



ATEND

Australian Tertiary Education Network on Disability

2020 National Disability Strategy Consultations

The Australian Tertiary Education Network on Disability (ATEND) is the peak professional organisation for Disability Practitioners in the Higher Education and Vocational Training sectors in Australia. ATEND aims to provide professional development and networking opportunities for disability practitioners and represent the interests of students living with disability throughout Australia.

ATEND acknowledges that members work across hundreds of traditional lands and custodial groups in Australia, and pay our deepest respects to their ancestors past, present and emerging leaders. Our passion and commitment to work with all Australians, including our First Nations peoples, is at the core of the work we do.

ATEND is pleased to submit to the 2020 review of the National Disability Strategy and will comment specifically in relation to proposed Outcome 5 (Learning and Skills).

Executive Summary:

ATEND advocates for consideration of tertiary education in the National Disability Strategy, and the development of mechanisms to foster engagement and retention in tertiary education and subsequent employment. ATEND notes the inconsistencies present in the education sector depending on jurisdiction and level of study and advocates for greater consistency and application of the Disability Standards for Education Act 2005, and the need for an extension of the standards to the publishing industry. Most importantly, ATEND asks for the National Disability Strategy to advocate for additional funding to support students living with disability in tertiary education.

Question 1: Comments on the vision and outcome area (Learning and Skills) proposed for the new Strategy?

Australia's education system is governed in part by the Commonwealth Disability Standards for Education Act 2005. Application of the Standards is, however, very inconsistent between education sectors. Adjustments routinely provided in higher education are very difficult to obtain in secondary schools and depend on the various State based curriculum assessment bodies for approval. The provision of reasonable adjustment enables a student the best chance of successfully completing their compulsory and post-compulsory education. Without reasonable adjustments in place, struggles occur very early in a child's learning, reducing the likelihood of ever transitioning to tertiary education. National consistency is required to enable people living with disability to effectively participate in and complete their education and gain qualifications and subsequent employment commensurate with their skills and abilities. [HEIMS \(Higher Education Information Management Systems\)](#) data indicates for 2019, that 61,349 domestic undergraduate students with disability were

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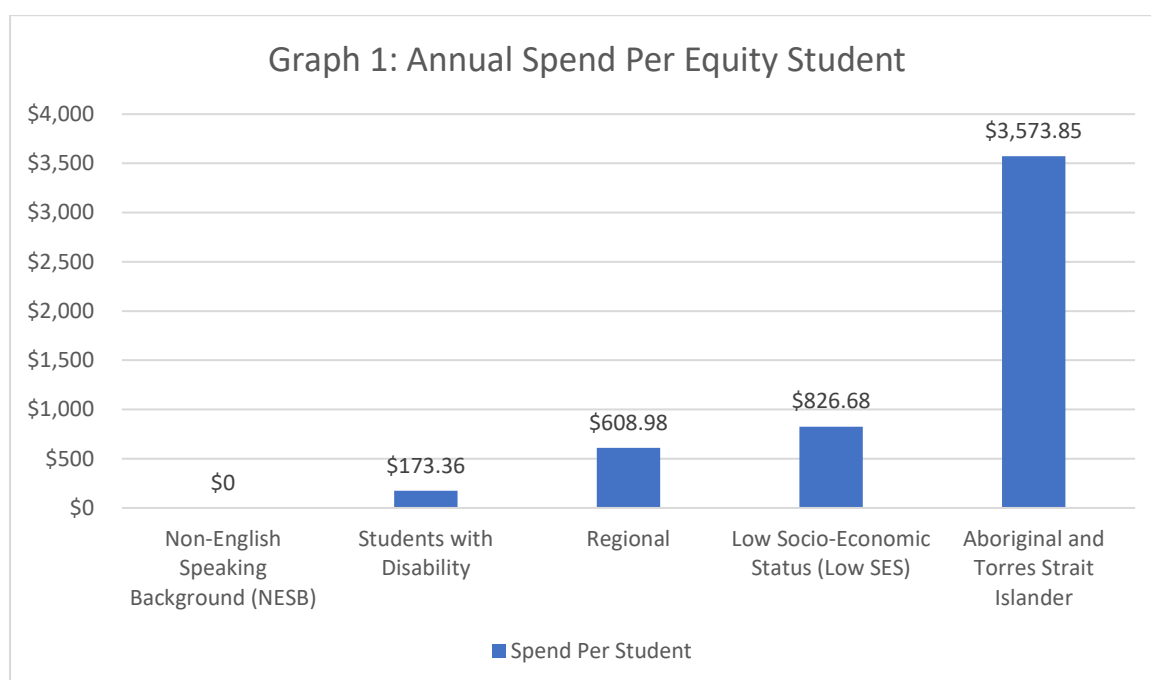
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enrolled across Australian higher education institutions, representing just 7.6% of the total undergraduate student population. Whilst participation rates are increasing significantly, the National Disability Strategy needs to bring focus to the consistent application of the Disability Standards across all education sectors.

Australia lacks a dedicated students with disability in education strategy to investigate issues of transition into tertiary education courses for all people with disability, and implement solutions consistent with [Article 24 - Convention on the rights of persons with disabilities](#). In the absence of a national education strategy, and despite students living with disability being the fastest growing equity cohort in Higher Education (growth rate of 50% compared to all students 12.6% from 2013 – 2018)¹, students living with disability:

- Are the second least funded equity group (\$173.36/student p.a.) (See Graph 1 below and Appendix A), and:
- have significantly lower graduate full-time employment outcomes (61.5% compared to 72.4% for graduates with no disability in 2017)².

Graph 1 (below) reflects the unbalanced investment on equity groups in Higher Education, much to the detriment of students living with disability.



See Appendix A for detailed source information

The funding allocations for students living with disability contribute towards the direct cost of meeting very real access requirements for education providers – including the delivery of disability related student and support services, assistive technology and equipment, modifications and

¹ Koshy, P. (2019). Equity Student Participation in Australian Higher Education: 2013 – 2018. National Centre for Student Equity in Higher Education (NCSEHE), Perth: Curtin University http://www.ncsehe.edu.au/wp-content/uploads/2019/12/NCSEHE-Equity-Student-Briefing-Note_2013-18_Accessible_Final.pdf

² <https://www.graduatecareers.com.au/files/wp-content/uploads/2018/01/gradstats-2017-3.pdf>

adaptions of learning material, transcripts, captions and Auslan interpreting. Funding distributed by the Commonwealth Disability Support Program generally only covers Table A higher education providers. Secondary providers must negotiate extraordinarily complex State based assessment and eligibility processes to fund education for students living with disability, effectively gate keeping students out of the system and allowing students to fall through the cracks without support. This can lead to either exit early or transition into a vocational education stream where there is often no identifiable funding source and provision is dependent on the State in which the program is delivered. Such inconsistency does not allow for investment in strategic (indirect) activity that might reduce inequities and enhance future access to higher education for students with disability, such as the development and implementation of policies, processes and systems underpinned by universal design principles. In contrast, such strategic activities are well supported and investment actively encouraged by public policy and funding opportunities for regional and remote, low SES and Aboriginal and Torres Strait Islander students. The data in Graph 1 showcases the inequity experienced by students living with disability in Higher Education Equity Policy and is reflective of the broader inequality experienced by Australians living with disability.

It could be argued that students living with disability may be covered under other equity categories, and therefore do not need separate identification and funding. However, such argument fails to address the unique and specific support, adjustment and employment preparation needs of students living with disability, which are different and specific to individual circumstance, and are in addition to the needs associated with being resident in a rural or regional area, or being from an Aboriginal and Torres Strait Islander or low SES background. Disability requires its own individualised response, and therefore requires funding commensurate with the present and increasing numbers of students.

ATEND therefore recommends:

- *Tailored support for participation by students living with disability being designed into all wider education engagement and retention initiatives from the outset*
- *Funding to meet the specific needs of students living with disability which is linked to their participation rate in Higher Education, and is increased proportionately to the amount of funding for Low-SES Students*
- *Commitment is made to the development of a detailed education strategy for students living with disability in tertiary education within the National Disability Strategy, encompassing both Federally funded Higher Education and State funded Vocational Education and Training.*
- *Inclusion of encouragement mechanisms for the consistent application of the Disability Standards for Education 2005 in all education sectors nationally with a shift from gate keeping to enabling.*

Question 2: What do you think about the guiding principles proposed here? (Design universally/ address barriers faced by priority populations).

Creation of inclusive resources at their point of production is more efficient and cost effective than retrofitting. Only with such resources are students living with disability enabled to participate in their studies. This encompasses design and delivery of everything from services and events, buildings and facilities, access to learning information, through to curriculum development and teaching delivery. The creation and implementation of inclusive learning experiences rests on adherence to many discrete pieces of legislation and policy, including those related to education, publishing, and building construction. Each of these instruments, some Federal and some State based, currently set

different expectations and attract different consequences, making it difficult to drive comprehensive change that might enable students with disability to participate most effectively in education.

ATEND members spend much of their time organising and retrofitting accessibility to existing content and curriculum that has not been prepared in an accessible manner, consistent with the principles of Universal Design for Learning (UDL). For example, videos that are used in teaching that do not have captions or transcripts available, and where copyright requirements prevent these from being easily created, or published material that is not available in an accessible digital format suitable for students who use screen readers or require audio format.

ATEND recommends that in consideration of the National Disability Strategy, and with reference to the current Disability Standards for Education (see ATEND's submission to the 2020 Review of the Disability Standards for Education 2005 [here](#)), a paralleled set of Disability Standards for Publishing be developed and actioned by the Federal Government to ensure that the principles of Universal Design for Learning can be fully implemented across the education sector, especially with the increasing utilisation of third-party produced content. The current reluctance of the publishing industry to implement broad change and embed accessibility in digital content development and production causes significant and expensive barriers in equitable access to education. For example, a prescribed text might not be available in an accessible digital format, meaning that the book has to be manually scanned page by page and retro converted from a PDF into a Word document then corrected for mistakes generated by the scanning and conversion process. This can cost \$3-4 per page. If the text was available from the publisher in an accessible digital format this process would be unnecessary. The publishing industry can help with this.

ATEND notes the 2015 Disability Standards for Education review recommendation for "...the Australian Government (to) work with State and Territory governments to improve the consistency of funded supports for people with disabilities in different post-compulsory educational settings to ensure equitable access across settings": access to accessible learning content is an opportunity for the Australian Government to action this recommendation.

Accessibility also extends to facilities and physical access. Inconsistent requirements for the application of accessible amenities at education institutions is demonstrated through the provision (or lack thereof), of inclusive sanitation facilities on most campuses. Accessible Adult Change Facilities were added to the 2019 National Construction Code Volume One³, which was adopted by States and Territories of Australia on 1 May 2019. However, while other Class 9B buildings such as shopping centres, sports venues, museums, art galleries and airports now have mandatory requirements for installation based on identified design occupancy measures, schools and TAFE/ university buildings (also Class 9B) are specifically excluded from this requirement.

[Changing Places](#) is a *voluntary* initiative (since 2012 in Australia) which advocates for accessible public toilet and change rooms for users with high support needs who are otherwise unable to use an 'accessible' toilet. To date, only four tertiary institutions across the whole of Australia – six facilities at RMIT and three at Deakin in Victoria, one at ECU in WA, and one (located at the educational playground) at University of Queensland – offer bathroom facilities for people with high level physical assistance needs. To our knowledge no TAFEs anywhere in Australia have implemented the Changing Places initiative. Lack of access to adequate sanitary facilities is a massive barrier to participation in education (and employment) for people living with disability at our tertiary education institutions nationally.

³ <https://abcb.gov.au/Resources/Publications/Consultation/Accessible-adult-change-facilities-in-public-buildings>

Lack of impetus, and the high cost for installation for such amenities is a major disincentive for education institutions to fit out appropriate facilities. This matter requires consideration if Australia wishes to attract and retain students with disability (or employ staff with disability) in our tertiary education sector.

Specific and impactful facility issues like this are presently enabled by:

- Exemptions in legislation when modifications are perceived as out of scope, too expensive or difficult.
- Low awareness beyond the equity sphere relating to the needs of students living with disability in tertiary education.

For these reasons, ATEND holds an expectation that it is now time for Australia to engage in a thorough and rigorous interrogation of the roadblocks and disablers within our systems which prevent people living with disability from accessing, participating in and succeeding in tertiary education. The result could inform the development of specific education principles within the revised National Disability Strategy – which must propose adequate funding, policy, and legislative environments to enable full access to and participation in post compulsory tertiary education and training for all.

ATEND therefore recommends:

- *Implementation of Universal Design for Learning principles as part of the National Disability Strategy.*
- *Development of a set of Disability Standards for Publishing as companion to the Disability Standards for Education.*
- *Inclusion of TAFE and University campuses in the National Building Codes requirement for Accessible Adult Change Facilities.*

Question 3: What is your view on the proposal for the new Strategy to have a stronger emphasis on improving community attitudes across all outcome areas?

ATEND notes that attitudes towards disability vary significantly across leadership, cultural and socio-economic groups, and that these factors play a significant role in the observance, detection, assessment, diagnosis and educational response to disability in its various forms.

Data provided by the Australian Disability Clearinghouse on Education and Training (ADCET) for the purposes of this submission indicates that attitudes within Australia's tertiary education institutions can and will shift – given access to the right type of support and training. ADCET in collaboration with the National Disability Coordination Officer (NDCO) Program have created specific resources relating to raising awareness and expectations of people living with disability in the tertiary education sector. The first resource, released in 2019, "Disability Awareness in VET" has two streams – one for VET Staff, and one for VET educators⁴.

For VET educators who undertook the training, a shift in knowledge and confidence occurred.

⁴ <https://disabilityawareness.com.au/elearning/vet-sector/>

Table 1: Respondent agreement with statements relevant to the Standards

Statement	Before undertaking Disability Awareness in VET training	After completing Disability Awareness in VET training
<i>'I have an understanding of inherent requirements and reasonable adjustments'</i>	66.67%	96.67%
<i>'I have an understanding of the legislative framework that supports the rights of students with disability in education and training'</i>	65%	95%
<i>'I felt confident in promoting and applying access and inclusion strategies within my teaching practice'</i>	70%	96.67%

To illustrate the importance of this training in shifting attitudes, the following are some key quotes from VET Educators in response to the question 'What might you do differently after undertaking this training?':

- *"more recording and documentation of reasonable adjustments"*
- *"Take more time discussing different learning strategies with staff and students"*
- *"I will be more careful forming individual judgements about students"*
- *"Revisit training resources to ensure accessibility"*
- *"Recognise that the way individuals learn can be unique"*
- *"Change my language – no longer say "special needs" for example"*

ATEND applauds ADCET and the NDCO Program for creating and maintaining these valuable training resources. We seek a process to embed these and future resources systemically so that all tertiary educators have access to and are encouraged to engage with these learnings and trainings for the benefit of students living with disability. ATEND agrees that community attitudes are critical to the inclusion and engagement of students living with disability in tertiary education and the National Disability Strategy has a key role to play in promoting the inclusion and success of people living with disability.

ATEND therefore recommends:

- *The further development of training resources for tertiary education providers.*
- *TEQSA registration be dependent on providers making this training available to all tertiary teaching and professional staff.*

Question 4: How do you think that clearly outlining what each government is responsible for could make it easier for people with disability to access the supports and services they need?

ATEND notes the Commonwealth Governments' ongoing investment in students with disability in Higher Education via the Disability Support Program, however, this funding only applies to Higher Education institutions. Education providers enrolling students in Vocational Education and Training

face a mishmash of funding depending on the course and the State in which the program is delivered. This is confusing for students. Only some States have implemented specific funding schemes relating to the support for students with disability in Vocational Education and Training, whilst providers that enrol apprentices who are willing to declare their disability to their employer and to the provider, can access the Commonwealth funded Disabled Australian Apprentice Wage Support (DAAWS) Program. Why does the Commonwealth fund service for apprentices living with disability but not nurses living with disability who are enrolled at the same TAFE provider? Clarity and consistency is required to ensure students living with disability have equitable opportunity in education.

ATEND therefore recommends:

- *That the National Disability Strategy specifically addresses the provision of tertiary education for students living with disability. Include sector consultation to determine priorities and consolidated government oversight that ensures appropriate implementation and accountability mechanisms for the Strategy.*
- *The allocation of additional funding to implement the education component of the National Disability Strategy. Consideration should be given to international best practice, for example UK Office for Students £40 million annual commitment allocated explicitly to support providers to develop inclusive teaching practices and further the adoption of the social model of disability.⁵ Alternatively, each Australian State or Territory government could implement a State based equivalent of the DSP for students enrolled in Vocational Education and Training, whether public or private, so that students are assured of full service irrespective of which institution they are enrolled in or which jurisdiction they are located in. This would help to clarify the ambiguity related to Government services. ATEND holds an expectation that students with disability should have equal access to post-secondary education regardless of where they live or study.*

Question 5: How do you think the Strategy should represent the role that the non-government sector plays in improving outcomes for people with disability? (Examples of the non-government sector include big, medium and small businesses, community organisations, employees of these businesses, private research, investment organisations and individuals.)

Both the government and non-government sectors have a responsibility to employ people living with disability. The Disabled Australian Apprentice Wage Support program is an example of an initiative taken by the Commonwealth Government to improve the employment opportunities for apprentices living with disability, encouraging the private sector to embrace diversity in their workforce. Such initiatives could be considered for all industries in order to improve the employment outcomes for people living with disability. The education sector can prioritise the education of people living with disability, supported by the Disability Standards, but if they are unable to obtain employment, especially in jobs commensurate with their skills and qualifications, then people are inadvertently

⁵ Beyond the bare minimum: Are universities and colleges doing enough for disabled students?
<https://www.officeforstudents.org.uk/publications/beyond-the-bare-minimum-are-universities-and-colleges-doing-enough-for-disabled-students/#funding>

being set up for long term disappointment, under-achievement and welfare dependency. Through effective joined-up policy, it is possible to achieve better outcomes both for people with a disability and for the broader population.

ATEND therefore recommends:

- *the National Disability Strategy emphasises the role that non-government sector plays in enhancing outcomes for people living with disability. Evidence show that community attitudes can be shifted through exposure and positive example.*

Question 6: What kind of information on the Strategy's progress should governments make available to the public and how often should this information be made available?

While participation rates in Tertiary Education for students with disability in both Higher Education⁶ and VET⁷ grow year-on-year, this is not attributable to specific targets or leadership at the federal level. ATEND believes that national targets may encourage education providers to prioritise the enrolment, retention and completion of students living with disability in tertiary education. All education providers must be required to publish these measures in an appendix as part of the annual National Disability Strategy report. The data is already gathered through HEIMS, and whilst it is published on the Department of Education Employment and Training website, there are no targets in place by which to measure progress or outcomes.

ATEND therefore recommends:

- *Specific engagement, retention, success and completion rate targets are set for both vocational and higher education providers and achievement is published. In the same way such targets are set for other equity category students.*
- *Specific post-graduation employment engagement and retention targets for employers who receive Government subsidies or contracts.*
- *Specific reporting on complaints related to disability service provision received by each education institution, compiled through a Learning portal relating to student complaints and issues raised with their providers, distributed to all registered providers nationally and publicly available.*
- *Change of eligibility requirements for Job Access funding to better support tertiary students undertaking Work Integrated Learning*

⁶ <https://www.adcet.edu.au/inclusive-teaching/understanding-disability/Higher-Education-Statistics/>

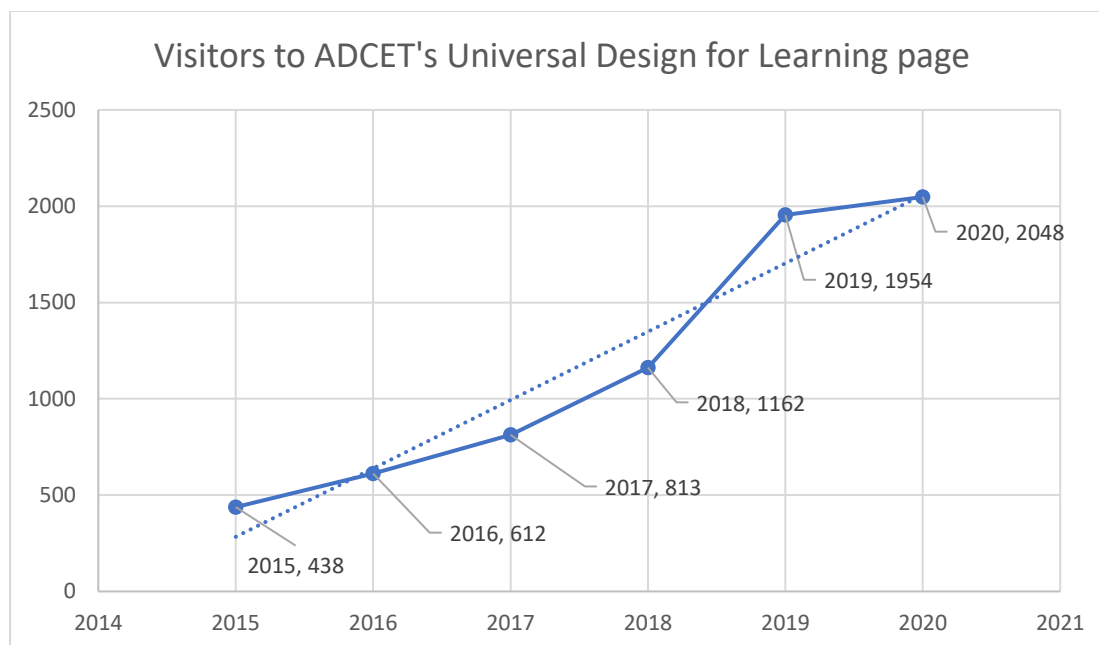
⁷ <https://www.adcet.edu.au/inclusive-teaching/understanding-disability/vet-statistics/>

Question 7: What do you think of the proposal to have Targeted Action Plans that focus on making improvements in specific areas within a defined period of time (for example within one, two or three years)?

ATEND is supportive of the need to have targeted action plans. Of most importance is the adoption of the principles of Universal Design of curriculum and learning resources. The Disability Support Program's evaluation in 2014-15 found that "there are opportunities to improve the administrative efficiency of the program and consider whether it is still appropriate to target individual students or if the focus should be on applying Universal Design principles to curriculum design more broadly"⁸.

Australia is now lagging behind some of our equivalent counterparts overseas when it comes to taking specific action to shift our post-secondary education system towards Universal Design for Learning. Most notably, the UK Office for Students annual commitment of £40 million (\$72 Million Australian) is allocated explicitly to support providers to develop inclusive teaching practices and further the adoption of the social model of disability⁹. This is an investment in promoting inclusive practices that is approximately ten times Australia's current provision to Universities for all matters relating to students with disability. The UK's leadership in this arena is underpinned by their rising numbers of students with disability in postsecondary education – with 13% of undergrad and post-grad University students declaring that they have a disability, vs. Australia's current (yet rapidly growing) 7.2%. We simply must get proactive.

ATEND would like to see a specific action plan relating to embedding this in Tertiary Education in Australia at the systemic level. Data made available by ADCET for the purposes of this submission demonstrates ongoing growth in people looking for information relating to UDL in the tertiary education context:



⁸ <https://docs.education.gov.au/documents/evaluation-disability-support-programme-final-report> (p.41)

⁹ Beyond the bare minimum: Are universities and colleges doing enough for disabled students?
<https://www.officeforstudents.org.uk/publications/beyond-the-bare-minimum-are-universities-and-colleges-doing-enough-for-disabled-students/#funding>

This demonstrates a growing interest in Universal Design for learning within Tertiary Education, which at this time is not supported in currently policy or legislation, including the Disability Standards for Education (2005).

ATEND therefore recommends:

- *A specific and targeted action plan to look at levers and policy options to better embed Universal Design for Learning in tertiary education.*

Question 8: How could the proposed Engagement Plan ensure people with disability, and the disability community, are involved in the delivery and monitoring of the next Strategy?

ATEND believes that engagement of people living with disability is essential to the development of an effective National Strategy. The strategy must be informed by the needs and wants of people living with disability for it to have any real impact of importance to those affected by it.

ATEND therefore recommends:

- *Consultation in the development of the plan.*
- *Representation of people living with disability on any body or committee overseeing the implementation and outcomes of the plan.*
- *Analysis of reported education complaints to inform the identification of priorities.*

Conclusion

ATEND members thank you for the opportunity to contribute to this conversation. Should there be any questions please feel free to contact Anthony Gartner, President, Australian Tertiary Education Network on Disability.

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APPENDIX A

Table Grouping or Equity Category	\$ Spend Per Student, Higher Education Equity Programs	Annualised, Equity Group Specific Funded Program(s) Cost \$millions
Students with Disability	\$173.36	<ul style="list-style-type: none"> Disability Support Fund (DSF) and Australian Disability Clearinghouse on Education and Training (ADCET) \$7.78m National Disability Coordination Officer Program (NDCO) (<i>partial HE program</i>) \$4.38m
Aboriginal and Torres Strait Islander	\$3,573.85	<ul style="list-style-type: none"> Demand Driven Funding \$4.25m (<i>not included in calculation</i>) Indigenous Student Success Program (ISSP) \$68.5m
Low Socio-Economic Status (Low SES)	\$826.68	<ul style="list-style-type: none"> Higher Education Participation and Partnerships Program (HEPPP) (current) \$134.643m
Regional	\$608.98	<ul style="list-style-type: none"> A "range of measures" pending \$100m Regional University Centres \$18.55m Rural and Regional Enterprise Scholarships (<i>not included in calculation</i>)
Remote	\$5,000	<ul style="list-style-type: none"> Tertiary Access Payment \$40.8m
Non-English Speaking Background (NESB)	\$0	