life chances as other learners and to live independently.

Those parents whose children are enrolled in primary education feel more positive about these aspects than those with children enrolled in secondary education; they are more likely to consider that the support provided to their children fully enables them to manage school work and the constraints of their disability/SEN.

6.1.2 Availability of expertise in supporting learners' diverse needs

As previously outlined, within the education system in Malta, there is an impressive pool of highly qualified and experienced personnel. The Student Services Department has a team of highly trained support service staff – LSAs and teachers.

The staff teams in resource centres also have expertise and strengths that offer the potential to provide support – in particular with learners with very complex needs – in assessment and curriculum differentiation issues to a wide range of colleagues in the mainstream sector.

Within mainstream schools, INCOs, teachers and LSAs working in nurture groups and within the complementary teacher system demonstrate a wide range of skills necessary for early intervention and supporting learning in effective ways.

The fieldwork indicated that, across the system, many well qualified and experienced staff members are potentially underused at present. These staff would



be a key resource within a future support system that focuses upon mainstream capacity building.

6.1.3 Forward-thinking initiatives to increase the inclusiveness of the Maltese education system

The education system in Malta is highly selective. The three sectors (state, church and independent), the existence of single-gender schooling at secondary level and the continuing emphasis on ability grouping through the banding system are all dimensions of selection experienced by the majority of learners in Malta.

However, the Ministry for Education is well aware of these issues and is trying to address them through a number of potentially far-reaching initiatives – some of which are unpopular with different groups of system stakeholders.

The *Framework for the Education Strategy for Malta 2014–2024* (see **Chapter 1** for more details) sets out forward-thinking goals that aim to raise achievements for all learners by making the education system more equitable and improving responses to diversity.

Efforts to make inclusion a reality for learners with disabilities and SEN must go hand-in-hand with work to make the overall system more equitable – these aims cannot be separated in a long-term agenda to develop the capacity of mainstream schools. The current wide-ranging policy initiatives in Malta demonstrate the desire to address system inequalities while increasing the overall inclusiveness of educational opportunities for all learners.

6.2 Findings – areas for development

6.2.1 The perceived need to improve the support provided to mainstream schools

A range of stakeholders in the system recognises and positively views the Ministry-level efforts to make education in Malta more equitable, to better cope with change and improve responses to diversity. These stakeholders also recognise that such initiatives must be linked to radical change in the current system of support, with a shift in focus from individual learners to school capacity building.

As discussed in **Chapter 4**, alongside training, the provision of practical support in classrooms is seen by all stakeholders as the major factor in enabling school professionals to meet learners' needs. The perceptions that the current system of classroom support lacks coherence and presents essentially very limited support options for addressing individual learning needs is clearly reflected in the results of the on-line survey which indicates that class teachers in particular, do not feel effectively supported by the present system.



Less than 15% of SMTs consider that their school is fully supported by the Student Services Department and less than 10% consider they have adequate staffing and resourcing levels from support services.

The survey results also indicate that teachers feel they require better support from the local multi-professional team. Only a quarter of teachers consider that they are fully enabled to develop effective learning programmes for learners with SEN, while less than a quarter feel that they are fully enabled to plan and implement co-ordinated learning support for learners with SEN. Less than 20% of teachers feel fully enabled to solve problems related to differentiated teaching.

The survey suggests that while LSAs appear to be confident in the enabling effect of school-level support, parents are less optimistic about its ability to empower their children to express their views and, to a lesser extent, to empower them to access appropriate support. This finding suggests that, for some parents of children with statements at least, there is an awareness of the possible negative impact of 1:1 support.

Data from the focus groups and interviews highlights that the overemphasis on individual support within the current system can be a potential barrier to participation for a number of stakeholders:

- *For learners*, support tends to focus on academic issues, which is sometimes detrimental to their inclusion in school and classroom life. One-to-one support can be disempowering by failing to provide equal treatment opportunities and not fostering wider social inclusion opportunities.
- *For parents of children with statements*, the current support system does not foster their participation in wider school community activities, or provide them with clear opportunities for contributing to decision-making about their child's education.
- *For class teachers*, who are not given responsibility for meeting diverse learning needs in their classrooms, there is little need to develop skills in assessing and monitoring learning, as well as differentiation and curriculum adaptation.

It can be argued that the current system of support is perpetuating a view that classroom support is an end in itself, instead of being a means to enable class teachers to meet a wider range of learning needs in their classrooms.

Such high levels of 1:1 support are also leading to calls for the establishment of separate 'units' within mainstream schools where groups of learners with SEN can be educated together in potentially more efficient ways. These calls appear to offer an attractive solution to the pressures faced by many schools and individual



teachers of managing classroom support effectively. However, an expansion in segregated provision is clearly understood by many stakeholders to be a retrograde step. For some learners it would limit their rights to an inclusive education and, at a system level, the development of separate specialist provision would not address the need to undertake widespread capacity building in all mainstream schools and classes.

6.2.2 Effectiveness and long-term sustainability of LSA provision

There has been a marked increase in the number of referrals and, in particular, allocation of LSAs in mainstream classrooms, on a one-to-one or shared basis. The increase in the number of LSAs employed, along with the number of learners they support (indicated in italics and brackets), can be seen in Table 2.

Sector	School Year	Kindergarten	Primary	Secondary	Totals
State	2008/09	53 (105)	680 (907)	385 (229)	1118 (1241)
	2010/11	93 (136)	724 (823)	493 (953)	1310 (1912)
	2012/13	148 (267)	793 (1146)	564 (1320)	1505 (2733)
Church	2008/09	25 (31)	203 (331)	221 (313)	449 (675)
	2010/11	46 (63)	220 (352)	256 (366)	522 (781)
	2012/13	33 (48)	291 (414)	275 (437)	599 (899)
Independent	2008/09	1 (1)	1 (7)	5 (5)	7 (13)
	2010/11	3 (11)	26 (40)	21 (35)	50 (86)
	2012/13	14 (17)	39 (54)	37 (51)	90 (122)

Table 2. Learning Support Assistants (*working with Identified Learners*)

[Notes:

- Different datasets were available relating to LSAs in independent and church schools, as the information was collected at different times. The lower datasets have been used in the tables.
- LSA refers to the notification of a person being employed. This could be on a full-time or part-time basis.]



Total Government expenditure on all SNE support (individual educational needs-related) in 2011 was €30,306,736. By 2013, this had risen to €36,719,619 – an increase of just over €6.4 million, or 17%.

Government expenditure on LSAs in state schools and other centres in 2011 was €19,427,058. In 2013, the expenditure in this same category was €25,345,817. This represents an increase of over 23% (or €5.9 million) in two years.

The increase in expenditure on LSAs represents over 92% of the increase in spending on all SNE support between 2011 and 2013.

Such increases can be questioned in terms of both short- and long-term sustainability. The Audit data shows that many stakeholders question whether such a high level of investment is equitable, or cost-effective. Stakeholders raised concerns regarding the real added value and impact of such high levels of investment for individual learners, their families and the overall education system.

The Audit data indicates that there is little clear evidence demonstrating that the allocation of an LSA leads to improved academic or social learning for learners. The analysis of the background information highlights various calls for improvements in support monitoring, review, re-allocation and/or withdrawal as appropriate. However, the examination of Audit data failed to find evidence that LSA support is systematically monitored, reviewed and then reduced or withdrawn when no longer needed.

Data from focus groups and interviews in particular raises questions about the efficacy of LSA support and the impact on learning outcomes. Many stakeholders voiced the concern that if improved learning outcomes were in evidence, then this was only for a minority of learners. They felt that such high levels of resourcing compared with limited returns, could not be considered a cost-effective public expenditure.

The sector-wide increase in LSA allocation demonstrates that the LSA has become the preferred solution for supporting learners identified as having any form of learning need. In addition to this approach being questionable in terms of cost-effectiveness, it can also be questioned in terms of pedagogical appropriateness.

High levels of LSA provision in schools result in limited motivation to change the organisation, environment, curriculum or teaching approaches being used in mainstream classes.

School visits, as well as focus groups and interviews, highlighted the fact that, in some cases, teachers only engage with learners supported by LSAs on a limited basis. This raises questions about learners' entitlement to be taught by qualified teachers and also limits opportunities for teachers to extend their pedagogical



practice by engaging with a wider range of diverse needs. In many schools, LSAs play a key role in assessment and planning for learners with SEN/disabilities and, again, the lack of involvement of teaching staff can lead to inconsistent and, in some cases, poor quality outcomes. This situation is exacerbated by the fact that there are limited formative assessment procedures in many mainstream schools, in particular for learners with more complex needs (see **Chapter 5** for more details).

Such a system of personal support enables learners with SEN/disabilities to be placed in mainstream schools. However, both the desk research as well as data from focus groups and interviews highlights the potential for such intensive individual support to be a barrier to learning and participation, acting against the fulfilment of learners' rights.

The current position maybe can be seen as a stage of development along the continuum of developments towards inclusive education. The LSA system has been a way of starting the inclusion process, but now the focus on inclusion as a response to all learners (including all minority groups and learners vulnerable to exclusion) results in the need for more flexible means of providing support.

6.2.3 The need for a clearer role for specialist provision

In 2009, the four special schools in Malta were changed into resource centres – one primary, two secondary and one for young adults – each incorporated into local colleges. The resource centres' stated role is to provide services to mainstream schools, as well as providing full- or part-time education for a small number of learners with complex needs.

In practice, the centres work as special schools while also providing multi-agency services to 'visiting' mainstream learners. Mainstream groups/classes also attend the resource centres on an occasional basis for curriculum projects, etc., but these may provide limited opportunities for professional development and, as shown by focus group discussions, may be seen by some stakeholders as reinforcing the 'charitable' model rather than supporting real participation and sustainable friendships.

However, demand for places in these centres is currently increasing and stakeholders report that the role of the resource centre as a support to learners in mainstream has not yet been fully developed.

Focus groups in particular indicated that, for some stakeholders, the resource centres feel alienated from the mainstream system and, in some cases, it is difficult to discern how they differ from special schools. There appears to be a degree of role confusion for different stakeholders about how these centres should operate and, as a result, there is the potential for the staff to feel undervalued.



Within the resource centres there is a pool of skills and expertise that does not appear to be used effectively to support capacity building within mainstream schools. There is real potential for the resource centres to have a clearer role in supporting mainstream school staff – rather than individual learners. By working with mainstream teachers within, for example, co-teaching situations, the valuable expertise of resource centre staff could be used in a way that would contribute more effectively to capacity building and would benefit a far wider range of learners than those identified as having the most complex learning needs.

6.2.4 The role of the Student Services Department re-focused as School Services

Within the remit of the Student Services Department (SSD), there is a range of school-, college- and centrally-based services focusing upon various specialised services and support.

The SSD's mission is stated as:

To ensure the effective and efficient operation and delivery of services to the colleges and state schools within an established framework of decentralisation and autonomy (Ministry of Education and Employment, 2013, p. 108).

This mission is very much in line with a mainstream capacity-building approach.

However, an analysis of background information as well as data from fieldwork suggests that, apart from the in-service training and CPD activities offered by SSD personnel, the majority of services offered focus on work with individual learners and/or their families.

The learner-focused approach can be seen within the mission statements of a number of services, for example:

The School Psychological Service strives to promote the optimal psycho-educational environment that facilitates the learning and development of children and young people. This is undertaken through partnership with parents and collaboration with school staff and other child professionals and services (Ministry for Education and Employment, 2014d, p. 90).

Also, the Social Work Service:

To provide an effective social work service to all students of compulsory school age in support of their education and personal growth, working within the students' educational, family and social environment (ibid., p. 94).

While schools and educational contexts are mentioned, they are not the main focus and this may reinforce the perception that support is targeted upon individual learners, essentially based upon a deficit model.



Audit data indicates that there is a need to facilitate the SSD to work as a support service for schools and school staff, using a capacity-building approach by implementing a shift in the focus of all individual services' work away from a compensatory approach for some learners to an intervention and prevention approach for schools.

6.2.5 The need to develop a support system underpinned by a collaboration culture

The Audit's findings suggest that the relatively fragmented system of provision in Malta creates a culture of individual, rather than collaborative, practice. Fieldwork data suggests that effective co-operation among professionals in schools and services often depends upon individual working bonds and relationships.

It appears too that there is not a strong culture of systematic reflection on practice in the overall support system. Many stakeholders do not see professional self-review as something that is relevant or useful for them or their learners. Conversely, many stakeholders are quick to identify failings within the system and the actions of other actors, rather than engaging in critical self-review based on a clear understanding of personal professional responsibility.

This issue may be symptomatic of a 'closed' culture, where commenting on others' practice may be seen as 'speaking out against colleagues'. Such a culture promotes 'blame games' and abdication of personal and collective responsibilities.

The system in Malta is based on a sincere will to develop more inclusive school environments, but the limited possibilities for formal and informal inter-professional communication result in differing perceptions and expectations among stakeholders. Focus groups in particular highlighted the fact that perceptions of 'adequate' support differ widely among groups of stakeholders, but there are limited opportunities for professionals to openly discuss these differing views and reach equitable agreements on ways forward.

The analysis of data from the focus groups indicates that collaboration among stakeholders could be further supported by:

- Clearer designation of management responsibility for inter-disciplinary working.
- The establishment of more formal – but participatory – communication 'cycles' that take an action-plan approach and require all stakeholders' inputs on key issues. Collaborative action planning would cover: identification of targets, implementation, monitoring, evaluation, debating implications and setting new targets.



In summary ... in relation to *how effectively systems of support enable all stakeholders in education*, the areas of strength can be seen as:

- Parents who believe in the benefits of inclusive education for their children
- The availability of expertise in supporting learners' diverse needs
- The forward-thinking initiatives to increase the inclusiveness of the Maltese education system.

Areas for development highlighted by the Audit are:

- The perceived need to improve support provided to mainstream schools, in particular addressing the issues that individual support within the current system can be a potential barrier to participation for:
 - learners,
 - parents and
 - class teachers
- The effectiveness and long-term sustainability of Learning Support Assistant (LSA) provision
- The need for a clearer role for specialist provision
- The role of the Student Services Department which should be re-focused by implementing a shift of all individual services' work away from a compensatory approach for some learners to an intervention and prevention approach for schools
- The need to develop a support system underpinned by a collaborative culture, with:
 - clearer designation of management responsibility for inter-disciplinary working, and
 - the establishment of more formal communication 'cycles' that take an action-planning approach.

Support services are viewed by many stakeholders as being relatively effective in providing for individual learners with SEN, but their role needs to be re-focused towards providing more enabling support for mainstream schools and staff.



7. EDUCATIONAL QUALITY ASSURANCE PROCESSES THAT ENABLE ALL STAKEHOLDERS IN EDUCATION

This chapter explores *how effectively the educational quality assurance processes enable stakeholders in education*. The focus of this examination is essentially on the *monitoring process* and how quality assurance procedures promote and support inclusive education.

7.1 Findings – areas of strength

7.1.1 Increasing integration of issues of diversity and inclusion in wider education policies

The analysis of the background information from Malta demonstrates that diversity and inclusion issues are increasingly being considered within ‘mainstream’ policy documents.

As part of Malta’s National Curriculum Framework (NCF), issues of diversity and inclusion are integrated into the general principles that include entitlement, diversity and learner-centred learning. Education for diversity is also included as a cross-curricular theme (Ministry of Education and Employment, 2012a). The on-going work reflects a consideration of a range of needs, including those of learners who are gifted and talented, those who have special educational needs or severe disabilities and those who experience social disadvantage or come from diverse social, cultural and linguistic backgrounds, including children of refugees and asylum seekers.

The NCF emphasises the importance of a national inclusion policy that is embedded in all educational processes and outcomes within the NCF, in all schools. It also recognises the need for a supportive infrastructure – including on-going support and professional development, student services and human resources. This infrastructure would enable all learners to achieve their full potential and help teachers and school leaders to implement the curriculum effectively.

7.1.2 Existing quality assurance standards and procedures

Establishing quality assurance standards and developing mechanisms for monitoring those standards is a critical step within overall system development. In Malta, the *Integrated School Improvement Framework* is moving towards such a scenario. The 2014 External Review document has been published to supplement internal reviews and performance appraisals within the existing school improvement framework (Ministry for Education and Employment, 2014e). The document focuses on the following areas of school activity: education leadership, internal evaluation and development, effective school management, learning and teaching, assessment,



school ethos and climate, and parental involvement. Criteria and indicators have been established for each of these areas.

A stated aim of the External Review framework is ‘to promote a culture of consistent excellence and rigour in aiming for the highest possible standards’. It further states:

At its best, the external review highlights and celebrates the consistent efforts of the school ... It also indicates ways how to improve these efforts at classroom and school level (Ministry for Education and Employment, 2014e).

This clearly indicates that the Ministry recognises the importance of setting and monitoring standards for system improvement and development.

7.1.3 Willingness of the Directorate for Educational Services to engage in system review

The readiness of the Directorate for Educational Services to undertake reviews of special needs and inclusive education in Malta cannot be questioned. The *Inclusive and Special Education Review* conducted in 2005 was a comprehensive internal review leading to clear proposals for developments at system and school levels.

The decision to undertake the current External Audit is another example of the Directorate’s willingness to engage in review activities. The Critical Reflection process has been an open and honest examination of current policy and practice.

The range of experience in evaluation for improvement is a strength to be built upon in future work to develop the special needs and inclusive education system.

7.2 Findings – areas for development

7.2.1 The need to embed national quality assurance and accountability mechanisms in school-level policy and practice

Findings from the desk research, supported by the background information, show that school inclusiveness and stakeholders’ ability to provide the best quality education are closely related to the effectiveness of quality assurance monitoring mechanisms. If no systematic monitoring and evaluation takes place, not only will opportunities for learning from experience be lost, but unsuccessful initiatives may also be continued or repeated, potentially leading to fragmentation and ineffective use of resources.

Evidence from an analysis of the background information as well as information from the focus groups and interviews suggests that the monitoring and evaluation of quality standards for education generally and inclusive education specifically is unsystematic.



The national quality framework – in addition to current modes of funding for support – does not foster adequate accountability in relation to inclusive education. This lack of accountability appears to be a major obstacle to the promotion of effectiveness and equity in schools and is one of the key reasons for the abdication of the responsibility for meeting individual needs among stakeholders.

Many stakeholders consider that the current general quality assurance system has the following disadvantages in relation to supporting inclusive education:

- It is perceived as focusing more on administration than on the development of competences for inclusive education.
- There is a lack of involvement and ownership by key stakeholders of the quality assurance system.
- It does not offer sufficient support to all stakeholders and may be seen by some as 'punitive'.

Overall, compliance with quality assurance standards requires more detailed examination. The on-line survey clearly indicates that national quality assurance procedures could be better embedded in school practice. According to SMTs, quality assurance procedures only partially support inclusive education at school level. Less than a quarter of SMTs feel fully enabled to develop clear strategies for school-wide monitoring and evaluation based on national quality assurance procedures. Meanwhile, less than 20% feel fully empowered to develop school-level monitoring and evaluate the effectiveness of their inclusive education policy.

The survey results also show that quality assurance procedures at school level could be more supportive for inclusive education. Only around one third of SMTs are confident in the ability of school's quality assurance procedures to effectively support inclusive education and to empower schools' stakeholders in terms of on-going assessment procedures that inform the development of IEPs. Similarly, about one third of SMTs feel that school quality assurance procedures support them to use on-going school assessment to evaluate the effectiveness of a learner's educational programme and support, to effectively use results of school-based assessments, or to make decisions regarding eligibility for support and additional provision.

7.2.2 The need to embed national quality assurance and accountability mechanisms within SEN resourcing procedures

The information from the desk research calls for a focus on quality education for all learners – a system cannot be considered high quality if it is not inclusive. However, data from focus groups and interviews has highlighted issues in relation to the way that quality assurance and accountability promotes effectiveness and equity within SEN resourcing procedures.



Stakeholders have raised the following issues in relation to quality assurance linked to SEN resourcing:

- There is limited attention to processes within school-based assessment and early intervention strategies.
- Quality assurance standards may need to be more effectively embedded within the service level agreements held with the NGOs that provide specialist support in schools.
- The Statementing and Moderation panel is seen as being too close to the Ministry and Directorate for Educational Services, resulting in the perception that it is not fully accountable for its actions and recommendations.
- Educational targets/indicators used in quality assurance work should be accessible and appropriate for all learners. The high stakes testing associated with benchmark tests and final examinations is not an appropriate indicator for all learners and leads to strategic behaviour on the part of parents and professionals (i.e. attempts to secure resources for access arrangements). Such arrangements have little long-term impact on learning or employability.

7.2.3 Addressing perceptions of fragmentation in the governance of inclusive education

Governance for inclusive education appears to some system stakeholders to be fragmented. Focus groups and interviews highlighted issues relating to the effectiveness of collaboration among different ministries as well as among directorates and departments within the Ministry for Education. The issue of ‘spilt responsibilities’ for inclusive education – potentially among the ministries overseeing education, social policy, health, finance and equality and equal opportunities, etc. – was raised and there were calls for more transparent overarching co-ordination of Ministry-level efforts to meet individual needs.

Different stakeholders stressed the view that, in addition to employing a high level of centralised decision-making, the Ministry for Education often responded to requests and situations in what is perceived to be a very reactive way. Calls for more proactive approaches to addressing challenges were evident from school and service-level stakeholders, as well as from representatives of the Ministry itself. The problems caused by a highly reactive system – notably increased fragmentation as a result of multiple, sometimes overlapping, initiatives coupled with limited evaluation and periods for embedding practice – appear to be very clear to system stakeholders.



7.2.4 The need for transparent formal accountability procedures

The data from interviews and focus groups in particular shows that many stakeholders feel there are no clear and transparent accountability procedures for inclusive education. The lines of communication to be used within accountability processes are unclear for stakeholders and two inter-connected factors result in a negative impact on the implementation of inclusive education policy and practice:

- There is no formal compliments or complaints procedure in place for individual stakeholders to follow in a transparent and equitable way.
- The lack of a formal communication procedure results in key people in the educational administration being too accessible to individual stakeholders. There is an expectation that high-level decision makers will be personally available to enter into direct communication with stakeholders and will then personally take action.

While it is recognised that this may be the result of the geography of a small island, as well as being in line with the culture and traditions of Malta, this situation further reinforces the high level of reactivity of the overall system. Some stakeholders interpret the ‘accessibility’ of decision makers to deal with personal requests and complaints as inequitable and lacking in transparency. In addition, dealing with micro level issues ultimately detracts from the time and resources that decision makers have available for higher-order policy implementation issues.

In summary ... in terms of *how effective the educational quality assurance processes are in enabling stakeholders to implement inclusive education, areas of strength* can be identified as being:

- The increasing integration of issues of diversity and inclusion in educational policies
- The existence of quality assurance standards and procedures
- The willingness of the Directorate for Educational Services to engage in system review.

Areas for development are seen as:

- Embedding national quality assurance and accountability mechanisms in school-level practice by:
 - focusing less on administration and more on the development of competences for inclusive education;
 - increasing the involvement and ownership by key stakeholders of the quality assurance system; and



- developing the quality assurance system in a way that is clearly supportive and not punitive for all stakeholders.
- Embedding national quality assurance and accountability mechanisms within SEN resourcing procedures by:
 - paying more attention to quality assurance processes within school-based assessment and early intervention strategies;
 - embedding quality assurance standards within the service level agreements held with the NGOs that provide specialist support in schools;
 - ensuring greater 'distance' between the Statementing and Moderation panel and the Ministry and Directorate; and
 - developing educational targets/indicators for quality assurance work that are accessible and appropriate for all learners.
- Addressing perceptions of fragmentation in the governance of inclusive education
- Implementing transparent formal accountability procedures, including:
 - reducing the accessibility of key people in the educational administration to individual stakeholders' requests, and
 - implementing a formal compliments or complaints procedure that can be used equitably by all stakeholders.

Overall, it can be seen that the current quality assurance system provides a good basis for further developments that will ensure transparency and accountability, as well as high quality education for all learners.



8. EVALUATION OF POLICY AND PRACTICE AGAINST THE STANDARDS

The Framework of Standards identified for the Audit sets out the critical aspects of the special needs and inclusive education system in Malta that must be examined in order to move policy and practice forward in the short, medium and long term. The evaluation of policy and practice against the Standards is an attempt to ascertain – using the evidence gained from all data sources – how far the individual Standards are being effectively implemented. The purpose of this evaluation is to inform future policy decisions, not to conduct a summative, snapshot evaluation for its own sake.

This formal evaluation process has involved a detailed examination of the critical issues identified in the Standards. These issues have been presented in **Chapters 3 to 7** and should be seen as complementary to the overall discussion of findings.

8.1 Process for evaluating policy and practice against the Standards

All five Audit Team members worked through a number of steps in order to evaluate policy and practice against the Standards.

As a first step, each team member analysed all data sources – background information, fieldwork data and on-line survey results – to identify evidence of the extent to which the Standards were being met and also to highlight issues arising in relation to the Standards.

Each team member then completed an individual evaluation of policy and practice against the agreed Standards. Using a grid, team members indicated whether, based on all available evidence, they considered each Standard as:

- *To be initiated* – planning is at an early stage or practice is yet to be started.
- *Requiring development* – implementation is partial, or inconsistent across schools.
- *Embedded in policy and practice* – work in this area is established and sustainable in the majority of schools.

Discussions within the Audit Team led to agreements on how the judgements were to be made in the evaluation of policy and practice against the Standards and how individual Standards were interpreted – for example if, within a Standard, the focus was upon all learners, unless *all* was clearly evidenced, the evaluation could only be ‘some evidence’ or, at best, ‘requiring development’.

The five individual team members’ evaluations were then combined into a team-level analysis. Using a modal calculation of three out of five team members – or a 60% rating – an overall evaluation against each of the Standards was reached.



Using this method, only one of the 137 Standards did not lead to a clear three out of five majority – *6.7a Written procedures are established and implemented*. The team evaluation indicated a 1-2-2 split and so the rating of ‘requiring development’ was agreed upon.

All team members agreed upon this compilation. The final evaluation of policy and practice against the Standards is presented in full in **Annex 7: Evaluation of Policy and Practice against the Standards**.

The overall evaluation can be summarised as follows:

- Just over a quarter of the Standards – 37 – were identified as being at the stage of *to be initiated*;
- The vast majority of Standards – 100 – were identified as *requiring development*;
- None of the Standards were identified as being *fully embedded* in policy and practice in the majority of schools.

This evaluation of policy and practice demonstrates that much work has already been started in relation to the seven core areas covered by the Standards. However, this work requires development in order for key areas of policy to be embedded in practice.

8.2 Priorities for future action identified by the evaluation

The following Standards were identified as not having being initiated within policy and/or practice and are therefore considered to be priorities for future examination and action.

1. Legislation and policy

National policy

- Stakeholders from civil society – including parents – have a clear role in policy development implementation and review.
- Policies provide operational definitions of what is understood by access and appropriateness.
- Policies outline role accountability and describe procedures for appeals and arbitration.

Conceptions of inclusion

- A human-rights approach to disability and special needs underpins all policy initiatives.



- Inclusive education is understood by all stakeholders as being an approach for all learners.

2. Building capacity within mainstream schools

School organisation

- All schools have policies and action plans detailing how national-level policies on inclusive education will be implemented.
- School-level policies consider: school ethos, systems and procedures, teaching and learning issues, behaviour, pastoral support and learner well-being.
- The school community works collectively to remove barriers to learning and participation in schools and minimise all forms of discrimination and stereotyping.

School leadership

- SMTs take a universal design approach to the school environment as well as the curriculum.

Co-ordination between state and non-state services

- There is school-level policy outlining procedures for working with other members of the community to design and deliver services for learners with special educational needs.
- State, church and independent schools follow and implement common procedures in relation to assessment and recording, guidelines for IEP procedure and documentation.

Collaboration with other agencies

- There are school-level procedures for ensuring effective collaboration with all stakeholders in the school community, including learners and their families, community agencies, organisations and associations, other education authorities, regional health and children's services authorities.
- All forms of educational support are effectively co-ordinated.


3. Specialist provision as a resource for the mainstream sector

Support services

- Role accountability is agreed by all stakeholders and written down.

Teacher support

- Teachers have the adequate support (including peer support and collaboration) so that their practice is in line with their job description.

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- Teachers are supported to monitor the effectiveness of their practices and adjust practices as necessary.

4. Training and professional development for school leaders, teachers and LSAs

Professional development routes

- All forms of pre- and in-service educational professional development are overseen by a recognised national body.
- There is a recognised forum for training providers to meet, share experiences and facilitate effective co-ordination of service provision.

Roles and responsibilities

- The long-term effectiveness of professional training is systematically monitored by the recognised national body.
- Appropriate general and specialist training is available for all staff in order to ensure all staff can respond positively to learner diversity.

5. Teaching, learning, curriculum and assessment

Raising achievement for all

- There is a national curriculum framework with learning outcomes that cover the needs of all learners, including those with the most complex needs.
- School resources are distributed in an equitable way to support inclusive education.
- All lessons are made accessible to all learners in an appropriate way.

Learner engagement and participation

- Training is available for school staff, learners and their parents to support learner self-advocacy approaches.

Monitoring learners' progress

- There is a national assessment framework that covers the needs of all learners, including those with the most complex needs.
- Schools are supported to develop coherent formative and summative assessment, recording and reporting procedures that are in line with national and school-level policies for inclusive education.
- The range of assessment procedures used in a school allows all learners to display their skills, abilities and competencies.
- All learners are involved in self-assessment and recording of their own learning progress.



Transition opportunities

- Alternative accreditation pathways exist for learners who require them.

6. Identification of needs and allocation of support

Assessment of individual learning needs

- There are clear procedures implemented for monitoring the achievements of learners who are at risk of exclusion from learning opportunities.

Statementing procedures

- The requirements for school-based assessment evidence to determine eligibility for formal assessment in line with statementing procedures are communicated to and implemented by all schools.
- The statementing process focuses upon a learner's educational needs and is not solely focused upon the need for services.

Support allocation

- All support for learners with individual needs is audited regularly to ensure effectiveness and sustainability.

7. Monitoring and evaluation

Quality assurance standards

- All quality assurance standards cover equity, efficiency and innovation issues.
- Accountability procedures in line with quality assurance standards are developed, communicated and implemented.

Compliance with Standards

- Systematic monitoring is conducted by the educational directorates to ensure compliance with all quality assurance standards.
- Mechanisms are developed for collecting and sharing data across ministries to ensure compliance with agreed Standards.

These areas and Standards form the foundation for the final Audit Recommendations presented in **Chapter 9** of this report.

8.3 Reflections on the evaluation process

Before presenting the final recommendations of the Audit, this section will present some reflections from the Audit Team on the process of developing and using the Standards.



The Framework of Standards used in the Audit is extremely detailed and comprehensive. The wide focus, combined with the specificity of the wording of many Standards, made it hard to find clear evidence of individual Standards being embedded in policy or practice.

Overall, the Standards are not just statements of aspiration for the special needs and inclusive education system in Malta – they present an ambitious vision, which can only be fully achieved within a long-term development programme. The fact that the Ministry Team developed such an aspirational Framework of Standards for the Audit is commendable both in terms of the underlying ambitions for inclusive education in Malta, but also the Ministry Team’s willingness to undergo a transparent process of examination of the degree to which these ambitions are being fulfilled.

It is fair to suggest that, if a similar audit exercise were completed in other European countries, no country would have a profile showing that all of the agreed Standards were fully embedded. All countries would have profiles indicating areas for development and/or initiation.

A strength in the use of these Standards is the potential they present for clarifying policy goals and then engaging in debate with system stakeholders about those goals.

A strength in the use of the evaluation of policy and practice against the Standards is that it identifies priorities for further action by highlighting evolution, trends and progress made, as well as areas for development.

The degree of agreement between the evaluation of policy and practice against the Standards and the issues and current system limitations raised by the Ministry Team in the Critical Reflection Document should also be noted. The critical issues for the special needs and inclusive education system in Malta are, in the main, known to the key stakeholders. The crucial next step is the identification of clear actions to address these issues. A discussion of the suggested priorities arising from the External Audit is presented in **Chapter 9**.



9. RECOMMENDATIONS LINKED TO THE STANDARDS

The recommendations for developing policy and practice in line with the Standards have been developed based on the three elements of the Audit:

- Standards set for the Audit which indicate the Ministry's aspirations for the education system;
- desk research that highlights principles from literature and international policy to inform developments;
- all sources of evidence from the data collection and analysis regarding current practice.

The recommendations cover all seven areas of Standards, with a particular focus on the priority Standards identified as 'to be initiated' (see **Chapter 8**).

A fundamental aim behind all the recommendations linked to the Standards is to move current policy and practice away from compensatory measures and towards intervention and prevention measures.

9.1 Legislation and policy that promotes a rights-based approach to supporting the active participation of all learners

All forms of *legislation for education* should be underpinned by a rights-based approach. This requires that:

- legislation refers to and is consistent with international agreements – such as the UNCRPD and UNCRC – as a means to ensuring the right of all children to quality education and effective support to maximise their learning and participation and achievement of valued outcomes, and
- inclusive education is an integral part of all legislation for education, as well as other relevant social and health sectors.

All *educational policy* should focus on maximising learning opportunities for all learners. This requires:

- a clear vision for inclusive education that is effectively communicated to all stakeholders;
- leadership from the Ministry for Education to ensure consistency among ministries and correspondence among and within system-level policies;
- a shift in policy-making from a reactive approach to a longer-term, developmental approach based on collaboration among all system stakeholders;



- holistic policy goals that reduce fragmentation and lead to a more equitable and effective provision by implementing a system that enables the participation and wider achievement of all learners; and
- the clear articulation of:
 - the rights all learners within policy, particularly in relation to: attending school, being taught by a qualified teacher, receiving support from other services in their local school, being involved in decisions about their learning, and participating equally in meaningful learning opportunities;
 - the individual and collective responsibilities of all stakeholders in meeting the diverse needs of all learners;
 - the roles of all stakeholders in the education system – including parents – in policy development, implementation and review; and
 - role accountability and transparent procedures for appeals and arbitration.

In relation to *policy implementation*, a participatory approach is needed, moving from ‘crisis management’ by a few key stakeholders to collaborative planning according to realistic timescales. This should be coupled with a transparent and independent approach to monitoring and evaluation. This requires:

- directorate-level support to services, colleges and schools to develop their understanding of national policy and enable them to implement it in the context of their own work;
- the creation of financial incentives to encourage all schools to address accessibility issues and become more inclusive; and
- system flexibility to encourage innovation and support the engagement of all stakeholders.

9.2 Build the capacity of mainstream schools guided by a clear policy vision for inclusive education as an approach for all learners

Strong leaders at college and school level who are able to communicate a vision of inclusive education play a critical role within mainstream capacity building. These leaders need to be effectively supported by the directorates to enable them to:

- change the attitudes of school-level stakeholders in line with rights-based approaches, moving away from deficit models;
- build an inclusive culture, ensuring that all school stakeholders take responsibility for all learners; and



- take a universal design approach to all school development (e.g. the school environment, curriculum, teaching and learning).

School leaders should also be supported to develop *school-level policies for accessibility and inclusive education* in collaboration with the school community.

These policies should:

- articulate how the school policy will support the implementation of national-level policy on inclusive education;
- aim to remove barriers to learning and participation and minimise all forms of discrimination and stereotyping; and
- articulate whole school understanding of quality and effectiveness and procedures for monitoring and evaluation.

Capacity within the mainstream system should be developed through more targeted *college-level initiatives*. This requires:

- increased opportunities for collaboration to build greater understanding of inclusive education among all stakeholders in the college/school community (including learners, parents, external organisations and services) and, as a result, increase ownership of and commitment to policy initiatives.

9.3 Establish a continuum of support and resources for colleges and schools


An effective and well co-ordinated *continuum of support* for inclusive education requires a range of provision – from in-class support through flexible organisation and differentiated teaching, to support provided by external agencies. All support should be targeted at:

- school leaders and their capacity to support teachers and effectively organise provision for all learners;
- teachers and their skills and ability to meet learning needs; and
- learners and their individual learning needs.

All available support structures should aim to:

- provide leaders and teachers with a range of flexible support, including opportunities for collaboration with peers and other professionals;
- support school teams to monitor the effectiveness of their practice and make adjustments as needed in order to meet their learners' learning needs; and
- access specialist advice when needed to respond to specific challenges.

In order to reach these goals, achieve equitable distribution of resources and reduce the number of learners requiring formal statementing procedures:

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- Student Services should change their primary focus away from individual learners and work with other partners to provide a coherent inter-disciplinary support service around each college community;
 - the specialist resource centres should support school teams to meet the complex needs of learners in mainstream settings;
 - the work of NGOs should be reviewed to ensure that available expertise is used to support mainstream school teams; and
 - all services should be transparent and cost-effective, administered through service level agreements that are monitored and reviewed on a regular basis.

9.4 Develop coherent training in inclusion for all school stakeholders

Training and professional development should be *considered as one of the critical levers in the development of an inclusive education system* that is able to meet all learners' needs. Comprehensive training for inclusive education should:

- be available to policy makers, college and school leaders, teachers and LSAs as well as to the professionals who support teaching teams (i.e. subject teachers, education officers, etc.) in order to develop positive attitudes and values, as well as knowledge, understanding and skills.

All system stakeholders should be engaged in a *comprehensive review* of all current forms of ITE and CPD that leads to the identification of:

- the professional development needs for general and specialised training for all stakeholder groups (in particular college/school leaders, teachers, LSAs);
- a clear rationale demonstrating how inclusive education underpins all training routes; and
- agreed standards for monitoring the content quality and effectiveness of training.

A long-term *sustainable model for training* must be widely agreed. A sustainable model will:

- reduce the need for professionals to travel abroad to undertake relevant training;
- establish clear service level agreements with all training bodies and providers between the Ministry for Education on behalf of colleges and schools;
- develop a network of institution-based trainers/educators and school-based mentors with knowledge and experience of inclusive education to ensure the quality and consistency of ITE and CPD for a range of stakeholders; and



- identify possibilities for the provision of more flexible, school-based CPD that works towards addressing wider capacity-building issues.

9.5 Provide flexible frameworks for curriculum and assessment, together with teaching approaches that engage all learners and support their active participation

The need to develop *greater flexibility within the national curriculum and assessment frameworks* has been recognised. This flexibility will enable teachers to plan learning opportunities to meet the needs of all learners, including those with the most complex needs. Further reform is needed in order to reduce the negative effects of high stakes assessments (through benchmark testing and examinations) and, in particular, to reduce school drop-out rates and to promote equity for learners from diverse socio-economic backgrounds to raise the achievement of all learners.

All education professionals must take responsibility for meeting the needs of all learners. This is an essential requirement for all colleges and schools working towards the inclusion of all learners.

In order to promote learner engagement and participation:

- Training should be made available for school staff, learners and their parents to support learner self-advocacy.
- Teachers should use assessment for learning to support learners in self-review and in making decisions about their learning.
- Using the flexibility available within the curriculum, teachers should plan a range of accessible and relevant learning opportunities for all learners, taking a universal design for learning approach.
- Teachers should work together to pilot evidence-based teaching approaches that actively involve all learners.
- Alternative assessment and accreditation pathways should be established for those learners who require them.

9.6 Re-focus the identification of needs and allocation of support towards early support and prevention

In an inclusive system, learners' support *needs are identified as soon as they arise and support is provided to prevent escalation*. The Maltese system currently relies on compensatory or remedial approaches, which many stakeholders believe reward schools for their lack of success in meeting learners' needs.

A move to a *rights-based approach to the identification of learners' needs* will require:

- early identification of learning needs and the provision of flexible support in the classroom from the school's existing resources;
- early identification and advance planning for learners with more complex needs in order to provide appropriate inter-disciplinary support in the classroom, utilising external resources; and
- opportunities for all parents to be more actively involved in the school community and, in particular, to be involved – with their child – in all decisions that affect them.

Such an approach will also require:

- the systematic monitoring of learners who are at risk of exclusion from learning opportunities;
- the establishment of flexible school support frameworks (see section 9.3);
- the monitoring and regular review of support for learners to ensure that it is effective, appropriate, sustainable and that it meets the identified needs; and
- the reduction in the use of formal statementing procedures as the means of accessing support for learners experiencing difficulties.

When a *formal assessment* is undertaken with a view to providing a statement:

- A wide range of school-based formative assessment evidence should be considered to determine eligibility for formal assessment.
- The process should clearly focus upon the identification of learning needs and not upon the need for services or support.
- All state, church and independent schools should follow agreed procedures in relation to the provision of school-based assessment information and their contribution to formal assessment procedures.

9.7 Embed coherent monitoring and evaluation processes in all school, service and Ministry-level work

For the educational process to be of high quality for all learners, it must be equitable and inclusive and *focus on raising standards* – in terms of learner outcomes and equal access to effective processes and procedures. For this to happen:

- quality assurance mechanisms should be improved at all system levels in order to ensure high quality, equitable education for all;
- quality assurance standards should be systematically developed and integrated into all Ministry, Directorate, service and school-level processes; and



- all quality assurance standards should cover equity, efficiency and innovation issues.

The *implementation of quality assurance standards* must be monitored. This requires that:

- accountability procedures in line with quality assurance standards are developed, agreed and implemented;
- the educational directorates and all services and schools undertake systematic monitoring of compliance with agreed quality assurance standards; and
- mechanisms are developed for collecting and sharing data across ministries with regard to compliance with agreed quality assurance standards.

An effective quality assurance process requires the *collection of a wide range of data* that can be used for improvement purposes, including information on:

- learning progress covering a wide range of academic, social development and achievement outcomes, and
- effectiveness of policy and practice at school and service level.

Quality assurance processes should clearly *support school capacity building* by:

- ensuring that all stakeholders are involved in the development and implementation of a quality assurance system that goes beyond 'easy-to-measure' targets and considers inclusive policy and practice;
- developing procedures for the monitoring and evaluation of all new initiatives, so that stakeholders can learn from the experience of piloting and further develop evidence-based practice in their context; and
- engaging all stakeholders in a quality assurance process that is supportive rather than punitive and that leads to the further development of their understanding and skill levels.

9.8 Inter-connections between the areas of recommendations

Although presented separately here, the inter-connections between the areas of Standards and individual recommendations must be highlighted. These inter-connections are illustrated in Figure 6.

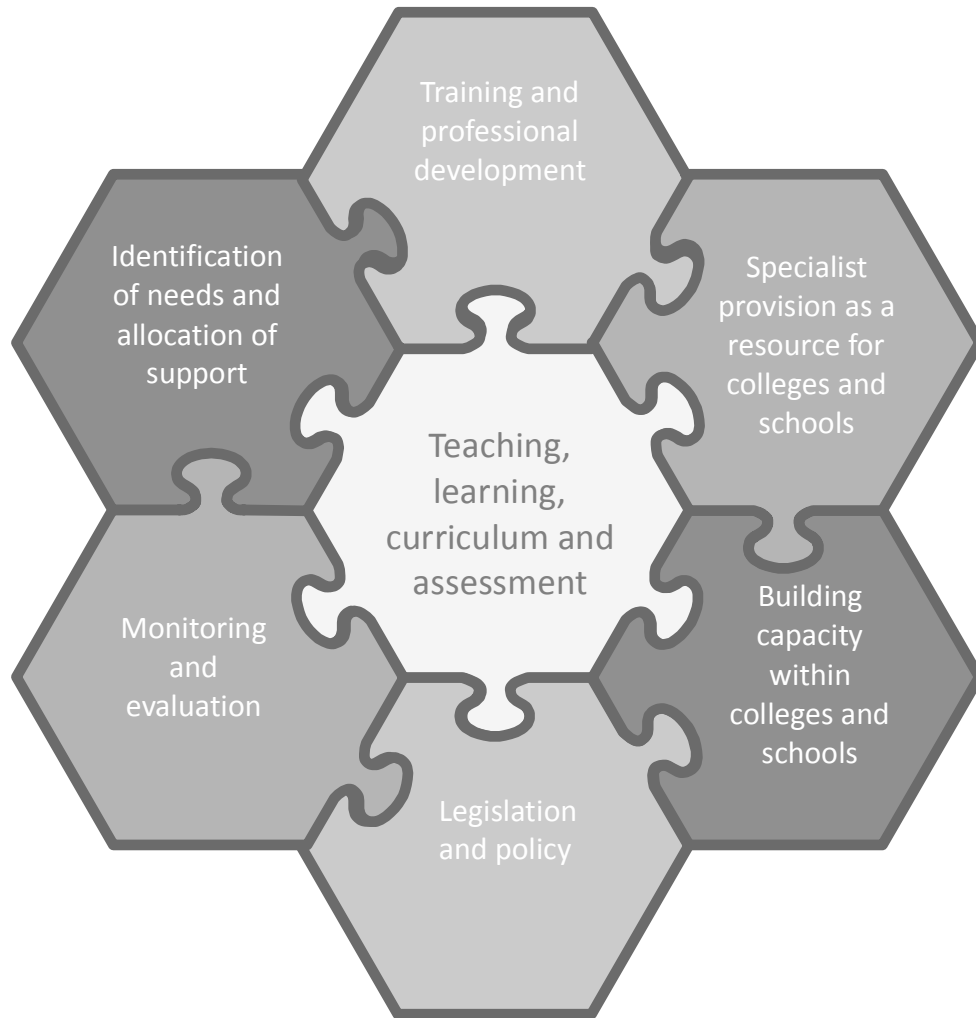


Figure 6. Inter-connection of the seven areas of system Standards

Teaching and learning are placed at the centre of Figure 6 and are also at the centre of the recommendations that have been identified for developing systems of policy, practice and provision that will potentially have the greatest impact on meeting the rights of learners, families and supporting teachers and schools.

Inclusive classroom practice cannot be developed in isolation. It will require a supportive legislative and policy context, professional development and on-going support both from colleagues within colleges and schools and from external services. Such a system will increase the confidence and capability of teachers, LSAs and other school staff to support all learners in a culture of collaboration and continuous improvement.



WAYS FORWARD

The work undertaken by the Ministry Team as part of this External Audit has fulfilled a number of important objectives for long-term policy development. The Audit activities have achieved a number of important outcomes in the move towards a more inclusive education system:

- *the identification of strengths and areas for development in the current system for special needs and inclusive education*, through data collection and analysis;
- *reflections on challenges to be addressed*, through the discussion of findings;
- *the benchmarking of key achievements within the current system*, through the evaluation of policy and practice against the Standards; and
- *the identification of possible strategies to address identified challenges*, through the recommendations linked to the Standards.

The recommendations outlined in **Chapter 9** should be implemented over time. Following on from the External Audit activities, a number of steps will be necessary in order to ensure that all future action has a clear focus. These steps will also lead the Ministry Team activities to the next step in the Audit cycle (see Figure 1).

Firstly, it is necessary to work with all relevant stakeholders to *review the Standards used in this External Audit*. The Standards developed for this Audit provide a comprehensive starting point for future work, but they require further discussion with all stakeholders in order to achieve widespread understanding of and commitment to an agreed framework of goals and standards for the Maltese system for special needs and inclusive education.

Secondly, *a small number of priorities for action must be identified*. These initial actions will serve as key levers for short-, medium- and longer-term change and development in policy and practice. The identification of priority actions must be linked to discussions with all stakeholders about the targets to be achieved in the short, medium and long term and the relevant indicators required to measure progress.

Thirdly, *strategic action plans must be developed in order to implement the identified priorities* and provide a detailed roadmap for achieving the targets identified with stakeholders. In addition to targets for national, college and school-level work, the action plans will outline roles and responsibilities for planning, implementing and evaluating actions within a clear timeframe and will identify how to make best use of all available resources.



Priority steps

The identification of key actions and the development of realistic implementation strategies can only be achieved through a process of dialogue involving all stakeholders. The Audit findings clearly show the need for a *national dialogue* with stakeholders to increase awareness and understanding of the priority needs of different stakeholder groups within the special needs and inclusive education system.

In order to support this dialogue, priority steps can be identified from the Audit work that are necessary for the effective implementation of all other recommendations.

Creating clarity around the concept of inclusion

Developing conceptual clarity will ensure that all stakeholders understand inclusive education as an approach for all learners.

This will require:

- collaborative work in order to develop a shared conception of inclusive education as a means for improving quality and equity for all stakeholders;
- collaborative work in order to develop a shared idea of inclusive education and what quality and equity for all stakeholders looks like in practice; and
- the development of shared operational definitions of key concepts such as access and appropriateness.

It will then be possible to undertake a review of legislation and policy in order to ensure a consistent, rights-based approach to meeting all learners' needs.

Re-focusing support to colleges and schools

Developing national-level services to support all schools to move away from meeting additional learning needs through compensatory approaches, towards preventative, capacity-building approaches.

This will require:

- the work of the Student Services Department to be clearly targeted towards colleges, schools and their teaching teams;
- this change in focus to be indicated by a change in name from – for example – Student Services to School Services;
- a dialogue with all stakeholders in order to re-structure existing services, moving away from the provision of support to individual learners to supporting teachers and schools; and



- services to be located within existing college campuses so that they are clearly recognised as a part of the ‘mainstream’ system.

Establishing a national education training body

There is a need to ensure a coherent system of training and leadership development for inclusive education.

Such a national body would:

- oversee all forms of initial and in-service education and professional development;
- review existing training and develop new approaches to the training of professionals at all levels;
- monitor the long-term effectiveness of training in line with national education quality assurance standards and frameworks; and
- provide a recognised forum for training providers to meet, share experiences and facilitate effective co-ordination of provision.

Undertaking development work to support all colleges and schools to use evidence-based teaching and learning approaches

Developing more flexible curriculum and assessment frameworks will enable teachers to plan appropriate learning opportunities and use a range of teaching approaches to engage all learners.

These frameworks must provide clear guidance on:

- ways to assess and monitor the progress of all learners, including those with the most complex needs;
- formative assessment for learning approaches that involve learners in self-review and decisions about their learning;
- recording and reporting procedures that are in line with national and school-level policies for inclusive education;
- innovative approaches to curriculum development to enable colleges/schools to plan a curriculum for all learners; and
- teaching approaches that support active learning to meet the full range of needs in every classroom.

Supporting all schools in teaching for diversity

There is a need for existing school-level support to be re-focused.

This will be achieved through:



- a mapping of available support capability – resources, personnel and expertise – across colleges;
- the identification of professional development and training needs for all school professionals;
- an exploration of different models for the effective deployment of LSAs so that they:
 - work within wider teaching teams;
 - help teachers to meet the needs of all learners in a class; and
 - give 1:1 support to a limited number of learners, under the direction of the class teacher; and
- the introduction of evidence-based teaching approaches – team teaching, peer tutoring, collaborative learning, etc. – to support a wider range of learning needs as part of regular classroom practice.

Promoting self-review at all levels of the system

Embedding coherent quality assurance processes for inclusive education at all system levels.

This will require:

- an examination of the current integrated school review framework to ensure that it adequately considers issues relating to inclusive education;
- an approach within the Directorate for Quality Standards that promotes inclusive education as an approach for all learners, not just for those with statements of individual need; and
- alignment of all procedures within performance appraisals, internal reviews and external reviews so that they effectively consider inclusive education policy and practice at school level.

These priority steps are mutually dependant, as shown in Figure 7.

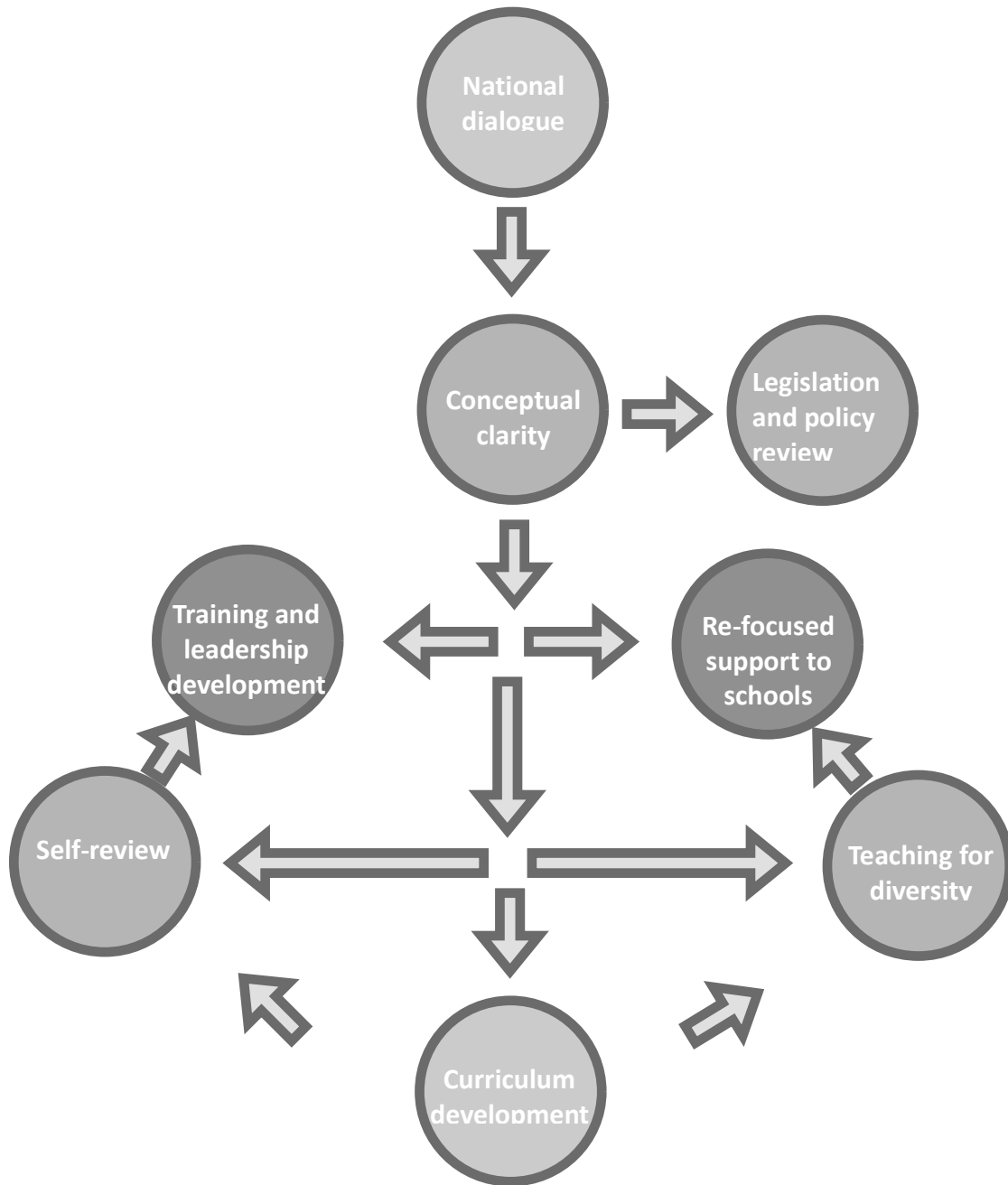


Figure 7. Flowchart of priority steps

While all these steps are inter-related, each step also requires feedback from other steps to inform on-going development. For example, monitoring and evaluation of teaching for diversity and curriculum development through self-review will inform further improvements in training and leadership development, as well as re-focused school support. Similarly, developments in training and support will further inform thinking around concepts underpinning legislation and policy.



Critical levers for short-term action

Looking across all Audit activities, it is possible to pinpoint three critical levers that could potentially be used to promote wider system change. These actions could be taken in the short term and would draw on the information provided in the Audit Report and Annexes for guidance.

1. Establish a stakeholder platform for discussion and agreement on key issues for inclusive education

The Audit has clearly demonstrated the high degree of stakeholder engagement with the issue of inclusive education. However, there is a need to formalise stakeholder inputs to national and local-level debates. This could be achieved by establishing a formal communication procedure for all stakeholders highlighting clear roles and responsibilities in relation to the implementation of inclusive education.

Such a stakeholder platform could be used to review and revise the Standards used for this External Audit. The revised Standards could then be a basis for taking forward all other areas of work, based on a participatory approach.

2. Audit current resourcing levels and identify possible models of more flexible resourcing options

The Audit has also indicated the need to consider the re-allocation of existing financial and human resources and some possible models are provided in this report. The same resources could be used, but in different, more cost-effective and efficient ways. There is a need for a comprehensive audit of all forms of resource allocation, including external support services and resource centres, college and school-level support, resources allocated through statements and the provision of access arrangements.

This Audit should be linked to a stakeholder-led mapping of current provision to identify areas of strength, gaps and examples of ineffective resourcing. The resourcing audit and mapping of provision together would lead to a transparent analysis of how current resources and support could potentially be allocated using more proactive and preventative approaches.

3. Develop pilot projects to examine inclusive teaching and learning approaches

The Audit has found that relatively few Standards can be considered fully embedded in policy and practice and this indicates the need for a longer-term, staged approach to implementation – trialling, then evaluating initiatives before scaling-up.

Pilot projects in a small number of schools could be used to explore innovative approaches and ways to implement, monitor and evaluate practice. A carefully



planned pilot provides possibilities for learning from experience before beginning wider-scale implementation in other colleges and schools. A basic audit and review cycle (as used in this work) could be used.

Approaches to piloting might include:

- a limited focus on a single support initiative, such as trialling the re-allocation of LSAs from supporting individual learners to supporting teaching teams in all classes in a school, and
- combined initiatives that take a more systemic approach, such as co-locating the resource centre provision directly within college campuses.

Re-visiting the 2005 re-positioning plan?

The 2005 review of special needs and inclusive education called for a ‘re-positioning plan’. The review suggested that:

The Plan should redefine the current scenario within the inclusive and special education sector, by redrawing policies, systems, and practices. It should put in place a spectrum of supply to meet, with more focus, efficiency and effectiveness than at present, a defined spectrum of individual educational needs. The Plan should be drawn up by the Education Division, in consultation with the major stakeholders in the sector (Spiteri et al., 2005, p. 63).

Now, almost ten years since this call, the Audit work has concluded that Malta should consider a new ten-year plan for inclusive education, ideally on a cross-political party basis. Such a plan would be:

- based on stakeholder consultation;
- focused upon system equity, efficiency and effectiveness;
- located within the existing *Framework for the Education Strategy for Malta 2014–2024*; and
- aligned with international policy goals and commitments, as well as EU targets and objectives for education and training.

A ten-year plan to guide the development of a system that effectively supports schools to meet the needs of all learners would align with the ambitious goals of Maltese stakeholders. This inclusive system would provide a school in every area that could deliver a quality education for all members of the local community – together.

Concluding comments

The mission statement of the Ministry for Education and Employment is ambitious and forward-thinking:



... to provide present and future generations with the necessary skills and talents for citizenship and employability, in the 21st century and beyond. Our children need to develop their personal and social potential and acquire the appropriate knowledge, key skills, competences and attitudes through a value-oriented formation including equity, social justice, diversity and inclusivity (Ministry for Education and Employment, 2014f).

The accomplishment of this mission requires a fully inclusive education system developed through clear political vision and strong leadership. However, there is a strong foundation on which to build, with a high level of stakeholder commitment to an inclusive education system.

There is also a solid knowledge base with skilled and motivated policy makers and practitioners who work hard to provide a high quality education system for all learners and their families.

Many stakeholders have engaged in the Audit process and will hopefully recognise their own voices in the report. The Audit Team also recognises that some stakeholders may not agree with the interpretation of their views, but hope that any disagreements will lead to further debate about the system and the desired goals.

This External Audit has given a voice to the 'implicit knowledge' held by many stakeholders in the Maltese system and helped to make their views 'explicit'. The findings and recommendations in this report have drawn on the contributions of these stakeholders who will be eager to engage in further debate and increase their ownership of new developments and improve their system in the long term.



LIST OF ANNEXES

Below is the list of Annexes that with this report comprise the overall Reporting Package for the External Audit.

These Annexes are presented in full in the accompanying document *Special Needs and Inclusive Education in Malta – External Audit Annexes*.

Annex 1: External Audit Methodology

Annex 2: Desk Research Report

Annex 3: Critical Reflection Document

Annex 4: Framework of Standards

Annex 5: Exemplar Survey

Annex 6: Survey Results Report

Annex 7: Evaluation of Policy and Practice against the Standards



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