SUMMARY OF SUBMISSIONS IN RESPONSE TO THE
DEAF EDUCATION DISCUSSION PAPER 2010

OCTOBER 2010
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Abbreviations
The following abbreviations are used in this report:

AoDC: Adviser on Deaf Children
BOT: Board of Trustees
CI: cochlear implant
DEC: Deaf Education Centre
DHI: deaf and hearing-impaired
GSE: Group Special Education, Ministry of Education
IEP: Individual Education Programme
KDEC: Kelston Deaf Education Centre
ORRS: Ongoing and Reviewable Resourcing Schemes
NZSL: New Zealand sign language
RTD: Resource Teacher: Deaf
VDEC: van Asch Deaf Education Centre
1. EXECUTIVE SUMMARY

In June 2010, the Ministry of Education released the Deaf Education Discussion Paper 2010 (the Ministry, the Discussion Paper, the Paper). The Discussion Paper sought feedback from stakeholders that would assist the Ministry to improve specialist education services for DHI children and young people1.

The Discussion Paper outlined four different options for delivering such services, and asked which option readers preferred. These options were as follows:

- Option 1 (the current system)
- Option 2 (a single national provider)
- Option 3 (a national coordinating body)
- Option 4 (regional fund managers).

The Discussion Paper focused on the issue of which approach to service provision would best meet the needs of DHI children. However, it invited feedback through questions that gave scope for commenting broadly on the provision of DHI services, as follows:

- “Do you think the current system needs changing? If so why?”
- “Which service model, Options 1 to 4, you think would provide the best service? Why?”
- “Are there other issues concerning the provision of deaf and hearing impaired services that we should consider?”

A breakdown of expressions of preference for the service provision options identified in the Discussion Paper is as follows:

- 97 submissions selected Option 1
- 105 submissions selected Option 2
- 7 submissions selected Option 3
- 13 submissions selected Option 4
- 3 submissions selected both Options 1 and 2
- 1 submission selected both Options 1 and 4
- 5 submissions selected both Options 2 and 3
- 1 submission selected both Options 3 and 4
- 11 submissions selected Other as an option
- 17 submissions selected none of these options.

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1 From this point onward in the report, references to “children” or “students” should be understood as referring to “children and young people” or “children and students”.
The factors most frequently mentioned in connection with Option 1 in submissions were as follows:

- Overall satisfaction with the current service (50 submissions); for example, 23 submissions expressed satisfaction with the service provided by DECs
- Problems with the current service provision model seen as arising from a lack of resources rather than structural causes (12 submissions)
- Acceptance of the fact that there is scope for improvement, which can be achieved within the current model (17 submissions).

The factors most frequently mentioned in connection with Option 2 in submissions were as follows:

- Option 2 would provide a more consistent and coordinated approach to service provision and would reduce fragmentation and duplication (38 submissions)
- Support for the concept of one national provider to coordinate services, employ staff and provide consistency (20 submissions).

The factor most frequently mentioned in submissions in connection with Option 3 was that it would add additional layers of management and bureaucracy (13 submissions).

The factor most frequently mentioned in submissions in connection with Option 4 was that it would lead to further fragmentation and inconsistency in service provision (14 submissions).

1.1 Overarching issues raised in submissions

The overarching issues raised in submissions were as follows:

- Issues associated with delivery of Deaf Education services by different providers, as follows:
  - The need for services to be integrated, including issues of fragmentation, duplication and lack of clarity over roles; issues relating to the integration of services provided by GSE and DECs, and of services provided by the two DECs; issues around having a multiplicity of services provided to an individual DHI child
  - Consistency of service delivery between regions, and between service providers
  - Issues around ensuring the delivery of the services that most benefit DHI children, including the choice of services available, and access to services according to need as opposed to other determining factors.
- Issues around the adequacy of the resources available for Deaf Education services, as follows:
  - Quality of services, including issues of professional development
  - The level of services, including the adequacy of the resources available to enable the use of NZSL
  - Issues around the distribution of resources, including the availability of services in rural as compared to urban areas, regional distribution of resources, and the amount of resources tied up in maintaining DECs.
- The desirability of parents having a greater say in the direction of Deaf Education services
- Comments on the review of Deaf Education services, including comments on overall aims and process used by the review.
1.2 Introduction

1.2.1 Background

In June 2010, the Ministry released the Discussion Paper. The Discussion Paper sought feedback from stakeholders that would assist the Ministry to improve specialist education services for DHI children and young people.

The Discussion Paper outlined four different options for delivering such services, and asked which option readers preferred. These options were as follows:

- Option 1 (the current system): a combination of a centralised and regional provider model. Frontline specialist deaf education services are provided through the Ministry of Education to all of New Zealand through 16 district offices and through two DECs, van Asch (which serves most of the North Island) and Kelston (which serves the lower North Island and the South Island).
- Option 2 (national provider): would involve combining existing service providers into a single organisation with responsibility for funding and provision of all specialist services for DHI children.
- Option 3 (national coordinating body): would involve creating a new organisation that could take the form of a formal or semi-formal body with responsibilities that could range from decision making on the allocation and coordination of resources to influencing providers to achieve deaf education goals.
- Option 4 (regional fund managers): would involve creating new regional-based organisations to manage the funds and purchase agreements for specialist services on behalf of the Ministry of Education.

The Discussion Paper focused on the issue of which approach to service provision would best meet the needs of DHI children. However, it invited feedback through questions that gave scope for commenting broadly on the provision of DHI services, as follows:

- “Do you think the current system needs changing? If so why?”
- “Which service model, Options 1 to 4, you think would provide the best service? Why?”
- “Are there other issues concerning the provision of deaf and hearing impaired services that we should consider?”

The paper was sent to a range of stakeholders including parents, teachers, schools, education and other interested agencies (see Appendix 1 for a full list of organisations to which the paper was sent).

1.2.2 Submissions received

In total, 261 submissions on the Discussion Paper were received. Submitters were in the following categories:

- 119 parents/caregivers
- 59 teachers

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2 Some submissions selected more than one category e.g. parent/caregiver and teacher.
In terms of geographical distribution, the submissions came from the following regions:

- Northland
- Auckland
- Waikato
- Bay of Plenty
- East Coast/Poverty Bay
- Taranaki
- Hawkes Bay
- Manawatu/Wanganui
- Wellington/Wairarapa
- Marlborough
- Nelson
- Otago
- Canterbury
- Tasman
- Southland
- Not applicable
- Unknown.

Submissions ranged from brief comments to comprehensive responses on multiple themes.

### 1.2.3 Process for summarising submissions

In order to summarise the submissions received, the Ministry provided an initial list of themes for analysis. An initial scan was then undertaken to identify themes for analysis. These themes were presented to the Deaf Education Steering Group for comment and approval.

Following this process, all comments in the submissions were grouped under the themes for analysis, which were as follows:

1. Overall support for the status quo in Deaf Education services
2. Resource and service requirements of Deaf Education services
   - Resource/service levels
   - Integrated services
   - Cost effective
3. Structure of Deaf Education services
   - Vision
   - Type of setting

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3 Brief explanations of themes are provided in the "Summary of Findings" section of the report, that presents summaries of submissions by theme.
3.3. Quality of service
3.4. Flexible/responsive services
3.5. Type of service
3.6. Management/administration
  3.6.1. Governance
3.7. Accountability
3.8. Seamless provision

4. Equity of access to Deaf Education services
   4.1. Students with multiple needs
   4.2. Students in remote areas
   4.3. Access to NZSL
   4.4. Māori and Pasifika students
   4.5. Equity of access - other

5. The relationship between Deaf Education services and parents/whanau
   5.1. Relationship with parents/whanau

6. Other.

Comments relating to the themes for analysis from individual submissions were entered into a Microsoft Access database. The comments under each theme were then reviewed and summarised and the overall list of themes revised and condensed. This report presents the information as a summary under each theme. In addition, there is an overview section that discusses overarching issues raised in submissions.

Overarching issues are defined for the purpose of this report as those that were specifically raised by 20 submissions or more. A number of issues raised by fewer than 20 submissions are also mentioned in the Overview section, as examples or to give a more complete overview of the range of views on a particular issue.

Direct quotes from submissions have been included to ensure the voices of submitters are clearly represented. Care has been taken to ensure that all key concepts and concerns in the submissions are represented in the overview section.

It is acknowledged that some comments in submissions could be coded to multiple themes, and that there is a significant level of cross-over between themes. For example, issues of access to NZSL are raised under multiple themes, including:

- Resources/service levels - issues of the adequacy of resources available to provide access to NZSL
- Type of setting/learning environment - issues of the availability of NZSL in learning environments
- Flexible/responsive - issues around DHI children having the option of access to NZSL
- Type of service - issues of whether Deaf education services include access to NZSL as an option
- Students with sign language needs - general issues of access to NZSL.

Submissions sometimes included additional descriptive information outside of the scope of this review. While this information has not been included in this report, it has been flagged in the Access database submitted to the Ministry with this report.
1.2.4 Navigating this report

This report is divided into four main parts:

- An executive summary
- An introductory section, that describes the background to the Deaf Education review, the Discussion Paper and the approach taken in this report to the analysis and presentation of submissions
- An Overview of submissions, that summarises the main issues raised in submissions (where main issues are defined as those raised by 20 or more submissions)
- A more detailed summary of issues raised in submissions, broken down into Themes for analysis developed for the report.

1.2.5 Referencing submissions

All comments, viewpoints and quotations in the detailed summary section are referenced to individual submissions. The single exception to this is where, under each theme, summary statistics of whether submissions responded with a direct “Yes” or “No” to the question: “Do you think the current system needs changing?” are provided.

Where ten or more submissions are associated with any collective comment or theme, a breakdown of categories of respondent is included.

Where 20 or more submissions are associated with any collective comment or theme, a breakdown of submitters’ region of origin is included in Appendix 2.

Readers should note that the number of submissions reported as being associated with any collective comment or theme (eg, “five submissions expressed the view that…”) in most cases almost certainly understates the number of submissions that supported that particular view. This level of understatement arises because there were many instances where submissions appeared to support a particular viewpoint, but where this could not be confirmed to a reasonable degree of certainty. For example, a submission might appear to refer to a particular education service, but using terminology that was open to different interpretations.

A number of submissions were made by organisations representing groups of people or as group submissions. It is not possible to identify how many individuals these views represent.
2. OVERVIEW OF SUBMISSIONS RECEIVED IN RESPONSE TO THE DEAF EDUCATION DISCUSSION PAPER 2010

2.1 Introduction

Responses to the three questions posed by the Discussion Paper fell into three broad types:

- Responses identifying a preferred service provider option (or options), and commenting directly on the advantages and disadvantages of the options presented in the Paper
- Responses identifying reforms to Deaf Education services that should be delivered under any future system, without necessarily specifying which service provision option would best achieve this
- Comments on the aims and process of the Deaf Education review.

There was a considerable degree of overlap between these types of response, and many individual submissions included all three types.

This overview section first presents a summary of the number of submissions selecting each of the four options identified in the Discussion Paper, together with a brief discussion of the factors influencing the most common choices.

The section then goes on to discuss the overarching issues most commonly raised in submissions. Solutions proposed to these issues in submissions, including the adoption or retention of a particular service provision model, are identified.

No commentary on the submissions received in response to the Discussion Paper would be complete if it did not acknowledge the level of thoughtfulness and caring concern for the well-being and future development of DHI children that is such a feature of all submissions.

2.2 Expressions of preference for individual service provision options

One hundred and seventy-six submissions answered "yes" to the question: "Do you think the current system needs changing?" (68 parents/caregivers, 2 students, 36 teachers, 16 advisers, 17 service providers, 29 other categories, 8 unknown).

Ninety submissions answered "no" to the question: "Do you think the current system needs changing?" (44 parents/caregivers, 4 students, 23 teachers, 2 advisers, 4 service providers, 8 other categories, 5 unknown).

A breakdown of expressions of preference for the service provision options identified in the Discussion Paper is as follows:

- 97 submissions selected Option 1
- 105 submissions selected Option 2
- 7 submissions selected Option 3
• 13 submissions selected Option 4
• 3 submissions selected both Options 1 and 2
• 1 submission selected both Options 1 and 4
• 5 submissions selected both Options 2 and 3
• 1 submission selected both Options 3 and 4
• 11 submissions selected Other as an option
• 17 submissions selected none of these options.

The factors most frequently mentioned in submissions in connection with Option 1 were as follows:

• Overall satisfaction with the current service (50 submissions) and/or for individual services (eg, RTDs, AoDCs) or service providers (one or both DECs); for example, 23 submissions expressed satisfaction with the service provided by DECs
• Problems with the current service provision model seen as arising from a lack of resources rather than structural causes (12 submissions)
• Acceptance of the fact that there is scope for improvement, which can be achieved within the current model (17 submissions).

Expressions of satisfaction with the current service were frequently accompanied by personal accounts of the submitter’s experience with the service, such as the following:

“I am comfortable with the current system as the specialist education service provider has been able to step into my shoes as a parent, to ensure that my son is provided for in every aspect of his educational needs. My son attends a Kura Kaupapa Māori Total Immersion School. I do believe his needs are being met inside the Kura for teachers and students and people who come into contact with him”\(^4\).

The factors most frequently mentioned in connection with Option 2 were as follows:

• Option 2 would provide a more consistent and coordinated approach to service provision and would reduce fragmentation and duplication (38 submissions)
• Support for the concept of one national provider to coordinate services, employ staff and provide consistency (20 submissions).

The factor most frequently mentioned in connection with Option 3 was that it would add additional layers of management and bureaucracy (13 submissions).

The factor most frequently mentioned in connection with Option 4 was that it would lead to further fragmentation and inconsistency in service provision (14 submissions).

2.3 Overarching issues raised in submissions

\(^4\) 0197 - Note that all submissions are cited in footnotes using a 4-digit numeral code. Note also that all quotations included in this report are reproduced verbatim.
Note: for the purpose of the discussion below, overarching issues are defined as those that were specifically raised by 20 submissions or more. Issues raised by fewer than 20 submissions are also mentioned, however, as examples or to give an overview of the range of views on a particular issue.

The overarching issues raised in submissions were as follows:

- **Issues associated with delivery of Deaf Education services by different providers:**
  - The need for services to be integrated, including issues of fragmentation, duplication and lack of clarity over roles; issues relating to the integration of services provided by GSE and DECs, and of services provided by the two DECs; issues around having a multiplicity of services provided to an individual DHI child
  - Consistency of service delivery between regions, and between service providers
  - Issues around ensuring the delivery of the services that most benefit DHI children, including the choice of services available, and access to services according to need as opposed to other determining factors

- **Issues around the adequacy of the resources available for Deaf Education services, as follows:**
  - Quality of services, including issues of professional development
  - The level of services, including the adequacy of the resources available to enable the use of NZSL
  - Issues around the distribution of resources, including the availability of services in rural as compared to urban areas, regional distribution of resources, and the amount of resources tied up in maintaining DECs

- The desirability of parents having a greater say in the direction of Deaf Education services

- Comments on the review of Deaf Education services, including comments on overall aims and process used by the review.

These issues are discussed in more detail below.

### 2.3.1 Service delivery by different providers

Issues associated with having Deaf Education services delivered by different providers were raised by 131 submissions. Such issues were put forward by the Discussion Paper as possible drivers for change, and the volume of related discussion indicates that this suggestion resonated with many submitters.

**Issues relating to integration of services**

Forty-two submissions commented on issues relating to lack of integration between services, including instances of fragmentation of services, duplication of services, lack of clarity around the respective roles of specified services and the need for better integration.

The main areas within the current system of service delivery where issues of lack of integration were identified in submissions were as follows:

- Lack of integration between, duplication of services provided by, the two DECs (18 submissions)
- Issues arising where multiple providers deliver different services to individual children, and the demands this creates in terms of coordination and navigation (13 submissions).
A range of perspectives on the need for the DECs to better integrate services was presented, including comments on a perceived difference between the DECs in their current approach to Deaf Education services (which could be represented as either enhancing or limiting the choice of services available to parents and DHI children). A small number of submissions expressed the view that DECs already had good systems in place to enhance the integration of their services.

The practical difficulties of having to deal with a number of service providers was commented on by some submissions, with the following quotation being representative:

“We have ORRS teachers, part time teachers, teacher aides who are under resourced and under qualified i.e., no training, resources or support. We have TOD’s who are spread too thin and advisors who are unaccountable … we have schools funding teachers, GSE, t/aides and advisors and van Asch funding, TODs. This leads to very confusing situations”\(^5\).

\textit{Consistency of services}

Areas where a lack of consistency in service delivery was identified in submissions as an issue included lack of consistency between services provided by DECs, by mainstream schools and by different individuals in the same role (for example, one submission referred to differences in the services delivered by AoDCs in the North and South Islands).

Lack of national consistency was typically presented as a problem of equity of access to services, whereby the level of services available to DHI children was determined by factors such as location. There was a significant degree of overlap between issues of consistency of service and issues of adequacy of service levels (discussed below). A representative comment was as follows:

“The current system has many regional differences and inconsistencies that don’t ensure a national equality of service. Deaf units in mainstream schools are only available in Auckland. Preschool and transition services are limited and only available at DECs. These services need to be extended into areas experiencing population growth. As acknowledged in the discussion document there are also many redundancies in the two DEC system which need to be addressed. This includes Audiology services, resource production and technology provision”\(^6\).

\textit{Ensuring the delivery of the services that most benefit DHI children}

Issues around ensuring the delivery of the services that most benefit DHI children were identified in 100 submissions.

Forty submissions raised issues around the choice of services available to DHI children, with specific issues identified in submissions being as follows:

- The need for access to services to be determined by the needs of the individual (16 submissions), as opposed to the present distribution of resources or the preferred approach to Deaf Education supported by a provider

- The availability of services being determined by the overall approach to Deaf Education supported by individual providers (24 submissions). The two main approaches identified in

\(^{5}\) 0033  \(^{6}\) 0114
submissions, which are discussed in a separate section below, are as follows: an approach that focuses on the ability of DHI children to learn and communicate using DHI-specific media, particularly NZSL, and an approach that concentrates on assisting DHI children to acquire the skills to enable them to function in a hearing environment.

2.3.2 Preferred solutions to integration issues

Twenty-seven submissions expressed the view that Option 1 offered a solution to integration issues.

Twenty-one submissions expressed the view that Deaf Education services should be managed by DEC, under Option 2.

Seventeen submissions expressed the view that DEC should be retained, without linking this preference to a particular service provision model.

Seventeen submissions expressed the view that the AoDC service should continue to be managed by GSE, because of the associated access to a wider multidisciplinary service that can ensure that all of the needs of DHI children are met. A small number of submissions expressed the alternative view, that the delivery of services would be enhanced if the AoDC service were managed in the future by DEC.

A number of submissions suggested that integration issues could be addressed by improved communication and cooperation between service providers.

A small number of submissions expressed the view that there were already good levels of integration and cooperation between DEC and/or systems in place to ensure that integration and cooperation occurred.

2.3.3 The adequacy of the resources available for Deaf Education services

Issues around the adequacy of the resources available for Deaf Education services were raised by 101 submissions.

The quality of current Deaf Education services

Issues relating to the quality of current Deaf Education services were raised by 58 submissions. These issues included the need for minimum standards of professional development for teachers, both in DEC and in mainstream schools. Submissions also commented on the need for minimum standards for other service providers including AoDCs and RTDs, and on the need for the resources necessary to ensure that standards could be achieved and maintained (16 submissions). A distinctive sub-set of views on the importance of professional development in relation to Deaf Education services stressed the importance of service providers being trained/fluent in NZSL.

The level of current services

Issues relating to the type and range of services currently available were raised by 74 submissions. These issues included:
• Calls for more resources and systems support for the teaching of NZSL (20 submissions), including tuition in NZSL for teachers and parents, and support for the use of NZSL in classes, including access to NZSL interpreters

• Support for the services provided by satellite units (17 submissions)

• Support for the reinstatement of the Deaf Resource People service (13 submissions)

• Funding to increase the availability of technological support, including FM systems, videoconferencing facilities and technical backup (16 submissions).

Submissions advocating increased access to NZSL in classes and homes supported their position with reference to factors such as the need to recognise the status of NZSL as New Zealand's third official language, and/or to New Zealand's commitments to provide equality of access to education for DHI children at a level consistent with the UN Convention on Rights of People with Disabilities, and/or the importance of NZSL as one of the cornerstones of Deaf culture.

The distribution of resources

Twenty-nine submissions raised issues around the distribution of resources that were unrelated to the current system of multiple service providers. These issues included:

• Inequalities in the availability of services in rural as compared to urban areas (mentioned by eight submissions)

• Regional distribution of resources (ten submissions), with most of those submissions commenting on the need to retain an adequate level of funding in areas other than Auckland, despite demographic trends that have seen an increasing concentration of children in the greater Auckland area

• A degree of disproportion between the amount of resources being allocated to DECs and the services they deliver (eleven submissions).

While some submissions expressed satisfaction with the level of support available to DHI children and their parents living in rural areas, the following quotation represents a more typical viewpoint:

"Deaf children residing in either Auckland or Christchurch, where there are Deaf Education centres, satellites in regular schools and itinerant teachers, are advantaged compared to deaf children dependant on the less regular attention of advisors in the regions and rural areas of the country".7

2.3.4 Preferred solutions to issues of adequacy of resources

A small number of submissions commented specifically on the potential for different service provider models to improve the adequacy of resources available for Deaf Education services.

A small number of submissions commented on options for redistributing the present quantum of resources to better meet the needs of children. A more common pattern was for submissions to identify adequacy of resource issues as being separate from issues of the most effective way of delivering services, but requiring attention under a future system of service delivery.

7 0096
Comments in submissions on the need to retain individual services can also be regarded as coming into the category of addressing issues of adequacy of resources. The issue around retention of services raised most frequently in submissions was that of the importance of retaining DECs, as residential schools and/or as bases for other services. Twenty-one submissions specifically supported the retention of DECs, although the level of support for retaining DECs is also indicated by the number of submissions (50) indicating positive satisfaction with the services provided by DECs.

2.3.5 Different approaches to Deaf education

Twenty-four submissions raised, in one form or another, service delivery issues in relation to different approaches to Deaf education. A range of perspectives was presented, with the main division being between an approach that focuses on the ability of DHI children to learn and communicate using DHI-specific media, particularly NZSL, and an approach that concentrates on assisting DHI children to acquire the skills required to enable them to function in a hearing environment.

In practical terms, such issues were associated with support for particular services, including services that enhance access to NZSL; educational settings that allow DHI children to learn and communicate with other DHI people, both children and mentors, including DECs and satellite units; technological support and educational settings that allow DHI children to learn and communicate in a hearing environment. Such issues were also raised in association with an emphasis on the importance of DHI children having access to a choice of services that enables them to develop according to their own individual needs.

Also associated with issues of different approaches to Deaf education was debate over whether there should be a single vision for Deaf education, with the highest level of support being for a single vision under Option 2 (fourteen submissions).

A distinctive sub-theme in this area was support for giving DHI children access to a Deaf culture, with its own distinctive role models and language. A small number of submissions compared the situation and challenges of Deaf culture within a majority hearing culture with that of Māori in relation to Pakeha culture.

Two individual perspectives on issues raised by different approaches to deaf education taken from submissions are as follows:

"Deaf schools (van Asch and Kelston), are important for Deaf Education because of social, political and technology reasons. Deaf and hearing impaired learn better if the school is suitable for them. I understand the family may not be in CHCH or in AKLD but the parents must understand the children will advance like other peers if they speak using their own language, to others early in life. They can play sports earlier in life, rather than going to rehab. They can communicate and learn ideas to other peers earlier, rather than communicating repetitive phrases in a quiet room with a specialist teacher. They can grab opportunities earlier in life, helps them to succeed later in life for example university studies, or competency in life skills, such as cooking, surviving own its own and managing with others. The governments' focus for the education providers is to make sure that the kids are reading, writing and counting. It didn't say about you must hear or you must talk (orally) to achieve the 3 competency. What Deaf and hearing impaired children are missing out to achieve competency, is the communication with teachers, peers and to their own self. The kids
need, to identify the right connections with each other (social), value the culture they have (political), and advance equally because they cannot hear altogether (technology)."8

"It is important to recognise that children with hearing disabilities cover the width of the hearing spectrum; the new service provider system needs to recognise the needs of children who rely on spoken language is supposed to in CD sales. Every child has the right to learn, using the modality that suits their abilities."9

2.3.6 The desirability of parents/whanau having a greater say in the direction of Deaf Education services

Fifteen submissions commented on the desirability of parents/whanau having a greater say in the direction of Deaf Education services, in particular through involvement in decision-making in schools at, for example, the Board of Trustee level. A small number of submissions expressed an alternative view that there was a risk that too great a degree of stakeholder involvement in decision-making could lead to capture of the decision-making process by one particular perspective on Deaf Education services.

2.3.7 The complexity of issues around Deaf Education services

A feature of the discussion in submissions is the complexity of the issues raised. While part of the analysis of submissions necessarily involves identifying common patterns and themes, breaking down submissions into such patterns and themes can result in losing sight of the interconnectedness of the issues involved. The following quotation is only one of many that illustrates this point:

"I have no Deaf friends, my school is all hearing children and I am the only Deaf one. This is not fair. My Deaf friend in Auckland has a Deaf teacher and Deaf friends. I want that. I don’t like so many people coming into my class all the time, the advisor, the teacher of deaf, the speech therapist, the van asch people. Too many people come and see me all the time. I like having an interpreter in my class, when I had a teacher aide signing, she was not good enough and I could not understand what was happening in the classroom. I did not like that. I have an interpreter for some of my school time and not for others. I don’t learn on Fridays, I just follow and rest because this is the day that the interpreter is not there. I don’t like being taken out of my class to work with just the teacher of the deaf."10

Issues raised in this single short quotation include:

- The challenges facing a DHI child required to socialise with and be educated alongside his or her peers
- The question of which peer group, either hearing children or other DHI children, the submitter should be educated amongst
- The challenges for an individual child of having to deal with a variety of people delivering different services
- The availability of the right services (and what those right services are), and

8 0128
9 0091
10 0137
• Issues of adequate professional development in service providers.

This quotation also, of course, illustrates the human predicament underlying these issues.
2.3.8 Other issues

Analysis of submissions identified a number of groupings of issues that comprised distinctive themes in their own right, but that did not qualify as overarching issues either because of the relatively small number of submissions that addressed them, or because there was no collective pattern to the comments about them contained in submissions.

These other issues are as follows.

A preference for a service delivery option other than those proposed in the Discussion Paper (12 submissions)

Eleven submissions preferred not to elect any of the four service delivery options proposed in the Discussion Paper because they did not sufficiently address what were considered to be the challenges currently facing Deaf education. A small number of submissions offered alternative solutions.

Management or administration of Deaf Education services (38 submissions)

This category includes comments made about levels of management/bureaucracy associated with service delivery models, and concerns that Options 3 and 4 may mean additional layers of administration (and therefore remove funding from the frontline). This section also includes debates on the value of a national organisation.

Governance (37 submissions)

A number of submissions commented on issues relating to how Education services should be governed, particularly in relation to the role and membership of Boards of Trustees and parental involvement on Boards.

Accountability (7 submissions)

A number of submissions commented on the need for the service to generally be more accountable, particularly to parents.

Seamless provision (9 submissions)

A number of submissions commented on the level and nature of services between the stages of early, primary and secondary education. This category also includes discussions on the need for ongoing support for the transition to tertiary education. Submissions identified problems in the area of seamless provision in Deaf Education and/or recommended changes in this area.

Cost effectiveness (10 submissions)

In commenting on options for changes to the service delivery model, a number of submissions commented on the need for a future service to be cost effective (cited as reasons for supporting both the status quo, and alternative models).
**Students with multiple needs (14 submissions)**

A number of submissions commented on issues of access to services for students with multiple needs. Support for retaining the AoDC service within GSE (referred to above) was also connected with such issues.

**Māori and Pasifika students (5 submissions)**

A number of submissions commented on issues of access to service for Māori and Pasifika students, including overrepresentation of this group amongst deaf children, poor educational outcomes for these students, lack of culturally and community-aware support/service provision, and the need for professionals with cultural understanding and resource development in this area.

**2.3.9 Comments on the review of Deaf Education services**

Seventeen submissions quired different aspects of the Ministry's review of Deaf Education services. Aspects of the review that came in for comment included whether a review of services was warranted, the true (as opposed to the stated) aims of the review, the review methodology, and the analysis underlying the Discussion Paper. A small number of submissions explicitly stated their support for the review.

**2.3.10 Breakdown of submissions by region and type of submitter**

Analysis to identify patterns of comments from individual types of submitter, and also from individual regions, was carried out.

The methodology used in the analysis involved identifying whether the profile of submissions associated with a particular topic or theme differed significantly from the profile of all submissions. A difference of 7.5% or greater was defined in advance as “significant”.

To illustrate this methodology, 2 actual examples taken from the analysis follow:

- Forty-five percent of submitters categorised themselves as "parents/caregivers". Forty-four percent of submissions expressing a preference for Option 1 came from parents/caregivers. The difference between the two profiles of 1% was not considered significant.

- Eighteen percent of submissions came from submitters in the Auckland region. Seven percent of submissions expressing a preference for Option 1 came from the Auckland region. The difference between the two profiles of 11% was considered significant (ie, it suggests a relatively low level of support for Option from submitters in the Auckland region.

It is noted that this methodology makes no allowance for any inherent bias in the profile of all submissions. There is no suggestion that, for example, the proportion of submissions from any particular geographical region is the same as the proportion of stakeholders living in that region.

**Analysis of preference for options for service provision**

Breakdowns of submissions by region and type of submitter were carried out for responses to the question, “Do you think the current system needs changing?”. 
This analysis found that overall, expressed preferences for options for service provision broadly tracked the overall profile of submissions. There were 4 exceptions to this, as follows:

- Submissions from the Auckland region expressed a significantly high level of support for Option 2, and conversely, a significantly low level of support for Option 1.
- Submissions from the Canterbury region expressed a significantly higher level of support for Option 1, and conversely, a significantly low level of support for Option 2.

**Analysis of themes**

Breakdowns of submissions by region and type of submitter were carried out for the five Themes for analysis that were the subject of the highest number of comments in submissions. These themes were:

- Integrated services (commented on by 131 submissions)
- Type of service (commented on by 85 submissions)
- Status Quo/satisfied (commented on by 81 submissions)
- Resources/services (commented on by 74 submissions)
- Type of setting/learning environment (commented on by 71 submissions)

This analysis found that overall, submissions commenting on particular themes broadly tracked the overall profile of submissions. There were five exceptions to this, as follows (in decreasing order of significance):

- There was a significantly high level of comment by submissions sourced from parents/caregivers on the Status quo theme. The overall trend of comments suggests a relatively high level of support for the status quo of service provision.
- There was a significantly high level of comment by submissions sourced from Canterbury on the Type of setting/learning environment theme. The overall trend of comments suggests a relatively high level of support for a continued or augmented role for DECs.
- There was a significantly high level of comment by submissions sourced from teachers on the Resources/services theme. The overall trend of comments suggests a relatively high level of support for an increase in the resources for Deaf Education services.
- There was a significantly low level of comment by submissions sourced from parents/caregivers on the Type of setting theme.
- There was a significantly low level of comment by submissions sourced from parents/caregivers on the Integrated services theme.
3. SUMMARY OF FINDINGS

The following section presents a detailed summary of issues raised in submissions, broken down into themes for analysis developed for this report.

Theme 1.1: status quo

Overview

Eighty-six submissions (49 parents, 6 service providers, 15 teachers, 3 advisors, 1 student, 2 parents and teachers, 1 student and teacher, 1 parent/teacher/student, 7 others, 1 unknown) expressed overall support for retaining the status quo in Deaf Education services. Comments in submissions within this category could be broken down further into the following themes:

- The current system is working well
- The current system provides an effective service for deaf children and their families
- There is no evidence or reason to change the current system
- Within the status quo/Option 1 model there was still room for improvement
- Any proposed changes to Option 1 need to happen gradually to ensure there is no impact on the current level of service.

Thirty-three submissions in this category responded to the question, “Do you think the current system needs changing?”, with 32 answering “Yes” and 1 answering “No”.

Individual submissions are discussed below.

Thirty-six submissions (24 parents/caregivers; 1 parent and teacher, 8 teachers, 1 student, 1 other and 1 unknown) commented that the status quo (Option 1) is currently working well, that people are satisfied or that this option leaves everything the way it is. The following quotations are representative:

- “Having been involved in Deaf Education as a teacher and now as a student, I have observed this specialist education throughout New Zealand, within the base schools at Kelston and van Asch, with Resource teachers and also at satellite units. I have taught at a base school and as an RTD. All sectors appear to be functioning well providing quality education for our deaf students”.
- "We are happy with the current system. We moved closer to Christchurch to have access to services".

Where 20 or more submissions are associated with any collective comment or theme, a breakdown of submitters’ region of origin is included in Appendix 1.
More specifically, 22 submissions (1 advisor, 2 others, 16 parents/caregivers, 3 teachers) commented that they were happy with the way the system currently worked and the level of service received by deaf children and their families, often including personal stories. The following quotation is representative:

- “Our region comes under the care of van Asch, therefore we all have a united vision/pathway of how things are managed. Families know where to go/who to ask for information or services. We as a family have never felt misguided or lost in this process.”

Submissions referred to the services being consistent, efficient, families feeling supported, there being good communication and relationships between providers and families, and positive student outcomes are achieved. There was also a comment that there is good access to resources and resource personnel.

Some submissions referred to the high level of support they receive from service providers in particular areas, including Taranaki, Christchurch, South Canterbury, Southland and Hawkes Bay. One submission recommended that Taranaki be a model to help other areas improve their services.

High quality services mentioned as providing excellent support were: Advisors and Resource Teachers; VDEC; Van Asch Education Centre outreach programmes; van Asch teachers; Van Asch Education Centre early intervention services; the GSE team; the cochlear implant trust; support for mainstreaming; sign language school; and the newborn screening programme.

Four submissions supported having two DECs.
One RTD commented that they felt well supported and able to provide a thorough service.\(^{40}\)

A submission from a mainstream Auckland school stated that hearing impaired students at their school received good support.\(^{41}\)

Five submissions stated that there was no researched based evidence or reason to indicate that major change needs to occur,\(^{42}\) with a representative quotation being as follows:

- "Unless there is evidence this is not working why change. You have experienced staff who would be unaffected and at no further cost."\(^{43}\)

Three submissions questioned why something that worked well needed to be changed,\(^{44}\) with one submission commenting as follows:

- "Current management and governance structures are working well in each centre ... There is not a sense that the system is broken and that radical change is required ... any consideration of different structures should be on the basis of responding to an actual need rather than change for changes sake or in response to any ideological perspectives on the need to centralise/rationalise."\(^{45}\)

Two submissions were concerned about the possibility of losing the current level and quality of service and support and two were concerned about the effect of any changes on children's education.

In relation to the CI programme, one submission commented that they did not believe that any of the proposed changes to deaf education services was likely to result in the delivery of better services to users of its programme.\(^{48}\)

According to one submission, the education of the deaf child should be paramount before there is any wholesale changes and funding wastage. Another submission commented that resources to change the system were not available.

While supporting Option 1, 17 submissions (7 parents/caregivers, 4 service providers, 3 others, 2 teachers, 1 student) commented that there was still room for improvement.\(^{51}\)

Seven submissions raised concerns about the impact of any significant change on current processes that are working well and instead express a preference for a process of incremental change and development,\(^{52}\) with a representative comment being as follows:

\(^{40} 0172\)
\(^{41} 0190\)
\(^{42} 0044; 0048; 0065; 0125; 0167\)
\(^{43} 0048\)
\(^{44} 0012; 0072; 0161\)
\(^{45} 0072\)
\(^{46} 0160; 0161\)
\(^{47} 0128; 0160\)
\(^{48} 0081\)
\(^{49} 0121\)
\(^{50} 0126\)
\(^{51} 0007; 0028; 0053; 0065; 0072; 0077; 0078; 0100; 0105; 0139; 0156; 0161; 0164; 0167; 0170; 0208; 0238\)
\(^{52} 0012; 0017; 0022; 0060; 0144; 0156; 0174\)
• “Option 1 enables us to build on what is there – without upsetting processes that are currently working well.”

Six submissions commented that they selected Option 1 because it was the best one out of the four options provided, although not necessarily ideal, with one submission commenting that:

• “The current structure (Option 1) of the provision of services is currently the best option, although there are elements that could be better aligned and improved.”

Two submissions commented that the options provided in the Discussion Paper did not address the ‘drivers for change’ also identified in the Paper.

One submission stated that there is no guarantee that the other options will provide any advantage over the status quo.

Three submissions specifically commented that they did not believe Option 1 was the best option as they did not consider the status quo was working. One submission considered it outmoded and another stated that it was inadequate. One submission commented that the Ministry of Education would not initiate a review without instituting change.

53 0017
54 0058; 0072; 0172; 0186; 0208; 0238
55 0072
56 0053, 0060
57 0018
58 0085; 0087; 0136
59 0066
60 0075
61 0081
Theme 2.1: resources / service levels

Overview

Seventy-eight submissions (5 advisors, 9 others, 28 parents/caregivers, 4 parents and teachers, 9 service providers, 20 teachers, 3 unknown) raised issues in relation to current resources provided for Deaf education and the associated levels of service. Comments in this category could be broken down further into the following themes:

- Individual parts of Deaf Education services are inadequately resourced
- Workloads for providers of Deaf Education services (principally teachers) are too high
- More teaching and support resources need to be provided
- Scope for more effective allocation of currently available resources
- The Deaf Resource People service should be reinstated
- Geographical allocation of resources
- Other resources/service level issues.

In this section, individual submissions are discussed under the headings of these themes. Forty submissions in this category responded to the question, “Do you think the current system needs changing?”, with 38 answering "Yes" and 2 answering "No".

Individual parts of Deaf Education services are inadequately resourced

Six submissions identified individual parts of Deaf Education services as being currently under-resourced.

Three submissions referred specifically to under resourcing of DEC\textsuperscript{62}.

Two submissions expressed the view that there is currently insufficient funding for AoDCs. One submission cited under-funding for AoDCs as one of a number of instances of under-funding in the system:

- “The current system does not provide sufficient funding to deliver high quality, intensive, early intervention services to children 0 – 3 years, regardless of mode of communication (sign or spoken language). Examples of underfunding for early intervention services that we are aware of [include]...: Current AoDC caseloads do not support intensive, high-quality intervention due to the high numbers of families per each AoDC\textsuperscript{63}.

Three submissions identified lack of resources for the teaching of NZSL as an issue\textsuperscript{64}.

\textsuperscript{62} 0018; 0073; 0150
\textsuperscript{63} 0088
\textsuperscript{64} 0126, 0153; 0248
Workloads for those providing Deaf Education services are too high

Six submissions identified high workloads for those providing Deaf Education services as a problem.

Four submissions referred to current heavy workloads for AoDCs. One submission referred to speech-language therapists becoming more and more overloaded. One submission referred to high caseload numbers without specifying the service involved. One submission cited an ERO report on KDEC (more detailed reference not provided) as detailing regional coordinators and RTDs as instances of insufficient staffing.

Current services need to be better resourced

Twenty-two submissions proposed that current services be better resourced.

Seven submissions sought additional funding in the area of NZSL teaching, with individual proposals being as follows:

- Additional provision of NZSL Educational Interpreters
- Fully funded sign language classes
- Currently there is not enough funding to ensure adequate NZSL support
- Funding for Deaf people coming into schools to teach NZSL to Deaf students as well as hearing students to provide better communication amongst Deaf and hearing students
- NZSL courses funded for Specialist teachers under the ORRS funding scheme
- Funding should be given to schools to implement the NZSL curriculum using deaf adults from the local community.

Six submissions advocated an increase in the provision of teacher aides. A representative comment was as follows: “The provision of teacher aide hours to support the child we have would ideally be better funded so he can have more 1:1 support each day. School budgets are too tight.”

Four submissions proposed that further resources be made available for RTD services, with one representative comment being that "A few of the children are not getting enough support from the RTOD simply because the teacher of the deaf cannot be there all day, every day." One of these
submissions\textsuperscript{79} proposed that the amount given to each RTD for the purchase of appropriate resources be increased, citing as a precedent a lump sum payment of $1000 received by Resource Teachers: Learning and Behaviour.

Four submissions\textsuperscript{80} proposed that further resources be made available for AoDC services, with a typical comment being that Advisers on Deaf children play a crucial role in advice and guidance to families, children and facilities and they are under funded and understaffed\textsuperscript{81}.

Four submissions\textsuperscript{82} proposed that further resources be made available for DECs, with one submission\textsuperscript{83} referring to both DECs and one to VDEC, and the other two submissions referring to KDEC only.

Two submissions supported provision of additional funding specifically to enable the management teams and boards of the two DECs to hold more frequent combined meetings for the purpose of enhancing collaboration and coordination between DECs\textsuperscript{84}.

Two submissions\textsuperscript{85} proposed that there be further assistance for children with cochlear implants, with one of the submissions commenting that “There needs to be more help for children with cochlear Implants - travelling the 3 hours to Auckland for support is not very practical. More satellite clinics (such as Hearing House) around the country - possibly based within local audiology clinics - would benefit CI recipients immensely”\textsuperscript{86}.

Other proposals that additional resources be provided for individual services were as follows:

- Parents of DHI children; support and back-up for technological aids\textsuperscript{87}
- Funding for speech therapists\textsuperscript{88}
- Better access to local Speech/ Language therapists for deaf children over the age of 8 years who are not ORRS verified\textsuperscript{89}
- Special visiting teachers to work with classroom teachers on how to meet the learning needs of hearing impaired students\textsuperscript{90}
- Expert specialist resource teachers to support deaf students in the mainstream\textsuperscript{91}
- Special Deaf teacher hours\textsuperscript{92}
- Early Intervention\textsuperscript{93}

\textsuperscript{79} 0234
\textsuperscript{80} 0119; 0139; 0143; 0144
\textsuperscript{81} 0119
\textsuperscript{82} 0018; 0077; 0150; 0249
\textsuperscript{83} 0249
\textsuperscript{84} 0053; 0078
\textsuperscript{85} 0018; 0139
\textsuperscript{86} 0139
\textsuperscript{87} 0139
\textsuperscript{88} 0021; 0139; 0168
\textsuperscript{89} 0216
\textsuperscript{90} 0244
\textsuperscript{91} 0077; 0098
\textsuperscript{92} 0168
\textsuperscript{93} 0018
• Including money, time and training for mainstream schools\textsuperscript{94}

• Regional coordinators; relieving specialist teachers for RTDs who are undertaking professional development (citing an ERO report on KDEC - more detailed reference not provided)\textsuperscript{95}

• Funding for Professional Development for teachers in learning NZSL: “PD should be mandatory for staff in schools that have NZSL using students. Currently we have to pay [for PD] and do weekend courses”\textsuperscript{96}

• Specialist teaching; itinerant services\textsuperscript{97}

• ORRS teachers, and other specialist staff (including the Specialist Resource Team from VDEC)\textsuperscript{98}

• FM systems for children with hearing loss: “Many hours are spent by AoDCs doing FM applications for school age children. If this is provided as part of the child’s health care as are hearing aids the AoDCs will have more time to spend working with families/whanau”\textsuperscript{99}

• Full-time support people involved in educating deaf children: “There should be full time support people involved in the child’s education. The support staff need to be matched to the deaf person’s needs to be skilled”\textsuperscript{100}

• Fully funded air travel to and from VDEC, at least once a year, or for important meetings\textsuperscript{101}

• More follow up from advisors for moderate losses - “we haven’t seen one for a few years”\textsuperscript{102}

• Increased opportunities for Deaf people to work and be involved with Deaf education, including increasing representation of Deaf people on BOT, management, teachers, Deaf culture/NZSL specialist staff, Deaf Advisors - Increased opportunities for Deaf children to meet each other, meet Deaf adults and learn about Deaf culture\textsuperscript{103}

• Funding to enable more weekly visits by an itinerant teacher of the deaf\textsuperscript{104}

• Additional funding for teachers\textsuperscript{105}

• Extra teacher time for DHI students with high or very high special educational needs\textsuperscript{106}.

Scope for more effective allocation of currently available resources

Thirteen submissions identified scope for more effective allocation of resources currently available for Deaf Education.
Four submissions\textsuperscript{107} expressed the view that the current allocation of resources between DECs and Deaf Education services provided to mainstream schools did not reflect the movement towards educating hearing impaired children in mainstream schools, with one submission describing the current system as “Unworkable and inequitable - not a fair representation of Deaf children in New Zealand ... compared with how Deaf and hearing impaired children are doing in the mainstream, the Deaf schools are over resourced. Advisors of Deaf Children are supporting the majority of families with accessing services within the MoE and families from the day the children are diagnosed with a hearing loss”\textsuperscript{108}.

Two submissions expressed a preference for locally based provision of services that are currently provided by specialist RTDs\textsuperscript{109}. One of these submissions recommended that RTDs be pooled and that deaf children learn together in schools, so that teachers have a support base and RTDs have more time available for teaching, because the need to travel long distances is reduced\textsuperscript{110}.

One submission expressed the alternative view that specialist services currently located at DECs needed to be strengthened, to ensure equitable distribution of these services throughout regions\textsuperscript{111}.

One submission reflected on whether the best educational outcomes for hearing impaired children came from attendance at DECs or mainstream schools: “If KDEC was to close more training and funding would be needed for Mainstream schools or else deaf children will get little support in large classes and with teachers who are unwilling to help and support deaf children. I like what KDEC does however they are under funded and rely on ORS funding from students for basic operation. Deaf children cannot hear and operate in a school classroom with 30 other children and keep it - class sizes need to be smaller and the teachers need to be willing and have the time to plan and learn about hearing impairment”\textsuperscript{112}.

Other views regarding the effective allocation of current resources expressed in individual submissions were that:

- “Resources need to be directed where they are needed most to reflect future changes in the population spread”\textsuperscript{113}
- “Obviously the rolls at the 2 main deaf centres are decreasing, but there is still a need for deaf services throughout NZ, and it is currently not working, hearing impaired children are missing out on services”\textsuperscript{114}
- “IMHO money [should be released] to provide better, more equitable services to deaf education”\textsuperscript{115}
- “Money currently spent on administration should be reallocated to resources”\textsuperscript{116}.

\textsuperscript{107}0018; 0041; 0149; 0159  
\textsuperscript{108}0041  
\textsuperscript{109}0046; 0180  
\textsuperscript{110}0180  
\textsuperscript{111}0102  
\textsuperscript{112}0150  
\textsuperscript{113}0120  
\textsuperscript{114}0028  
\textsuperscript{115}0235  
\textsuperscript{116}0234
The Deaf Resource People service should be reinstated

Fourteen submissions (1 advisor, 4 others, 3 parents/caregivers, 2 teachers, 2 unknown) sought reinstatement of the Deaf Resource People service. Several submissions spoke highly of the service, with the following comments being representative:

- "One of the 'drivers for change' listed in the discussion document states that there are challenges in delivering NZSL education and associated supports for many students. One of the most effective and highly-regarded answers to this issue was the employment of the Deaf Resource People in the early 2000's. These people had a unique perspective on Deaf issues, being that they had all grown up Deaf. They were able to deliver NZSL teaching for students, parents and professionals; identify and address issues around how to adapt classrooms and/or teacher behaviours that make it difficult for Deaf students to access the teaching; educate people about Deaf Culture; provide support to students who were struggling with being the only Deaf child in a school; and much more. These positions should be reinstated and made permanent, so that all Deaf/Hearing-Impaired students have access to this education and support."

- "Deaf resource staff provided the cultural and linguistic role models for deaf students, their families, professionals and other associated people in the mainstream. They helped the deaf child to 'understand' their identity and culture as a deaf person."

Geographical allocation of resources

Four submissions raised issues about the geographical allocation of resources.

Three submissions argued that changing the current system for deploying resources to meet the increase in demand for services in the Auckland area would not give sufficient weight to the effect of population growth elsewhere in the country. One submission observed that "I'm strongly of the view that removing resources from elsewhere in order to meet the needs of an increasing population in Auckland would seriously disadvantage children, families and schools in the rest of the country where there is also population increase albeit at a slower rate."

One submission specifically opposed any reduction in the level of funding made available to the children in the South Island, commenting that "It is common for funding to be moved north to the detriment of South Island children who are often more geographically isolated. This must not happen."

One submission suggested that the impact on staff workloads of the trend for families to move from rural to urban areas needed to be understood better, so that a consistent level of service and support could be provided.
Other comments

Fourteen submissions commented broadly on the importance of adequately funding Deaf Education Services, with individual perspectives being as follows:

- "Funding for mainstream deaf children must be increased to allow these children to achieve at their highest level."¹²⁴
- "There is limited funding for deaf children in the mainstream - with the teachers hours - it does not benefit deaf children having half support."¹²⁵
- "Not having to battle for hours so obviously needed for these children."¹²⁶
- "We need money to make whatever option work - please think that if there was your child what would you do to ensure they learn and have the best education possible. If you put the money, education and time in now you will produce happy, productive members of society!!"¹²⁷
- "All resources made available to all the providers, teachers, advisors, resource workers, ORRS so our deaf children have the same opportunities as hearing children."¹²⁸
- "Continuation of funding so that the submitter’s daughter can receive teacher aiding and specialised teacher of the deaf through immediate and college years."¹²⁹
- "Level of support needs to be based on individual need, not level of hearing loss e.g. children with mild, moderate and unilateral loss face the same challenges as those with more severe losses but are often overlooked."¹³⁰
- "Funding and the provision of teacher aides to give deaf or hearing impaired children the opportunity to learn as much as possible to be as independent as possible out in the community."¹³¹
- "Remember you are going to free up a lot of money. PLEASE put in safeguards to ensure the money does stay with deaf education."¹³²
- "Allocating more hours if needed but at the end goal we all want our children to work independently."¹³³
- "Supports need to be easily accessed, ongoing/certainty of provision to avoid deploying resources to make huge funding application each year."¹³⁴
- "It sounds like setting up more services/resources within a National Education System is a good idea. Anything to increase the amount of services to deaf/hearing impaired people/children is great."¹³⁵
Three submissions referred broadly to a lack of resources for Deaf Education, without giving further particulars, with one submission commenting that:

- "No resources were provided until our child turned 5 years old and then the hearing adviser saw us once in a year and a half due to lack of resources. We have to send equipment to van Asch to get it fixed instead of being able to access a technician in Wellington. Regional services are stretched and what little support we do get is ineffectual".

Other resources or service level issues raised in individual submissions were as follows:

- The fact that repairs on specialist equipment can only be carried out in 2 centres means that it takes a long time to get equipment serviced and returned.
- Current levels of professional development hours for VDEC regional staff need to be retained.
- VDEC hours for students who are unable to be serviced by the RTD service need to be retained.
- Support for greater accountability and transparency in mainstream schools around the use of 0.1 and 0.2 allocated teacher time.
- Concerns over the possibility of a reduction in current resource levels, together with a comment that the sector has enacted a massive restructuring over the last 12 months in order to meet budget on what the Ministry considers to be core services.

One submission expressed the view that access to resources was working well.

**Resource/service level issues raised in discussions of Service Provision options**

A number of submissions identified resource / service level issues in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.

**Option 1: Status Quo**

Three submissions suggested that any difficulties with the current model were due to funding limitations (rather than governance and management structures), with a representative comment being that “The current model is struggling because of funding limitations. In the current context of no new funding available, it is difficult to see how changes to the current governance and management processes will provide value for money.”
Submissions commenting on Option 1 identified the following examples of areas where a perceived lack of resources was creating service delivery issues:

- Teachers of the Deaf in high schools not having sufficient release time to complete administration
- One Regional Centre having insufficient resources to meet the needs of DHI children within its region
- Withdrawal of funding for Deaf Resource People positions
- Current high caseloads for AoDCs not supporting intensive, high quality early intervention
- Current high demands on staff creating stress for teachers and affecting the level of service given to students
- Funding for NZSL interpreters
- Funding for NZSL education.

Five submissions raised concerns that shifting to an alternative Service Provider option would involve transition costs. One also expressed concern that transition costs would take funding away from services.

Two submissions raised concerns regarding any proposal to shift funds from the southern to the northern region and potentially reduce existing services to students in the southern region, with a representative comment being, while the population is increasing fastest in the Auckland region, "We note that the population is increasing in general. Funding and resource allocation to both providers is currently fully utilised. In the words of one of the providers, there is no fat in the system."

Resource/service level issues raised by individual submissions were as follows:

- A comment that the status quo was preferable to cutbacks in resources for Deaf Education
- A comment that any additional funding would be better spent on extending the teacher training programme
- An expression of general concern that children are missing out on services
- A comment that the status quo should work, but that at present, some children are not receiving appropriate services and support.
A comment that extension of innovative practice is only limited by efficient management of financial resources and therefore, at a time when resources are capped, it is important to look at more stringent use of existing resources\textsuperscript{161}.

**Option 2: National Provider**

Four submissions commented that Option 2 would allow for more resources to be available to frontline staff and services\textsuperscript{162}.

Two submissions stated that Option 2 is the only option that allows resources to be used in the most effective and efficient way possible, and provides access to a fair share of available resources and is equitable\textsuperscript{163}.

Comments in individual submissions were as follows:

- Option 2 described as “the best of a messy bunch” that increases the chances of consolidating resources in the area where more of the deaf population\textsuperscript{164}.
- There is no indication that a national model would provide improved funding, in-school access, and an adequate budget for outreach staff\textsuperscript{165}.
- Concern at the possibility that changes to the current service provider model would be accompanied by a reduction in the resources available for deaf education\textsuperscript{166}.
- Any reduction in costs should not involve the reduction of much needed resources and teachers\textsuperscript{167}.

**Option 3: National Coordinating Body**

One submission raised concerns that Options 3 and 4 would cause more waste of precious resources\textsuperscript{168}.

**Option 4: Regional Fund Managers**

Two submissions\textsuperscript{169} commented that more frontline staff and direct support in schools was needed. One submission\textsuperscript{170} noted that more people in national offices would not achieve this.

Comments in individual submissions were as follows:

- Concerns about the cost of setting up regional-based organisations under Option 4\textsuperscript{171}.

\textsuperscript{160} 0199 \\
\textsuperscript{161} 0102 \\
\textsuperscript{162} 0004; 0070; 0071; 0155 \\
\textsuperscript{163} 0017; 0256 \\
\textsuperscript{164} 0235 \\
\textsuperscript{165} 0018 \\
\textsuperscript{166} 0078 \\
\textsuperscript{167} 0004 \\
\textsuperscript{168} 0233 \\
\textsuperscript{169} 0145; 0244 \\
\textsuperscript{170} 0244
• Concern that Options 3 and 4 would lead to a waste of resources\textsuperscript{172}

• A suggestion that services offered under a regional fund manager model will be limited as they will depend on the professionals available\textsuperscript{173}. 

\textsuperscript{171} 0180
\textsuperscript{172} 0233
\textsuperscript{173} 0180
Theme 2.2: integrated services

Overview

One hundred and thirty-three submissions (1 advisor and service provider, 15 advisors, 21 others, 39 parents/caregivers, 1 parent and student, 4 parents and teachers, 14 service providers, 1 student, 33 teachers, 5 unknown) address issues relating to integration in Deaf Education services. Comments in submissions in this category could be broken down further into the following themes:

- There is inconsistent delivery of services nationwide (ie, inconsistency in the availability of services and in the level of services)
- There is fragmentation and duplication of services (this includes gaps between services, duplication of services, lack of clarity about the roles of different services, lack of clarity for consumers because of the number of service providers)
- A diversity of proposed solutions intended to bring about Integrated Deaf Education services.

Individual submissions are discussed below under the headings of these themes.

Thirty-six submissions in this category responded to the question, "Do you think the current system needs changing?", with 35 answering “Yes” and 1 answering “No”.

Inconsistent delivery of services nationwide

Fifty-five submissions (7 advisors, 1 advisor and service provider, 8 others, 13 parents/caregivers, 1 parent and student, 2 parents and teachers, 8 service providers, 13 teachers, 2 unknown) referred to issues of inconsistencies in the delivery of services nationwide.

Fifteen submissions (3 parents/caregivers, 2 parents and teachers, 3 service providers, 4 teachers, 2 others) connected inconsistency issues with issues of coordination between the two DECs, with a representative comment being that:

- "We have two Deaf education centres operating independently and sometimes in competition with each other. At transition times we hear of families prepared to move cities or towns to get the service they want for their children."

Four submissions referred specifically to the need for the services provided by AoDCs and RTDs to be better integrated. One submission describes the consequences of what were perceived as a decline in communication between these two services as follows:

- "Assessments and information are not shared, families are put in the middle, things are doubled up or missed entirely and it is the students that are missing out (luckily some RTD were able to use common sense to see this was a bad idea and continued to work with AoDC)."

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174 0016; 0018; 0046; 0083; 0103; 0104; 0116; 0156; 0165; 0166; 0224; 0226; 0243; 0245; 0250
175 0083
176 0116; 0224; 0243; 0245
177 0116
Six submissions referred to issues arising from a disconnection between AoDC service and DECs, with one submission commenting that “The separation of Advisers of the Deaf and Deaf Education centres has resulted in duplication, lack of communication and professional jealousies.”

Three submissions described national inconsistency issues as reflecting differences between the services provided in the two DEC areas.

Two submissions referred to an issue of duplication of the resources currently provided by the DECs.

Two submissions regarded the current arrangements for ensuring coordination between the two centres as being satisfactory, referring to joint meetings between the centres' boards and also management teams, while acknowledging that that there was scope for enhancing coordination through an increase in funding available for joint meetings. Similarly, another submission described how the DECs have worked collaboratively to develop national resources.

Seven submissions identified a need for better communication and coordination between the services provided by GSE and those provided by the centres, with one representative comment being that “Service collaboration/coordination between MoE SE staff and DEC staff is currently disjointed, despite efforts to ensure otherwise.”

Four submissions associated problems of fragmentation and lack of coordination with having separate employing bodies for AoDCs, DECs and RTDs.

Two submissions identified problems of a lack of consistency in the delivery of the AoDC service. One submission identified inconsistencies in delivery between the North and South Islands, and also between different parts of the Northern Island. One submission traced issues of inconsistencies in the delivery of the service back to structural changes that saw AoDCs employed by GSE rather than by the DECs as previously. The same submission suggested that GSE managers had little understanding of the primary duties of the AoDC service, and a number of problems had arisen under the new system as a consequence, including insufficient data sharing and lack of attention to technical "hands-on" problems, with the current job description now being sufficiently wide to allow such problems to arise.

Issues of inconsistency of service delivery identified by individual submissions were as follows:

- The growing diversity of services available to hearing impaired children as the cause of inconsistency issues: “Deaf Education has changed over the years with more hearing impaired
students attending their local mainstream schools. Technological advances, Newborn Hearing Screening and Early Intervention services have all contributed.\textsuperscript{190}

- A lack of consistency between individual schools in the way that ORRS positions are being used.\textsuperscript{191}
- A lack of consistency in the service provided by GSE staff, resulting in some students not getting access to the RTD service.\textsuperscript{192}
- There is inconsistency in provision for the professional development of staff between different providers.\textsuperscript{193}
- Current inconsistency issues in terms of the current system represent a failure to meet extant strategic commitments.\textsuperscript{194}
- Inconsistency in awareness of the services available between schools.\textsuperscript{195}

Seventeen submissions (1 advisor, 2 others, 7 parents/caregivers, 1 parent and student, 1 service provider, 3 teachers)\textsuperscript{196} referred in general terms to the existence of inconsistency issues, with representative comments being as follows:

- “At present levels of service are not equitable across the country, and any changes must ensure this is addressed. These differences include caseload numbers, assessments used, number of visits to children, and links with related organisations such as SCIP and HH. When making sure these services are equitable, it is vital to lift the lower level rather than lower the better level. The decisions on this should be jointly made.”\textsuperscript{197}

- “The current system has many regional differences and inconsistencies that don’t ensure a national equality of service. Deaf units in mainstream schools are only available in Auckland. Preschool and transition services are limited and only available at DECs. These services need to be extended into areas experiencing population growth. As acknowledged in the discussion document there are also many redundancies in the two DEC system which need to be addressed. This includes Audiology services, resource production and technology provision.”\textsuperscript{198}

One submission referred in positive terms to steps that had been taken to improve the integration of service delivery by the two DECs while still allowing for regional and local community input, following a review of special education in 2000.\textsuperscript{199} These steps are described as including the Ministry signing the same agreements for service delivery with both DECs, to ensure a national approach to the delivery of services including Regional Teaching and Supports Services, Early Intervention Services, Resource and Technical Services and Residential Services. The agreements are described as being designed to cater for a greater percentage of children being educated in their local school with additional specialist support, with the criterion for apportioning funding under these agreements being the same for both DECs.

\textsuperscript{190} 0113
\textsuperscript{191} 0153
\textsuperscript{192} 0191
\textsuperscript{193} 0256
\textsuperscript{194} 0256
\textsuperscript{195} 0122
\textsuperscript{196} 0001; 0011; 0028; 0046; 0075; 0096; 0122; 0124; 0129; 0156; 0158; 0189; 0191; 0200; 0211; 0221; 0258
\textsuperscript{197} 0122
\textsuperscript{198} 0114
\textsuperscript{199} 0053
Fragmentation and duplication of services

Forty-three submissions (4 advisors, 1 advisor and service provider, 5 others, 13 parents/caregivers, 1 parent and teacher, 2 service providers, 1 student, 14 teachers, 2 unknown) referred to issues of fragmentation and duplication of services.

Thirteen submissions (1 other, 4 parents/caregivers, 1 service provider, 6 teachers, 1 unknown) identified the number of different service providers as a source of issues of fragmentation and duplication of services. Six of these submissions referred specifically to the difficulties for parents and staff that arose from the need to deal with a number of service providers, with one representative comment being "I found that I had to ring different providers for different reasons - not a very good system".

Six submissions referred to problems arising from a lack of clarity about the role of RTDs, with one submission commenting that "Currently [RTDs] appear to focus on academic support for secondary students when many of these students are finding it socially difficult to wear hearing aids and would therefore benefit more from some speech therapy as their speech patterns deteriorate".

Six submissions referred to problems arising from a lack of clarity about the respective roles of RTDs and AoDCs, with comments including:

- "van Asch Deaf Education regional services has ‘blurred the lines’ between the roles of AoDC and RTDs feeding the concept of duplication of services of these two distinct groups."
- "The personnel at the deaf education centre are not advocating MoE staff, i.e., AoDC, and RTD work together, sharing resources or assessments and even communicating."
- "Parents are also often disempowered by RTDs taking responsibility for education and also for roles that are usually the responsibility of the parent e.g. transporting children to various appointments."

Two submissions suggested that problems of fragmentation of services arose because some AoDCs did not have the appropriate skills or perspective for their role, with one submission commenting that "The majority of the AoDCs currently employed do not see deaf children as having a culture and language that the family are entitled to access and do their best to steer the family away from Deaf community, NZSL and cultural information. It is inappropriate for an AoDC to be teaching NZSL to a family when they do not have a qualification or certification in the language."
Issues around fragmentation and duplication of services identified in individual submissions included the following:

- Fragmentation of services could be attributed to DECs reducing their communication with other providers as part of their efforts to protect their current role

- Problems of fragmentation of services existed in service areas where the Ministry of Education rather than the DECs have control

- Problems of fragmentation of services were connected with there being not enough trained AoDCs

- There is a specific issue of lack of coordination between RTDs and specialist teachers

- A specific issue of lack of coordination where parents, schools, class teachers, and AoDCs were unaware of when a "SRT" is visiting or of their purpose in working with a particular child

- A submission that cited an ERO report on KDEC (more detailed reference not provided) as identifying a number of areas of lack of role clarity, including the RTD / Early intervention service interface, the alignment of RTDs, Advisors of the Deaf and the Early Intervention Service, and the need for KDEC to clarify the RTD role and service

- A lack of coordination between organisations with responsibility for assisting deaf people to meet employment and other needs on leaving school; examples given are "Workbridge, NFD, DANZ, deaf club"

- An issue of poor integration of funding for deaf services between GSE and DECs, giving as an example: DECs are responsible for the contract for cochlear habilitation, yet don't receive funds for this activity

Sixteen submissions (1 other, 8 parents/caregivers, 1 parent and teacher, 1 service provider, 5 teachers) referred in general terms to fragmentation of services.

Two submissions queried the use of the term “fragmentation” in relation to deaf education services. One of these submissions suggested that it was more appropriate to talk of specialisation in the deaf education sector, rather than fragmentation, citing National CI services as an example of a specialist service that collaborates with other specialist services in both the Health and Education sectors.
Proposed solutions intended to bring about integrated Deaf Education services

Fourteen submissions (3 Others, 1 parents/caregivers, 3 service providers, 1 student, 5 teachers, 1 unknown) proposed that coordination of services should be enhanced by placing deaf support and education services under the jurisdiction of the two DECs, with one representative comment being that “The excellence of service out of both deaf education centres can be strengthened if all educational services for deaf children, including advisers of deaf children, and other auditory disorders are managed and governed by both the deaf education boards and management teams within their respective regions.”

Four submissions specifically referred to the need to reduce fragmentation of service by transferring management of the AoDC service to the DECs.

Four submissions proposed that the ORRS service be transferred to the DECs in the interests of better integration of services.

Five submissions supported the creation of a National Provider, with one representative comment being that “There needs to be a ONE stop shop for deaf so that families can relax and trust in the information and the service they are getting.”

Three submissions proposed that Deaf Education services be placed under a single national organisation, expressing this preference in the following terms:

- A nationally co-ordinated service
- A central focus, a single governance body, and centrally managed services
- A National Resource Centre.

Two submissions supported keeping deaf education within the system for other special education services, rather than creating a separate structure. One submission saw a variety of advantages in retaining this arrangement, which maintains the current transdisciplinary team approach that is already in place:

- “... won't fragment AoDC services to deaf/HI children from other MoE Special Ed services they receive ... allows AoDCs to retain a wider perspective of Special Education policies, processes and best practice and enables them to respond to local community needs ... also gives AoDCs a voice in regard to deaf education with their MoE colleagues, as well as maintaining the current close working relationship with MOH service providers – audiologist, ENTs and this needs to continue as an 0-21 service as part of MoE.”
Seven submissions identified a need for better communication and coordination between the services provided by GSE and those provided by the centres. One said that "A wide range of service models could work. What is missing is coordination and communication between the different people working with our deaf child".

Four submissions referred specifically to the need for the services provided by AoDCs and RTDs to be better integrated. Suggestions offered by submissions for addressing this issue including the following:

- "The AoDC service should focus on pre-school and early years and the RTD service on school aged students."
- "AoDCs should be included under the same workplace as RTDs, or RTDs should be trained to do the work that AoDCs currently do ... because there is a shortage of trained AoDCs and no career path that encourages RTDs to apply for those positions."

Four submissions referred to the need for AoDCs and RTDs to be employed by the same body to facilitate their working collaboratively.

Five submissions expressed the view that AoDCs should be reintegrated into deaf education services from GSE, in the interests of better coordination.

Nine submissions expressed the view that AoDCs should remain in GSE in the interests of their remaining integrated with other specialist services, with a representative comment being that "AoDCs remaining as part of the MoE ...It is mutually beneficial and it gives AoDCs a broader understanding of special education and the opportunity to access other specialist services from colleagues such as working alongside our MoE colleagues (SLT, EIT, Psychologist, ESW, Kaitakawaenga, OT/PT)".

One submission expressed concern at the possibility that Deaf Education specialist services might become isolated from those of mainstream specialist education services, commenting as follows:

- "The discussion document uses the figure of 40% of children with a hearing loss having additional needs. While the level of need around their hearing loss may vary, this highlights the need for specialist services to be collaborative. The isolated location of some families also requires the service providers to have knowledge of ‘the wider system’, enabling interdisciplinary and transdisciplinary training for specialist colleagues (eg SLT, EIT), support staff (TA, PTT) and class teachers. This is currently available under the MoE Special Education model."
Three submissions\textsuperscript{243} emphasised the importance of communication to ensure integration of services, with one representative comment being that “We don’t know what resources or support is available from the different agencies and groups ... We would love to have clearer lines of communication with the personnel who could best support the students at our school who are hearing impaired”\textsuperscript{244}.

Two submissions\textsuperscript{245} proposed that there be a national register of all hearing impaired and deaf children, with one submission commenting that this would assist with the assessment of need and the allocation of resources to areas of greatest need\textsuperscript{246}.

Proposed solutions to assist integration in Deaf Education services put forward in individual solutions included the following:

- “Identify cochlear Implant programmes as a specialist units that should therefore be kept together with audiology services”\textsuperscript{247}
- Place AoDCs under the management of the National Provider if this model emerges\textsuperscript{248}
- Increase collaboration between services for deaf children and services addressing other disabilities, giving the examples of deaf/blind, deaf/health, deaf/behaviour\textsuperscript{249}
- To assist GSE staff and DEC staff to work together, introduce a referral system that encourages some referrals to be considered by RTDs before coming to GSE as with behaviour referrals\textsuperscript{250}
- Ensure a seamless service and role clarity between the different branches of the Ministry of Education\textsuperscript{251}
- GSE should continue to provide specialist services for DHI children from 0-21\textsuperscript{252}.

Twelve submissions (2 advisors, 3 others, 4 parents/caregivers, 1 service provider, 2 teachers) commented in general terms on the importance of ensuring coordination and collaboration between Deaf Education services\textsuperscript{253}, with one representative comment being that “All children and young people in Aotearoa NZ have the right to access and nationally co-ordinated equitable service under a balanced government structure and with clear leadership in order to become well adjusted adults”\textsuperscript{254}.
Integrated services issues raised in discussions of Service Provision options

A number of submissions identified integrated services issues in relation to individual Service Provision options (ie, the 4 options presented in the Discussion Paper). These issues are summarised in this section.

**Option 1: Status Quo**

Seven submissions were concerned that Option 1 did not address the underlying issue of fragmentation of resources and services\(^\text{255}\).

Fragmentation was attributed by two submissions to the fact that service providers work independently and are managed by different agencies\(^\text{256}\).

Three submissions\(^\text{257}\) commented on the inequality and inconsistent level of service provision across the country, with two\(^\text{258}\) mentioning that Option 1 may mainly suit people living in either Auckland or Christchurch.

Two submissions raised concern that Options 2-4 would fragment the service even more, with children in some areas receiving a lower level of service\(^\text{259}\).

Seven submissions commented that Option 1 should be maintained with improvements in service co-ordination and collaboration\(^\text{260}\).

More specifically, three submissions\(^\text{261}\) commented that the system of KDEC looking after those residing north of Taupo and VDEC those residing to the south works effectively, and one submission\(^\text{262}\) commented that with some adjustments this could continue.

In discussing Option 1, a number of submissions commented on where they saw scope for changes to current services, as follows:

- Greater levels of cooperation and coordination between the DECs to address inequality across the country\(^\text{263}\)
- Reallocating all service delivery to the DEC\(^\text{264}\)
- Allocating AoDC services to DECs\(^\text{265}\)
- Allocating ORRS services to DECs\(^\text{266}\)

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\(^{255}\) 0017; 0078; 0088; 0097; 0130; 0132; 0219
\(^{256}\) 0088; 0145
\(^{257}\) 0018; 0156; 0180; 0190
\(^{258}\) 0180; 0190
\(^{259}\) 0077; 0135
\(^{260}\) 0053; 0102; 0103; 0143; 0145; 0147; 0204
\(^{261}\) 0081; 0145; 0204
\(^{262}\) 0204
\(^{263}\) 0103
\(^{264}\) 0078; 0130; 0132
\(^{265}\) 0031; 0053; 0102; 0143; 0145; 0147; 0204
\(^{266}\) 0031; 0053; 0102; 0143; 0147; 0204
- Reallocation of services to DECs, to encourage a seamless education for deaf students, consistent teaching and assessment procedures, a continuity of service and funding, and clearly delineated roles\textsuperscript{267}
- Reallocation of services to DECs to restrict the possibility of 'double-dipping' with some students having the services of an RTD, ORRS teacher and Teacher Aide\textsuperscript{268}
- Reallocation of services to DECs to encourage specialist staff to work in a more collaborative manner and to improve the coordination of professional support to teachers\textsuperscript{269}
- Put cochlear implant centre staff under the management of the two DECs\textsuperscript{270}
- Put preschool services under the management of the two DECs\textsuperscript{271}
- Concerns that AoDCs are isolated in their current location, as members of multidisciplinary teams not involved in deafness\textsuperscript{272}
- A comment that deaf education services outside of special education need to be made nationally consistent\textsuperscript{273}
- A comment that it is not the current system which is at fault but rather the areas of Deaf Education which are not coordinated by van Asch\textsuperscript{274}
- A concern that deaf children are being denied their cultural identity by being 'lumped into Special Education'\textsuperscript{275}

Other submissions focused on the following features of Option 1 that were effective and should not be changed.

Five submissions commented that the Option 1 structure of two DECs does provides for collaboration and sharing of ideas and efficient approach to service delivery with examples resource sharing initiatives provided\textsuperscript{276}. These submissions\textsuperscript{277} referred to the two Boards of Trustees meeting biannually and one\textsuperscript{278} also mentioned the National Coordination meetings held between the two DECs. One also mentioned the positive feedback received from local communities\textsuperscript{279}.

Two submissions expressed the view that AoDCs should stay in their current position, because of associated benefits including AoDCs having access to a range of disciplines that give them on the job professional development, and ensuring a multidisciplinary approach to HDI children, particularly those with multiple disabilities\textsuperscript{280}.

\textsuperscript{267} 0147; 0204
\textsuperscript{268} 0204
\textsuperscript{269} 0102
\textsuperscript{270} 0143
\textsuperscript{271} 0204
\textsuperscript{272} 0088
\textsuperscript{273} 0166
\textsuperscript{274} 0145
\textsuperscript{275} 0180
\textsuperscript{276} 0017; 0053; 0102; 0122; 0167
\textsuperscript{277} 0102; 0167
\textsuperscript{278} 0102
\textsuperscript{279} 0053
\textsuperscript{280} 0146; 0166
Other comments in individual submissions were as follows:

- The two DECs were very close to achieving a satisfactory level of collaboration, additional resources were required for this purpose, and changing to a single provider would only introduce unproductive delays.\textsuperscript{281}

- There are structures currently in place to ensure RTDs employed by the DECs and AoDC employed by the Ministry of Education can work together; it is the role of the Ministry of Education to lead the coordination of services across agencies.\textsuperscript{282}

- “In our region, coordination between GSE and RTD is working well.”\textsuperscript{283}

- The DECs operate under the same agreements for service.\textsuperscript{284}

One submission questioned how, with no new funding available, changes to the current governance and management processes will provide value for money and address issues of fragmentation.\textsuperscript{285} One submission advocated for retaining Option 1 with greater levels of co-operation and co-ordination between the two DECs to address the inequality across the country.\textsuperscript{286}

**Option 2: National Provider**

Three submissions commented on the fragmentation and lack of coordination with the current system.\textsuperscript{287}

Thirty-one submissions (5 advisors, 5 other, 14 parents/caregivers, 1 service provider, 4 teachers, 2 unknown)\textsuperscript{288} commented that Option 2 would provide for a more consistent, coordinated and efficient national approach to service provision, with individual comments emphasising particular aspects of the associated benefits and issues, as follows:

- A national provider would reduce the redundancy inherent in the current two DEC system. One resource team could provide sign language and teaching resources to all deaf units.\textsuperscript{289}

- A national provider could provide a cohesive plan for deaf education, from hearing impaired children in mainstream classrooms to students in deaf units.\textsuperscript{290}

- “There would need to be careful consideration of how to merge two very different services (KDEC and VDEC). Both schools have things they do well and things that don’t work so well – the merged service needs to pick up on the positives of both schools and minimise the negatives.”\textsuperscript{291}
• Regionally both Deaf Education Centres have demonstrated their ability to listen and adapt services to meet the aspirations of their communities. A natural progression would be to have one national governance Board of Trustees to provide opportunities for national consistency rather than regional consistency.  

Fourteen submissions (3 advisors, 2 others, 3 parents/caregivers, 2 service providers, 3 teachers, 1 unknown) commented that Option 2 may assist with ensuring consistent service provision across the country, with individual comments on this possibility being as follows:

• "From a Deaf point of view the differences in treatment between Kelston and van Asch providers has often been a source of great friction in the Deaf Community. It is crucial that if NZSL is to be introduced professionally as a compulsory part of the Deaf education curriculum in the future, then it must be introduced uniformly across the country and be accessible in the small communities as well as the big. The Deaf population is widely spread in New Zealand and many in the smaller centres do not enjoy access to services which are readily available in the main centres.

• "The two [DECs] have already got excellent resources, skills, knowledge, specialist staff which are already there to provide the services for deaf and hearing impaired children and young people. By combining the two together, they can share their existing knowledge, skills and resources throughout New Zealand.

Thirteen submissions (1 advisor, 4 others, 4 parents/caregivers, 1 service provider, 2 teachers, 1 unknown) commented that a nationally coordinated service under Option 2 would reduce fragmentation and duplication of services and resources, with individual comments on this possibility being as follows:

• "Large amounts of money are spent yearly by the two centres developing resources in the same areas, the most current example is the development of the Social Studies Resource.

• "There is much inefficiency and there is no need for two separate sites operating as separate entities. There needs to be unification, and shared vision/expertise.

• "NZ is a small country with limited specialist human and material resources in this field; Option 2 offers the potential to plan, budget and manage service delivery and workforce development with a national overview of needs, resources, standards and systems of provision.

• "Reduce what must be a very high cost for the wasteful current setup of multiple Admin services, none of which seem able to share data, along with a 'grab' for territory by quite a number that has a very negative impact on the services we are all supposed to supply to our clients.

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292 0256
293 0080; 0089; 0090;0114; 0122; 0154; 0189; 0211; 0220; 0229; 0232; 0239; 0241; 0261
294 0232
295 0023
296 0019; 0030; 0035; 0040; 0071; 0082; 0083; 0088; 0113; 0221; 0245; 0251; 0255
297 0113
298 0251
299 0082
300 0255
Two submissions described Option 2 as more streamlined\textsuperscript{301}.

Two submissions commented that the national provider should ensure that the National Plan for Deaf Education is followed\textsuperscript{302}.

Twenty-five submissions (4 advisors, 5 others, 6 parents, 1 parent and teacher, 4 service providers, 3 teachers, 2 unknown)\textsuperscript{303} stated their support for the concept of one national provider to coordinate services, employ staff and provide consistency, with individual comments on aspects of this option being as follows:

- “The reason I like this option is because all service providers and specialists are governed by one organisation giving us an advantage of getting information and help from the one main organisation”\textsuperscript{304}
- “I believe this would ensure consistency across services and encourage greater collaboration. This would ensure students are receiving the best possible service”\textsuperscript{305}
- “This will encourage the development of co-ordinated services that capitalise on, and support the best skills of staff members to provide appropriate services according to a learner’s specific needs at any particular time in their educational and social development”\textsuperscript{306}
- “Deaf need an education system in the same way that Māori need one, to recognise and value the language and culture advisors and teachers should work together for the same employer and then they can work together instead of giving us conflicting information”\textsuperscript{307}
- “AoDCs can finally be employed in the same agency as the RTDs and other deaf specialists. Makes more sense to pool the content specific professionals”\textsuperscript{308}
- “AoDCs and teachers of the deaf would have a common manager and common focus”\textsuperscript{309}
- “This will help with the identification of areas where satellites can be established and where smaller groups or individuals need to be resourced. This may include the establishment of residential support in the lower North Island to allow some students better access to their families”\textsuperscript{310}
- “RTDs could be housed with other resource teachers”\textsuperscript{311}
- “A redistribution of teachers from DECs to mainstream”\textsuperscript{312}.
Three submissions commented that under this model the services providers would all work together. One submission noted that the national provider could either be a national resource centre or the Ministry of Education Special Education.

Seven submissions proposed that AoDCs stay with GSE and that RTDs and other specialists could also be employed by GSE (as national provider) to facilitate a more cohesive working relationship with the AoDC and other special education staff through a multidisciplinary team approach.

- “I believe that having the AoDC employed by MoE is a strength of the current service. AoDC are able to collaboratively work with other specialists, especially for supporting students in Early Intervention and ORRS. MoE already have a clear, transparent management structure in place, including supervision, appraisals, salary scales, etc. If teachers of the Deaf were to be brought under the MoE this system would already be in place, meaning there would be no need to create entirely new structures.”

- “Many students who are deaf have other complex issues as well as deafness so are under MoE Special Education as well. Advisers need to stay within MoE Special Education to help the teaming around the child/student and it would be brilliant if the Resource Teachers could be too for the same reason.”

- “RTDs and CI Habilitationists should be transferred to MoE Special Education and be part of the multi/trans disciplinary team and management system that is already established.”

Six submissions expressed concern that fragmentation of services would continue for children who required access to other Ministry specialist support services, if AoDCs were no longer to be directly employed by GSE.

- “As an SLT I would be lost without immediate access to [AoDCs] and the flexibility of joint-assessments, case conferencing and co-work that being on-site affords. The majority of the students they support are mainstreamed i.e., NOT in a school for the deaf.”

Five submissions drew comparisons between Option 2 and the BLENNZ model. One submission raised the following specific concerns:

- “My concern is that isolating all Deaf Education away from the MoE (ie, in an entirely separate Deaf Education National provider such as BLENNZ is for vision) would do just that - isolate Deaf education from the rest.”

Three submissions suggested that there could be one National Body employing RTDs, Deaf Mentors, Interpreters, NZSL teachers, establishing satellite classes and in-service training, with AoDCs continuing to be employed by the Ministry. A representative comment was that:

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313 0101; 0163; 0177
314 0163
315 0046; 0116; 0119; 0122; 0159; 0229; 0241
316 0116
317 0119
318 0046
319 0046; 0108:0113; 0116; 0163; 0166
320 0166
321 0090; 0116; 0163; 0165; 0213 – BLENNZ (acronym not identified) is a specialist residential school.
322 0116
• “Local schools and staff are well versed in Language and Literacy. Many children don’t require additional service from the schools for the Deaf Specialist Teachers. Many of the children with hearing loss on the moderate contract and have no connection with the schools for the deaf. Children with multiple special needs, deafness often secondary or supplementary. These children require a teaming approach. Hence beneficial for AoDC to remain at SE 324.

Three submissions325 proposed that under Option 2 the DEC could become a resource centre catering for repairs to hearing aid technology, specialist resources, professional development and expertise in and promotion of NZSL resources.

Four submissions326 expressed concern at the possible consequences of transferring AoDCs to DECs, including HDI children being isolated from the services of other MoE specialist staff and receiving a lesser service as a result.

Four submissions327 expressed the view that the two DECs do not currently work together. One submission328 suggested that services and staff should all be in one place to avoid rivalries and tension between the DECs. One submission329 commented that Option 2 would allow for better sharing and resources and skills and a reduction in conflicting advice to parents.

Comments in individual submissions were as follows:

• A single national organisation could operate as follows: “Provide services around satellite classes (EI and school age), technology repairs, resource development, professional development, interpreter services, Deaf Mentor services, NZSL support and promotion”330

• An expression of concern that a national provider model could isolate deaf education services and not address fragmentation for mainstreamed students, with the comment that “Any National Provider which leads to isolation of services is moving away from international and national trends of inclusion, devolving of responsibility to communities and local schools, inter and transdisciplinary models of service provision, and the ability to respond to need with flexible use of staff and resources”331

• A caution that there was the potential for significant risk to deaf education with Option 2332

• An expression of concern about the potential cost of purchasing resources if AoDCs were moved to a separate body under Option 2333

• GSE should not become the national provider334
• The Ministry needs to continue to have a major role and work with other special needs providers\textsuperscript{335}

• A comment One submission\textsuperscript{336} commented that Universal Neonatal Hearing Screening Program protocols were established between the Ministries of Education and Health and these would need to change if AoDC were removed from the Ministry of Education\textsuperscript{337}

• A suggestion that under the national provider model, AoDC should work with preschool and families, and RTD with school aged students\textsuperscript{338}

• A comment that there was no indication that a national model would improve role clarity between RTDs, Deaf Advisors, and Early Intervention services\textsuperscript{339}

• A suggestion that bringing all AODCs in line with the terms of service under which the current AODCs employed by VDEC are contracted would be an additional expense\textsuperscript{340}

• A suggestion that, while Option 2 might reduce fragmentation, this could be at the expense of “specialisation and client representation”\textsuperscript{341}.

\textbf{Option 3: National Coordinating Body}

Two submissions\textsuperscript{342} expressed the view that Option 3 could foster closer collaboration with the team involved with the child. One of these submissions supported Option 3 where AoDCs and RTDs were employed and managed by the existing management structure in GSE.

Other comments made in individual submissions were as follows:

• Support for a mixture of Options 3 and 4, as offering a way of getting key concepts/treatment paths/educational requirements decided upon and instigated across the country\textsuperscript{343}

• Concern that Options 2, 3 and 4 would not give a supportive service for deaf children, but would fragment the service further, with the possibility of losing specialist expertise in the central and southern region\textsuperscript{344}

• Concern that Options 3 and 4 would result in further fragmentation of services, isolate services from mainstream education and not provide a unified vision for Deaf Education\textsuperscript{345}

• A suggestion that both options 3 and 4 would create a greater need for collaboration by adding additional organisations to the current system, which would only exacerbate the current problems\textsuperscript{346}

• Option 3 described as inconsistent, inequitable and confusing for professionals and families\textsuperscript{347}
• A suggestion that Option 3 had a number of disadvantages, including the potential loss of the multidisciplinary approach of GSE teams as communication and file sharing become an issue and the potential isolation of Deaf Education.

• A comment that Option 3 ‘seems to embody the worst of all worlds’, comparable to the Vision Education Agency (VEA) model of funding and co-ordination of services previously rejected by government and the Ministry of Education, and more likely to foster competition for resources and professional rivalry than improve collaboration.

Option 4: Regional Fund Managers

Two submissions supported the adoption of Option 4, in combination with another service model option, as follows:

• A combination of Options 2 and 4
• A mix of Options 3 and 4.

Fourteen submissions (2 advisors, 7 others, 3 parents/caregivers, 1 parent, teacher and student (chose all three categories), 1 service provider) raised concerns that Option 4 would lead to further fragmentation of services with greater fragmentation and inconsistency in service provision, with individual comments being as follows:

• “Some regional directorates would inevitably be weak through lack of available expertise in their geographic area and could succumb to the influence of local pressure groups.”

• “Option 4 would just double the amount of dysfunction with four regional offices working in four divergent ways instead of just the two schools and GSE.”

• “Little overall professional support and innovation.”

• “The possibility of losing the specialist expertise specific to deaf children in the central and southern region.”

One submission commented that it would be difficult to get a nationally co-ordinated voice under Option 4.

One submission recommended modifying Option 4 so instead of the Deaf schools becoming the National Provider (as in Option 2) GSE becomes the National Provider and resource Teachers of Deaf become part of the GSE regional staff. Advantages of this option identified by the submission were:
• Cost effective, requiring little additional set-up costs
• AoDCs and teachers of the deaf working together under a common manager
• AoDC’s and RTDs working as a unified team
• Maintains a multi-disciplinary approach with access to a variety of specialists
• Seamless transitions between education providers if a family moves to another area
• Consistent service delivered by RTD throughout New Zealand
• Funding for frontline service is provided in an equitable manner
• Consistent service provision which is regionally/district based and supplied
• Deaf education would not be seen as an isolated intervention and would promote positive outcomes of mainstreaming
• Intervention provided in a family-centred manner
• Children with multiple needs would be adequately serviced with a wrap-around service involving specialists from all fields
• Deaf Schools could become resource centres employing Deaf tutors and staff to develop resources, especially around NZSL.
Theme 2.3: Cost-effective

Thirteen submissions (1 advisor, 6 parents, 2 service providers, 4 teachers) address issues of cost effectiveness in Deaf Education services.

Seven submissions directly responded to the question, “Do you think the current system needs changing?” as follows: 6 answered “Yes”; 1 answering “No”.

Four submissions supported establishing a single organisation with responsibility for funding and providing all Deaf Education services on grounds of cost effectiveness.

Two submissions expressed the view that having two schools for the deaf was not cost-effective, with one representative comment being that “Financially it seems absurd that there needs to be two schools for the deaf, both with very few students physically taught within them, to then pay for the upkeep of these large numbers of buildings and grounds. Also, management appears top heavy with two principals, two sets of senior managers, increasing numbers of specialist resource teachers”.

Other views expressed by individual submissions were as follows:

- “There is no need for substantial changes to the present structure for Deaf Education services, although there is likely to be scope for making the present system more cost efficient”.
- Changes to the present system would be likely to give rise to greater costs than at present.
- Support for a considered approach to options of a change, rather than hurrying to change something that is not completely broken.
- There are always ways to improve and change service models to make them more cost-effective and better.
- It would be beneficial if there were ways to save money without affecting services or the job effectiveness of teachers and specialists.
- A comment that, if the DECs are to be discontinued, then Options 2 or 3 would be more cost effective.
- A comment expressing surprise that, in a period of restrictions on government funding, any options which involve additional cost were being entertained.
- Concern that there be no additional costs for schools arising out of the review.

References:
359 0004; 0029; 0108; 0233;
360 0050; 0116
361 0116
362 0204
363 0174
364 0121
365 0049
366 0004
367 0009
368 0065
369 0096
Theme 3.1: Vision

Thirty submissions (1 advisor, 4 others, 15 parents/caregivers, 3 service providers, 6 teachers, 1 unknown) raised issues relating to the overall vision for Deaf Education services.

Three submissions in this category responded to the question, "Do you think the current system needs changing?", with all 3 answering "Yes".

Seven submissions commented that the Discussion Paper appeared to take the view that multiple visions for a deaf education service were not desirable, and that this did not appear to suit the New Zealand context, with its diverse range of populations and cultures and geographic diversity. Two submissions suggested that having a single vision of a deaf education was not consistent with student-centred service delivery.

Five submissions supported there being a single national vision for Deaf education.

One submission commented on the lack of a national vision for Deaf education.

Vision-related issues raised in discussions of Service Provision options

A number of submissions identified vision-related services issues in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.

One submission also noted that one vision could be achieved for deaf education regardless of the option, as it should all align with the New Zealand curriculum.

Option 1: Status Quo

Two submissions did not consider that the concept of multiple visions was a disadvantage for Option 1 (as stated in the Discussion Paper).

- "Changing what is to us a successful delivery structure in order to enable a single vision for deaf education is ridiculous ... We can't see any reason why there shouldn't be different useful visions of provision of services depending on the different demographics and logistical challenges".

Two submissions also raised concerns that a single vision for Deaf education in New Zealand could limit responsiveness and choice.

- "The notion of a '...single vision...' to '...develop consistent service provision...’ suggests reducing responsiveness to the needs of individuals and their families. This would be inconsistent with good practice standards in education and is unacceptable to the van Asch Board".
Two submissions\textsuperscript{379} suggested that there were already common visions for deaf education. One submission\textsuperscript{380} supported this suggestion by describing how the DECs operate under the same agreement for services with the Ministry of Education and take into account the principles of the National Plan for the Education of Deaf and Hearing Impaired Children and Young People in Aotearoa/New Zealand.

- “There already exists a shared vision for students who are deaf or have hearing disabilities. While there may be differences between delivery processes, both providers share the vision of enhancing learning outcomes for deaf and hearing impaired students within a nationally effective, equitable and cohesive service ... concurs with this shared vision and believes that the primary goal must be that equitable, cohesive, nationally coordinated public education service for all deaf and hearing impaired children and young people is provided in a timely manner from birth to the completion of their school years\textsuperscript{381}.

- “Because NZ is so small there is little chance of significant vision divergence between the providers (a concern that is significantly overstated in the Discussion Paper)\textsuperscript{382}.

**Option 2: National Provider**

Fourteen submissions (12 parents/caregivers, 1 teacher, 1 unknown)\textsuperscript{383} commented that they chose Option 2 as it supported a single vision for deaf education.

With a single vision makes it easier to provide and lobby for services that are needed\textsuperscript{384}.

- “A single vision can still allow for flexibility to best meet individual needs even though these needs will vary considerably among deaf students\textsuperscript{385}.

- “I like the thought of a single vision for deaf education. This option seems more uniform and the advantages weight out the disadvantages. Most of the ‘divers for change’ could be resolved by this option\textsuperscript{386}.

One submission\textsuperscript{387} commented that the team of people creating the vision would need to be carefully selected to ensure the vision was balanced.

One submission\textsuperscript{388} commented that a single vision for deaf education would need to reflect the nature of the different needs of the population across the country (rural vs urban, isolation vs critical mass) and the needs of someone in a high density urban area would be very different to most of the other regions.

One submission\textsuperscript{389} stated that a single vision approach has the potential to achieve the community's agreed desired Matrix of outcomes.
**Option 3: National Coordinating Body**

One submission\(^{390}\) suggested that Option 3 will allow for a clear vision and direction to be established and provide the opportunity for an authoritative voice on deaf education to emerge.

**Option 4: Regional Fund Managers**

One submission commented that having a single national vision for Deaf education was achievable irrespective of the preferred approach to Deaf education, and that this would be consistent with the New Zealand curriculum\(^{391}\).
Theme 3.2: Type of setting

Eighty-one submissions (7 advisors, 17 others, 26 parents/caregivers, 2 parents and teachers, 9 service providers, 1 student and teacher (chose both categories), 1 parent, teacher, and student (chose all three categories), 14 teachers, 1 unknown) raised issues relating to the type of setting for Deaf Education services.

Forty submissions in this category responded to the question, “Do you think the current system needs changing?”, with 35 answering “Yes” and 5 answering “No”.

Fourteen submissions (5 advisors, 2 others, 3 parents/caregivers, 1 service provider, 2 teachers, 1 unknown) supported the continued or expanded use of satellite units. One submission suggested that satellite units needed to be connected to the DECs, because mainstreaming was not working. Two submissions suggested that satellite units were only viable in areas with a high population, asking what equivalent options, such as funding for more live-in courses at a DEC, could be made available in regional areas. One submitter commented that satellite units needed to be staffed according to student needs.

Two submissions suggested that the students needed to be able to move easily between satellite classes and the mainstream.

Twenty-one submissions (2 advisors, 3 others, 7 parents/caregivers, 1 parent and teacher, 1 service provider, 1 student and teacher, 5 teachers, 1 unknown) supported the continued provision of access to specialist schools. One submission expressed support in the following terms:

- “Deaf schools (van Asch and Kelston), are important for Deaf Education because of social, political and technology reasons. Deaf and hearing impaired learn better if the school is suitable for them. I understand the family may not be in CHCH or in AKLD but the parents must understand the children will advance like other peers if they speak using their own language, to others early in life. They can play sports earlier in life, rather than going to rehab. They can communicate and learn ideas to other peers earlier, rather than communicating repetitive phrases in a quiet room with a specialist teacher. They can grab opportunities earlier in life, helps them to succeed later in life for example university studies, or competency in life skills, such as cooking, surviving own its own and managing with others. The governments’ focus for the education providers is to make sure that the kids are reading, writing and counting. It didn’t say about you must hear or you must talk (orally) to achieve the 3 competency. What Deaf and hearing impaired children are missing out to achieve competency, is the communication with teachers, peers and to their own self. The kids need, to identify the right connections with each other (social), value the culture they have (political), and advance equally because they cannot hear altogether (technology).”
• “Deaf schools were described as a place 'where language and culture can be transmitted'”\textsuperscript{399}.

Options for the provision of DECs in the future proposed in submissions were:

• Setting up a residential school in Christchurch, in addition to those already operating\textsuperscript{400}

• Continuing with two residential schools, because additional schools could not be justified in a country with a population of New Zealand\textsuperscript{401}

• Reducing the number of DECs to one as a response to declining demand\textsuperscript{402}, with one submission adding that a merger of the current centres should not be accompanied by a single focus on one or other of the recognised cultures in the Deaf and hearing impaired communities, the cultural-linguistic and other medical-disability models\textsuperscript{403}. One submission suggested that the DECs could be made smaller as a response to a declining demand for their services\textsuperscript{404}

• Reducing the size of the VDEC site to reduce costs, while maintaining or increasing current staff levels\textsuperscript{405}

• “Primary aged hearing children could attend van Asch deaf Education Centre so that social integrations among deaf continue. The hearing children learn sign language and the deaf learn how to behave / socialise. More KIT (Keep In Touch) Days with the mainstream students and satellite classes at van Asch”\textsuperscript{406}

• “Absorb the Kelston site into general education use by surrounding schools; a section of the Kelston site could continue to accommodate the present residential service for deaf students, all of whom attend satellite classes in surrounding schools, and an administration base for deaf education services in the region; the van Asch site could then become the national resource centre and specialist centre of excellence for deaf education”\textsuperscript{407}.

Other comments in submissions on the role of DECs were as follows:

• A number of comments on the cost of running and maintaining DECs in relation to the decline in demand for the services they provide as an issue \textsuperscript{408}

• A comment on the importance of DECs being able to maintain their special character as envisaged by Tomorrow's Schools, and therefore to use the Curriculum\textsuperscript{409}

• Criticism of DECs for a lack of receptivity to people who have chosen an oral route to Deaf education\textsuperscript{410}

• A suggestion that DECs are self-interested and out of touch with the needs of clients\textsuperscript{411}

\textsuperscript{399 0180}
\textsuperscript{400 0257}
\textsuperscript{401 0102}
\textsuperscript{402 0083; 0191}
\textsuperscript{403 0191}
\textsuperscript{404 0068}
\textsuperscript{405 0035}
\textsuperscript{406 0098}
\textsuperscript{407 0078; 0097}
\textsuperscript{408 0035; 0046; 0118; 0163; 0165; 0182; 0235}
\textsuperscript{409 0156}
\textsuperscript{410 0018; 0247}
\textsuperscript{411 0235}
• A suggestion that DEC's were responding to declining school rolls by showing flexibility in the use of their resources and facilities\textsuperscript{412}

• A comment that VDEC has an important role in providing an environment in which profoundly deaf children can access learning through NZSL\textsuperscript{413}

• A suggestion that there could be a conflict of interest when a DEC provided an itinerant service, because the DEC would word see its primary role as being to attract students to its core service\textsuperscript{414}

• Expressions of satisfaction with the services provided by one or both of the DEC's\textsuperscript{415}

• A suggestion that DEC's are not valued by special education staff\textsuperscript{416}

• A recommendation that the responsibility for staffing in satellite classes sits with the DEC rather than the host schools\textsuperscript{417}

• One submission provided detailed information about how the VDEC library/media centre supports deaf education\textsuperscript{418}

• "It is important that VDEC be retained as this is such an important piece of deaf education history and can be a place, as it was in the past, of language and culture transmission. Currently it is not being used to its full potential in part because the staff there and many of the AODCs do not see that as a positive option for children and therefore do not portray the benefits to parents"\textsuperscript{419}

Four submissions expressed concern that children are being sent to the DEC's because of behavioural problems within families or an inability to mix in their local schooling system\textsuperscript{420}. One submission commented on the particular difficulties that can follow as a consequence:

• "Deaf Education centres seem to be viewed by GSE, parents and other Deaf Education staff as the last resort for deaf children ... only chosen when these deaf children fail in the mainstream. This makes it more difficult for the Deaf Schools as they are getting students from the age of eleven and older that have limited or no language base yet are required to get them up to a level where they are achieving National standards in literacy & numeracy"\textsuperscript{421}

Four submissions expressed concern that education in mainstream schools was an isolating experience for HDI children\textsuperscript{422}. One submission discussed the issue of isolation for HDI children in mainstream schools in the following terms:

• "Deaf students who go in the mainstream, if they don't have full support, are disabled. There is the communication barrier, access to information and the confidence to speak up. It is hard for
deaf students if they don’t know their rights and don’t know whether they have the right to speak up. What you don’t know, you can’t change. Inclusion is really important – all people in the school around the deaf child should be learning about deaf culture/studies so that they can include the deaf child as one of them.423

One submission424 advocated a nationwide network of deaf units in mainstream schools to allow students to socialise and be educated in their own community.

Other views regarding type of setting expressed in submissions were as follows:

- A comment that, if DHI children are to be educated in mainstream schools, there needs to be continued cluster group education within the mainstream so that hearing impaired children can meet together and education and health providers can address their particular needs425
- Two submitters426 commented on the difference in the quality of services provided by the two DECs
- A comparison of the websites of KDEC and VDEC, finding the VDEC website superior on a number of counts, including content, availability of learning options, and inclusion of a charter427
- A comment that, whatever service provider option was chosen, it was important to ensure that the preferred system included strategies to address known issues, including providing Deaf Education Advisers to look after clusters of children and advocate with schools and specialist services428
- An expression of concern that Deaf students with special needs are being placed with Deaf students who only require support with communication, and suggested that there should be hubs where Deaf students can access any particular communication needs429
- Comment on the need for continuing availability of classes for children requiring NZSL as a learning medium430
- Mainstream schools cannot opt out of providing for deaf students431
- The importance of being educated in your own community432
- The need for deaf children to be able to socialise with deaf and hearing peers433.

Type of setting issues raised in discussions of Service Provision options

A number of submissions identified type of setting issues in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.
Option 1: Status Quo

Two submissions advocated that the current structure which gives families the choice and flexibility of two DEC and mainstream schools works well. One commented that Option 1 allows integration of deaf people with other non-deaf learners.

More specifically, ten submissions (3 others, 3 parents/caregivers, 4 teachers) commented that the two DECs should remain. Five commented that this would allow students to attend a residential schools and, according to three submissions, for parents and children to attend residential assessments. Another submission commented that the schools allow pupils, parents and teachers to have access to varied resources and meet other people nearby. Two submissions commented that the DEC should provide an important home base, foundation or focal point for deaf education, as follows:

- “The option of a base school is essential and I have seen pupils and their families develop in confidence and identification of being part of the deaf culture by being there.”
- “Option 1 would retain the special character of the two schools. Deaf people have a very strong affiliation to the centres and if they were to go, this would leave a big hole for many Deaf. We believe that it is vital to retain the residential opportunities for deaf children in the regions.”

Two submissions commented that a DEC was needed in both the North and South Islands. There was also a concern from one submission that if one school was closed children may have to travel a long way to access services or may not receive the services they need. One submission expressed concerns at the possibility of loss of services if a DEC were closed:

- “As a grandparent of a child with a cochlear implant and with other special needs The School for Deaf has been an amazing support system for all the family as well as meeting and understanding the child's needs. If this was closed it would be an overwhelming loss.”

Two submissions commented specifically on the benefits of having a school specifically for deaf children.

- “I feel that profoundly deaf children need their own school to get the most out of each other, specialist teachers and strategies, communication, and breakthroughs in learning.”

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434 0133, 0180
435 0215
436 0022; 0060; 0103; 0109; 0121; 0122; 0156; 0171; 0186; 0258
437 0020; 0103; 0121; 0156; 0258
438 0103; 0121; 0156
439 0109
440 0060
441 0122
442 0121; 0186
443 0109
444 0133
445 0133
446 0133
447 0020; 0157
Mainstreaming all profoundly deaf children would be a step backwards as schools may not cope and they will be separate in their learning anyway within a mainstream school. Four submissions commented on particular aspects of the service they received from VDEC including: the excellent staff; that the school caters for the needs of children who struggle in mainstream; and the support for families.

One submitter recommended that opportunities be provided for regional mainstream school students to take part in courses at a DEC.

Two submissions commented on the problems associated with retaining two DECs (ie, declining core school rolls, a growing role as service providers to students attending mainstream schools, the high cost of maintaining the DEC facilities) identified in the Discussion Paper. One submission described how VDEC has adapted and responded to the changing regional and local needs and the increase in regional services. Another submission commented:

- "I feel the resources at VDEC are invaluable and the buildings have been well utilised for the specialist resource teachers, media centre, SCIP, accommodation for families who come for intensive assessment and consultation and for regional staff when attending valuable professional development. Families and staff have a central site for the extensive resources and contact with specialists. The local resource teachers are able to attend assessments along with parents and so contribute when necessary."

One submission expressed concern that Option 1 would not support any further specialisation of the deaf units.

**Option 2: National Provider**

One submission commented on the possibility of having one school under Option 2, as follows:

- "We would support this only in the sense of a unified school that retains at least a southern and a northern residential/day school campus in some form - otherwise this would not be a placement option that is available to many deaf students."

One submission advocated keeping both DECs open to give parents geographical options. Another stated that both schools were needed to cater for students throughout the country who needed to enrol in a residential school.

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448 0157
449 0014; 0020; 0056; 0060; 0103; 0121; 0144
450 0014
451 0020; 0056
452 0121
453 0102
454 0053; 0060
455 0053
456 0060
457 0088
458 0082
459 0038
460 0211
One submission\textsuperscript{461} expressed concern at the risk of both DEC being closed under this option:

- “I am worried that all students, regardless of need, will be mainstreamed for the sake of mainstreaming. Student needs need to be closely monitored by the Deaf Education Centres, and student placements considered on levels of need”.

One submission\textsuperscript{462} raised concerns that the schools would be less hands on with education for deaf students under Option 2.

Instead, one submission\textsuperscript{463} suggested that families should be provided with choices in educational placement including options of residential schools, satellite classes and mainstream with FMs and or educational interpreters.

One submission\textsuperscript{464} commented that Option 2 was the preferred option as it would use existing education centres.

Within the framework of a national provider, submissions made the following recommendations on how services could be delivered at the frontline:

- Deaf education could become an arm of the Specialist Education Service with small units in mainstream schools\textsuperscript{465}
- The two Deaf schools can be the satellite classes for that area and a residential base for students outside of Christchurch and Auckland\textsuperscript{466}
- National provider can work with local schools to establish ‘Deaf Friendly’ schools so that families can enrol in that school knowing that there is support or training occurring from the AoDC, RTDs. A Deaf friendly school may have students mainstreamed with an interpreter or grouped together with a teacher of the Deaf teaming with a regular teacher\textsuperscript{467}
- DECs should be used for teacher of deaf training\textsuperscript{468}.

Five submissions\textsuperscript{469} advocated for the establishment of more satellite deaf units to respond to local needs:

- “What about smaller satellite deaf units in each city so that students can travel in for week long courses more easily than now”\textsuperscript{470}
- “I can't help but think that the expansion of satellite class units throughout our region with permanently based RTD and other specialist support staff would be a much more efficient and effective plan, reducing the number of travelling/visiting staff”\textsuperscript{471}

\textsuperscript{461} 0180
\textsuperscript{462} 0139
\textsuperscript{463} 0179
\textsuperscript{464} 0062
\textsuperscript{465} 0009
\textsuperscript{466} 0180
\textsuperscript{467} 0180
\textsuperscript{468} 0122
\textsuperscript{469} 0073; 0114; 0177; 0180; 0239
\textsuperscript{470} 0239
\textsuperscript{471}
• “There needs to be learning centres/satellite classes throughout New Zealand so that the children have a peer group and resources can be pooled”\textsuperscript{472}.

**Option 3: National Coordinating Body**

One submission questioned whether, under Option 3, deaf education could become an arm of the GSE with small units in mainstream schools\textsuperscript{473}.

**Option 4: Regional Fund Managers**

One submission\textsuperscript{474} stated a preference for Option 4 if it meant that deaf children would be able to go to school in their local area.
Theme 3.3: Quality of service

Overview

Sixty-three submissions (1 advisor and service provider, 1 service provider, 3 advisers, 14 others, 15 parents/caregivers, 1 parent and teacher, 1 parent, student and teacher, 6 service providers, 1 student, 17 teachers, 3 unknown) raised issues relating to the quality of Deaf Education services. Comments within this category could be broken down further into the following themes:

- General comments on quality of service
- Best practice research
- Training and professional development
- Specialist workforce and staffing requirements
- Other.

Thirty submissions in this category responded to the question, “Do you think the current system needs changing?”, with 28 answering “Yes” and 2 answering “No”.

General comments on quality of service

Four submissions expressed the view that the current system is not working or meeting the needs deaf students effectively. Comments made by these submissions include:

- “Attending University is still an exception”
- “As a teacher, parent and advisor I have seen it from many angles and it is not producing competent, successful Deaf adults”
- “The system continues to fail deaf children. The most recent KDEC ERO report from May 2010; 10% to 15% of the students have some degree of learning delay we need to question if this is due to psychological issues or a lack of early exposure to appropriate language role models.”

Four submissions raised concerns that the level of academic achievement is too low or that the level of academic achievement needs to be raised so that DHI students achieve at the same level as their hearing peers. One submission raised this point in relation to the satellite units. One submission commented that:

- “Expectations need to be raised allowing students to do NCEA level subjects not settling for unit standards but challenging the students to achieve, raise the bar, even if it takes a bit longer for them to get there.”
• Similarly, one submitter\textsuperscript{482} commented that the measure of the level of success needs to be linked to the New Zealand curriculum.

Other general comments were that:

• “The demographics and the educational needs of young people have changed. The function of education of DHI children is to provide sound and up to date education which will arm young people and provide for a positive future.”\textsuperscript{483}

• Options 2, 3 and 4 are less likely to improve student learning outcomes\textsuperscript{484}

• “The educational system for all Deaf students needs to specifically recognise that deaf students learn differently to hearing students and that not only should NZSL have standards for assessment, but Deaf English also. For example: Assessments need to take account of the fact that competence in written/oral language skills may not recognize conceptual understanding; Oral language skills are often vastly different to language skills.”\textsuperscript{485}

• Quality is determined by teachers, parents/families/whanau, and specialists together making decisions / choices by placing the student at the centre.\textsuperscript{486}

**Best practice research**

Four submissions\textsuperscript{487} commented on the need to research what is working and not working for the deaf education system and for deaf students. One submission\textsuperscript{488} noted that there is a lack of research-based evidence about the effectiveness of support currently provided to DHI students. Two submissions\textsuperscript{489} commented on the need to ask or interview people involved in deaf education or those that are part of the deaf community to find out what/who has and has not succeeded and why. One submission suggested that that this was important because:

• “Everyone has different experiences. All agree that Mainstream doesn’t always work and deaf School doesn’t either. Both areas need improving. In Denmark, the deaf school closed down and everyone went into the mainstream. Now a deaf school is being opened up again because there have been lots of problems in the mainstream.”\textsuperscript{490}

Two submissions\textsuperscript{491} noted the need for more research to be carried out to raise the achievement levels of DHI students or so that students achieve to the same levels as their hearing peers. One submission\textsuperscript{492} stated that research needs to be carried out to find out why DHI children often fail to achieve to the same levels as their hearing peers and to identify strategies that would provide better education opportunities.

\textsuperscript{482} 0078
\textsuperscript{483} 0169
\textsuperscript{484} 0130; 0132
\textsuperscript{485} 0153
\textsuperscript{486} 0017
\textsuperscript{487} 0098; 0131; 0186; 0244
\textsuperscript{488} 0244
\textsuperscript{489} 0098; 0186
\textsuperscript{490} 0098
\textsuperscript{491} 0083; 0122
\textsuperscript{492} 0122
Two submissions commented on the importance of defining best practice models for each deaf education centre, with one submission expressing the view that this would require adequate and independent research, and another suggesting drawing on the experience of Advisers on Deaf children and on DEC early intervention models.

One submission noted that current development, evidence and experience based practice and modelling of services is working well. The same submission commented that information sharing good practice and collective knowledge building particularly around assessment is also working well.

Other proposals relating to best practice models and research were as follows:

- “Deaf schools need to be open and there needs to be independent research. When the system is been implemented it should also be reviewed and a decision made on where to go from there.”
- “The strengths and weaknesses of other residential special schools such as Homai should be examined to see what they are doing well and where they are performing poorly. This information may be used to assist with any changes in deaf education.”
- “Identify strengths/weaknesses of the current system on an annual basis. Regular reviews are essential.”
- “Need to look outside of New Zealand for resources, talk to other providers and talk about where deaf education is going, what works and what doesn’t work.”

Training and professional development

Seven submissions commented on the need for more professional development or training for mainstream teachers with DHI children in their classes. Individual comments were as follows:

- “A yearly training day for teachers in the mainstream to learn more about how deaf children in the school are coping in the mainstream system and what to do to optimise their learning. One submission commented that they had informed the school on their child’s hearing loss, however the teachers were not aware of this and not taking notice and that they are not catering for him in class.”
- “The provision of 1 day courses for mainstream teachers by AoDCs and DECs specialist teacher need to continue.”
- “Teachers and teacher aides in the mainstream, who are not certified teachers of the deaf, cannot be expected to understand the complexities of supporting deaf children.”
“Training in hearing loss and all its complexities includes having knowledge about the various amplification devices that the students use.”

"Mainstream students supported by a teacher aide with little or no experience of deafness is unsatisfactory for example a very small knowledge of command signs in NZSL cannot be taken that the teacher aide is proficient in communicating in NZSL."

The mainstream course for teachers and teacher aides supporting the deaf learner and other workshops run by van Asch regional support SRT’s need to be extended and repeated on a regular basis so that all teachers supporting deaf students have regular professional support.

One submitter described the level of support they received as a teacher of DHI children in a mainstream school in Australia as higher than that provided in New Zealand.

Two submissions noted that deaf children in the mainstream may feel lonely or isolated through lack of conversation even though they are in a class of students their same age. One submission noted that they might be the only deaf child within the school community and that there is a real need for Deaf Resource Staff within the mainstream that provide mentoring and good role models for deaf children.

Other comments related to teachers and deaf students in the mainstream:

"Expectations of teachers need to be realistic and set achievable goals for children within the mainstream environment."

“Teachers do not understand the needs of deaf students in their mainstream classes. The expertise of the deaf advisors and ITD is the best source of knowledge. The role of specialist deaf educators in mainstream schools needs strengthening.”

“Teachers need to feel comfortable in accessing the services provided by Regional Centres so that they can learn how to best teach deaf students. Too many children are being put into the too hard basket by teaching staff and being left to their own devices within a mainstream setting.”

“Mainstream schools need to better support the work of RTDs. School organisation issues that affect the work of RTDs include, inappropriate class placements, the use of untrained teacher aides to support deaf students, restrictions imposed on students’ access to hearing aids outside of school time, school timetabling difficulties, particularly at the secondary level, and limited provision of withdrawal space in some schools for RTDs to use with students.”
Eight submissions\textsuperscript{515} expressed the view that people working with DHI students need to have specific training for their roles or that training programmes need to satisfactorily equip teachers to meet the needs of DHI students (including NZSL and deaf culture). Submissions included these comments:

- “Teachers should not be in the position of learning as they go along”\textsuperscript{516}
- “Training has become more generic and more theory based. Teachers of the Deaf are coming out of their training with not enough skills to teach the deaf children on their caseload”\textsuperscript{517}
- “There is a new concern that some schools are employing or using Special Education teachers who don’t have any training in Deaf education especially that they have limited knowledge in delivering speech, communication (NZSL & oral) and literacy programmes. Our greatest concern is that deaf education may become fragmented if any teachers without training in deaf education are allowed to work with deaf and hearing impaired students”\textsuperscript{518}

Three submissions\textsuperscript{519} noted that there needs to be more teacher training courses and professional development available once teachers have commenced working for a DEC. One submission commented that the training is inadequate\textsuperscript{520}. It was noted by one submission that NZSL needs to be given more emphasis\textsuperscript{521}. Another submission stated that teacher training needed to be increased to replace staff nearing retirement and reinforce present staff, and commented favourably on the training provided by VDEC\textsuperscript{522}.

Two submissions expressed the view that teaching staff need more training in NZSL. One submission commented that this was important because it may reflect upon achievement levels of the students\textsuperscript{523}. It was noted by the same submission that assessment tools and programmes need to be developed so that both deaf students and teaching staff can reach a good level of proficiency of NZSL\textsuperscript{524}.

Two submissions\textsuperscript{525} expressed the view that professional development is working well or that it should be maintained at the current level. One of these submissions\textsuperscript{526} commented that this has enabled skilled staff to keep up with developments in world knowledge and has in some instance contributed in the field of deaf education.

Two submissions\textsuperscript{527} commented that the Teacher of Deaf, Adviser and Audiology training courses are providing less technical training such as understanding, checking and maintaining children’s equipment. Both submissions noted the importance of having had good instructors. Comments made by these submissions included:

\textsuperscript{515} 0080; 083; 0122; 0145; 0147; 0153; 0154; 0185
\textsuperscript{516} 0080; 0153; 0154
\textsuperscript{517} 0122
\textsuperscript{518} 0185
\textsuperscript{519} 0155; 0220; 0254
\textsuperscript{520} 0254
\textsuperscript{521} 0155
\textsuperscript{522} 0220
\textsuperscript{523} 0092; 0155
\textsuperscript{524} 0092
\textsuperscript{525} 0017; 0102
\textsuperscript{526} 0102
\textsuperscript{527} 0073; 0255
• “This has resulted in teachers having an inadequate level of expertise in ensuring the technology
is functioning correctly, having very little diagnostic capability and are no longer available to
offer constructive assistance when issues arise”.

• “There is a great deal of disappointment at the level of hands on technology training.”

• “This urgently needs sorting as a high percentage of the daily work of these people relies on the
confident use and understanding of technical equipment.”

• “This must be addressed if mainstreaming of technology loaded students is to have a successful
outcome.”

• “The lack of trained people to deal with the technology is affecting those that are trained over
60% of my time is now taken up with supporting students, families, AoDCs, RTDs, TODs with
technology issues. It is frustrating and time consuming trying to help these people long distance
by telephone with issues that were historically addressed by a local properly trained adviser
service working in conjunction with technicians at schools for the deaf.”

Three submissions expressed the view that teachers and/or teacher aides needed to have sign
language skills. In relation to this, one submission proposed that Teacher of the Deaf training should
have NZSL as a pre-requisite, with a minimum standard to get into this programme. Other comments
were as follows:

• “If all staff are fluent in NZSL (one of our official languages) then they can work with a variety of
students. Currently, you have staff that are not fluent or able to use NZSL so can only work with
a select group of students, those that do not use NZSL.”

• “Having an understanding of NZSL can assist with communication whether the child is
profoundly deaf or not.”

• “Teachers need to be able to translate and be like an interpreter. Teachers need to have signing
skills and able to translate. Teachers should be learning sign language, deaf studies/culture so
that they can do their jobs properly.”

Five submissions expressed the view that there needed to be more deaf people working in the field. One submission suggested this was especially important in schools that provide NZSL as a curriculum subject. One submission commented that Deaf people should be able to access teacher training that is flexible, especially in relation to the subjects of Music and Māori.
Other comments regarding training were that:

- “There should be uniformity in the training of the professionals” \(^{541}\)
- “Itinerant teachers need to be trained up more and not do the work for deaf students” \(^{542}\)
- “Training of teachers is too spread out; all of the Deaf Research Unit should be in one place, especially if training is to continue to be on-line and part time” \(^{543}\)
- “Training should be available to interpreters that are already qualified and want to work in the compulsory educational area. A six month to one year programme that focuses on child and language development, working within the education sector - especially ethics as they may need to be different from the current interpreter ethics, mentoring, supervision, etc” \(^{544}\)
- “Teacher of the Deaf training should be Australasian provided and include the opportunity to specialize in one education method in a second year (i.e., a two year training course)” \(^{545}\)
- “Training programmes need to retain the appropriate ‘teacher of the deaf specialist’ component” \(^{546}\)
- “Appropriately trained staff and NZSL trained teacher aides should be paid according to their skills and experience” \(^{547}\)
- “Training for Resource Teachers of the Deaf from 2011 will have many excellent common components with other specialist Training” \(^{548}\)
- “There would be the opportunity to significantly increase the specialist workforce for deaf and hearing-impaired children through specialist training that would have a direct impact on the quality of services and education outcomes for ORRS verified deaf children” \(^{549}\)
- “The at-distance Teacher of the Deaf training is beneficial and engages teachers in areas away from urban centres” \(^{550}\)
- “A system for AODCs training that is New Zealand based is desirable” \(^{551}\)
- “Early intervention is highly specialised and requires ongoing training with a best practice focus. AODs are not able to develop these specialised skills” \(^{552}\).
- A suggestion that it was critical for the specialist workforce to remain in an environment which is supported through career development opportunities and ongoing professional development \(^{553}\)
• A suggestion that the training of RTDs needed to be maintained at the current level, with the comment that “This course must not be diluted and must not become a ‘Generic Special Needs Teacher’”\(^\text{554}\)

• A submission querying whether it was appropriate that AoDC and RTD should have access to the same training and achieve the same qualification\(^\text{555}\)

• A comment that Deaf people who want to be teachers of the Deaf should be encouraged to study, but there were too many barriers in the way\(^\text{556}\).

**Specialist workforce and staffing requirements**

Four submissions expressed the need for new teachers or different staff. Comments made in these submissions include\(^\text{557}\):

• “I would like to see the staff all re-applying for their positions in the new system”\(^\text{558}\)

• “Teachers stay and stay and get too comfortable. They lose the passion and reason for being a teacher of deaf”\(^\text{559}\)

• “Teacher of the Deaf work force is older and part of the candidate selection should include age and other skills e.g. some knowledge of NZSL, and oral language development”\(^\text{560}\)

• “Deaf Advisers are stuck in outdated thinking and lack understanding of all options available to children. For example I am aware of a recent case where Makoton Sign Language was still being promoted by an Adviser in preference to NZ Sign Language”\(^\text{561}\).

Two submissions highlighted a shortage of staff and the need for ongoing recruitment\(^\text{562}\). One submission commented that ongoing recruitment and retention of staff is essential in a successful service delivery model\(^\text{563}\). Two submitters felt that there is a shortage of staff that are fluent in NZSL\(^\text{564}\). Two submitters\(^\text{565}\) commented on the need for more professional staff. One submission\(^\text{566}\) stressed the need to keep existing dedicated personnel.

Three submissions commented on the need for a more stable staff base\(^\text{567}\). Two submissions felt that this was important because the staff gain a valuable insight into the progress of the children\(^\text{568}\). Another
submission commented that this was important because teacher changes are having a severe effect on the learning environment 569.

Three submissions expressed the need to ensure that the skills of the Teacher of the Deaf are matched with the student 570. One submission noted that selection of the support person should be done in conjunction with the deaf student and their family and that this was important because if the right choices are not made there will be failure in multiple levels, the most significant being the deaf student. If the right choices are made the deaf student can experience success and reach their full potential 571.

Three submissions noted that there needs to be manageable caseload numbers to ensure that a quality programme is delivered 572.

Three submissions requested specific specialist teaching services 573, as follows:

- “The reinstatement of the Deaf Resource Workers. We would like to see these positions become an integral part of our students learning environment” 574
- “For schools and students there needs to be a specialist who can share the knowledge and the support” 575
- “NZSL educational interpreters should be available and funded for by MoE in the compulsory education sector, including pre schools” 576.

Other comments relating to the workforce include:

- “The professionals working with deaf and hearing impaired students with special educational needs are crucial in supporting and guiding quality learning” 577
- “The quality of the services offered is largely dependent on the calibre of the staff” 578
- “Teachers are not meeting the needs of the vast majority of hearing impaired children” 579
- “Research shows that support staff and teachers must work together within the classroom to achieve the best educational outcomes for students with special educational needs” 580
- A suggestion that the role of AoDCs has changed considerably, that the AoDC appear to have been loaded with untrained staff and other duties, and that, as a result, the percentage of their caseload visited on a regular basis has diminished 581
- A comment that there is currently a confident specialist workforce and that the supply of expertise across the country is working well 582
• Favourable comment on the specialist skills provided by VDEC\textsuperscript{583}

• A comment that students with special educational needs have the right to high quality teaching and learning by trained and registered teachers who have a strong knowledge of the New Zealand Curriculum and are capable of working towards greater educational outcomes for the student\textsuperscript{584}.

• A suggestion that the programme was not well supported by highly skilled early intervention staff\textsuperscript{585}, together with the comment that “Early intervention is highly specialised and requires a unique set of skills. Currently, AoDCs are responsible for all children from birth to 18 years of age which limits their ability to specialise”\textsuperscript{586}.

Other comments relating to the quality of service

Three submissions commented on the need for greater emphasis to be placed on the educational outcomes of deaf students\textsuperscript{587}. It was stated in one submission that the education system needed to recognise that “Deaf children learn differently from their hearing peers, and that English as a second language is very difficult to learn”\textsuperscript{588}. One submission expressed the view that educational results should be held on a national database\textsuperscript{589}.

Other comments on the quality of services made in individual submissions were as follows:

• An account of one parent’s experience with getting access to Deaf education services, where what was described as a change in the rules for availability of services resulted in the submitter’s younger DHI child receiving a significantly lower level of services than the older DHI child and experiencing significantly poorer educational outcomes as a result\textsuperscript{590}

• “Parents need to see that their children can be educated in a mode easily accessible to them and Deaf students need to have the confidence that they can achieve”\textsuperscript{591}

• “Deaf and hearing-impaired children require unique and specialist skills in order reach their potential”\textsuperscript{592}

• “The change of provider was rushed and not enough time has been given to set up and deliver the full course in 2011. The programme has not yet been trialled and major areas of the course such as the delivery of the NZSL component and the practicums are not yet organised”\textsuperscript{593}

• “There will be opportunities to use the southern resource centre as a training facility for professional development in all areas of deaf education. This would also be in conjunction with the Teacher of the Deaf training now based at Canterbury University”\textsuperscript{594}
• “ORRS funding should not be provided to those who cannot do the job effectively e.g. those who cannot sign but are the teachers of profoundly Deaf NZSL students”\textsuperscript{595}

• “In light of the ‘baseline’ cuts occurring at the Ministry of Education, it is crucial to acknowledge that the specialists itinerating staff are frontline staff and remain employed by the Ministry of Education”\textsuperscript{596}

• “The current professional workforce has developed over many years under the current structure. Radical change may undermine the highly developed professional culture that exists in DECs. Workers who have interacted with international colleagues clearly indicate that overseas agencies and professionals look at the NZ set up with envy”\textsuperscript{597}

• “The strong performance management system at VDEC ensures performance standards and a self-renew process monitors the quality of service provision”\textsuperscript{598}

• “Current staff are more worried about preserving their jobs than about best practice”\textsuperscript{599}.\textsuperscript{594–0083, 595–0145, 596–0017, 597–0072, 598–0053, 599–0180}
Theme 3.4: Flexible/responsive services

Forty-four (4 advisors, 9 others, 19 parents/caregivers, 1 parent and teacher, 3 service providers, 5 teachers, 3 unknown) submissions addressed issues relating to the flexibility and/or responsiveness of Deaf Education services.

Thirty submissions in this category responded to the question, “Do you think the current system needs changing?”, with 27 answering “Yes” and 3 answering “No”.

Seventeen submissions (2 advisors, 4 others, 6 parents, 1 parent and teacher, 2 teachers, 2 unknown) supported the view that it was important for Deaf Education services to be responsive to the needs of individual students. A representative comment was that "Professional staff must ensure decisions are made based on the needs of the child, not what resource is, or is not, available. If the service is not available in an area and it is a requirement to enable that child to learn, then it must be provided". Individual submissions commented on particular aspects of this view, as follows:

- Deaf people need to learn a skill appropriate to what they can achieve.
- Current obstacles to achieving the ideal of programs individualised for each family and child include resource constraints, regional isolation and service fragmentation.
- An individual’s programme of services should to be responsive to changes in their learning needs as they grow and move through the education system.
- Having two DECs means that students had sufficient access to professionals who could assess their needs and plan for the delivery of the appropriate services.
- The current service is a battleground, being inadequate, not always age-appropriate or respectful to the individual.
- The current system does not have the flexibility to meet the needs of individual students, particularly those who use NZSL.
- A model which is based on the principle that the experts have all the knowledge is not appropriate in today’s environment.
- The need for flexibility in the deployment of ORRS allocations and van Ash, which should be used by people (not necessarily teachers of TODC) who best meet the needs of the deaf student.
- Support for a system which has centrally managed services, one management and administration centre and consistent delivery standards, which would ensure targeted services to both groups of children with similar needs and individual children with specific needs.
Three submissions commented that the current system is not meeting the needs of the majority of students, with one submission commenting that the current system doesn't offer families realistic choices.

Three submissions commented more specifically on areas where the current system was said not to be meeting the needs of students, as follows:

- Delivery of services in the northern North Island described as not appropriately targeted for the majority of students it is meant to serve.
- KDEC described as not currently matching the needs of outreach students, particularly oral students.
- VDEC described as not responsive to local community needs with the suggestion that it overly manages local RTD services.

A number of submissions commented on the need for funding to be allocated flexibly to meet the needs of children, with individual comments being as follows:

- Funding needs to be allocated to best meet the needs of children in the regions.
- Funding should be centrally managed to enable more flexibility with delivery and distribution of services and resources.
- Option 2 identified as the only option that may address the issue of a lack of flexibility in resource deployment.

Six submissions commented on the need for specific programs and services to be deployed flexibly:

- Support for giving ORRS hours to DECs.
- A call for clarification of the 0.1 & 0.2 FTE component of the ORRS system, with the comment that these hours are currently used differently in different parts of the country, and that Local areas need to have the flexibility to come up with their local solutions.
- The need for flexibility in the RTD service.
- Support for including .1 and .2 teacher time hours in whichever model is chosen and used flexibly to meet students' needs.
The need for flexibility in the allocation of resources between different services, giving as examples an NZSL interpreter or notetaker instead of a teacher aid\(^{623}\) and funding for rural-based families to purchase private decisions in their local area if speech therapy is not available\(^{624}\).

Comments expressed in individual submissions on the theme of flexibility and responsiveness of service included the following:

- Support for recognising educational interpreters and making them available to all school-age children if requested\(^{625}\). This position was based on the experience of the submitter’s child, who was described as being unable to access the benefits she would have received from attending a mainstream school because the DEC indicated that it could not provide interpreters at primary schools.

- The importance of recognising that children with hearing disabilities covered the width of the hearing spectrum, and for the new service provider system to recognise the needs of children who rely on spoken language as opposed to NZSL\(^{626}\).

- In addition, that the needs of children who are hearing impaired often differ markedly from children who are deaf\(^{627}\).

- The amount of time it took for equipment to be repaired, identifying this as a fault in the present system, which had too many levels of command\(^{628}\).

- The need for services to be mobile enough to support students needs commenting that this required a strong base to manage and develop resources. The conclusion reached was that the correct balance of philosophy was currently being maintained by having two DECs\(^{629}\).

- The importance of having local or regional offices to provide contact points for families and ensure that services are provided\(^{630}\).

Three submissions expressed views about the relationship between the two main approaches to deaf education, with individual comments being as follows:

- “There is no need to integrate the two main approaches to deaf education; They are so different that they need to stand independently of each other to be effective, as is commonplace overseas”\(^{631}\).

- “It is important to recognise that children with hearing disabilities covered the width of the hearing spectrum; the new service provider system needs to recognise the needs of children who rely on spoken language as opposed to NZSL. Every child has the right to learn, using the modality that it suits their abilities”\(^{632}\).
“Deaf children have the right to access information and their primary language, in NZ Sign Language, but... the needs of hearing-impaired children must also be met”

“There are major philosophical differences between the two DECs, which can result in parents being force-zoned into an approach that does not match their philosophical beliefs on the most appropriate learning option for their child.”

A number of submissions commented on the need for resources to be deployed to meet demographic changes.

Two submissions expressed the view that too much emphasis was being placed on the need to allocate resources to meet demographic changes in the Auckland area, noting that population growth was occurring throughout the country, and not solely in the Auckland area. Five submissions agreed that the allocation of resources needed to be flexible to accommodate demographic change.

Flexible/responsive services issues raised in discussions of Service Provision options

A number of submissions identified issues of flexibility and responsiveness in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.

**Option 1: Status Quo**

Four submissions commented that, under the current model, both DECs have been successful at deploying resources to respond and adapt to regional and local needs.

Two submissions commented that services currently provided by VDEC are well considered and responsive to population changes and the needs of children. Examples of innovative practices for students in local schools or isolated settings and a description of the process for moving staff from the core school to regional services to respond to student needs were provided by submissions.

One submission also commented that the current model did not limit the ability of providers to deploy resources to meet the demographic changes outside of their service region.

Three submissions advocated that the current model (Option 1) would be more responsive to those affected by decisions than a single governance arrangement (Options 2 and 3) which would take decision making or services a step further away. One submission commented that New Zealand was too spread out geographically to enable one national provider to understand the varying needs of each area, and that having two providers with satellite sites regionally) would enable the needs of all to be understood better.
met. One submission\(^{643}\) emphasised that delivery based around DECs would be more sensitive to local needs than a national provider, especially in areas of low density.

**Option 2: National Provider**

Three submissions\(^{644}\) commented on the fragmentation and lack of coordination with the current system.

Nine submissions\(^{645}\) commented that they supported Option 2 because it would keep funding as close to frontline services as possible.

Six submissions\(^{646}\) described Option 2 as flexible or responsive to needs, with one representative comment being that "Areas with a greater concentration of Deaf and Hearing Impaired students would be able to receive a proportionally higher amount of the funding available. It would be easier to track and aid transient students who currently shift from school to school and hence from region to region"\(^{647}\).

Other comments in individual submissions were as follows:

- Option 2 would allow retention of the things that currently work well, while allowing changes that would be more flexible\(^{648}\)
- "Although Option 2 and a single national provider is the best hope for deaf education, the national provider needs to cater fairly for the divergent needs of deaf and hearing impaired children"\(^{649}\)
- "Deaf education must be carefully realigned to provide an equitable and effective service using the available funds for all those that require a service"\(^{650}\)
- A suggestion that, if the DECs were to be discontinued and students mainstreamed, Option 2 or 3 would be more responsive\(^{651}\)
- An expression of concern that Option 2 would not be responsive to regional needs, commenting that this option "Builds an empire and does not allow for regional needs ... assumes all services needed throughout the regions will be the same and has one organisation making it a one size fits all ... Smaller regions will not have the flexibility of having resources available and within a manageable distance for access. New Zealand is long and thin. A service in one island will deplete the needs of students living a long distance away"\(^{652}\).

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\(^{643}\) 0178
\(^{644}\) 0091; 0108; 0255
\(^{645}\) 0001; 0010; 0029; 0030; 0035; 0096; 0140; 0169; 0180
\(^{646}\) 0079; 0095; 0120; 0153; 0233; 0238
\(^{647}\) 0120
\(^{648}\) 0071
\(^{649}\) 0066
\(^{650}\) 0163
\(^{651}\) 0009
\(^{652}\) 0219
Option 3: National Coordinating Body

Two submissions\textsuperscript{653} expressed the view that Option 3 could foster closer Special Education.

One submission\textsuperscript{654} commented that a mixture of governance and direct funding should allow for flexibility, as each child will have varying needs in different localities.

Two submissions\textsuperscript{655} expressed concerns that Option 2 or 3 would remove management and governance from the areas of high deaf population.

Option 4: Regional Fund Managers

Eight submissions\textsuperscript{656} supported Option 4 because they considered that it would focus on local solutions to local needs.

One submission\textsuperscript{657} commented that there was no evidence to suggest any further devolution to services regionally would result in more effective or efficient services.

\textsuperscript{653} 0117; 0122
\textsuperscript{654} 0011
\textsuperscript{655} 0097; 0145
\textsuperscript{656} 0011; 0013; 0052; 0122; 0175; 0192; 0231; 0257
\textsuperscript{657} 0081
Theme 3.5: Type of service

Eighty-nine submissions (9 advisors, 16 others, 35 parents/caregivers, 4 parents and teachers, 8 service providers, 1 student and teacher, 12 teachers, 4 unknown) raise issues relating to the availability of different types of Deaf Educational service.

Issues in this category included comments on particular services and types of equipment, such as cochlear implants, hearing equipment, use of technology, Individual Education Plans (IEPs), the need for early assessment, services for oral learners, and newborn hearing screening (both delivery and areas for improvement).

Sixty submissions in this category responded to the question, "Do you think the current system needs changing?", with 53 answering “Yes” and 7 answering "No".

Mainstream/In-class services

Four submissions commented on the need for the provision of educational interpreters\textsuperscript{658}. One submission noted that the current system ignores research that says a teacher aide is not sufficiently skilled to be working in the role of an educational interpreter and that the use of teacher aides as interpreters are causing long term damage\textsuperscript{659}. It was noted by one submission that the unreliable funding of ORRS means that schools are not able to employ a qualified interpreter long term\textsuperscript{660}.

Two submissions identified a need for additional teacher aide support\textsuperscript{661}.

Comments in individual submissions were as follows:

- A request for other in-classroom support services in the form of note takers and language assistants, together with a suggestion that these should become a funding priority to help children access the curriculum\textsuperscript{662}
- Mainstream education services have become more equipped to meet the needs of Special Education students, and that support for DHI students needed to recognise this in order to avoid duplication of services and assessments\textsuperscript{663}
- Teacher On a s and management staff needed to be aware of the resources available for every DHI child to reach their ultimate potential\textsuperscript{664}
- Many of the specialist methods used by RTDs are now mainstream techniques used by mainstream teachers\textsuperscript{665}.

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\textsuperscript{665} 0115
Technology

A number of submissions commented on the importance of technological supports for DHI children, with one representative comment being that using technology allows for student access to professional services for a higher number of students at minimal cost. Four submissions expressed the view that adequate access to technological supports was particularly important in rural areas, so that children can make contact with other deaf children more easily.

Other comments on individual submissions relating to the use of technology were:

- The management and optimisation of the technology require constant attention.
- There has been increased support through technology.
- Deaf children can only function in the mainstream through correctly functioning technology.
- "Technology is not a magic cure. They are still Deaf when it is taken off or needs repairing."

Five submissions supported the use of video conferencing, identifying the associated benefits as being:

- It saves time and money that the Itinerant teacher of the deaf would otherwise spend on travel.
- It would link students in different parts of the country.
- It would enable children to communicate in different deaf units to communicate, in speech or sign language.
- It would enable students in more isolated regions to access the services of the deaf education.
- It would create a sense of community.
- It would also provide improved access to interpreter services.

It was noted by one submission that the Ministry of Health is currently working with Deaf Aotearoa to support increased access to the services and information for the Deaf community by setting up video-telephone services in Deaf Access centres. This new service will be trialed in five settings this year.
Submissions offered suggestions about other types of technology that should be available, as follows:

- The use of blogs, TV, internet to connect people and use innovative ways of communication
- Texting and computers
- The use of the NZ Relay service
- Live captioning using voice recognition software.

A number of submissions commented on FM systems in particular. Comments made by submissions were as follows:

- FM systems should be provided to all oral children with moderate to profound hearing losses
- FM systems need better integration
- FM system applications require an equipment trial and application that is long, arduous and unnecessary. AoDCs spend valuable time completing FM applications and less time on the front line supporting students
- It can take months to set up a FM system
- Schools use FM systems to improve the quality of learning for not only the deaf students but also those who have a hearing impairment that may not qualify for specialist services.
- Research supports the installation of FM sound systems in all classrooms; the submission describes the benefits as follows: "We installed one at our own cost into our child's primary school classroom - the teacher loved not having to strain her vocal chords to be heard, our child and classmates could hear the teacher clearly and the hearing impaired child is not singled out as with a personal hearing aid"
- "An FM system is only as good as it is working for the educator".

Eleven submissions noted that technology is improving and/or that the system needs to take into account the increasing use of new technologies (3 advisors, 2 others, 2 parents/caregivers, 1 service provider, 2 teachers, 1 unknown). Individual comments were as follows:

- "Hearing aids and cochlear implants are better and better every year"
- "The need for change is virtually 100% due to technology (hearing aids, FM equipment and cochlear implants) its effectiveness and its resulting impact on base school rolls. The upgrading
and continuation in regard to support of this technology is key to the future success of the mainstreamed students."\(^{694}\)

- With continuing advances in technology consideration and funding needs to be given to the use of technology to enhance access to education for the deaf and hearing impaired students.\(^{695}\)
- “The rapidly changing technology landscape is providing opportunities to better support education and learning for DHI children, their families and whanau, nothing in the options provided would change this.”\(^{696}\)

Submissions commented on the importance of having a strong technical support service\(^{697}\). Comments made in relation to this were that:

- “If the hearing equipment is not working properly they might as well all stay at home.”\(^{698}\)
- “Most RTDs (and some AoDCs) are floundering and unable to recommend and support the best technology for students. All who support deaf students need to be able to recognise technology issues and be able to trouble shoot both hearing aids and FM. This is something that needs to be funded and included in whatever model of provision is decided.”\(^{699}\)
- “Students rely on technology which needs specialist monitoring, instruction, and management to provide their access to sound.”\(^{700}\)

One submission commented on the importance of the technician position in the van Asch region,\(^{701}\) and suggested that having an independent organisation such as van Asch overseeing repairs to hearing aids (carried out by a number of firms, because of the variety of brands and models used) was important to control results and costs.\(^{702}\) Another submitter argued that audiology services in DECs are not essential as they are available at local hospital clinics.

One submission suggested that Itinerate Teachers of the Deaf should take responsibility in checking the child’s equipment and sorting out any technical repairs, to avoid the need to remove the child from school to attend technical appointments.\(^{704}\)

### Cochlear Implant Services

A number of submissions commented on the cochlear implant programme, with comments in individual submissions being as follows:

- A suggestion that the cochlear implant programme needed to be reviewed, together with a comment that “I am unaware of any research that substantiates the success or failure of this programme as applied to children and educational achievement.”\(^{705}\)
A comment that cochlear implant services have twice been reviewed in recent years on behalf of the Ministries of Education and Health, and that improvements to services were being progressed\textsuperscript{706}

A suggestion that given the short space of time since the last Ministry of Education review it would be disruptive and counter productive to propose further significant changes to habilitation services for preschool cochlear implant children at this point \textsuperscript{707}

Comments that the cochlear implant programs work well at present, and that substantial changes may compromise the delivery of these health services \textsuperscript{708}

A comment that services around hearing aids and cochlear implants need greater balancing \textsuperscript{709}

A comment that deaf children can only function in the mainstream with their technology functioning correctly or by using NZSL \textsuperscript{710}

A comment that children in oral/aural deaf education are usually heavily dependent on personal high technology equipment, including cochlear implants \textsuperscript{711}

A comment that, while implants being carried out in New Zealand are technically successful, the learning outcomes of children with implants are below those experienced overseas, with New Zealand surgeons privately funding habilitation through the Hearing House Trust to improve learning outcomes. The submission suggests that it is "Quite frankly disgraceful that the huge cost of cochlear implants is not adequately supported through the MoE DHI programmes" \textsuperscript{712}

Comments that programmes being run at Hearing House are effective in improving learning outcomes for children with implants \textsuperscript{713}

There needs to be another outpatients centre for cochlear transplant recipients in Wellington because of the rise in the number of implants, and to reduce travel and accommodation costs for those in the lower North Island \textsuperscript{714}

A comment that the MoE funding and delivery model is inadequate for optimal outcomes for habilitation of CI children, particularly at preschool ages \textsuperscript{715}

A concern that centralising governance of CI services alongside other deaf education services would see loss of the specialist nature of the service \textsuperscript{716}.
Other Technology issues

One submission commented on the need for provision of a dry box to each child with hearing aids, to avoid loss of service due to moisture damage and also save money in repairs\textsuperscript{717}.

One submission suggested that there needed to be improvement of classroom acoustic for optimum outputs of hearing aids and cochlear implants\textsuperscript{718}. The same submission noted that digital hearing aids can reduce background noise to a greater degree than conventional or analog programmable hearing aids\textsuperscript{719}.

NZSL / Oral

A number of submissions commented on the development of language skills in DHI children, with comments in individual submissions being as follows:

- A comment emphasising the importance of teaching NZSL and deaf studies\textsuperscript{720} in order to help children develop confidence, and find their identity as deaf children, and communicate with other deaf children\textsuperscript{721}.
- A suggestion that Deaf Schools and Language Nests should be compulsory for deaf children for the first eight years of their life, when language development is critical, and that this was particularly important because most deaf children come from a family that has no knowledge of deafness or NZSL\textsuperscript{722}.
- A suggestion that multi language skills, including oralism and signing, should be taught to all DHI children\textsuperscript{723}.
- A suggestion that an inclusive system needed to be maintained, that offered a wide range of programmes including NZSL, oral language, auditory/oral approach and CI services and habilitation\textsuperscript{724}.
- A comment that there have been positive changes in New Zealand deaf education through New Zealand Sign Language and the commencement of having Deaf adult involvement\textsuperscript{725}.
- A comment that too much time is spent on 'correcting' hearing rather than delivering language access, with the submission offering the following personal experience: "I'm almost 40 years old, all the hours spent on teaching me to lip-read, talk to and 'fit' me into the hearing world has been wasted. At 40 my lip-reading, speech skills are a constant struggle to maintain. I'm glad to have learnt NZSL, this has expanded my sign languages to being able to use American Sign Language and International Sign. I was fortunate to spend a year as an Exchange Student in USA. That was the only country I feel that has given me a 'real' education and today I often say that I..."
got my real education in USA rather than NZ. NZ has placed far too many barriers for Deaf by limiting their opportunities and talents early on. Equal quality accessible education is the key. A comment that some parents do not want any signing for their children and a complete non-signing option must be available in the mainstream, and in the deaf schools: “Total signing only to me is a very frightening situation and narrows kids options to life in a hearing/speaking world.” A suggestion that KDEC has created a tension between NZSL and oral learners and this has created a system that does not equitably serve needs of all learners, in which RTDs do not receive the attention and resources tailored for their needs and are unable to redirect the KDEC philosophy to better support the outreach needs.

A comment that, for the majority of KDECs students, access to high quality education is directly linked to their access to competent education-experienced NZSL users and interpreters, and that there is a clear need to increase the number of staff who operate at an advanced level of signing.

A comment to that deafness should be celebrated not mourned – “Families need support to overcome their grief and to be provided ALL communication styles for a best, well informed decision.”

**Early intervention**

Two submissions commented that early intervention services for young children were working well.

Two submissions praised the early intervention programme at VDEC and supported its retention.

Ten submissions emphasised the critical importance of adequate provision of early intervention services (1 advisor, 3 others, 3 parents/caregivers, 1 parent and teacher, 1 service provider, 1 teacher), with comments in individual submissions being as follows:

- “Additional preschools need to be established in Wellington and Christchurch, to provide an environment that meets the specialist educational needs of deaf and hearing impaired children.”
- “Many children with hearing loss require early speech language therapy to develop age appropriate language, but this service is overloaded at present.”
- “There needs to be a more balanced early intervention, not only medical but also sociolinguistic.”
• “Early intervention requires an on-going structured programme which is individualised for each family and their child. Currently, resource constraints, regional isolation, and service fragmentation make this difficult to achieve”\textsuperscript{737}.

Three submissions commented on the importance of identifying children with partial or impaired hearing earlier\textsuperscript{738}, with comments in individual submissions being as follows:

• A suggestion that a hearing Stanine level type test be introduced, to help assist with assessment of a whole class for funding purposes\textsuperscript{739}

• A comment that that schools are finding access to hearing testing for students difficult, and that there is a strong preference for 5 year old testing\textsuperscript{740}

• A comment that there needs to be better and more varied testing to highlight and/or reduce misdiagnosis\textsuperscript{741}

• A comment that the newborn hearing screening programme should not be changed because the team approach that is in place is working well; the same submission observed that “We need to continue to improve this service. We have been very frustrated by the divisive attitude of some of the staff from the regional provider”\textsuperscript{742}

• A comment that the generic verification system does not work for Deaf and hearing-impaired learners, and that children with a mild to moderate hearing loss who are not verified will fall behind their hearing peers then require intensive support\textsuperscript{743}.

**IEP**

Seven submissions commented on the contribution made by IEPs, with comments in individual submissions being as follows:

• IEPs should be the cornerstone of planning for each child, with regular reviews and training for coordinators of IEPs so they know how to run and document them\textsuperscript{744}

• IEPs are currently used effectively, and there is a willingness to work collaboratively to improve these processes\textsuperscript{745}

• IEPs must be student and family focused\textsuperscript{746}

• There must be regular reviews of the goals and the student’s progress toward achieving these goals\textsuperscript{747}

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\textsuperscript{737} 0088
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\textsuperscript{742} 0119
\textsuperscript{743} 0083
\textsuperscript{744} 0011
\textsuperscript{745} 0017
\textsuperscript{746} 0083
\textsuperscript{747} 0083
• Parents must be involved in all aspects of development and monitoring\textsuperscript{748}
• IEPs need to be action, goal or outcome focused\textsuperscript{749}
• IEPs ensure that teachers are informed of the student’s needs around communication strategies and technology\textsuperscript{750}.

One submission noted that some schools refuse to set up an IEP for students\textsuperscript{751}.

**Audiology**

Six submissions commented on the Audiology service, with comments in individual submissions being as follows:

• "It is important that parents attend their child’s audiology appointments at DECs; currently, many parents do not, thereby missing out on an opportunity to increase their understanding of their child’s hearing and likely language outcomes. This lack of parental involvement could be avoided if the children attended their local hospital audiology clinics, which have specialist paediatric audiology equipment not provided by DECs, and which are run by paediatric audiologists"\textsuperscript{752}
• "Audiology clinics are expensive to run; the DEC audiology clinics are another redundancy in deaf education"\textsuperscript{753}
• "DEC audiology clinics provide excellent support with FM applications and fittings for the deaf unit classes which local hospital clinics cannot provide. An AoDC type role would be needed to ensure this service continues"\textsuperscript{754}
• An expression of concern about adequacy of the service provided by an audiology service: "As an example our child has had hearing aids for three years and we only recently found out they have different programmes in them for different situations. We still don't know what they do and can’t access this information"\textsuperscript{755}
• "Audiology services from Hearing House need to be provided in Hamilton, to cut down on trips to Auckland"\textsuperscript{756}
• A comment on the amount of time that can be involved in setting up appointments at a hearing clinic, and getting hearing equipment to suit the child completed\textsuperscript{757}.

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Tertiary Education

One submission expressed the need for universities to have units like those in schools to train deaf people in the other fields of professional specialisation.\(^{758}\)

One submission highlighted the need for the current system to be expanded to cover Deaf and hearing impaired students who transition to tertiary education, commenting that:

- "Currently there is no requirement to have staff who are trained to work at the tertiary level with deaf students. Once these students leave secondary school they are on their own basically. If there was a provision for trained teachers of the deaf to also be involved in an advisory or training role then I believe we would see more deaf students achieving their potential and completing their chosen course of study.\(^{759}\)"

DECs

Four submissions commented favourably on VDEC's ability to deliver a comprehensive range of services.\(^{760}\)

One submission commented that children and their parents within the KDEC zone cannot opt to go to another Ministry-funded specialist centre that better suits their philosophy for managing their disability, and that KDEC therefore needs to provide for all DHI learning and technology preferences.\(^{761}\)

One submission commented that, in order to assess whether service delivery reform is necessary, the Ministry needed to ask whether the agency delivering specialist, but theoretically un-streamed resources, is actually delivering.\(^{762}\)

AODC

Six submissions commented on the role of the AODC. Comments in individual submissions were as follows:

- "Having locally based AoDCs is important because they enable building of connections and understandings between specialist teacher roles, maintaining relationships with Early Intervention that facilitate opening doors for families with deaf children, are able to use their knowledge of local schools and solutions to help prioritise resources and fairness of provision and other support programmes for children, have input into decision making about Teacher Aide and use of Specialist Teacher from ORRS programme, provide an inclusive approach, play an important role as communicator and advocate between families and health audiology, paediatric and social services and between health and education, and can play a significant role in areas where the Newborn hearing screening has been slow to roll."\(^{763}\)
• “AoDC services have become overloaded, with consequent problems including parents and children receiving no support during the critical phase of hearing aid fitting and the initial weeks of hearing aid use, and teachers not being given basic information regarding the impact the child’s hearing is likely to have in the classroom and how to insert the hearing aids. It is concluded that such problems will continue unless additional AoDC hours are made available”764

• “Very happy with the way our Advisor works with our child and communicates with us as Parents. The support we have received from our AoDC and van Asch have helped also. We feel if every region looked at this module, we feel everyone would be as satisfied as us”765

• “There should be an advisor of the deaf who sits above itinerant teachers. Then ordinary teachers could get knocked into line by the ITD and advisor”766.

Issues around the respective roles of AODCs and RTDs

Three submissions commented on issues around the respective roles of AoDCs and RTDs. Comments in individual submissions were as follows:

• “In the future there may need to be a greater number of AoDCs relative to RTDs, to assist deaf children to function in mainstream schools”767

• “Concerns about the future role of Deaf Teachers and Deaf AoDCs in providing a better future with a partnership of Deaf working with hearing counterparts”768.

Resource Teachers for the Deaf / TOD

Seven submissions commented on issues around the roles of RTDs. Comments in individual submissions were as follows:

• Access to Teachers of the Deaf should be available from early childhood769

• “Feedback that schools I am involved with are very happy with the service provided by RTDs in our area. I’d like this to continue”770

• RTDs should be used in schools771

• “The RTD service should be disestablished, because it is not meeting the needs of deaf children in mainstream schools; RTDs usually remove children from their classrooms and provide a service which does not support what is happening in the class and isolates them from their peers. The resources freed up from disestablishing the RTD service could be used to improve training of regular class teachers and strengthening the in-class support available for children”772
• The criteria for service from RTDs should be reviewed as students needs have changed over the years.

• "The current system of DECs/RTD services does not take into account the Universal Newborn Hearing Screening and Early Intervention Programme (UNHSEI), advances in early intervention, advances in technology or the fact that most deaf/HI children are educated in the mainstream, with the accompanying expectation that deaf/HI children will arrive at school with age appropriate speech/language skills."  

• RTDs should be trained in taking ear-mould impressions to help alleviate the problems for parents in rural areas, the long wait for appointments at Audiology, or even for AoDCs to visit to take impressions.

• There are inequities within the RTD service.

• An account of positive experiences with an RTD, together with the comment that RTDs fulfil an important, specialised role that Education Support Workers and AoDCs cannot.

• Criticism of the rule that RTDs can only work with any one child for a period of four years, based on personal experience.

• “All RTD and TOD in the country should have access to the same professional development opportunities in their specialist areas, e.g. NZSL, CI, oral language and literacy.”

• Support for allowing AoDCs into school before the child turns five, based on personal experience.

**ORRS Funding**

Two submissions commented on issues around ORRS funding. Comments in individual submissions were as follows:

• “The 0.1 and 0.2 additional teacher component of ORRS should be more flexible to provide other specialist services. Each Deaf or hearing-impaired child must have regular Individual Education Plans (IEPs) – a minimum of two a year. The IEP must be seen as being the guiding document for the provision of services and resources. Goals must be realistic and reflect the needs of the student.”

• “GSE needs to become more involved in providing specialist services around Deaf Children in the area of ORRS funding of Specialist Services. For example, most deaf children do not need access to a music therapist or occupational therapist, but require a more targeted approach to specialist services e.g. people proficient in NZSL and Deaf Culture, councillors or other people who can assist children, families and schools in working with children who experience severe
isolation (rather than implementing strategies for these children to become part of an inclusive society).\(^{782}\)

**Social**

Two submissions commented on the importance of addressing the social or emotional needs of DHI children in a peer setting.\(^{783}\)

One submission noted that DHI students “Need more support so that they continue wearing hearing aids in class. Peer pressure and a desire not to be different impacts so much on them that they choose to not hear teaching and this impacts on the jobs they will be able to obtain because of a lack of qualifications.”\(^{784}\)

**Other**

Other comments and suggestions regarding “Type of Service” issues were as follows:

- “There are some children that are rarely visited by Deaf educators and are being taught by teachers who have very little knowledge how to teach hearing impaired children.”\(^{785}\)
- Deaf education resources need to be expanded to provide support for the Deaf and hearing impaired students to learn and be interested and motivated in their own learning.\(^{786}\)
- Make more opportunities available for hearing people (adults and children) to learn the Deaf Language.\(^{787}\)
- Development of local curriculums should be a priority.\(^{788}\)
- A comment that students are often outnumbered in classrooms with adults, which becomes crowded and unnatural.\(^{789}\)
- Favourable comment on the services delivered by GSE, based on personal experience.\(^{790}\)
- “To make sound decisions on service delivery requires accurate and comprehensive data, including age distribution of DHI children, population dispersion, preferred communication style (oral or sign), and assistive devices used.”\(^{791}\)
- “The running down of oral/aural education services created the necessity to set up an alternative service outside the state education system. This has been a resounding success and the Hearing House charity now works in co-operative joint venture with Kelston Deaf education Centre.”\(^{792}\)
• “Health and education services are equally involved in the management of DHI children. In the intensive early years physical proximity between audiology and habilitation services is ideal. There are also benefits to clients if adult and paediatric cochlear implant services are associated. While Ministry boundaries and funding sources treat health and education separately, young deaf children with cochlear implants in particular are best served by seamlessly integrated health and habilitation services”\textsuperscript{793}

• “The experts are deaf people themselves, they have gone through the system so we all need to work together”\textsuperscript{794}

• “There should be standards because there are no challenges for deaf children”\textsuperscript{795}

• “There is a need to strengthen the deaf cultural perspective in relation to medical inputs in the planning and resourcing of deaf education, particularly within early intervention (Advisory) services and within the ORRS verification process”\textsuperscript{796}

• “Enhancing ‘outreach’ services would also align with the recommendations from the cochlear Implant Service Habilitation review”\textsuperscript{797}

• A description of difficulties encountered in getting access to services, including difficulties with getting information, getting continuous service, getting access to hearing advisors, in hearing advisors getting access to schools, concluding that all teachers need to be made aware of the needs of students in their class and how best to meet those needs, that parents need to be listened to, and that hearing advisors need to have mandatory access to schools\textsuperscript{798}

• There should be a psychologist at each deaf school working alongside deaf students and ensuring their education is progressing well and not leaving them behind\textsuperscript{799}

• Auditory Processing Disorder should be a mandatory part of education and possibly health training, since it is largely undiagnosed and misunderstood\textsuperscript{800}

• A postgraduate student reports on the findings of his/her thesis, which indicates that providers do not have the specialist knowledge required to support DHI students in a way that provides equality of access to education at a level consistent with the UN Convention on Rights of People with Disabilities, concluding that there should be provision for trained teachers of the deaf to also be involved in an advisory or training role\textsuperscript{801}

• A range of proposed improvements, including more inclusive environments in mainstream schools, greater awareness of advances in the understanding of spoken language and greater support for developing spoken language, continuing advances in the understanding of cognitive and linguistic foundations or learning by deaf children, universal newborn hearing screening, access to cochlear implants, effective and timely early intervention services for families of deaf

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\textsuperscript{796} 0082
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children that are family centred and interdisciplinary and transdisciplinary and based on the philosophy of informed choice.  

- A comment that the Discussion Paper is probably more relevant for students who go to a special school for the deaf, noting a personal experience of good support from a teacher specialized in working with deaf students.

- A comment that Special Education service pathways and service standards reflect the move towards schools taking responsibility for the learning of DHI students, but that this is less so for DECs; concluding that “DHI children will always need teacher of the deaf specialised knowledge during their education, but that this needs to be managed and targeted to address needs which are driven by the IEP process, not driven by the needs of a Deaf Education Centre's goals; it also needs to empower mainstream educators (including early childhood teachers and teacher aides) through inter and transdisciplinary approaches.”

Type of service issues raised in discussions of Service Provision options

A number of submissions identified “Type of Service” issues in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.

Option 1: Status Quo

One submission outlined how the regions in Option 1 align with the current boundaries of the Northern cochlear Implant Trust and the Southern Hearing Charitable Trust, and suggested that there could be an impact on the provision of children's habilitation services if regions or services provided by the DECs changed as a result of the current review. This submission also highlighted the potential impact of any changes in boundaries or service arrangements at the DECs on the hearing aids funding process.

Option 2: National Provider

Two submissions did not support the notion that a national provider model (Option 2) would result in the delivery of better services to users of CI services in New Zealand. According to one submission:

- "Any attempt to include cochlear implant habilitation under a national deaf education provider would lead to significant service fragmentation in the programme. In particular the separation of cochlear implant audiology and habilitation would have a detrimental impact on service delivery, and ultimately on outcomes for children."
Theme 3.6: Management/administration

Overview

Forty-one submissions raised issues in relation to the management and/or administration of Deaf Education services (5 advisors, 11 others, 11 teachers, 1 parent and teacher, 1 parent/caregiver, 1 parent, teacher and student, 4 service providers, 5 teachers, 2 unknown). This category includes comments made about levels of management/bureaucracy associated with service delivery models, and concerns that Options 3 and 4 may mean additional layers of administration (and therefore remove funding from the frontline). This section also includes debates on the value of a national organisation. Another key theme in this section is school governance and the role and membership of Boards of Trustees and parental involvement on Boards.

Comments within this category can be broken down further into the following themes:

- Bureaucracy
- Other management/administration comments or issues.

Bureaucracy

Three submissions commented on the level of bureaucracy in the current system. Two submissions commented on the extent to which the current system was driven by the bureaucracy rather than the needs of students.

Two submissions commented on management-related issues. One submission suggested that there was "A lot of middle management at specialist education centres". Another comment was that there needed to be a management structure that allowed reflection, accountability and supervision without multi layers of redundant management.

One submission commented that "Administration is heavy".

Other management/administration comments or issues

One submission commented that individuals with vested interest have imposed their views on aspects of Deaf Education and that this is backwards looking rather than focusing on the needs of children with hearing loss today and in the future.

One submission noted that there is insufficient critical mass in deaf education in New Zealand to warrant two parallel DECs.

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Management or administration issues raised in discussions of Service Provision options

A number of submissions identified management or administration issues in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.

**Option 1: Status Quo**

Two submissions commented that they agreed with the identified advantages in the current management and governance model and did not believe there were any negative issues inherent in this model.

In relation to the DEC, one submission commented:

- “I do not see any advantage in changing the current governance and management structure as the two DECs have common goals, with the management teams meeting at least twice per year with an opportunity to develop future vision, sharing and developing ideas.”

Two submissions were concerned about the additional resources and management needed for the other options.

- “There seems to be an over-abundance of management in both deaf schools, will another system not add to the number of managers and therefore an increase in costs.”

Two submissions commented that the proposed management structure would need to be identified and transparent.

Comments in individual submissions were as follows:

- A comment on the likely increase in bureaucracy
- A comment that ‘bureaucratic changes at a higher level don’t really solve anything’
- A suggestion that the disadvantages of the status quo could be worked on without changing the service provision model
- A suggestion that Option 1 would work if more Deaf people were involved in decision making
- An expression of the view that Option 1 would not work because “It continues with a system to support an entirely different model of service provision designed and operating before the philosophy of inclusion became the driver for NZ special needs education, before the governance changes in Tomorrow’s Schools, and the funding changes of SE2000”
A comment that the submitter "Did not want the current service model changed so that we simply have something else to get used to".

Option 2: National Provider

Two submissions commented that for a small country like New Zealand, it made sense to only have one service provider, as suggested by the national provider model.

Other comments in individual submissions were as follows:

- The National Provider in Option 2 should be an organisation other than the DECs, because they are currently not utilising funding to meet the needs of their broader community.
- The governance framework and management structure of GSE should be used to assimilate staff and services for mainstream deaf and hearing impaired students.
- The board of management of the national provider under Option 2 should be based in Wellington.
- The national provider would ideally have one head office and two deaf schools (one in the North Island and one in the South Island) with a CEO in each.
- There should be two deaf schools within the national provider model; this arrangement to work, school boards would need to communicate regularly.
- In order to put Option 2 in place, a new crown agency should be set up to provide the services and supports necessary to ensure that the national provider is able to deliver its services in an effective and efficient manner.
- A comment querying whether a national provider would allow performance to occur without suffocating it in bureaucracy.
- Concerns that a national provider would add a further level of bureaucracy.
- A suggestion that Option 2 would "Reduce current top heaviness. Where funding decisions seemed to be far removed from students".
- If Option 2 was selected, the national coordinator would need to be carefully selected and deaf professionals would need to take as much of a lead role as hearing.
- Concern that a national provider could be captured by deaf politics.
• An expression of the view that GSE should not be the fund holder

• The national provider needed to be responsible for deaf education in mainstream schools, because mainstream schools are not aware of the needs of deaf or hearing impaired students

• Support for consumer groups being represented in the national provider: “Option 2 is the best fit out of the available choices. This could be an umbrella type organisation however it will need ... control ... to ensure changes happen. There is still a lot of work, consultation and lobbying that needs to occur to ensure that the MoE clearly understands the need for the umbrella body to have true representation of its consumer groups. It is important that the two Deaf Ed Centres don't just get combined together and then labelled as a cohesive and holistic organisation that has the ability to have a national view, there needs to be a restructuring of positions and ensuring that the right people are in the right roles”

• If Option 2 were chosen, careful consideration would need to be given to how the North and South Island regions would be represented at the Board of Trustees level, and also to how the unique identities of the two DECs would be preserved

• A suggestion that any problems with Option 2 could be addressed by employers of service providers.

**Option 3: National Coordinating Body**

Thirteen submissions (2 advisors, 4 others, 4 parents/caregivers, 1 parent, teachers and student, 1 service provider, 1 teacher) raised concerns that Option 3 would add additional layers of management and bureaucracy.

Eight submissions were also wary of the degree of influence or authority a national coordinating body would have on deaf education, with individual comments including the following:

• “It is difficult to understand how this body could ‘influence providers to achieve deaf education goals when it has no authority to manage funds or directly provide services”

• “There is no guarantee that this group would be any more influential and effective in delivering a quality effective and co-ordinated service to young people and their families than what we have already”

• “A co-ordinating body that has no control of funding or provision of services cannot be effective. They are in control of nothing. DEANZ already exists, how would the point, purpose or role of this new body differ?”

• “This seems to have no authority and will be just another level of management with no actual influence on the teaching, learning and support of the students, as it requires buy-in. And so far
although there has been 'buy-in' of the National Plan there has still been no actual changes or
benefits for the deaf child in the classroom”851

- “It sounds like a poor idea that this organisation would not manage funds or provide services - it
sounds just like an extra complication of the existing system”852

- “There is no guarantee that this group would be any more influential and effective in delivering
a quality effective and co-ordinated service to young people and their families than what we
have already”853.

Submissions recommended the following amendments or additions if Option 3 were selected:

- The Ministry of Education should act as the coordinating body, rather than establishing a new
crown entity854

- If the steering group became the co-ordinating body there needed to be more feedback from
them and they needed to be more open855

- Positions on the Board of Trustees of the coordinating body should be allocated to specific
sector groups, to make it truly representative856.

Two submissions suggested more effective models than Option 3 including: having a sole service
provider operating under clear parameters from the Ministry of Education857; and ensuring Ministry of
Education staff 'seek out the best options for the children assigned to them' rather than putting in place
another level of management858.

Other comments on individual submissions were as follows:

- A national coordinating body should have representatives from a variety of key stakeholders and
work collaboratively; under this model, the DECs should be disestablished and replaced by
regional resource centres859

- Concerns that a national body had the potential to be commandeered by interest groups with
agendas that do not recognise the service delivery needs of the children it oversees860

- A more formal National Coordinating Body would effectively manage high level relationships
with other government sectors (eg, health, tertiary training providers)861.

**Option 4: Regional Fund Managers**

Two submissions862 commented that Option 4 was inefficient and that it appeared that management
and administration would be tied up in a number of service centres.
Two submissions\textsuperscript{863} commented that Options 3 and 4 would both involve additional bureaucratic structures and management layers. One of these submissions\textsuperscript{864} noted that these new structures would have less expertise and authority than a single national provider. The other submission\textsuperscript{865} was concerned that these options would detract funds from the students and advocated for guidelines on the use of these funds.

With regard to Option 4, one submission\textsuperscript{866} was concerned that it would be difficult for families to access the Ministry of Education with this additional layer of management in place. One submission\textsuperscript{867} commented that it was important to action any changes with minimal bureaucracy.
Theme 3.6.1: Governance

Overview

Forty submissions (17 others, 7 parents/caregivers, 2 parents and teachers, 8 service providers, 1 student and teacher, 4 teachers, 1 unknown) raised issues relating to the governance of Deaf Education services.

Ten submissions in this category responded to the question, “Do you think the current system needs changing?”, with 8 answering “Yes” and 2 answering “No”.

Governance - general

Eight submissions supported the retention of the present governance structure. A number of these submissions identified the need for changes within the present structure, with individual comments being as follows:

- Deaf people need to be more involved in decision-making, including at the Board of Trustee level.

- The current system needs improving, but education of DHI students is an education issue that should be addressed through the normal education framework ie, governance by a Board of Trustees.

- While the Boards of Trustees should remain the same, there should in addition be a provider, Group Deaf Education, which would be part of the Ministry of Education. This new Group would assist parents, teachers and other service providers such as GSE by providing advice, services and access to technology.

- Suggestions for making current Boards of Trustees more democratic: give all parents and caregivers of children receiving services from the DECs the right to vote for Board members; give parents of deaf students receiving a service from a DEC the right to vote for board members enrolled in their local mainstream school.

- Involve parents and stakeholders.

Four submissions suggested that having a single combined governance board created a risk of domination by individuals, organisations and/or regional interests with a particular viewpoint.

Two submissions suggesting that the model had a polarising and divisive influence and is subject to political capture.
Two submissions suggested that the Board of Trustee model should be replaced by oversight by a neutral State agency, with one submission emphasising the need for governance to be free from polarisation between two main groups, one supporting education via an alternative modality to hearing and integration into a culture with its own language in which deafness is not a disability, and the other seeking intensive habilitation and training of the hearing modality, with the help of technology, to equip members to integrate successfully into hearing society.

Other comments in individual submissions were as follows:

- The present services need to be upgraded to address issues of fragmentation of services such as strengthening links between the local regions and the Deaf Education Centre Board of Trustees.

- It was difficult to see how changing the governance of series would improve the education of deaf and hearing impaired children.

- A suggestion that the parents of DHI children attending local mainstream schools were more closely concerned with input into governance via those schools than via DECs, even if they were receiving RTD support.

- The Ministry needs to understand that the "umbrella body" must have a true representation of its consumer groups.

- A comment that parents whose children are clients of VDEC currently have input into the Board of Trustees through a parent representative, and that parents regularly provide positive feedback about the services delivered by VDEC.

- A comment that the Ministry does not listen to DHI children or their parents, together with the suggestion that a provision giving parents of DHI children voting rights for their regional DEC Board of Trustees as well as for the Board of Trustees of their local school should be introduced through legislation.

**Governance issues raised in discussions of Service Provision options**

A number of submissions identified Governance issues in relation to the four options presented in the Discussion Paper. These issues are summarised in this section.
**Option 1: Status Quo**

Four submissions commented that the current governance structures with separate boards of trustees for the two DEC operates effectively and there is no need for change. In addition, it was stressed in one submission that the governance model for special schools should be the same as for all public schools with governance responsibilities vested with the parents of children receiving the services.

Two submissions outlined how the VDEC board of trustees provides appropriate representation for parents (core school and regional) and stakeholders.

Two submissions commented that members of a school governance body should not be paid officials. One submission argued that Ministerial appointments should only occur if and when required. Another submission commented that boards currently use existing cooption provisions to bring in representation from other stakeholders and therefore no change was required to these processes.

Two submissions expressed concern with the focus and detail in discussion document in relation to governance, with individual submissions commenting as follows:

- “In reality, none of the options in the Ministry’s discussion paper offer alternatives to the current service models ... [the submitter] is disappointed that the Ministry has chosen to narrow its discussion and choice of options to governance and management issues rather than an identified range of deaf and hearing impaired education issues ... [and] finds it difficult to understand why the Ministry is concentrating on management and governance. Both deaf education schools have received excellent ERO reports regarding management and governance, and their students are achieving well- in many instances above the norm.”

- “There is insufficient clarity and detail around Options 2-4 in the consultation paper to enable us to be properly informed and to allow meaningful comments to be made. It is therefore very difficult to see how changing the governance of services will improve options and resourcing for the education of deaf and hearing impaired children.”

Four submissions raised concerns that any other governance or management options (eg a national provider or national coordinating body or regional fund manager or a single board of trustees) could undermine the concept of ‘democratically elected parent representatives’ in line with the principles of ‘Tomorrows Schools’.

Other comments in individual submissions were as follows:

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887 0017; 0053; 0077; 0078
888 0017
889 0053; 0078
890 0017; 0078
891 0017
892 0078
893 0017; 0167
894 0017
895 0167
896 0017; 0078; 0130; 0132
A comment that there was no evidence that changing the governance arrangements would by itself make any difference to the quality of services to children.  

Boards of Trustees would provide the best service for the schools.

Other governance options would not be responsive to the contextual needs of individual communities.

"Any change of governance arrangements that followed Options 3 or 4 would be an erosion of this democratic process and would not be acceptable to the board ... Decision making on the organisation of the DECs services is the responsibility of democratically elected parent representatives."

None of the options proposed by the Deaf Steering Group appear to offer the same level of community and client representation for CI service users as the existing structures.

Option 2: National Provider

Six submissions supported the concept of a National Provider with one Board of Trustees as a means of providing greater coordination and consistency.

"The deaf education service needs a single governance body made up of parents and professionals whose role is to oversee the principles and philosophies, policies and practices of all facets of educating Deaf and hearing-impaired students. This governance body, chaired by a parent, would be the arena where issues would need to be resolved. We would hope that with good information sharing, and a transparent child- and family-focused service, these issues would be few and far between."

"The schools need to be run by the same board using the same conditions and guidelines. This would be paramount for this option to succeed and would need to involve both present services taking on the best of both."

"There could be a single Board of Trustees that would include professionals, parents and students from both DEC. However both DEC would continue as separate hubs with residential accommodation, specialist resource teachers, services such as parent/child live in assessment courses, regional student residential courses, technicians, early intervention, staff PD. Some services such as resources could be run from one centre and then would supply to all staff. The regional co-ordinator roles would be run from each DEC, under the main BOT. This would require a great deal of planning but would hopefully streamline a lot."

Submissions offered suggestions as to who should be represented on a national provider board including: Deaf and hearing impaired community representatives; Parent representatives; Deaf
Aotearoa and New Zealand Federation for Deaf Children\textsuperscript{908}, cochlear implant representatives\textsuperscript{909}, and Māori representatives\textsuperscript{910}. Comments in individual submissions included the following:

- “Deaf need to be involved working in partnership with providers in making big decisions about what happens in deaf education – on the MOE Board of Trustees and any other meetings. These deaf people should be nominated by deaf community to represent variety of boards/committees\textsuperscript{911}.

- “Careful consideration would need to be given to regional and minority representation in its governance structure, and to defining its mandate in relation to policy, provision and evaluation functions”\textsuperscript{912}.

Four submissions\textsuperscript{913} raised concerns that the proposed governance structure in Option 2 may reduce local input into decision making, with one submission commenting as follows:

- “The current structure of boards of trustees has provided the ability for van Asch and Kelston centres to provide community involvement in the provision of deaf education and this has been valued by the families of deaf students for many years ... If there is a need for better coordination and provision of services from the centres then there are structures in place to progress this issue, without the need for radical reorganisation ... then, if progress is not forthcoming, discuss alternative structures, not the other way around”\textsuperscript{914}.

Other comments on Option 2 in individual submissions were as follows:

- It would enable the implementation of the National Plan for the education of deaf and hearing impaired children and young people in Aotearoa New Zealand and also the Service Matrix\textsuperscript{915}.

- Opposition to having a single Boards of Trustees, because the current system (with 2 Boards of Trustees governing 2 DECs) helps prevent the problem of 1 Board of Trustees being heavily swayed by the latest educational trends\textsuperscript{916}.

- Opposition to Option 2 because it would transfer governance of CI services to a single provider and away from the existing community-based and client-led model\textsuperscript{917}.

- Adoption of Option 2 would result in the loss of regional services and expertise\textsuperscript{918}.

One submission raised concerns with the sector being governed and influenced by factors other than best practice under Option 2:

- “A Board of Trustees comprised of parents is fraught with difficulties. Parents of deaf and hearing impaired children can have widely differing perspectives on how deaf and hearing
impaired children should be educated. Such a Board would have a significant say in the direction of deaf education and national service provision. The potentiality for disagreement and disharmony is of concern, with parents potentially being pitted against each other with the ultimate disempowerment or intimidation of one group over the other.919

One submission recommended BLENNZ be used as a model for governance with a single Board of Trustees, because of the degree of input by parents into the governance and management of DECs that this allows.920

**Option 3: National Coordinating Body**

One submission921 expressed support for Option 2 in conjunction with Option 3, commenting that a more formal National Coordinating Body would ensure effective representation of stakeholder views (including providers and consumers) in setting national policy directions and in the governance arrangements of a National Provider.

**Other**

One submission suggested that none of the options provided in the Discussion Paper would solve any of the perceived issues within Deaf education.922 The same submission suggested that there could be a single Board of Trustees that would include professionals, parents and students from both DECs, with the DECs continuing as separate institutions providing residential accommodation, specialist resource teachers, and other services such as parent/child live-in assessment courses, regional student residential courses, technicians, early intention and professional development for staff. Under this arrangement, some services could be run from one centre; the regional coordinator roles would be run from both.

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919 0088
920 0090
921 0082
922 0258
Theme 3.7: Accountability

Nine submissions raised issues relating to accountability for Deaf Education services. Two submissions in this category responded to the question, “Do you think the current system needs changing?”, with both answering “Yes”.

Three submissions commented on the lack of accountability within the current system. It was stated by two submissions that there is not enough accountability within the existing structure.

One submission commented that there needs to be national level involvement regarding accountability for funding and for the services provided.

One submission expressed the need for more accountability in relation to services.

It was also noted by one submission that the accountability process needs to be more transparent so parents know how well their child is doing at school.

Three submissions stated that Option 2 would assist with accountability.

Accountability issues raised in discussions of Service Provision options

Three submitters stated that Option 2 would assist with accountability.

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923 0032; 0052; 0080; 0096; 0140; 0153; 0154; 0231; 0248
924 0153; 0154; 0248
925 0153; 0154
926 0231
927 0052
928 0080
929 0032; 0080; 0153
930 0032; 0080; 0153
Theme 3.8 Seamless provision

Overview

Fourteen submissions (5 others, 2 service providers, 2 parents/caregivers, 1 advisor, 1 unknown, 1 parent and teacher, 2 teachers) raised issues relating to the need for seamless provision of Deaf Education services. Comments within this category can be broken down further into the following themes:

- The transition between secondary school and/or tertiary education and the workforce
- Other concerns relating to a seamless provision of services.

All of the nine submissions analysed in this section identified problems in the area of seamless provision in Deaf Education and/or recommended changes in this area, implying that they considered that the current system needs changing.

Two submissions in this category responded to the question, "Do you think the current system needs changing?", with both answering "Yes".

The transition between secondary school and tertiary education or the workforce

Six submissions noted comments on the need for better transition between secondary school and tertiary education or the workforce for deaf students. One submission commented that "Bridging the gap between leaving school and out into the wide world needs attention, there are enough deaf agencies that can help with this, i.e., Deaf Aotearoa and Workbridge".

One submission suggested that:

- "Transition should be specifically aimed at deaf children and should be delivered over 2 or even 3 years, depending on the child. Students should have the opportunity to go to DEC for aspects of their transition and video links and other technology should be available for them."

One submission commented that although early intervention is important, there also needs to be support for the students at the higher levels especially years 9 to 13:

- "Just because they have got to these levels, it does not mean that they need less support...Many students end up in menial jobs or in parenthood early, not because they choose this path, but because the support is lacking in many ways. Why have support ready in tertiary when we cannot get them through these years? Please help solve the real issues."

One submission noted that KDEC transition process is very valuable and should be available nationwide.

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931 0075; 0080; 0098; 0121; 0122; 0145
932 0098
933 0122
934 0145
935 0114
Other concerns relating to a seamless provision of services

Four submissions highlighted that transitions need to be managed efficiently\(^{936}\).

Comments in individual submissions were as follows:

- Transition needs to be provided in all sectors especially if the child is to attend a mainstream school, where there is little experience of a deaf child\(^{937}\). One submission\(^{938}\)
- There is a need for flexibility in the movement of students in and out of base schools to ensure access to professional and specialist expertise all the way through their schooling\(^{939}\)
- There needs to be prompt transitions with staff at the beginning of the year and between preschool and school needs to be a priority\(^{940}\)
- The transition process needed to start early to allow families to review all real options available to be able to make informed decisions\(^{941}\).

Seamless service issues raised in discussions of Service Provision options

Two submitters\(^{942}\) commented that one national provider under Option 2 would help to facilitate the seamless provision of services from birth until they leave school, and the transition between the compulsory components of the education service.
Theme 4.1: Students with multiple needs

Seventeen submissions (4 advisors, 1 advisor and service provider, 2 others, 4 parents/caregivers, 1 parent and teacher, 2 service providers, 2 teachers, 1 unknown) addressed issues relating to the provision of Deaf Education services to students with multiple needs.

Seven submissions in this category responded to the question, “Do you think the current system needs changing?”, with all 7 answering “Yes”.

Seven submissions discussed the situation of students with multiple needs who need services from a range of providers. 

Three submissions expressed the view that the present multi-disciplinary team approach taken by GSE effectively addressed the needs of these students.

Three submissions expressed the view that deaf education services outside GSE are less than effective in addressing multiple needs.

Individual comments in this topic area included the following:

- More support is needed for DHI students with other special needs.
- The special school environment is effective in addressing multiple needs, and may be more effective in doing so than mainstream schools.
- A description of the particular challenges of working with the diversity of services required to meet the needs of a child who has multiple senses impaired.
- There is a population of DHI students that is currently underserviced; this population has multiple needs, which may not be fully addressed either in a mainstream school or a DEC.
- Lack of recognition and support for students with Auditory Processing disorder.
- Students who are deaf with a disability should be able to apply for support via special education services.
Students with multiple needs issues raised in discussions of Service Provision options

Option 2: National Provider

Two submissions\textsuperscript{952} commented that Option 2 has the potential to respond more appropriately to specific low incidence groups including deaf with additional disabilities.

Option 4: Regional Fund Managers

One submission\textsuperscript{953} commented that Option 4 maintains the multi disciplinary team approach within GSE that has benefitted deaf children with multiple disabilities or deaf children with behaviour issues.

\textsuperscript{952} 0086; 0127
\textsuperscript{953} 0122
Theme 4.2: Students in remote areas

Twenty-two submissions (1 advisor, 1 other, 8 parents, 1 parent and student, 1 parent and teacher, 10 teachers) addressed issues relating to the provision of Deaf Education services to students in remote areas.

Ten submissions in this category responded to the question, "Do you think the current system needs changing?", with 9 answering "Yes" and 1 answering "No".

Thirteen submissions (1 other, 6 parents/caregivers, 6 teachers) commented on the need for people in remote and lower population areas to access to DHI services and current difficulties.

Individual comments in this topic area included the following:

- Deaf children residing in either Auckland or Christchurch, where there are Deaf Education centres, satellites in regular schools and itinerant teachers, are advantaged compared to deaf children dependant on the less regular attention of advisors in the regions and rural areas of the country.

- "Service provision needs to be flexible and responsive ... in order for families in rural and lower population areas to maximise local skills and not rely on an 'expert model', while still being able to access specialist expertise and knowledge."

- An example from personal experience of appropriate and timely support for preschoolers and children at a small rural school in the south island.

- A query about how the employment contract for RTDs will change if their role changes.

- A South Island hospital identifying the need for a strongly supported deaf education service that is locally accessible families, regular teachers and hospital services as special educators.

- A suggestion that there will always be a large expense for specialists travelling to remote areas.

- A parent commenting that remote areas such as the East Coast need to be better resourced.

- A caregiver whose experience has been of receiving good support in both rural and urban setting, who concludes that the problem seems to be more about numbers versus funding.

- A comment that VDEC currently provides professional development and support to rural support staff and teachers, through its regional Specialist Resource Teacher Team.
Students in remote areas issues raised in discussions of Service Provision options

Option 1: Status Quo

Two submissions commented on Option 1 in relation to students in remote or small areas. One submission from a small rural school stated that the current model worked well, with regular access to services, resources and staff. Two submissions were concerned that if the system was centralised there would be disadvantages for schools not located near a main city who may miss out on service delivery.

Option 4: Regional Fund Managers

One submission commented that an advantage of Option 4 was that it offered benefits for all centres, not just the main ones where the majority of deaf children live.

\(^{964} 0212; 0231\)
\(^{965} 0212\)
\(^{966} 0212; 0231\)
\(^{967} 0021\)
Theme 4.3: Access to New Zealand sign language

Fifty submissions (8 advisors, 9 others, 14 parents/caregivers, 3 parents and teachers, 5 service providers, 8 teachers, 3 unknown) identified issues relating to the provision of Deaf Education services to students with sign language needs.

Twenty-one submissions in this category responded to the question, “Do you think the current system needs changing?”, with 20 answering “Yes” and 1 answering “No”.

Twenty-one submissions (3 advisors, 2 others, 5 parents/caregivers, 3 parents and teachers, 2 service providers, 3 teachers, 2 unknown) identified issues of a current lack of resources for teaching NZSL. Lack of resources was described as impacting on the availability of NZSL classes for parents and children, and on the system’s ability to facilitate the use of NZSL through NZSL-proficient teaching staff and NZSL interpreters.

Four submissions identified issues of a lack of consistency in the availability of resources for teaching NZSL.

Three submissions identified obstacles (including lack of teaching resources and a failure to give sufficient recognition of the importance of NZSL) to accessing the New Zealand curriculum through NZSL.

Nine submissions identified a failure on the part of the current system to give full recognition to the importance of NZSL as New Zealand’s third official language.

Eight submissions identified a failure on the part of the current system to give full recognition to the importance for deaf children of being able to access deaf culture.

Five submissions drew a comparison between DHI children’s rights to learn, and be able to use, NZSL and the rights of Māori in respect of te reo.

Five submissions identified as an issue neglect of, or late provision of access to, NZSL and Deaf culture because the current system gives priority to technical or clinical solutions to deafness (e.g. cochlear implants).

Four submissions identified issues of lack of involvement of the Deaf community, including through the use of deaf mentors, in educating deaf children and in helping them to understand and embrace deaf culture.
Twelve submissions (1 advisor, 3 others, 3 parents, 3 teachers, 2 unknown) cited the NZSL Act 2006 and/or New Zealand’s 2008 ratification of the United Nations Convention on the Rights of People with Disabilities as defining and New Zealand’s obligations to promote the use of NZSL\textsuperscript{976}.

**Proposed solutions for students with sign language needs**

Twenty-seven submissions (2 service providers, 6 others, 3 unknown, 5 advisors, 2 teachers, 8 parents, 1 parent and teacher) put forward proposals for addressing current issues for students with sign language needs.

Twenty-two submissions (5 advisers, 4 others, 2 service providers, 2 unknown, 2 teachers, 6 parents, 1 parent and teacher) proposed that resources be made available for teaching NZSL to parents and/or children and facilitating its use\textsuperscript{977}, with individual proposals including the following:

- Creation of Kohanga Reo type NZSL classes to make the availability of NZSL more widespread\textsuperscript{978}
- More home education of NZSL for all levels of Deafness, which could be given as a webpage, leaflet or verbal encouragement. All literature organised should include a list of books that can be referred to for increased vocabulary\textsuperscript{979}
- Provision of congregated placement options for deaf children that enable bilingual language acquisition and teaching that is tailored to visual learners\textsuperscript{980}
- Deaf Education services working with the deaf community, providing information to parents that encourages the use of sign language\textsuperscript{981}
- Free sign language classes offered to all parents and whanau\textsuperscript{982}
- Establishment of a professional interpreter service, including further training opportunities, developing professional standards and the means to recognise and register interpreters\textsuperscript{983}
- It should be a requirement that all RTDs are competent in NZSL, and should be more competent than the DHI children they are teaching\textsuperscript{984}
- NZSL to be available to every family, from initial identification as ASL is with the Colorado model of Early Intervention\textsuperscript{985}
- Availability of NZSL as a language option\textsuperscript{986}
- Make Deaf Resource Tutors with a sound knowledge of NZSL available to teach in the regions\textsuperscript{987}

\textsuperscript{976} 0082; 0086; 0090; 0096; 0098; 0111; 0153; 0154; 0180; 0232; 0242; 0243
\textsuperscript{977} 0017; 0079; 0082; 0085; 0090; 0098;0099; 0111; 0115; 0116; 0129; 0141; 0150; 0157; 0158; 0164; 0177; 0179; 0232; 0242; 0257; 0239
\textsuperscript{978} 0111; 0177; 0179; 0232
\textsuperscript{979} 0157
\textsuperscript{980} 0082
\textsuperscript{981} 0129
\textsuperscript{982} 0098
\textsuperscript{983} 0090
\textsuperscript{984} 0085
\textsuperscript{985} 0116
\textsuperscript{986} 0158; 0164; 0257
\textsuperscript{987} 0242
• Training for mainstream teachers in NZSL
• NZSL to be taught to hearing students
• DECs to focus on providing resources by video and technology as well as personnel to support NZSL students only (referring to overseas models where a signing teacher team teaches with the class teacher in the mainstream)
• Official acknowledgement and support for the right of all hearing Impaired and Deaf Children and their families to have access to NZSL and Deaf Culture
• More deaf adults in the system.

Eight submissions proposed structural changes to address issues for students with sign language needs, with individual proposals being as follows:

• Establishment of an independent mechanism to develop and promote standards and promote the use of NZSL
• Promote the awareness and use of NZSL amongst all New Zealanders
• The Ministry of Education to acknowledge that there are families that have the right to be taught in their first language (NZSL)
• Make NZSL the first and foremost language for deaf children
• “AoDCs to stop gatekeeping then waiting until it is too late to introduce NZSL”
• Introduce signing in schools from year one (in particular, recommending Makaton, www.makaton.org.nz, as offering benefits for a whole range of children)
• The education system to recognise that deaf students learn differently to hearing students and that not only should NZSL have standards to assessment, but deaf English also.

Students with NZSL needs issues raised in discussions of Service Provision options

One submission commented that Option 3 would meet New Zealand’s obligations as a signatory to the UN Convention on Disabled Persons Rights.
**Theme 4.4: Maori and Pasifika students**

Eight submissions address issues relating to provision of Deaf Education services to Māori and Pasifika DHI children.

Five submissions in this category responded to the question, “Do you think the current system needs changing?”, with all 5 answering “Yes”.

Comments in individual submissions include the following:

- Agreement that outcomes for Māori and Pasifika deaf children are not always adequately met and that there is an over representation of this group amongst deaf children

- A comment that many severe to moderate Māori deaf youth are leaving school almost illiterate, and that these students need more input from specialists and far better monitoring

- A comment expressing the hope that children in the total immersion Māori learning environment will not feel discriminated against

- A comment identifying issues in the delivery of services to Pasifika Island and Māori families by some professionals, including AoDCs; these issues included variations in service delivery, lack of understanding and openness, late diagnosis, lack of culturally and community-aware support/service provision for students and their families around the issue of wearing hearing aids and having hearing loss

- Given the number of Māori and Pasifika children who are deaf or hearing impaired, there is a need for professionals with cultural understanding and resource development in this area.

**Māori and Pasifika students issues raised in discussions of Service Provision options**

Two submitters commented that Option 2 has the potential to respond more appropriately to specific groups including Māori and Pasifika.
Theme 4.5: Equity of access - other

Fifteen submissions (2 advisors, 4 others, 5 parents/caregivers, 3 service providers, 1 teacher) addressed other issues of equity of access to Deaf Education services not covered in previous sections.

Six submissions in this category responded to the question, “Do you think the current system needs changing?”, with all 6 answering “Yes”. Individual comments in this topic area included the following:

- The current system does not meet the needs of deaf students equitably.\textsuperscript{1007}
- There are issues in connection with access to RTD support for children with moderate hearing needs: access varies throughout the country, criteria for access are confusing and nontransparent.\textsuperscript{1008}
- A suggestion that parents with oral learners in the northern part of New Zealand are getting a narrowly focussed and ill directed service compared to their needs.\textsuperscript{1009}
- A comment that the move towards educating DHI children in a mainstream environment can only succeed if the necessary funding and professional support is available.\textsuperscript{1010}
- A suggestion that there is insufficient support for children who have unilateral hearing loss or mild to moderate hearing losses.\textsuperscript{1011}
- A suggestion that there is a lack of recognition and support for students with Auditory Processing disorder.\textsuperscript{1012}
- A suggestion that there should be 3 streams of service provision, for 1/ primarily NZSL users, 2/ deaf/hearing impaired who use some speaking and listening skills, but also need NZSL to access the curriculum, 3/ deaf/hearing impaired with additional special needs.\textsuperscript{1013}
- A query about the availability of appropriate services for the 40% of deaf and hearing impaired children with no related special education needs.\textsuperscript{1014}
- A comment that hearing loss in children may not be recognised, which results in poor outcomes for the children and, when hearing loss is recognised, the need to make an intensive effort to catch up.\textsuperscript{1015}
- Favourable comment on the service provided for speech habilitation children with cochlear implants by the Hearing House in Auckland; concluding with the suggestion that it would be undesirable for the restructuring to place the Hearing House under the control of one ideology or another.\textsuperscript{1016}
- Consideration should be given to supporting the needs of the siblings of deaf children.\textsuperscript{1017}
• More provision should be made to addressing the needs of different ethnicities/cultures within the deaf community and education.\textsuperscript{1018}
Theme 5.1: Relationship with parents/whanau

Overview

Forty-two submissions (3 advisors, 7 others, 18 parents/caregivers, 1 parent and teacher, 4 service providers, 6 teachers, 3 unknown) raised issues relating to the relationship between Deaf Education services and parents/whanau. Submissions in this category included comments on the need to provide information and options to parents/whanau, to be accountable to parents/whanau and to include them in governance arrangements.

Comments within this category can be broken down further into the following themes:

- The need for deaf education services for families and communities
- The types of deaf education services for families and communities
- The importance of input from students, parents and community
- The provision of information and access to information for parents
- Greater partnership and communication between teachers, parents and the community.

Seventeen submissions in this category responded to the question, “Do you think the current system needs changing?”, with all 17 answering “Yes”.

The need for deaf education services and support for families and communities

Eight submissions\(^{1019}\) identified the need for more accessible deaf education services and support for families and caregivers who have deaf or hearing impaired children. Two submissions\(^{1020}\) commented that such services have an important role in assisting parents to understand their child’s hearing loss.

Individual submissions suggested that deaf education services and support for families and communities should be:

- Available to Māori parents\(^ {1021}\)
- Within reaching distance for struggling parents such as parents in Otara and Manakau\(^{1022}\)
- Available to those who do not access pre-school services\(^ {1023}\)
- Provided for people who are just finding out that their child has hearing loss\(^ {1024}\)
- Provided to people about how to deal with the deaf community\(^ {1025}\)
- Free to parents and whanau\(^ {1026}\).

\(^{1019}\) 0030; 0058; 0089; 0098; 0100; 0108; 0191; 0219
\(^{1020}\) 0100; 0191
\(^{1021}\) 0030
\(^{1022}\) 0058
\(^{1023}\) 0030
\(^{1024}\) 0058
\(^{1025}\) 0058
\(^{1026}\) 0058
Types of deaf education services for families and communities

Six submissions expressed the importance of the use of a mentor, family support person, or advocate. One submission commented that a mentor would be helpful because it is important for parents to see there are successful deaf people around who can be excellent role models.

Two submissions commented on who the mentor should be:

- Mentors and family support persons could be specially trained parents.
- Mentors would be deaf individuals who could be trained to work with and counsel the parents of deaf children.

Seven submissions commented on the role of the mentor, support person or advocate, as follows:

- Two submissions commented that a deaf mentor or deaf resource person would help families learn about deaf culture and identity early in the child’s life.
- The mentor would provide un-biased and non-government support and information to parents to support decision-making.
- A mentor would provide support for families who have cultural beliefs or barriers when accessing support for their deaf and hearing impaired child into the education system.
- The mentor would help parents to assess all the options for their children, start to implement communication strategies from an early age and allow them to make the best decisions for their children.
- A person in this role could operate alongside the health and educational professionals.
- A person in this role should be someone with enough official authority to enable them to direct or guide other professionals.

Two submissions noted that they would like to meet with other families with hearing loss, other deaf adults or/and the deaf community. One submission expressed frustration that the current system did not allow for such contacts.

Other types of services that submissions requested were:

- Parent groups, which needed to be local and supported to begin with.
• Night classes for deaf people, children of deaf adults, and any other people interested

• A service that provides hands on practical assistance with specialist knowledge

• Counselling, which should be offered to parents of deaf children because parents are often grieving when they find out their child is deaf

• Support for communities to get together and understand their child’s hearing loss and meet other families in the same situation in culturally appropriate ways. One submission observed that such support was available in South Auckland and had produced very successful results.

**Importance of input from students, parents, and communities**

Five submissions noted the importance of the views of parents being heard in the system and the importance of parents to have power to influence the services that are being delivered to the students.

Three submissions proposed that parents of students receiving regional teaching services be given voting rights for election to the Board of Trustees of the DECs so that parents have more opportunity to become involved in the governance of education centres. One submission stated that this would generate significantly increased interest and participation by parents in governance and service delivery issues and decisions. Another submission noted that this would also enhance the democratic process.

One submission commented that there should be direct input from parents and students as to how effectively their needs are being met by the current regimes because their opinions are important and matter very much to the success of any system.

One submission commented on the importance of having communities involved in decisions about Deaf education.

One submission commented on the importance of Deaf students having meaningful input into the review.

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1039 0091
1040 0098
1041 0108
1042 0089
1043 0191
1044 0191
1045 0071
1046 0069; 0071; 0080; 0153; 0154
1047 0050; 0053; 0078
1048 0078
1049 0053
1050 0169
1051 0169
1052 0231
1053 0071

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Provision of information and access to information for parents

Seven submissions commented on the importance of families having unbiased information so that they can make informed decisions. One submission commented that "Parents need more informed information on all options for their children now and in the future, e.g. technology available, language options access to Deaf Culture etc." One submission suggested that parents were not being given all the information necessary to make informed decisions to help them meet their needs, while another submission noted that for special education to be successful, students and families must be empowered and informed in order to make appropriate decisions based on true choices.

Three submissions highlighted the need for parents to be informed of what educational services and options are available to them and/or what they are entitled to. One submission offered the following example: "If a child is not coping well in the mainstream, are the professionals (AoDCs, RTDS) helping the parents to explore other options for their child's education, such as satellite units in the mainstream high schools?" One submission described finding out about entitlements through friends, but suggested that the information would have been better coming from deaf services. One submission suggested that having full information about services and options was particularly important for parents of newly diagnosed children because families choosing the NZSL option required early exposure to proficient sign language role models.

Two submissions highlighted the need for easier access for parents to find or get to resources or services for their children.

General comments regarding information include:

- Information needs to be expanded.
- All information must be child and family focused.
- Information needs to be simpler.

Greater partnership and communication between teachers, parents and the community

Four submissions identified a need for better and effective partnerships or collaborative relationships between those who are deaf/hearing impaired, schools, agencies, parents/whanau and
communities. One submission commented that there was scope for stakeholders to build a sustainable foundation for ongoing improvement in educational outcomes for DHI learners with special educational needs. Another submission commented that too often deaf students and parents are left feeling that the educational partnership that should exist is a one way avenue that excludes them.

Three submissions commented on the need for better communication and improved communication pathways.

Two submissions commented on the need for greater sharing of information and knowledge so that schools, families and organisations can work together. One submission highlighted that this would maximize the use of resources and personal and would empower families and schools. Another submission stated that education is a child and family focused service, and works well when information is shared.

Other comments relating to partnership and communication in individual submissions were as follows:

- Parent/whanau and community engagement is working well
- Parents want people to talk to, and to be listened to
- The importance of ongoing informed consent from parents needs to be recognised: “While VDEC gets parental initial consent for their staff to work with particular students there is no understanding or use of parental ongoing informed consent which has led to parents not knowing who is visiting their child from outside of regular local supports”
- Parents need to be contacted regularly; this needs to be initiated by the Ministry of Education
- Reporting to parents on programme changes, staff changes, and feedback on progress needs to be improved. Parents and caregivers should be told why staff changes are made.

Other comments

Three submissions noted that any changes made as a result of the review need to benefit families/children, with one representative comment being as follows:

- “The current system needs some change, but only if the changes benefit all the students, families and professionals throughout the country, and include the parents and families in the decision making.”
Two submissions\textsuperscript{1080} noted that parents are confused by the current system.

Two submissions\textsuperscript{1081} commented that there needs to be choice and flexibility for the families and that families need to be empowered.

Other comments in individual submissions were as follows:

- None of the options identified in the Discussion Paper appear to take the children or their families into consideration\textsuperscript{1082}
- The unique nature of deafness needs to be acknowledged and celebrated; no other parents are faced with their children having a 'first language' which is different from theirs, a culture which they need to understand in order to bring up their children\textsuperscript{1083}.

**Relationship with parents/whanau issues raised in discussions of Service Provision options**

**Option 2: National Provider**

Six submissions\textsuperscript{1084} commented that Option 2 offered the best advantages for, and is most likely to meet the needs of, children and their families.

Four submissions\textsuperscript{1085} referred to the benefits of having one trusted place or agency where families can go to for information and advice, with one representative comment being as follows:

- "Parents should NOT have to deal with more than one professional body when deciding on educational options for the child. There will be no hidden agendas, less bias and will hopefully rid us of any historical baggage"\textsuperscript{1086}.

To make Option 2 work, one submitter\textsuperscript{1087} advocated involving parents in the planning stage.

**Option 3: National Coordinating Body**

One submission\textsuperscript{1088} stated that a combination of Options 2 and 3 would be best for ensuring parent input and that the direction and goals of the service need to remain in the hands of those receiving the service.
**Option 4: Regional Fund Managers**

One submission\(^{1089}\) suggested that Option 4 would provide the best service because it would involve parents, who are best placed to know what is good for their children, in the management of Deaf Education services.

Three submissions\(^{1090}\) described Option 4 as frustrating and confusing for parents, with one representative comment being as follows:

- "It is too messy and not fair on families as they will have to move from one area to another to find a system, programme that caters to their child's needs"\(^{1091}\).
Theme 6.1: Other issues

Forty-five submission (5 advisors, 7 others, 13 parents/caregivers, 1 parent and teacher, 9 service providers, 7 teachers, 3 unknown) raised issues that could not be categorised under the themes for analysis developed for this report.

Seventeen submissions directly responded to the question, “Do you think the current system needs changing?” as follows: 17 answered “Yes”; 0 answered “No”.

A number of submissions commented on aspects of the Discussion Paper, including:

- Challenges to the accuracy and completeness of the data contained in the report\textsuperscript{1092}, with several giving the failure to record any DHI children in the Gisborne area as an example
- Questioning the robustness of the analysis that has gone into the development of the Discussion Paper\textsuperscript{1093}, in some instances because of the inconsistent quality of some data
- A description of the Discussion Paper as "not parent friendly and... very confusing”\textsuperscript{1094}
- Concern that the Discussion Paper fails to address service delivery issues\textsuperscript{1095}
- Questioning the thinking behind the 4 options\textsuperscript{1096}
- Concern that the Discussion Paper appears to favour Option 2\textsuperscript{1097}
- Insufficient clarity around the options and scope of the renew\textsuperscript{1098}
- In particular, 4 submissions commented that the description of Option 3 was vague and lacked sufficient detail to allow for informed decision making\textsuperscript{1099}.

Fifteen submissions (3 advisors, 1 other, 3 parents/caregivers, 1 parent and teacher, 3 service providers, 4 teachers) commented on aspects of the review, including the following:

- An expression of scepticism about the value of identifying which service model would provide the best service, because of the discrepancy between official guidelines and what the system actually delivers, together with the comment that "Everyone involved runs around trying to cover up or make excuses for each other and at the end of the day, what is written is no meaning whatsoever”\textsuperscript{1100}
- A suggestion that the review was no more than a supplement to the current Special Education Review or an extension of developments planned for the residential behaviour schools\textsuperscript{1101}

\textsuperscript{1092} 0018; 0031; 0053; 0078; 0097; 0105; 0125; 0130; 0132; 0145; 0222
\textsuperscript{1093} 0018; 0053; 0060; 0078; 0097; 0125
\textsuperscript{1094} 0180
\textsuperscript{1095} 0017
\textsuperscript{1096} 0098
\textsuperscript{1097} 0032; 0163; 0235
\textsuperscript{1098} 0065, 0122, 0201
\textsuperscript{1099} 0010, 0065; 0088; 0247
\textsuperscript{1100} 0260
\textsuperscript{1101} 0125
Concern at the possibility that the conclusions of the review may be dominated by the perspective of Deaf children with high needs, with the perspective of the majority of DHI children with more moderate needs being under represented.

Support for the review, accompanied by the comment that, while the current system for delivering Deaf Education has shown flexibility in adjusting to medical and technological advances, this has tended to be responsive rather than through a planned, consultative approach.

Support for the review, accompanied by the comment that the current system contains anomalies that have arisen out of the historical development of deaf education in New Zealand.

Concern over what is described as the decision not to seek AoDC input into the review.

Comments stressing the importance of the review incorporating the views of RTDs.

A comment that staff involved in the delivery of Deaf Services are best placed to comment on the issues raised by the Discussion Paper.

Concern that the VDEC Board of Trustees and the professional associations of the Teachers of the Deaf and AoDCs are not represented in Appendix 2 of the Discussion Document.

Expressions of appreciation at having the opportunity to comment on the Discussion Paper.

A suggestion that there has been an unhelpful degree of secrecy surrounding the Steering Group, its composition and findings.

A suggestion that Deaf Education services need to be reviewed in the context of the wider review of special education.

Three submissions advocated the establishment of a national database of DHI students. Other submissions offered a range of individual comments, including the following:

- Support for the implementation of the National Plan for the Education of DHI children and young people and of the Service Matrix.
- Reflections on how medical advances in the area of early diagnosis and intervention, together with advances in the technology available to children, have raised the expectations of achievement and inclusion for children, but have also created new requirements for teachers, support staff, families and students in terms of managing and using supporting equipment.
• A suggestion that any change arising from the review needed to take place in a managed, consultative and transparent manner which would identify and resolve issues prior to the implementation of any change\textsuperscript{1116}

• A comment that the responsibility of the sector to report on outcomes of students against children with typical hearing has been lost\textsuperscript{1117}

• A comment on the need for Deaf Education services, including those delivered by AoDCs and RTDs, to reflect changes from a focus on low-incidence, high need service provision as under the DECs towards mainstreaming\textsuperscript{1118}

• A suggestion that Deaf Education Centres be retitled to avoid the implication that centres teach deafness\textsuperscript{1119}

• A suggestion that successes in Deaf education need to be celebrated, and should be given publicity\textsuperscript{1120}

• A comment that current negative attitudes towards cultural perspectives of the deaf will inhibit a smooth transition to a new system\textsuperscript{1121}

• “If any change isn’t implemented properly there could be years of fiddling to try and make it work”\textsuperscript{1122}

• A comment about the difficulties obtaining a Student visa experienced by disabled children of immigrants\textsuperscript{1123}

• A comment challenging the availability of the Invalid Benefit for those aged 16 years and over\textsuperscript{1124}

• A comment that any new model adopted will need to reflect the drivers for deaf education for 2011\textsuperscript{1125}

• Support for the establishment of a national resource centre that would provide resources and professional training\textsuperscript{1126}

• Support for the establishment of a national programme for the instruction of sign language and the employment of speech therapists\textsuperscript{1127}
Appendix 1: organisations invited to participate in the Deaf Education services review

Note that not all organisations invited provided a submission.

Deaf Aoteroa New Zealand
Kelston Deaf Education Centre
van Asch Deaf Education Centre
NZ Federation for Deaf Children
Distance Education Association of New Zealand
New Zealand Society for the Intellectually Handicapped
Parent to Parent
Northern Cochlear Implant Trust
Southern Cochlear Implant Trust
Hearing House
See Hear
Massey University
University of Auckland
Auckland University of Technology
Victoria University
Blind Low Vision Education Network NZ
New Zealand Special Schools Parents Association
Association of New Zealand Special School Principals
New Zealand Educational Institute Inc
New Zealand Post Primary Teachers' Association
New Zealand Principals' Federation
Secondary Principals' Association of New Zealand Inc
New Zealand School Trustees Association
New Zealand Association for Intermediate and Middle Schooling

Te Akatea: Maori Principals Association
Association of Proprieters of Integrated Schools
NZEI Principals Council
Secondary Principals Council
Public Service Association
Human Rights Commission
Office for Disability Issues
Ministry of Health Disability Services
New Zealand Audiological Society
Disabled Persons Assembly
Appendix 2: breakdown of submission clusters (20+ submissions) by region

Introduction

This appendix provides a breakdown of larger (20+) groups of submissions commenting on individual themes in relation to Deaf Education services.

Theme 1.1: Status Quo

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
<tbody>
<tr>
<td>86 submissions addressed issues relating to the status quo in delivery of Deaf Education services.</td>
<td>Auckland: 12</td>
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<tr>
<td></td>
<td>Bay of Plenty: 6</td>
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<tr>
<td></td>
<td>Canterbury: 22</td>
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<td></td>
<td>Hawkes Bay: 7</td>
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<td>Unknown: 6</td>
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<td></td>
<td>Wellington/Wairarapa: 9</td>
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<td>Waikato: 3</td>
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</table>

| 36 submissions commented that the status quo (Option 1) is currently working well, that people are satisfied or that this option leaves everything the way it is. | Auckland: 6        |
|                                                                                                                                               | Bay of Plenty: 2    |
|                                                                                                                                               | Canterbury: 6       |
|                                                                                                                                               | Hawkes Bay: 2       |
|                                                                                                                                               | Manawatu/Wanganui: 3|
|                                                                                                                                               | Marlborough: 1      |
|                                                                                                                                               | Nelson: 1           |
|                                                                                                                                               | Northland: 3        |
|                                                                                                                                               | Taranaki: 2         |
|                                                                                                                                               | Unknown: 4          |
|                                                                                                                                               | Wellington/Wairarapa: 5 |
|                                                                                                                                               | Waikato: 1          |

| 22 submissions commented that they were happy with the way the system currently worked and the level of service received by deaf children and their families. | Auckland: 3        |
|                                                                                                                                               | Bay of Plenty: 3    |
|                                                                                                                                               | Canterbury: 3       |
|                                                                                                                                               | Hawkes Bay: 2       |
|                                                                                                                                               | Manawatu/Wanganui: 1|
|                                                                                                                                               | Otago: 1            |
|                                                                                                                                               | Southland: 1        |
|                                                                                                                                               | Taranaki: 5         |
|                                                                                                                                               | Wellington/Wairarapa: 2 |
|                                                                                                                                               | Waikato: 1          |

Theme 2.1: Resources/services
### Theme addressed by 20+ submissions

<table>
<thead>
<tr>
<th>Breakdown by region</th>
<th>78 submissions raised issues relating to resources/service levels available for Deaf Education services.</th>
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<tbody>
<tr>
<td>Auckland: 12</td>
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<tr>
<td>Bay of Plenty: 4</td>
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### Theme 2.2 Integrated services

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<tr>
<th>Breakdown by region</th>
<th>134 submissions addressed issues relating to integration in Deaf Education services.</th>
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<td>Auckland: 30</td>
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<tr>
<td>Bay of Plenty: 8</td>
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<table>
<thead>
<tr>
<th>Breakdown by region</th>
<th>55 submissions referred to issues of inconsistencies in the delivery of services nationwide.</th>
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<tbody>
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<table>
<thead>
<tr>
<th>Breakdown by region</th>
<th>43 submissions referred to issues of fragmentation and duplication of services.</th>
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<tbody>
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<td>Auckland: 11</td>
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<td>Bay of Plenty: 5</td>
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<tr>
<td>Theme 3.1 Vision</td>
<td>Breakdown by region</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------</td>
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</tbody>
</table>
| **Theme addressed by 20+ submissions** | **Auckland:** 6  
Bay of Plenty: 3  
Canterbury: 7  
Hawkes Bay: 1  
N/a: 3  
Nelson: 1  
Otago: 2  
Southland: 2  
Tasman: 1  
Unknown: 1  
Wellington/Wairarapa: 3 |
| **30 submissions raised issues relating to the system's vision for Deaf Education services.** | **Wellington/Wairarapa:** 4  
Waikato: 2 |

<table>
<thead>
<tr>
<th>Theme 3.2 Type of setting</th>
<th>Breakdown by region</th>
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</thead>
</table>
| **Theme addressed by 20+ submissions** | **Auckland:** 13  
Bay of Plenty: 3  
Canterbury: 27  
Hawkes Bay: 7  
Manawatu/Wanganui: 2  
N/a: 4  
Nelson: 1  |
| **81 submissions raised issues relating to the type of setting for Deaf Education services.** | **Wellington/Wairarapa:** 3 |
Northland: 1  
Southland: 5  
Taranaki: 1  
Unknown: 5  
Wellington/Wairarapa: 11  
Waikato: 1

21 submissions supported the continued provision of access to specialist schools.

Canterbury: 7  
Hawkes Bay: 3  
Manawatu/Wanganui: 2  
N/a: 1  
Southland: 1  
Wellington/Wairarapa: 6  
Waikato: 1

### Theme 3.3 Quality of service

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
</table>
| 63 submissions raised issues relating to quality of service. | Auckland: 9  
Bay of Plenty: 3  
Canterbury: 21  
Hawkes Bay: 2  
Manawatu/Wanganui: 1  
Marlboro: 1  
N/a: 5  
Northland: 1  
Otago: 3  
Southland: 1  
Unknown: 5  
Wellington/Wairarapa: 7  
Waikato: 4 |

### Theme 3.4 Flexible/responsive services

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
</table>
| 44 submissions addressed issues relating to the flexibility and/or responsiveness of Deaf Education services. | Auckland: 10  
Bay of Plenty: 2  
Canterbury: 11  
East Coast/Poverty Bay: 1  
N/a: 4  
Nelson: 2  
Otago: 5  
Southland: 2  
Unknown: 4  
Wellington/Wairarapa: 2  
Waikato: 1 |

### Theme 3.5 Type of service

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
</table>
| 89 submissions raise issues relating to the availability of different types of Deaf Educational | Auckland: 16  
Bay of Plenty: 3 |
service.

<table>
<thead>
<tr>
<th>Theme 3.6 Management/administration</th>
<th>Breakdown by region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Theme addressed by 20+ submissions</td>
<td>Auckland: 10</td>
</tr>
<tr>
<td></td>
<td>Bay of Plenty: 3</td>
</tr>
<tr>
<td></td>
<td>Canterbury: 9</td>
</tr>
<tr>
<td></td>
<td>N/a: 3</td>
</tr>
<tr>
<td></td>
<td>Otago: 3</td>
</tr>
<tr>
<td></td>
<td>Unknown: 5</td>
</tr>
<tr>
<td></td>
<td>Wellington/Wairarapa: 8</td>
</tr>
<tr>
<td>41 submissions raised issues relating to the management and administration of Deaf Education services.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Theme 3.6.1 Governance</th>
<th>Breakdown by region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Theme addressed by 20+ submissions</td>
<td>Auckland: 4</td>
</tr>
<tr>
<td></td>
<td>Bay of Plenty: 1</td>
</tr>
<tr>
<td></td>
<td>Canterbury: 13</td>
</tr>
<tr>
<td></td>
<td>Hawkes Bay: 3</td>
</tr>
<tr>
<td></td>
<td>N/a: 9</td>
</tr>
<tr>
<td></td>
<td>Southland: 1</td>
</tr>
<tr>
<td></td>
<td>Unknown: 2</td>
</tr>
<tr>
<td></td>
<td>Wellington/Wairarapa: 7</td>
</tr>
<tr>
<td>40 submissions raised issues relating to the governance of Deaf Education services.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Theme 4.2 Students in remote areas</th>
<th>Breakdown by region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Theme addressed by 20+ submissions</td>
<td>Auckland: 2</td>
</tr>
<tr>
<td></td>
<td>Bay of Plenty: 2</td>
</tr>
<tr>
<td></td>
<td>Canterbury: 3</td>
</tr>
<tr>
<td></td>
<td>East Coast/Poverty Bay: 1</td>
</tr>
<tr>
<td></td>
<td>Hawkes Bay: 1</td>
</tr>
<tr>
<td></td>
<td>Manawatu/Wanganui: 2</td>
</tr>
<tr>
<td></td>
<td>N/a: 1</td>
</tr>
<tr>
<td></td>
<td>Nelson: 1</td>
</tr>
<tr>
<td></td>
<td>Otago: 1</td>
</tr>
<tr>
<td></td>
<td>Southland: 3</td>
</tr>
<tr>
<td></td>
<td>Tasman: 1</td>
</tr>
<tr>
<td></td>
<td>Unknown: 1</td>
</tr>
<tr>
<td>22 submissions addressed issues relating to the provision of Deaf Education services to students in remote areas.</td>
<td></td>
</tr>
</tbody>
</table>
### Theme 4.3 Access to NZSL

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
</table>
| 50 submissions identified issues relating to the provision of Deaf Education services to students with sign language needs. | Auckland: 8  
Bay of Plenty: 1  
Canterbury: 12  
Hawkes Bay: 1  
Manawatu/Wanganui: 4  
Marlborough: 1  
N/a: 5  
Nelson: 1  
Northland: 1  
Otago: 5  
Taranaki: 2  
Unknown: 2  
Wellington/Wairarapa: 7 |

| 21 submissions identified issues of a current lack of resources for teaching NZSL. | Auckland: 5  
Canterbury: 6  
Manawatu/Wanganui: 2  
N/a: 2  
Northland: 1  
Otago: 4  
Unknown: 2 |

| 27 submissions put forward proposals for addressing current issues for students with sign language needs. | Auckland: 4  
Canterbury: 7  
Manawatu/Wanganui: 2  
Marlborough: 1  
N/a: 1  
Northland: 1  
Taranaki: 2  
Unknown: 2  
Wellington/Wairarapa: 6 |

| 22 submissions proposed that resources be made available for teaching NZSL to parents and/or children and facilitating its use. | Auckland: 4  
Canterbury: 5  
Manawatu/Wanganui: 2  
N/a: 1  
Nelson: 1  
Northland: 1  
Taranaki: 2  
Unknown: 1  
Wellington/Wairarapa: 5 |

### Theme 5.1 Relationship with parents/whanau

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
<tbody>
<tr>
<td>42 submissions raised issues relating to the</td>
<td>Auckland: 7</td>
</tr>
</tbody>
</table>
relationship between Deaf Education services and parents/whanau.

<table>
<thead>
<tr>
<th>Region</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bay of Plenty</td>
<td>1</td>
</tr>
<tr>
<td>Canterbury</td>
<td>9</td>
</tr>
<tr>
<td>East Coast/Poverty Bay</td>
<td>1</td>
</tr>
<tr>
<td>Manawatu/Wanganui</td>
<td>1</td>
</tr>
<tr>
<td>N/a</td>
<td>4</td>
</tr>
<tr>
<td>Otago</td>
<td>4</td>
</tr>
<tr>
<td>Southland</td>
<td>2</td>
</tr>
<tr>
<td>Taranaki</td>
<td>1</td>
</tr>
<tr>
<td>Unknown</td>
<td>4</td>
</tr>
<tr>
<td>Wellington/Wairarapa</td>
<td>5</td>
</tr>
<tr>
<td>Waikato</td>
<td>3</td>
</tr>
</tbody>
</table>

**Theme 6.1 Other issues**

<table>
<thead>
<tr>
<th>Theme addressed by 20+ submissions</th>
<th>Breakdown by region</th>
</tr>
</thead>
<tbody>
<tr>
<td>48 submissions raised issues that could not be categorised under the</td>
<td>Auckland: 6</td>
</tr>
<tr>
<td>themes for analysis developed for the report.</td>
<td>Bay of Plent: 3</td>
</tr>
<tr>
<td></td>
<td>Canterbury: 16</td>
</tr>
<tr>
<td></td>
<td>Hawkes Bay: 1</td>
</tr>
<tr>
<td></td>
<td>N/a: 5</td>
</tr>
<tr>
<td></td>
<td>Nelson: 2</td>
</tr>
<tr>
<td></td>
<td>Northland: 1</td>
</tr>
<tr>
<td></td>
<td>Otago: 1</td>
</tr>
<tr>
<td></td>
<td>Southland: 3</td>
</tr>
<tr>
<td></td>
<td>Unknown: 5</td>
</tr>
<tr>
<td></td>
<td>Wellington/Wairarapa: 4</td>
</tr>
<tr>
<td></td>
<td>Waikato: 1</td>
</tr>
</tbody>
</table>