EDUCATION FOR ALL

Special Needs and Inclusive Education in Malta

Annex 3: Critical Reflection Document

European Agency for Special Needs and Inclusive Education
1. Inclusion

Standards

- Inclusion is taken to mean “including all students”

Issues

Inclusion

An Inclusive school is a place where all learners have a right to high quality education can succeed. It should have the following characteristics: A Supportive environment, positive relationships, feelings of competence and opportunities to participate.

In Malta, inclusivity has been occurring in the schools for the past eighteen years. Learners with physical and mental disabilities have been attending main stream schools with the support of Learning Support Assistants (LSA).

Over the years, the schools have also been catering for learners with other conditions, such as behavioural conditions, social, emotional behaviour difficulties and learners coming from diverse social and cultural backgrounds. Such learners, where there is the need, are also supported by Learning Support Assistants. Schools are meant to cater for all the diverse needs of their learners. Teachers are responsible for the learning programme of the learners with the support of LSAs. But in a number of cases this is not happening.

Senior Management teams within the schools often shift the responsibility of learners with diverse needs onto others mainly the Inclusion Coordinator, who in most cases visits the school once a week. All paperwork, such as reports, filling up of referral forms are left for the INCO to see to. This impedes the INCO from class support as a good part of the school day is spent in the office.

Inclusive Education is still being seen as the onus of the LSA, with a number of teachers shifting this responsibility on the LSAs, Inclusion Coordinators (INCO) and support teams. LSAs are not in possession of a teaching degree and pedagogy and methodology in teaching are not their remit. However this onus is often placed in their hands.
Limitations

- Most of the Heads or Assistant Heads in schools have no formal qualification in the field.
- Assistant Heads responsible for Inclusion have other administrative responsibilities.
- Not all Education Officers take responsibility for Inclusive practices.
- Training offered by Student Services Department to Heads and Assistant heads is not compulsory.
2. Policy and Guidelines

Standard

- Written policies and procedures are developed, kept current, implemented and available to all schools and services within the Directorates
- The two Educational Directorates have written descriptions of programming and service options for all students.
- The two Directorates have written descriptions of the role of staff who provide programming and services to all students
- Written policies and procedures provide for access, appropriateness, accountability and appeals.
- Schools develop policies that increase learning and participation for all students.

Issues

The Inclusion Policy 2000 only focuses on 2 issues the IEP and the Statementing Moderating Panel. Through the years since the issuing of this Policy other documents that have been issued which while they have always reflected the government’s policy of Inclusion do not offer concrete guidelines on programming, services and access and accountability.

The Student Services department has also from time to time issued information on programming and services provision as have other sections within the Directorate for Quality and Standards in Education but these may at times have been fragmented and an coordinated.

Limitations

The need to consult with teacher’s union on Policy and Procedural Guidelines.
3. Placements

**Standards**

- Educating students with individual education needs in inclusive settings in neighbourhood or local schools shall be the first placement option considered in consultation with parents and when appropriate, the student.
- The most enabling placement is determined in a manner consistent with the Inclusion policy and the Referral system, in consultation with parents, and based on current assessment data.

**Issues**

It is felt that when a student presents with severe difficulties and challenging behaviours, placement in a Resource Centre or a Learning Support Centres is quickly deemed to be the best placement option. Although Student Services requests that such placements can only be considered in consultation with parents and professionals the general feeling towards such placement in some schools prevails.

On the other hand when students are assessed by a team of professionals and due to their sever difficulties it is determined that the most enabling placement would be full time or part-time placement in a Resource or Learning Support Centre, parents may disagree and do not give their consent to such placements.

We have students who present with challenging medical conditions requiring services of a nurse, who are in mainstream schools whereby no service of nurse is available. Till today, parents have the right to choose the placement however in some situations this presents considerable challenges due to the need to medical attention.
Limitations

Subject to Education Act

Parental attitudes.

Attitudinal barriers towards creating an accepting environment.

No nurses employed in mainstream schools
4. Colleges and Schools

Standards

- Every member of the school community is made to feel welcome and valued.
- There is a partnership between staff and parents.
- All local communities are involved in the school.
- There are high expectations for all students.
- Staff, students, parents and the community share a philosophy of Inclusion.
- Staff seeks to remove all barriers to learning and participation in schools.
- The school strives to minimise all forms of discrimination and stereotyping.
- The school makes its buildings physically accessible to all people.
- All forms of support are co-ordinated.
- Staff development activities help staff to respond to student diversity
- Provisions for individual educational needs are used to reduce the barriers to learning and to increase the participation of all students
- Pastoral and behaviour support policies are linked to curriculum development and whole school policies.
- Pressures for disciplinary exclusion are decreased.
• Barriers to attendance are reduced.
• Bullying is minimised.
• Lessons are made accessible to all students.
• Classroom discipline is based on mutual respect.
• All students take part in activities outside the classroom.
• School resources are distributed fairly to support inclusion.

Issues

It is felt that in some schools there is no common philosophy of inclusion and some children and families experiencing difficulties are not made to feel valued and welcome.

Expectations for students experiencing difficulties may in some schools be low or non-existing and IEPs are not given the importance they deserve.

Some schools may not be making the best use of local community and resource available within the community.

Differentiation is not being implemented in all classrooms and teachers report difficulty in dealing with mixed ability classes. Challenging Behaviour is an area that is creating the most difficulties.

Cohort of support staff within Colleges is not always in proportion with the number of Learners within the College.

Staff development activities in colleges and schools related to student diversity is not always given the importance it deserves. Each year there is only 4hrs of Professional development sessions in schools which might be taken up with areas other than Diversity. In some
instances when these sessions do take place they are usually addressed to LSAs. In-service training on diversity is usually on a voluntary basis.

Although some inclusive practices such as peer preparation programmes and Circle of friends are known to teachers and LSAs within schools these are not always put into practice. Evaluation of these practices within the Maltese scenario has never been done.

Parents themselves may not share the inclusive philosophy promoted by the Ministry especially if these parents have children who have no difficulties in learning

**Limitations**

Staff movement especially with the School Management Team may change the implementation of the inclusive philosophy within the schools.

The employment of support staff is subject to capacity building approval from the Ministry of Finance.

The attitudes of staff and parents.

Some school buildings are too old to be fully accessible.
5. Roles and Accountability

Standards

- Role accountability is agreed by all stakeholders and written down.
- Members of the SMT who have the responsibility of Inclusive practices need to be trained in inclusive practices.
- All teachers’ practice is in keeping with their job description.
- Teachers are supported to monitor the effectiveness of their practices and adjust practices as necessary.
- Teachers are supported to monitor the effectiveness of the practices of the LSA’s assigned to their class.
- LSAs are employed with the identified qualifications and training in supporting students.
- Monitoring procedures of programmes and Services are in Place.

Issues

The roles and responsibilities of all concerned in the inclusion process are very well defined. They are included in all the job descriptions, starting from Heads of Schools, Assistant Heads of School, Inclusion Coordinators, Teachers and Learning Support Assistants and Kindergarten Assistants. (Staff handbook, March 2010). It is felt that most of the time these job descriptions are subject to interpretation by staff members and MUT.

There are no tools in place to assert/assess accountability. Educational Officers (EO) visiting the schools very often do not assess
inclusivity and often assess only subject matter. They tend to leave this area in the hands of the EOs in charge of Inclusion.

There are no monitoring procedures so as to assure that all concerned are executing their role and are held accountable.

Teachers PMP are withheld due to Union directives.

**Limitations**

EOs are not trained in diverse needs and leave this job to the Education Officers in Inclusive Education whilst these do not possess the in depth knowledge in every subject.

Union interpretations of Job descriptions.

Negative attitudes towards the use of PMPs.

Administrative demands on SMTs are hindering curricular input and teacher support.
6. Assessment

Standards

• The range of assessments used allows all students to display their skills, abilities and competencies.
• Students are involved in assessing and commenting on their own learning e.g. use of success criteria
• There is monitoring of achievements of students who are at risk of exclusion so that particular difficulties can be detected and addressed
• Schools use a number of assessment strategies and data to determine eligibility for services and this is done before progressing to statementing
• Results of assessments are communicated and explained to parents, teachers and others involved with students’ programming.
• Results of assessments are used to make decisions, develop IEPs and determine educational programme that the student has to follow
• On-going assessment to develop, implement and evaluate the effectiveness of the educational programme provided

Issues

• Everybody sits for the same annual exam and adapted exam papers is not practiced
• Lack of staff is hindering access arrangements
• Psychological reports requesting access arrangements are being presented to the school sometimes even on the eve of
In schools there are students who do not sit for national examinations and there is no detailed assessment in place to identify the level of attainment of a student in the various areas and domains of learning.

Due to the fact that a number of teachers are shifting responsibility onto LSAs, especially when these have severe conditions, a number of LSAs assess and draft the individual educational programme on their own with limited input from the teacher. This creates inaccurate or vague situation assessment or present level of performance and consequently hinder appropriate target setting.

There is limited use of Level descriptors from the teachers and therefore this is rarely used to gauge the attainment level of the students.

Limitations

- There is no assessment pack in place which is appropriate for the Maltese educational system.

- Teachers may not realise the importance of assessing a student to identify his level of performance when he has significant difficulties which are hindering him/her from following the regular class curriculum. Consequently the teacher may not be differentiating and identifying the learning outcomes for all the range of abilities.
7. Early Identification

Standards

• College team will develop or utilize formal and informal checklists, screening tools or standardised assessments that will assist in the early identification of student.

• School personnel will make available, as early as possible, training for staff that will enhance the college team’s ability to identify and program for students with needs.

• The school staff and parents are informed about the characteristics used to identify individual educational needs of students in the physical, behavioural, communicational, cognitive and academic domain.

Issues

Limited knowledge and publications on warning signs related to the various conditions e.g. autism, ADHD, mental health, literacy skills, behaviour, epilepsy, diabetes, school phobia, dropouts & gifted and talented.

There are no clear guidelines on prioritising case load to ensure early identification of difficulties.

At present early identification from 0 to 3 falls under the remit of a different Ministry.

In-service training being provided to teachers is mainly on on-going issues at school and very little training is provided that will support early identification.
Training is more focused on being active rather than being proactive.

**Limitations**

Heavy caseload in relation to the number of professionals available. Employment of professionals is subject to Capacity building approval.

Coordination between the Ministries involved in Early Childhood Intervention.
### 8. The Individual Education Plan (IEP)

#### Standards

- IEPs are developed, implemented, monitored and evaluated for all students who have a Statement of Needs.

- Teachers and LSAs of students with individual education needs are provided with relevant resources and access to related professional development opportunities.

- School have a process and access to a professional team to provide consultation, planning and problem-solving relating to programming for students with individual education needs.

- Teachers:
  - involve parents and, when appropriate, students and other professionals in the development, implementation, monitoring and evaluation of students' IEPs
  - document, in the IEP, the formal review of students' progress, at regularly scheduled reporting time/s
  - throughout the year, provide feedback during informal reviews to parents and, when appropriate, students
  - make changes to the IEP, as required
  - obtain written informed parental consent on IEPs to indicate agreement with the IEP
  - in cases when parents do not attend IEP meetings or refuse consent, document the reasons for not attending or refusal and/or actions undertaken by the school to obtain consent and/or resolve concerns
  - ensure IEPs are placed in student records and LSAs and other professionals working with the student have access to the IEP.

LSAs work under the direction of a teacher to realize students’ goals, as outlined in their IEPs.
**Issues**

Planning, implementation and evaluation of IEPs

At present IEPs are only officially done for those students who have a statement of need. The need for an IEP is written in the Document issued by the Statementing Moderating Panel.

IEPS are usually done ones a year in the first term of school with a review at the end of the year. At present the Inclusion Policy 2000 is the official document that gives a description and guidelines regarding the IEP document and its implementation.

The responsibility of the IEP process is identified in the Job description (Job description Handbook, 2007, Ministry of Education, Youth and Employment) of the teacher, the Learning Support Assistant (LSA) and the Inclusion Coordinator (INCO)

The Teacher’s role in the IEP is stated as;

- Participating in and contributing to MAPS and IEP conferences and reviews of officially statemented students and collaborating with parents, SMT, Inclusion Coordinators and other professionals/stakeholders working with the student;

- Together with the Learning Support Assistants, developing and implementing the Individual Educational Programme (IEP) of students with Individual Educational Needs and participating in IEP and Individual Transition Plan (ITP) meetings;

The LSA’s role in the IEP is stated as;

- Together with the class teacher, developing and implementing an Individual Educational Programme (IEP)

- Attending IEP and Individual Transition Plan (ITP) meetings;

- Reviewing IEPs, including recording and reporting progress of such IEP implementation on a regular basis.

- Supporting the class teacher to prepare and write the IEP document of every student with a statement in class;
The INCO’s role in the IEP is stated as

- Together with their support staff, developing, implementing and reviewing the IEP/ITP of their students in class;
- Organising, together with the school management, IEP/ITP meetings for students in his/her care;
- In collaboration with the school management, participating in IEP/ITP meetings together with parents/guardians and other professionals working with the students;
- Ensuring that an IEP meeting is held at least annually for all students under one’s care;
- Ensuring that IEP/ITP documents are signed by them, the students’ parents/guardians, and school administration and that a copy of the document is sent to parents/guardians;
- Ensuring that students receive the services and support as indicated in the IEP document;

Concerns re Responsibility for the IEP

Although the job descriptions listed above mention the level of involvement and responsibility for the teacher, LSA and INCO, it is felt that these leave a lot of space for interpretation. This is in fact what is happening, leading eventually to;

- The LSA being left to play the major role in the IEP process.
- Some Teachers relinquishing their responsibility to LSAs
- INCO’s coordinating only IEPs for students who have Full time one to one support.
- SMT member not fully understanding the importance of the IEP or its process.
- SMT not owning the IEP to the extent that their development and implementation is hardly ever monitored

At present Student Services also has major concerns regarding the IEP process from consultation with the student’s team to evaluation. There is also concern regarding who is taking responsibility for the different aspects within the process (consulting with team members, assessment, setting targets meeting and writing IEP, implementation and evaluation)
Concerns re the IEP process

1. Consulting with team members;

At present the job descriptions of the Teacher, LSA and INCO all list that there has to be consultation with stakeholders. The job description of LSAs also specifies that the LSA must participate in sessions that are the educational and personal entitlement of the student’s, she/he is supporting.

Concerns:

• The student may not always have a team of professionals working with him/her. Parents sometimes consult professionals to receive reports that are required for the statementing process and further intervention may or is stopped after the report is issued.

• Team members may come from other NGOs or other Ministries (such as the Health department). At present NGOs who have a written agreement with the Ministry of Education are requested in accordance with the written agreement to give support to schools. Other NGOs working with the student are also encouraged to give support if and when asked by the schools. Two issues arise here, one is the fact that some NGOs report that they are not welcome in some schools while some schools also report that the support from NGOs is not always forthcoming.

Professionals working within other Ministries have always made themselves available for consultation. Some state schools have the services of a speech pathologist that sees the students within the school itself. When the professional cannot attend the school they have so far always produced reports for the purpose of IEPs when asked. These professionals also encourage the participation of the LSA in sessions. A concern here is that the LSA does not always attend these sessions or may not attend these sessions on a regular basis.

Student Services support staff always make themselves available to schools issues that arise include that they may not be informed in good time regarding dates of meetings. They also show concern that they are not always consulted regarding
targets set is areas such as communication, behaviour and independent living skills.

2. Assessments; (refer to point 4)

3. Setting targets;

A major concern in this area is whether the targets written in the IEP are set according to the priority needs of the students for the period covering the IEP. Since there are concerns with assessment procedures one questions the validity of some of the targets being set.

Another major issue is the fact that in some cases targets for underlying areas such as communication relationships are not being set accordingly if any at all.

4. Meeting and writing the IEP;

The meeting in itself is also under concern. IEP meetings should finely be the place where discussion and agreements on targets, strategies, resources and evaluation procedures take place. It is felt that this is not always the case. Some IEP meetings are only being done as a means of telling the parents what will be done. In fact in some cases the IEP document is presented to parents and others present as a written document ready to sign even at the beginning of the meeting.

It is also felt that at times IEPs are not written in a manner that ensures that the document can be a working document. Some concerns include;

- SMART targets are not used and at times these do not reflect the situation assessments given.
- Targets may be very vague.
- Language used is inappropriate.
- Strategies and Resources may not always reflect targets set
• Evaluations are very basic usually relating whether the student has achieved the target or not

Implementation;

In many situations it is found that the responsibility for the implementation of the IEP is being given to the LSA. This is especially so for students who have an alternative programme to the class curriculum. In situations where the student is concurrent with the class curriculum targets for behaviour, class participation, socialisation, self-help skills are also under the sole responsibility of the LSA.

The implementation recording that has to be done by LSAs, in most cases also shows, that there is little evidence as to how one is planning the student’s participation in class activities. When a student is not working concurrently with the class or on an alternative programme, these implementation planning sheets give no evidence whether the student is participating on a multi-level or overlapping programme. At times it is also found that strategies and resource planned may not be appropriate with the target set.

Another concern as regards implementation is how well the student’s daily progress is being evaluated. The responsibility here is also left to the LSA especially for the embedded skills.

5. Review;

A concern in this area is a simple one related to implementation. It is felt that since daily evaluations are not reflecting the student’s true progress the IEP review cannot truly reflect the student’s overall progress and the baseline for the next IEP.
**Limitations**

SMTs not giving enough importance to IEPs

Union regarding IEPs and planning for IEPs as extra clerical duties.

Teachers’ attitude towards them being responsible for IEPs.
9. Recording and Reporting Procedures

**Standards**

- There are written procedures for recording, and sharing of medical, information, and any other information such as reports from professionals, student’s programme/s, interventions and evaluation reports.

- Team members working with the student, including the class teacher have access to records that may help them to make informed decisions regarding provisions for the student.

- Schools will report achievements related to Students with a Statement of Needs as part of their annual reporting cycle.

**Issues**

At present no written procedures for recording and sharing of information are in place.

In schools recording is mostly done through the IEP document. This records a summary of assessments, targets, resources and strategies and end of year evaluation in each domain.

Progress of students with a statement of needs who follow the class curriculum is recorded in the same manner as all the other students, Through test results.

Each student with a statement of needs has a file which is compiled by the LSA in which she will be responsible to keep an updated profile, latest IEP, MAP session reports if done. Daily planners, observations and any other available reports.

The e1 platform available to all schools provides the space to keep updated records on all students with individual needs. Up to now this
is not being utilised by the schools.

The statementing moderating panel keeps records of referred students and the recommended statement provision.

Due to data protection, the Head of school keeps all reports submitted by parents. Parents are advised to give teachers and LSAs working with the student any reports that are available.

With parents' permission professionals working with the students are given access to these reports.

Reports done by professionals are only given to parents.

**Limitations**

Data protection issues.

Union viewing reporting procedures as extra clerical work.
10. Statementing

- There is written criteria and guidelines on when a referral for statementing should be made.
- There are clear written guidelines on the Statementing and review procedure.
- The Inclusion Specialist reviews progress reports of Students with a statement and issues recommendations for review to the Statementing Review Panel accordingly.
- Schools and parents are informed about the Recommendations issued by the Statementing Moderating Panel, Statementing Review Moderating Panel and the Appeals Board.
- Statement entitlement and recommendations is met by the College at all times

Issues

The Inclusion Policy (2000) is the official document that describes the statementing process. All schools have a copy of this and it is also available on the Ministry’s website.

There are presently three Boards related the statemening process;

- The Statementing Moderating Panel
- The Statementing Moderating Review Panel (that was set up in September 2013)
- The Statementing Appeals Board

These Boards work on a part time basis and try to meet ones a week usually for an afternoon or a morning.
One major concern in this area is that the first step taken when a student starts to experience difficulties within the class or school is to take all the necessary steps needed for the school to be able to refer the student for statementing. This means that the parents are advised to have their child assessed by a psychologist. Sometimes parents report that it is the teacher and LSA already in the class that alerts them to the problem and push them to fulfil the requirements of the Statementing Moderating Panel.

Another concern is that nearly all psychologists recommend that the child is given an LSA. Ones the parents see this recommendation; they request that the Head of schools immediately refers their child to statementing.

This situation has resulted in a yearly increase in requests for statementing.

Other issues related to the application itself include:

- Referrals Forms without the necessary information and documents are still being received by SMP even though these are duly signed by the Head or Assistant Head and finally by the INCO.
- Custody Papers: These are hardly ever attached to the referral forms.

Issues regarding Reviews of Statements of Needs

Most review requests received from schools are to increase support, very few requests to decrease or remove support are received.

- Review request to increase support made after two or more years from the date of statementing do not always include a new psychological report.
- Progress Reports of children with a statement of support are not always readily available.
- Review Request are sometimes being requested by the INCO.
• Complaints from parents and schools stating that they did not hear anything with regards to their Appeals are becoming frequent.
• Appeals are being requested by the INCO.

**Limitations**

The fact that the Learning Support Assistant is seen as a means to an end.

The fact that Boards meet on a part-time bases.

Parental attitude towards the need for LSAs. They have the impression that an LSA is the ultimate provision for their child to progress.

Yearly Increase in number of registered disabilities and conditions.
11. Parental Involvement

Standards

- Parents have the opportunity to participate in the decisions that affect their Child’s education.
- Parents have all the information needed to make informed decisions.
- Parents are invited to be involved in planning, problem-solving and decision-making relating to students’ special education programming.

Issues

Although parental involvement is advocated and some practices such as the involvement of parents in school councils are in place, it is felt that when a child has individual educational needs parents may not be fully involved in the planning, problem solving and decision making related to their child’s education. This may be resulting from;

- The school not making parents feel welcome.
- Parents who have lost their trust in the educational system
- Parents not having the knowledge and information to make informed decisions.
- Parents who may not be in a position to make informed decisions due to lack of skills.
- No policies and procedural guidelines are available that help schools to encourage parental involvement.
Limitations

Attitudinal berries that do not advocate parental involvement in schools.
12. Student Services Department

- According to the nature of the service, the number of professionals with that service is in proportion to the number of referred students.
- Each service within the Student Services Department (SSD) has clearly defined roles and responsibilities.
- Role and responsibilities of Services are clearly communicated to schools.
- SSD has clear expectations to what is expected from schools.
- Schools are well informed about what is expected from them regarding the entitlement provision for all students.

Issues

The number of professionals within each service is not comparable to the case load of referred students to that service. An example would be the Early Intervention Service has a cohort of 5 Resource Workers and 12 teachers with a case load of 900 children. These referred children cannot be seen on a weekly basis and sometimes the service has to resort to the organisation of group sessions in schools with a large number of referrals.

Service Managers within Student Services have a vast job description and a number of different services and provisions under their remit. Service Manager Special Education and Resource Centres have 8 services with a total cohort of ....... 5 Resource Centres and 3 Learning Support Centres (for students with SEBD). Although each Resource Centre has its own Head or Manager none of the Services have a Senior officer in charge of the services. This sometimes makes monitoring of services and quality assurance an irregular occurrence.

Communication between SSD and Schools
The role and responsibilities of each service and Centre can be found on the Ministry’s website, www.education.gov.mt. Training and information sessions for Assistant Heads responsible for Inclusion and Heads of schools are also given each year. During these sessions the remit is each service and Centre is explained. INCO are also aware of the remit of each service and Centre. The issue that is resulting is that this information usually remains at a Senior Management Level.

Limitations

Recruitment of professionals is subjected to capacity building approval from Ministry of Finance.
13. Coordination between state and non-state services

**Standards**

- There is written policy and procedures for working with other members of the community and Ministries to design and deliver services for students with Individual Educational needs.

- Schools work together with members of the community, who have an interest in students in schools, to meet the special education needs of students, including students and their families, community agencies, organizations and associations, other education authorities, regional health and children’s services authorities.

- There are Common procedures amongst state, church and independent schools in terms of recording procedures, guidelines and IEP procedure and documentation.

**Issues**

At present there is a lack of harmonisation in procedures used in state, church and independent schools in terms of:

- Recording procedure
- Support given to teachers and LSAs
- IEP procedure
- IEP documentation
- Access and use of services
Coordination between the different services does not always happen even if generally it is desired. Sometimes this results from lack of time for all the team members to meet.

Some parents seek to receive services from different entities sometimes without informing the said entities about the involvement of the other.

There are no written collaboration guidelines amongst the different entities that already work in tandem.

Limitations

The different work procedures practiced by the different entities.
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