Department of Education, Skills and Employment

Review of the National Disability Coordination Officer Program

Primary Report – February 2022

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I. Executive Summary

The Department of Education, Skills and Employment (the department) works to ensure Australians can experience the social wellbeing and economic benefit that quality education, training and employment provide, by actively supporting ministers to deliver Australian Government policies and priorities. A Government priority area is to ensure students with disability can access and participate in education on the same basis as students without disability.

The Department funds the National Disability Coordination Officers (NDCO) program that works strategically to ensure people with disability are provided with an equitable opportunity to access and participate in tertiary education and to reach their graduate employment goals. A national network of 30 NDCOs, supported by 15 Host Providers, work with a range of stakeholders (schools, TAFE institutes, employment agencies and disability services) to improve coordination and collaboration among service providers and build their capability to support people with disability.

ORIMA Research was engaged to review the NDCO program and provide advice on maximising its strategic impact based on the emerging needs of students, stakeholder feedback and review of the broader policy context including the impact of other government reforms.

ORIMA Research engaged over 750 people with a lived experience of disability, and multiple program and external stakeholders through online focus groups, in-depth interviews and surveys. Four co-creation workshops were facilitated to test emerging ideas to support improved tertiary participation and pathway outcomes for people with disability under a future program.

Key insights on current and emerging needs of students

A number of key insights were obtained from the extensive desktop, qualitative and quantitative research conducted as part of the review.

- **A key opportunity to drive greater entry into tertiary education lies in building career ambition**

Our research with secondary school, tertiary and tertiary-graduated students indicates that the primary motivation for entering tertiary education is to obtain a good job. This aligns with the aspiration of the NDCO program to achieve growth in employment related to tertiary studies. However, on average, students with disability are disengaging with the education system earlier than their peers and are less likely to progress to tertiary education. This largely reflects factors related to pre-tertiary access decisions, including low aspirations and expectations of students with disability, and ineffective career planning and advice.

- **Improvements in tertiary study access and completion rates are likely to flow from flipping the switch on self-reporting disability**

There are multiple barriers to students identifying or choosing to disclose a disability, including a reluctance to disclose personal information (particularly if there is little perceived benefit due to risk of discrimination or not knowing what support is available). Students and their families argued for a shift in responsibility from the student having to disclose to the tertiary providers being proactive in demonstrating their inclusiveness. In particular, students and family considered that it would be beneficial for tertiary institutions to provide more information that portrayed acceptance of diversity, as well as raising awareness about possible adjustments and the benefits of supports.

Along with promoting a safer environment for students to report disability, students saw this as valuable information in their decision making about enrolling at a tertiary institution as it would

provide greater confidence in course success. A reframing of disclosure should be more broadly beneficial for higher education institutions given the funding model of other government programs such as the Disability Support Program, in the higher education sector which is based on the proportion of students with disability enrolled at each eligible provider.

- **The experience of adjustments in tertiary settings remains patchy**

There remains a need to continue to improve the experience of students participating in tertiary education given a significant proportion who relayed they have experienced challenges in having their learning needs met. Prominent themes that emerged included the lack of knowledge of available adjustments (by students and educators), the limited capability of staff to execute adjustments consistently and proactively, students being unprepared for tertiary settings and differences in experience for visible and invisible disability. In this regard, there was a positive impact flowing from institutions' responses to COVID-19, which resulted in increased access to technology and online study options (a primary consideration for many students with disability in their choice of a tertiary provider). A more systematic approach to building educators' awareness and capacity for implementing reasonable adjustments was seen as important, ensuring this is designed together with the voice of students with disability. Students suggested greater accountability of tertiary providers was needed rather than the responsibility being on students. Audit or independent assessment functions were seen as a possible solution. Many stakeholders in the review promoted universal design for learning as an opportunity to improve participation of all students, not just those with disability – however recognised this would not negate the need for tailored approaches designed with individuals.

- **Transition from tertiary providers into employment is a gap**

Obtaining employment related to a student's qualifications was seen as the most challenging transition point for students by all stakeholders engaged in our research. Two key themes emerged: issues with pathways from tertiary institutions into employment; and barriers flowing from the attitudes of employers towards hiring tertiary graduates with disability. Course work placements that provide exposure to employers and acquisition of job skills were seen as inflexible and poorly planned. Confidence of tertiary students in obtaining a course-related job was low, particularly for university students (where employment opportunities are more commonly identified post-education). The need for tertiary providers to provide more active support to graduates to find work was highlighted, including the need to start earlier and through linkages for work placement and building relationships with prospective employers. The perceived biases and misconceptions of employers in hiring graduates with disability was commonly raised as a challenge in obtaining graduate employment related to their studies.

Summary of analysis of the NDCO program

Internal strengths and weaknesses were identified along with opportunities and threats that exist at a program and strategic level.

Key program observations are as follows:

- A key strength is the depth of knowledge among NDCOs of the tertiary education system – national, state and local arrangements, and how this system connects end-to-end (pre-access to employment).
- NDCOs' independence from the sector provides confidence to tertiary institutions about their advice and support.
- Breadth of activities and varied focus areas dilutes program delivery and therefore outcomes.

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- Lack of clear direction and agreed leadership both centrally and as a coordinated program.
- Little profile or understanding of strategic objectives by sector stakeholders, and internal misalignment on what constitutes 'strategic' is creating tensions.
- Limited role clarity and value proposition for Host Provider arrangements.
- Disconnection of the program from influential stakeholders and those with a representative voice (i.e. students with disability).

Key strategic opportunities are as follows:

- Government inclusion reforms have a stronger focus on mainstream services being responsible and accountable – including production of resources and campaigns (e.g. through Australia's Disability Strategy, the 2020 review of the *Disability Standards for Education 2005* (the Standards).
- Students with disability are the fastest growing equity group in Australian universities - this may increase influence and leverage greater support.
- Better utilising the broad range of industry and sector stakeholders with skills to leverage and contribute to program outcomes.
- Raising the disability focus within other equity and government programs.
- Utilising broader industry for advocacy rather than a siloed voice.
- Existing work on universal design in learning is underway.

Recommendations

There remains a need for a specific program to drive broader systemic change so that people with disability have equitable opportunity to access, participate and achieve their goals in tertiary education and subsequent employment.

A strategic and targeted approach to better respond to student needs
We recommend strengthening the program's strategic cohesion and influence through:

- Developing a high-level national strategic plan for the program that is tightly focused on agreed priorities;
- Identify relevant program data to be collected in relation to the priorities and align these with reporting requirements to meet broader whole of government disability reporting requirements;
- Ensuring the priorities for the program remain primarily focused on the **access** and **participation** phases of the student journey; and
- A regular review of program priorities to determine the best utilisation of resources and ideally timed to feed into the evaluations being undertaken as part of Australia's Disability Strategy.

Formally bring together stakeholders from the tertiary disability equity ecosystem
The review highlighted a need for the program to be better connected with stakeholders that have high interest, responsibility and influence within the tertiary disability equity ecosystem. We recommend the following to enable this:

- Establish a mechanism to formally support a strategic network to come together based on a shared commitment for change, collaborative relationships and activity partnerships.
- Ideally representation should be at a senior level and include coverage of the university and vocational education sector in order to drive change.

- Ensure a representative voice of tertiary students with disability.
- Consider the best mechanism to engage private RTOs.

Revised leadership model for the program

Strengthen the direction of the program through a revised leadership model that provides:

- Overarching program oversight and leadership on progressing program priorities; and
- Supports sector partnership engagement in delivery of program activities.

The Department would need to guide and endorse the overarching strategic plan and contribute to the program management through insights and identification of opportunities to collaborate with other government programs.

Adopt a partnership delivery model

We recommend that the current model of Host Provider arrangements be reformed to a 'partnership' model that provides partners with a greater input and stake in the delivery of the program's strategic activities. In developing this model, consideration should be given to:

- Mutual benefit of the partnership and delivery partner(s) of peak, industry, professional associations etc. and/or where specific areas of excellence and leadership are observed.
- The need for multiple partners for:
  - expertise and the requisite skill in the delivery of the priority activities; and
  - specialisation and coverage of the disability and tertiary sector, including higher education and vocational education and training.
- The ability to support national program activities, where required.
- Retaining a discrete focus on students with disability in the tertiary sector to ensure it is not diverted by other priorities.
- Demonstrated ability for the partner to work collaboratively to support national coordination and reporting across the program; and their connection to the broader sector and how this supports the impact of program activities.
- The need to review any partnership arrangement to ensure it continues to meet the program priorities.

Priorities for the next three years

We recommend the following priorities be used as a basis to form an integrated program for work. A Program Logic is contained within the report.

1. Strategically connect and leverage the national tertiary equity disability ecosystem to support inclusive practices through establishing a tertiary disability equity 'backbone';

2. Support tertiary institutions to translate information and research into practice via a consulting approach; and

3. Continue to progress universal design for learning in tertiary settings.

It is recommended that changes in the program model, including its leadership structure and activities, be undertaken with careful consideration of change impacts. This might include a staged approach where further co-creation with stakeholders occurs, and a planned approach to skills and knowledge retention and / or system centralisation.

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II. Introduction

A. Project background and objectives

The Department of Education, Skills and Employment (the department) works to ensure Australians can experience the social wellbeing and economic benefit that quality education, training and employment provide, by actively supporting ministers to deliver Australian Government policies and priorities.

This purpose is achieved by the department through the delivery of outcomes, including a focus on promoting growth in economic productivity and social wellbeing through access to quality skills and training and higher education, and policy and programs that assist job seekers into work and meet employer needs. A key Government priority area is to ensure students with disability can access and participate in education on the same basis as students without disability.

The National Disability Coordination Officer (NDCO) program works strategically to assist people with disability access and participate in Higher Education and Vocational Education and Training ('Tertiary Education') and subsequent employment, through a national network of regionally based NDCOs. The network of 30 NDCOs work with a range of stakeholders (schools, TAFE institutes, employment agencies and disability services) to improve coordination and collaboration among service providers and build their capability to support people with disability.

These NDCOs are recruited and 'hosted' by a lead organisation that has the contractual relationship with the department. Currently there are 15 Host Providers nationally that represent university, TAFE, employment or community services.

NDCO program aims and outcomes

The 2016 NDCO Program Guidelines articulate the three key objectives for the program, namely to:

- improve linkages between schools, tertiary education providers, employment service providers and providers of disability programs and assistance at all government levels;
- improve transitions for people with disability between school / community and tertiary education, and then to subsequent employment; and
- improve participation by people with disability in tertiary education and subsequent employment.

By focusing on the above program objectives NDCOs work towards achieving the following four program outcomes:

- the services and activities which facilitate transitions and participation from school to tertiary education and subsequent employment for people with disability are coordinated;
- local networks collaborate to identify and overcome barriers in transitions and participation in tertiary education and subsequent employment for people with disability;
- stakeholders have the knowledge and capability to support transitions and participation from school to tertiary education and subsequent employment for people with disability; and

- people with disability who have the ability to make decisions about their education and employment are able to do so based on an improved knowledge of their rights and entitlements, supports available, educational options and pathways to employment.

Review objectives

Since 2008, the NDCO program has been evaluated several times, most recently in 2011 and 2017.

Previous evaluations included recommendations for further review of the program to ensure continued appropriateness, effectiveness and efficiency, alignment with other government programs such as the National Disability Insurance Scheme (NDIS) and emerging government policy for people with disability, and consideration of available resourcing and funding.

This review primarily focused on the appropriateness of the program in meeting the current and emerging needs of students with disability accessing tertiary education and subsequent employment in the current environment.

In the last 12 -24 months there have been a number of major review processes taking place, including:

- the 2020 review of the *Disability Standards for Education 2005* (the Standards);
- the finalisation of *Australia's Disability Strategy 2021-2031*; and
- the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* (Disability Royal Commission).

It is essential to consider the role of the program in this broader context to ensure that it remains relevant and maximises its impact.

Our specific objectives for this review are presented overleaf.

> The overarching aim of this project was to review the NDCO in the current environment to ensure that it continues to drive change so that students with disability have equitable opportunity to access, participate and achieve their goals through to tertiary education and subsequent employment.

More specifically:

1. **Defining the current and emerging needs of students with disability accessing tertiary education and subsequent employment.**
   This included investigating:

   - Barriers for students with disability accessing tertiary education and subsequent employment and how students have successfully overcome them.

   - Gaps and opportunities at local, program and strategic levels.

   - Stakeholder perceptions of the NDCO program benefits and issues and their views on the emerging needs for future program design.

2. **Providing advice on how to reform the program to ensure that it delivers strategic outcomes that meet the needs of students with disability, taking into account the policy context including:**

   - The full implementation of the NDIS.

   - The findings / likely directions from the Disability Royal Commission.

   - The finalisation of the Australian Disability Strategy 2021-2031.

   - The 2020 Review of the *Disability Standards for Education 2005*.

   - The concurrent work being undertaken in relation to the Student Equity in Higher Education Roadmap.

Overview of the research methodology

An overview of the research methodology used to collect data to inform the review is presented in Figure 1 (overleaf). The first phase of research primarily focused on gathering information on stakeholder's views, opinions and experiences of the program to date.

The second phase focused on developmental research, exploring how the program can be reformed and delivered, such that it delivers strategic outcomes that better meet the needs of students with disability.

Figure 1: Overview of the research methodology
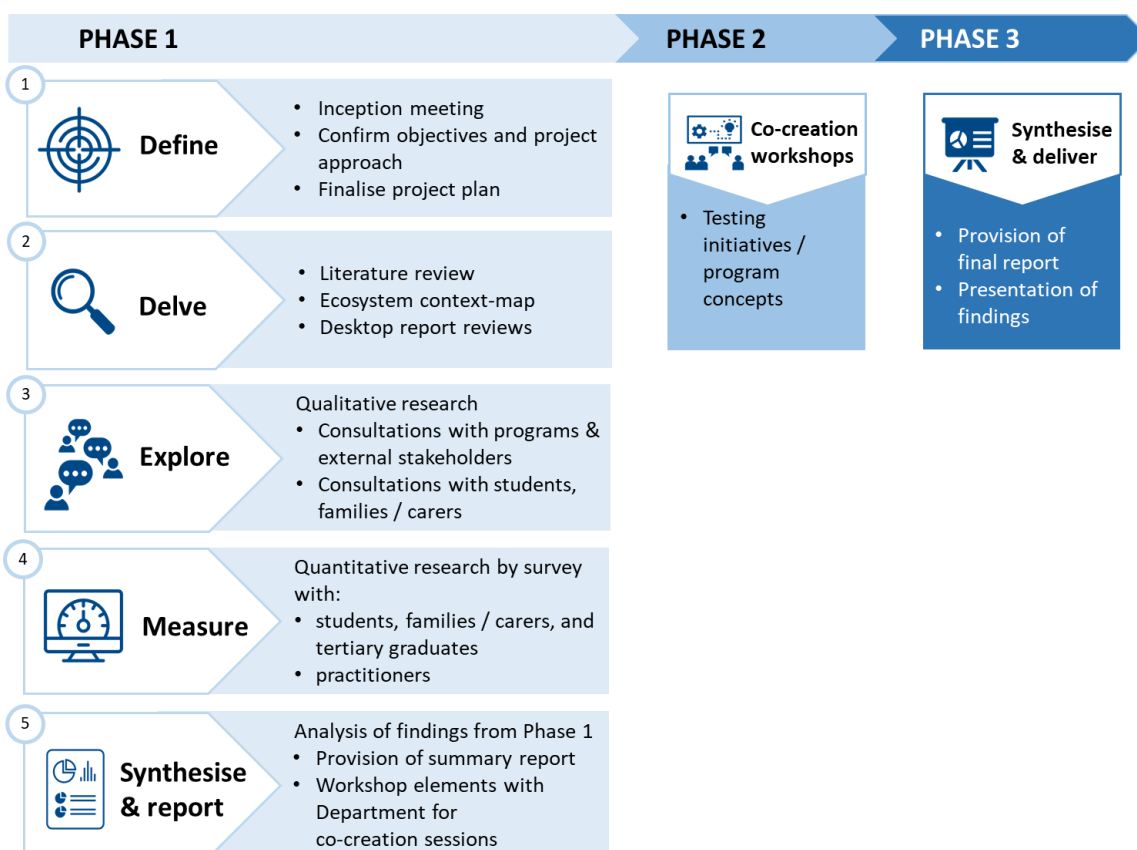
Desktop research

A literature scan and review of selected materials was completed to extend and complement the existing knowledge base. It reviewed both academic and grey literature (e.g. journal articles, reports authored by government departments and agencies, industry publications and not-for-profit organisations).

An ecosystem context map was also prepared in parallel to the literature review. It summarised the current state of play including the policy context, stakeholders and student barriers

The ecosystem context map and existing reports and resources provided by the department were used to identify any changes to the existing NDCO program logic and underlying metrics collected.

Qualitative research

Qualitative research was conducted online with the following target audiences over 11 October – 18 November 2021:

- Program and sector stakeholders across n=6 focus groups, n=1 mini focus group and n=9 in-depth interviews (including paired interviews), including
  - o   NDCOs and NDCO Host Providers;
  - o   NDIA representatives;
  - o   representatives from disability advocacy, industry and peak bodies;

- o representatives of organisations that support NDIS participant planning and implementation for employment goals;
  - o academics;
  - o disability employment service (DES) organisations;
  - o VET / Tertiary stakeholders; and
  - o research peaks.
- Strategic advisory committee discussions with government representatives.
- Students with disability, their family member or carer across n=7 focus groups and 4 in-depth interviews. Students included:
  - o those with physical, sensory, neurological, psychosocial, intellectual, cognitive or other disability or impairment; and
  - o students who were currently studying at TAFE/RTO or university, and graduates currently in their first 1-2 years of employment.
- All fieldwork was conducted via video call using Microsoft Teams. ORIMA co-moderated focus groups with the Youth Disability Advocacy Service (YDAS) and Victoria Advocacy League for Individual with Disability (VALID) for students with disability and all the other groups and interviews were conducted by the ORIMA Research team with two moderators.

A more detailed breakdown of the target audience and data collection approach can be found in the accompanying Methodology Report.

Quantitative research

Quantitative surveys were conducted over 28 October 2021 – 9 January 2022, with the target audiences noted in Table 1. The number of responses collected is also noted in this table.

Table 1: Target audiences and sample size

Audience	Number of responses collected
Current students with disability or impairment (year 10-12, university and TAFE/other tertiary)	n=524
Family members / carers of a student with disability or impairment (year 10-12, university and TAFE/other tertiary)	n=177
NDCOs and Host Providers	NDCOs: n=28 Host Providers: n=7
Graduates of tertiary education since 2016 with disability or impairment	n=202

Audience	Number of responses collected
Practitioners[1] who were full members of the Australian Tertiary Education Network on Disability (ATEND)	n=49[2]

All surveys were conducted online, with the survey of:

- **current students**, **family members / carers** of current students, and **tertiary graduates** involving programming and management of respondent recruitment from relevant online panels by Take2 Research;
- **NDCOs and host organisations** programmed and administered by ORIMA Research; and
- **practitioners** programmed by ORIMA, with invitations and reminders sent by ATEND to its members.

Further information about recruitment and fieldwork administration of these surveys can be found in the accompanying Methodology Report.

Co-creation workshops

Phase 1 of the review was primarily focussed on gathering information on stakeholder's views, opinions and experiences of the program to date and determining the current and emerging needs of students with disability accessing tertiary education and subsequent employment.

In light of the findings from Phase 1, the co-creation workshops sought to explore how the program can be reformed and delivered, such that it delivers strategic outcomes that better address the needs of students with disability. As part of this process, three concepts were developed (based on the Phase 1 findings) and presented to participants for discussion and refinement.

The workshop audiences included:

- n=1 workshop with (university, TAFE / VET) students with disability and disability peaks / advocacy organisations.
- n=1 workshop with year 10-12 students with disability.
- n=1 workshop with NDCOs and host organisations.
- n=1 workshop with government representatives and external stakeholders.

Two members of the ORIMA Research project team co-moderated each workshop. All the workshops were conducted online via Microsoft Teams over 24-28 January 2022.

Further information about these workshops can be found in the accompanying Methodology Report.

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[1] A practitioner is an individual who is primarily employed as a disability practitioner in the Higher Education and Vocational Education Training Sectors, whose primary focus of work in their professional capacity involves working to enhance tertiary education opportunities and access for people with disability.

[2] This figure is based on the number of respondents who answered at least one non-demographic question.

Ethics approval

As this project involved engagement with students with disability under the age of 18, ethics approval was sought and granted from the ORIMA Research Human Research Ethics Committee.

Quality standards

This project was conducted in accordance with the international quality standard ISO 20252, the international information security standard ISO 27001, as well as the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)*. ORIMA Research also adheres to the Privacy (Market and Social Research) Code 2021 administered by the Australian Data and Insights Association (ADIA).

Research limitations

Due to the COVID-19 pandemic, the qualitative data collection and co-creation workshop methodology was adjusted to the align with State/Territory Government public health restrictions. Focus groups and in-depth interviews were not conducted in-person, but were conducted online via video-calls.

The fieldwork period for the practitioner survey coincided with the end of the 2021 calendar year and school holiday period, which may have impacted the final response rate to the survey.

Terms used in this report

Tertiary Education: in the Australian context tertiary education encompasses all national and State/Territory government accredited post compulsory education units and packages from levels 1 to 10, including vocational and higher education.

Higher Education: consists of awards spanning Australian Qualifications Framework (AQF) levels 5-10, which include: Diplomas; Advanced Diplomas; Associate Degrees, Bachelor Degrees (including honours); Graduate Certificates; Graduate Diplomas; Masters Degrees; Doctoral Degrees; and higher Doctoral Degrees.

Vocational Education and Training: a vocational education and training (VET) qualification is a formal certification awarded by a Registered Training Provider (RTO) in recognition of the successful completion of an occupational or work-related knowledge and skills-based educational program. There are 8 types of VET qualifications; Certificate I, II, III and IV, Diploma, Advanced Diploma, Graduate Certificate and Graduate Diploma.

Transition stages: the following terms are used to describe key transition points for students in tertiary education.

- **Pre-access:** in the context of the program, pre-access relates to the period ahead of the decision to enter tertiary education. This stage includes aspects of motivation for entry and career planning. For this project, the views around pre-access predominantly relate to students in the equivalent of secondary school setting. However, the needs of people with disability in the community who may be currently working, in a day program or not engaged with education or employment system should also be considered. The report uses

terminology of secondary school years – these should be read as 'equivalent' years to recognise the different education programs and arrangements in different States/ Territories.

- **Access:** refers to students who are transitioning into tertiary education and considers elements of application, identification or disclosure of disability and support with onboarding including provision of information about inclusive learning supports.
- **Participation:** this stage describes the period of active study with the tertiary institution. It considers participation related but not limited to the physical and social environment, coursework, assessments, practical assignment and work placements.
- **Subsequent / Graduate Employment:** in the context of the program, subsequent or graduate employment refers to employment that is obtained after tertiary education is undertaken. It is acknowledged that some tertiary education courses, such as apprenticeships, have a component of "concurrent" employment (paid or voluntary). This concurrent employment is considered to support a pathway for graduate employment.

III. Key insights on current and emerging needs of students

This section of the report draws on the extensive desktop, qualitative and quantitative research conducted. It presents primary insights into the needs of current and graduate students which are most relevant to this program review. More detailed findings are presented in the Appendices.

A. Barriers and needs of students with disability accessing tertiary education and subsequent employment

A key opportunity to drive greater entry into tertiary education lies in building career ambition

Students with disability have been disengaging with the education system earlier than their peers. They are more likely than those without a disability to have completed year 10, year 9 or year 8 or equivalent as their highest level of school. This has led to a gap of almost double between completion rates of year 12 or equivalent – 33 per cent of students with reported disability versus 65 per cent of those with no reported disability.

A large proportion of the barriers identified relate to pre-access decisions and support including the low aspirations and expectations for students with disability to achieve their education and career goals. We heard that students experience doubt, redirection by educators / advisors into alternate pathways and employers not realising the strengths of individuals that have a disability.

Practically, there appears to be variability in effective career planning support that focuses on abilities over barriers, and insufficient information about tertiary options and the reasonable adjustments that could be made available. This is combined with students disengaging in school years 8-10 likely before they have developed job aspirations or goal setting commences, and / or because 'fighting' for the right to a good career is too difficult.

When presented with information about the program and related stakeholders in the system, students and parents suggested that there was a need for stakeholders, policy and programs to be better connected and work better together to improve tertiary pathways and employment outcomes for students. Finding information online about options and support was seen as confusing, time-consuming and frustrating.

Our research with secondary school, tertiary and tertiary-graduated students indicates that the primary reason for entering tertiary education is to obtain a job – mostly students know or have a general idea about the job or career area they are seeking. This aligns with the program aspiration of students obtaining graduate employment related to their tertiary studies.

Greater connection to other policy and programs promoting career aspirations, tertiary opportunities and employment would be highly advantageous to this cohort including Australia's Disability Strategy,

Employ My Ability – the Disability Employment Strategy, National Careers Institute programs / grants and NDIS planning including School Leaver Employment Supports (SLES).

Improvements in tertiary study access and completion rates are likely to flow from flipping the switch on self-reporting disability

Self-reporting of disability in order to access supports and adjustments is hindered due to several factors including:

- an intentional desire to move away from labelling and avoid social stigmas;
- reluctance to provide private health information, and the expensive, lengthy process to confirm disability support needs;
- a fairly traditional view of what constitutes disability without understanding the breadth of conditions covered under the *Disability Discrimination Act 1992* (DDA), including mental health; and
- not requiring support, not identifying with a 'disability' cohort or not seeing the benefit in disclosing their disability.

For those that identified they or their family member would benefit from adjustments or support in education or employment, we heard the need for a shift in responsibility from student disclosure to the responsibility of institutions/providers being proactive in demonstrating their inclusiveness and support offerings. In particular, providing meaningful information on what the DDA covers and how they practically support students / graduates with disability may give confidence around acceptance of diversity, raise awareness about possible adjustments and the benefits of supports, thus providing a safer environment for students to report disability.

We heard transparency in this type of information would be valuable for students when selecting a tertiary provider and give them greater confidence of likely course success given the fees involved. Students reported variability in what was provided on a tertiary institution's website, if at all, and when contact was made they found that the broader statements made by providers were not reflected in the practical support available. Students therefore felt that more information on institutions' inclusion performance would be helpful; ideally backed by an independent or reliable source to avoid this being a marketing piece with little substance.

This reframing of disclosure could be linked to higher education institutions given their access to government programs such as the Disability Support Program in the higher education sector, which is based on the proportion of students with disability enrolled.

The experience of adjustments in tertiary settings remains patchy

There remains a need to continue to improve the experience of students participating in tertiary education. While many students reported their tertiary educators as being supportive and understanding of their needs, there remains a significant proportion (around 30 per cent) who have experienced challenges in having their learning needs met by their tertiary provider.

This appears to start at the access phase with many students feeling a burden to find information themselves, inaccessible processes and lack of practical support to navigate this transition phase. **The**

lack of knowledge of available adjustments, and who to talk to for adjustment planning was a particular pain point.

Once in the door, the variable capability of staff to consistently and proactively execute adjustments or flexible arrangements to support their participation was a further consistent theme that emerged.

Conversely, practitioners cited a challenge that many students are unprepared for tertiary settings and that student capacity building before tertiary is essential to a successful transition.

Many students spoke about the burden of seeking adjustments falling on them rather than the tertiary provider. Students suggested that greater responsibility be taken by tertiary providers, and the potential need for audit or independent assessment processes that provided transparent information to prospective students and avoided blanket claims of providers supporting accessibility and inclusion that don't translate into practical supports.

A core strength and value of the NDCO program to practitioners is the translation of information into practice - these are highly valued resources. However, students and stakeholders have suggested that there is a need for a more structured approach to educator training and systems to better support students with reliable information on adjustments and implementation of support. Students also referred to the differences in attitudes towards application of reasonable adjustments for people with visible and invisible disability such as mental health, with students in the latter group experiencing or fearing judgement when asking for adjustments.

Many students cited the positive impact of providers' responses to the COVID-19 pandemic, which resulted in increased access to technology and online study options (interestingly this is also a primary consideration in student choice of a tertiary provider). Some students indicated surprise that tertiary education providers were not as far progressed in inclusive approaches.

While a more systematic approach to building educators' awareness and capacity for delivering reasonable adjustment was seen as important, it was as important that this be designed together with the voice of students with disability.

Many stakeholders including students recognised universal design for learning as a way to improve accessibility for all students, not just for people with disability and would not require people to disclose a disability in order to benefit. While universal design for inclusive learning would support a greater capacity in the sector, the challenge however remains that people are unique, and open dialogue between the person with disability and the educator or employer may still be required.

Transition from tertiary providers into employment is a gap

Considering the transition stages of a student journey from secondary to tertiary education, and from tertiary education to employment, obtaining employment related to a student's qualifications was seen as the most challenging transition point for students. This was confirmed by all stakeholders engaged in this research.

Two key themes emerged: issues with pathways from tertiary institutions into employment; and barriers flowing from the attitudes of employers towards hiring tertiary graduates with disability.

Akin to the challenges of implementation of reasonable adjustment, course work placements that provide exposure to employers and acquisition of job-skills were seen as inflexible and poorly planned.

Confidence of tertiary students in obtaining a course-related job was low, particularly for university students where employment was more commonly obtained some months after graduation. Despite university graduates identifying tertiary career guidance as the second most helpful support to find a job[3], they were also more negative than current students about the support from the tertiary provider in finding a job.

The need for tertiary providers to provide more active support to graduates to find work was highlighted and included the need to start this support earlier within their studies. Starting earlier may also benefit linkages for work placement and building relationships with prospective employers. Unsurprisingly, COVID-19 was seen as having a negative impact on finding and / or keeping a job related to their studies.

The perceived biases and misconceptions of employers in hiring graduates with disability was commonly raised as a challenge in obtaining course-related employment. Students indicated that employers see the complexities of recruiting a person with disability ahead of the skills and benefits it would bring to their business. Combined with the competitive nature of the job application process, it was thought that when comparing two skilled candidates, employers may screen graduates with disability out based on assumptions around the additional support required.

Design with us not for us

Throughout the review, we engaged with students with disability and family members who consistently stressed the need for their voice to be heard in the design and development of the future program given they are the beneficiaries of the program.

When considering the program and the broader ecosystem (contained in Appendix A and D) students felt that they were not connected with the program, and that it was critical for them to have a recognised 'seat at the table'. Having their voice included and listened to by those that are influential in the sector is a powerful platform for change and provides greater insight into priorities and how best to implement them.

Unfortunately, while progress has been made in understanding the importance and value of this expertise within the disability sector, more effort and education is required to ensure the program going forward engages with the people it aims to improve outcomes for. This needs to be done in a meaningful way and there is opportunity for the program to demonstrate meaningful inclusion as part of its future partnerships and operations.

This was also a theme that arose for practitioners, who also felt that if students with disability and practitioners were not an integral part of informing the program direction, this disengagement would result in inaccurate or reduced quality of information and practice support provided.

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[3] Note: This was based on a small number of responses and hence caution should be exercised in extrapolating this finding to the underlying population.

B. Gaps and opportunities at local, program and strategic levels

The table below presents an overview of the NDCO program's strengths, weaknesses, opportunities and threats based on the research undertaken, and consolidates findings at a local, program and strategic level.

Table 2: Summary of the NDCO program current state

	Observations
Strengths	• Depth of knowledge of the tertiary education system – national, state and local arrangements, and how this system connects end-to-end (pre-access to employment) • Ability to form and maintain positive relationship with local stakeholders (i.e. region and state-based stakeholders; community groups) • Independence from the sector provides confidence to tertiary institutions on advice and support • Agility to work within resourcing and adapt to changing landscape including responding to required advisory resources for pandemic, moving to online engagement and improving the scale of engagement • Some success in elevating projects, engagement and networks to national and / or more strategic approach • Success in developing relationships to progress initiatives including onboarding stakeholders to scale pilot projects, working on resources for NDIS participants • Committed staff demonstrating high engagement with program aims, resulting in self-motivating and self-directed workforce. Varied skills and diverse professional interest areas within current staffing complement • Appetite to move the program to a strategic focus and raise the program's profile
Weaknesses	• Little profile or understanding of strategic objectives of the NDCO program by stakeholders and within the context of the broader sector • Limited role clarity and value proposition for Host arrangements • The absence of connected program data generally, as well as against priorities • Operational inefficiencies including duplication, effort alignment based on output, clarity of outputs to outcomes, inefficient operating structures to support activity coordination • Red tape resulting in wasted effort in administration and delays in decision-making • Breadth of activities and varied focus areas dilutes program delivery and therefore outcomes

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	Observations
	• Blurred lines in terms of ownership of initiatives – i.e. NDCO program versus Host Organisation / Institution
	• Lack of clarity in NDCO role and/or aligned approaches with other funded program areas (i.e. Australian Disability Clearinghouse on Education and Training (ADCET); National Centre for Vocational Education Research (NCVER); National Centre for Student Equity in Higher Education (NCSEHE); National Aboriginal and Torres Strait Islander Higher Education Consortium (NATSIHEC))
Threats	• Lack of clear direction and agreed leadership both centrally and as a coordinated program of work
	• Lack of agreement over what constitutes 'strategic' risks achievement of objectives
	• Internal tensions between program staff are perceived externally as threatening sense of program cohesion
	• Activities may disempower or abrogate sector responsibility
	• Confusion around how broader reforms and other programs interface and the role/ responsibility for mainstream capacity building
	• Data collection not in place to support reporting on program priorities which feeds into broader whole of government reporting requirements
	• Disconnection of the program from influential stakeholders and those with a representative voice (i.e. students with disability)
	• Other program priorities may have unintended consequences on program efforts (i.e. employment targets not considering tertiary pathways)
	• Tension on ownership of activities/resources impacting on scalability
	• Limited focus on employment transition may compromise ability to achieve program goals
	• Cost / benefit for local hosts is questionable and risks being seen as a corporate social responsibility
Opportunities	• Government inclusion reforms have a stronger focus on mainstream services being responsible and accountable – including production of resources and campaigns (e.g. through Australia's Disability Strategy, the Standards)
	• Outcome measures being aligned to the disability equity agenda and frameworks as described under Australia's Disability Strategy
	• Students with disability are the fastest growing equity group in Australian universities and this may increase influence and leverage greater support
	• Broad range of industry and sector stakeholders with skills to leverage to contribute to program outcomes
	• (Re)focus program structure and (re)position resources within system to achieve objectives (i.e. create optimum interfaces and influence)
	• Raising the disability focus within other equity and government programs
	• Utilising broader industry for advocacy rather than a siloed voice

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Observations
• Existing work being undertaken on universal design for learning

It is critical that any changes are made in the context of broader government reforms building on the strengths of the program and focused on current opportunities and priority areas.

Strategic Opportunities

Since the last program review in 2017, two key reforms have been concluded and what has emerged is a more united platform for inclusion in mainstream settings. This includes the *2020 Review of the Disability Standards for Education 2005* (the Standards) and the more recent release of Australia's Disability Strategy. In particular, Australia's Disability Strategy provides a strengthened framework for outcomes, responsibility and accountability across all government initiatives, across education (pre-tertiary and tertiary) and improving outcomes in employment for people with disability.

We understand there will be a significant effort from government in the development of information, resources and campaigns to improve community attitudes (including among educators and employers), raise student expectations around education pathways, and best practice to support educational institutions' understanding and capability.

It is unrealistic to expect that any one program or stakeholder can address the complexity of social change required. However, the greater clarity about cross-government responsibilities provides an opportunity to:

- align to a uniform structure for measuring program outcomes as per Australia's Disability Strategy;
- support the visible inclusion of tertiary students and graduates with disability in government career development, education and employment policy and programs;
- include tertiary students and sector representation within advisory committees;
- identify specific cross-government responsibilities for initiatives that can be leveraged (e.g. NDIS SLES and employment policy);
- integrate and make use of department initiatives for education and employment for people with disability (see section VI for a range of programs and initiatives); and
- carve out a specific program role that contributes to greater impact in implementation of reforms.

A further strategic opportunity exists to bring together critical and influential parts of the broader ecosystem to enable greater connection, understanding, reach and impact of activities as a whole.

Connecting peak bodies, industry leaders, professional associations would also assist with ensuring a united commitment to change and system advocacy, improved quality of outputs and implementation.

As of 30 September 2021 there were 484,700 people with disability receiving supports from the NDIS, representing around 11 per cent of Australians with disability. This translates to a small proportion of all students with disability that would benefit from systemic improvement within the NDIS.

While the NDIA will mature its community engagement approach, we expect this will remain patchy unless a national approach is adopted – however the NDIA remains an important strategic partner, particularly in supporting more complex disability learning needs.

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In this review, we were asked to consider whether the full roll out of the NDIS had replaced the need for the NDCO program more broadly. Given eligibility for the NDIS funding is not as broad as disability as described under the DDA and its progress to date in supporting mainstream tertiary capacity building has been limited, the need for a program to build tertiary mainstream capacity remains. However, it should add value to other initiatives taking place across government.

Program opportunities

The program has played a role in identifying barriers and supporting change through practice information, engagement and submissions (incorporating research activities). With broader reforms now becoming clearer, there is an opportunity to refocus and reprioritise effort. There is an opportunity to:

- divest activities where these are being undertaken elsewhere or where expertise is best placed elsewhere (i.e. 'who in the sector is best placed to do an activity'); or
- cease / limit activities that are no longer a priority.

This will require working with stakeholders to garner commitment and connection between responsible programs.

The review has identified a primary opportunity to support the implementation effort arising from the review of the Standards.

The Department will be developing and employing additional resources for students and educators, with the responsibility of educators to implement. The program might support this translation of resources into adopted practice, support industry planning and / or provide a mechanism to provide insight on implementation issues back to government. Specialisation based on sector or topics would acknowledge the unique attributes of the higher education and vocational education and training providers. This program specialisation also affords an opportunity to elevate the status of the program with influential stakeholders.

While the funding of the program was not in scope for this review, a further opportunity would be to more clearly 'braid' Department funded activities with a clear contribution to the program (e.g. ADCET role in developing and communicating resources, research commissioning).

Local opportunities (geographic)

Given the variation in federal and State/Territory legislation and/or policy, accountabilities for implementation of the Standards, and local initiatives that have or are likely to arise as part of these accountabilities, there remains an argument to maintain a local presence. This would also retain the information and knowledge base built up by the program over time.

The pursuit of strategic objectives does not negate the role or need for local engagement for example directly with providers; however, the purpose, nature and outcome of the engagement should be clearly targeted on priorities. While having a local presence would also facilitate engagement with

harder to reach or intersectional[4] community groups, and connection with interfacing programs of government such as regional university, local programs / initiatives, this effort needs to be focused on program priorities.

C.   Stakeholder perceptions of the program

The effectiveness of the broader equity ecosystem

When considering perceptions of the program, we also considered the NDCOs' perspectives on the broader system that supports equitable tertiary access, participation and graduate employment opportunities. While NDCOs were generally positive around the broader system having clarity in roles (68%), the areas they rated with lowest system effectiveness were:

- duplication and coordination of the broader support network (26 per cent effective);
- communication between stakeholders (i.e. education, employment, health and disability) (33 per cent effective); and
- knowledge about the range of supports and services that exist (40 per cent effective).

Most other areas that covered more practical identification and implementation of supports or achieving education or employment outcomes were commonly rated around 50 per cent in terms of the broader network being effective. While this is based on a small sample size, it is consistent with what we heard as challenges of the broader system working together and the practical application of support.

Perspectives on the program's impact and barriers to achieving outcomes

Many stakeholders engaged in our research provided positive feedback on the usefulness of the program, particularly practitioners in accessing information and resources which translates research into practical advice and support for practitioners.

Practitioners reported that the NDCO program had impacted student participation in tertiary education decision making, access, and participation (79 per cent/83 per cent/77 per cent reported large or moderate impacts on each of these respectively). Slightly lower levels of impact were reported in relation to the program helping to find suitable employment (72 per cent), which also had the highest level of reports of no impact (15 per cent).

Overall, there was a sense of success, but a limited understanding of the strategic objectives of the program.

Table 3: Practitioner comments on the success of the NDCO program

Positive (58%)	Neutral (19%)	Negative (23%)

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[4] Intersectionality recognises that a person or group of people can be affected by multiple forms of discrimination and disadvantage due to their race, sex, gender identity, sexual orientation, impairment, class, religion, age, social origin and other identity markers.

"The NDCO program is the most supportive and professional pool of people I have worked with - it is an outstanding program as it is."	"There is a lot of variety in how NDCOs work and perhaps not enough consistency and transparency about how spend their time."	"Somewhat inconsistent, driven by a few individuals with great effect and many others who remain isolated an invisible in their work"
"Highly successful and internationally renowned. It is important to understand that this is a best practice approach internationally and that within the constraints of the system Australia has greatly benefitted"	"Success is entirely dependent on the skill set of the incumbent NDCO - some are highly skilled and excellent strategists who know how to influence policy change whereas others are focussed on assisting individuals in their regions."	"Was better before – it's lost its way in policy and research now - maybe because staff employed are keen in these areas but not suit the role"
"I appreciate the resources and information produced but don't know much about what else they offer"	"The programs and approach of each office appears scattered and focused on local engagement with community groups - there is a space for that, but to achieve societal changes, a more strategic focus is needed"	"Very good at writing papers based on little research"

There was some inconsistency in how NDCOs, Hosts and equity practitioners perceived the program strengths and barriers to achieving its strategic objectives. The themes are documented below.

NDCO program strengths in:
- understanding of local / regional issues to inform the program at the national / strategic level;
- expertise on systemic issues and barriers; and
- creating and piloting scalable solutions.

NDCO program barriers to making a bigger impact are:
- strategic engagement and influence at national government and policy level; and
- oversight and coordination of activities.

Areas of dissonance between stakeholder views included:
- alignment in strategy and approaches across sectors, regions or at a national level was seen as both a strength and barrier to preventing greater impact;
- NDCOs nominated the website and information provision as a barrier - currently there are multiple websites for information and resources; and
- practitioners thought barriers also included the lack of strategic engagement and influence in all education settings, and a lack of connection to other tertiary education initiatives.

Value of the program structure

A prominent feature of this program has been engagement of Host Providers who recruit and support the NDCO officers. However, the extent to which this model serves the purpose of pursuing more strategic objectives for the program was questioned. While only a small proportion of Host Providers engaged with the survey, 50 per cent felt that the model added little to no value.

Hosts relayed the challenge of supporting an elevated level of strategic pursuits given the distance of the program from their operations or lack of understanding of the strategic activities.

A number of Hosts questioned their involvement, not only in terms of the support they provide to the program, which they feel is limited, but also in terms of the financial impact it has more broadly. Host Providers tended to see or promote the program as a corporate social responsibility initiative of the provider and their contribution to change. This perspective will present a challenge should a more consistent national approach be adopted for the NDCO program.

With Host Providers currently representing different local providers in the sector, it is natural for local activities to be more targeted to their area of expertise and to engage more prominently with related local stakeholders (i.e. higher education, TAFE or employment). This may be a reason some equity practitioners identified they did not know their NDCO. It may also contribute to the challenge for NDCOs to broaden their reach across local boundaries and adopt a national approach.

Despite this, and other findings about the challenges the program structure creates, NDCOs and Hosts mainly felt the current Host model was a suitable arrangement. Another option that was seen as serving the purpose of the program going forward, was to align with an overarching organisation within the sector – whether that be in totality for the program, or single entities / peaks that represent a tertiary or employment sector.

Future focus

When considering the future focus of the program, NDCOs indicated a preference for the continuation of all activities they are doing currently with relatively equal ratings. From the perspective of practitioners, there was a much stronger focus on the program taking a greater role for strategic engagement and partnership on the transition into and out of tertiary education, developing and promoting practice information to support student access and participation, and strategic projects that focus on transition points.

Overall, we heard that the future focus of the program should be on supporting student participation within tertiary education through developing and promoting the translation of information into practice, along with strategic engagement and partnership.

Universal design is recognised as an emerging body of practice to improve accessibility for all students, not just for people with disability, and would not require people to formalise diagnosis or disclose a disability in order to benefit.

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IV. Recommendations on program reform to ensure that it delivers strategic outcomes that meet the needs of students with disability

A. A strategic and targeted approach to better respond to student needs

There remains a need for a specific program to drive broader systemic change so that people with disability have equitable opportunity to access, participate and achieve their goals in tertiary education and subsequent employment. Most other programs that operate in this area focus on individual needs.

Our review found that the program could be strengthened and better positioned to influence outcomes by having an agreed strategic focus. The draft strategic plan for the existing program was never finalised which led to significant confusion and variability in terms of implementation. We recommend the development of a high-level national strategic plan for the program tightly focused on agreed priorities.

The existing program identifies four priorities which are largely process based (e.g. Identify Gaps and Barriers and Escalate and Advocate), and do not provide clear boundaries for the work of the program. Our research identified the lack of clarity over what the NDCOs' roles and responsibilities are as one of the more significant weaknesses of the program stemming from the lack of an agreed and uniform strategic direction.

In an environment where tertiary institutions will increasingly be held accountable for meeting their legislative responsibilities under the DDA and the Standards, the strategic focus of this program should be on supporting those endeavours in areas where it has the greatest potential to improve the outcomes of students with disability through a targeted range of activities. Continuing to deliver a broad range of activities which are *not* uniform across the program significantly reduces the effectiveness of the program in addition to causing confusion.

An agreed strategic plan and a revised model of program leadership, outlined below, will enable roles and responsibilities to become clearer for those involved in program delivery, and focus effort where it is most needed. It will also help reduce the confusion and maximise the opportunities for collaboration with the broader sector including ATEND, ADCET, NCSEHE and NATSIEC.

In light of program reforms settling, and recognition of the expertise and responsibilities that exist in the sector, we recommend the following activities be discontinued or reconsidered as secondary program activities dependent upon alignment with the core priorities:

- Social research – consideration should be given to existing research partnerships and commissioning research that informs an understanding of the student experience using a more structured methodology.
- Advocacy – significant time and effort is focused across a broad range of activities focused on advocacy at a local level and/or via submissions. Future advocacy efforts should be focused on program priorities including strategic advocacy that supports systemic change with

consideration of the most effective or impactful areas to contribute based on the expertise of the program.

- Policy submissions – the program may be better positioned to collaborate or contribute information to the submissions by peaks and industry where this is assessed to align with program priorities and have a perceived high impact for program outcomes.
- Unfocused engagement – engagement should be aligned to the priorities, target key cohorts and have a clear purpose as documented in the strategy.
- Student expositions and events - the program may be better positioned to collaborate or contribute to national events of peaks and industry.

We recommend that the priorities for the program remain primarily focused on the access and participation phases of the student journey with an agreed data collection strategy to ensure that progress against priorities can be measured. To support broader outcomes, the findings from this review should be shared with other areas of the department which are responsible for pre-access and subsequent employment. We recommend the three priority areas the program could focus on are:

➢ Strategically connect and leverage the national tertiary equity disability ecosystem;

➢ Support tertiary institutions' translation of information and research into practice; and

➢ Continue to progress universal design for learning in tertiary settings.

Further details on these priorities are provided in the report including potential options and considerations for how these could be executed.

We also recommend a regular review of program priorities to determine the best utilisation of resources. We would recommend an alignment meeting annually and more fulsome review of the priorities every three years in order to align with government reporting and evaluations being conducted as part of Australia's Disability Strategy in 2025 and 2029. This process will identify new priorities or support continued effort in existing areas based on progress made to date and broader reforms in the tertiary education landscape.

B.   Strategic connection and leadership within the tertiary disability equity ecosystem

Formally bring together stakeholders from the tertiary disability equity ecosystem

Operating at a more strategic level requires greater connection with peaks, industry, leadership alliances and professional associations at a national level.

The review highlighted a need for the program to be better connected with these stakeholders that have high interest, responsibility and influence within the tertiary disability equity ecosystem.

Ideally representation should be at a senior level and include coverage of the university and vocational education sector in order to drive change. Stakeholders have advised that there is no forum that brings these parties together, and that national strategic engagement with peaks is a key barrier to this program having greater impact.

It is recommended that the program establish a mechanism (i.e. a 'backbone') to support a strategic network to come together based on a shared commitment for change, collaborative relationships and activity partnerships. Creation of such a forum has the potential to create greater impact by extending the support for and reach of program activities, connecting stakeholders and mobilising areas of the sector.

The benefits of this connection are reciprocal, with stakeholders having a greater connection to government programs and contribution into program and resource design. In turn, this provides greater visibility and status of the program, improved understanding of diverse stakeholder perspectives on implementation issues, and partnerships for designing and implementing solutions.

Compatible with the findings of this review and broader progress within the disability sector, it is critical that this network include a representative voice of tertiary students with disability. The value they have provided to the design ideas for this review should not be underestimated, and the quality of solutions / activities of the program going forward would be greatly enhanced through the expertise of lived experience.

Given the high proportion of students that access private registered training organisations, further consideration should be given to their engagement, particularly as there is no single representative peak. It might be that discrete strategic engagement occur via alternate mechanisms.

Revised leadership model for the program

The review has highlighted the program challenge of being able to influence stakeholders for systemic change, and coordinating program activities to align with the program's strategic intent. Elevating the strategic connection to the broader disability equity ecosystem and with stakeholders that have national influence also requires an elevation of the program leadership. This would assist in program credibility and confidence in stakeholder partnerships, and as a further mechanism to increase the status and influence of program activities.

We envisage a revised leadership function that would serve two critical roles:

- overarching program oversight and leadership on progressing program priorities; and
- sector partnership engagement to support delivery of program activities. This would include engagement of other enabling programs such as National Centre for Vocational Education Research (NCVER), National Centre for Student Equity in Higher Education (NCSEHE) and Aust. Disability Clearinghouse on Education and Training (ADCET) etc.

The Department would need to guide and endorse the overarching strategic plan and contribute to the program management through insights and identification of opportunities to collaborate with other government programs. We expect this initial period of reform implementation will bring many changes, and it is important the program continues to keep pace with other developments.

Functionally, there are a few options around the delivery of the program that will influence the leadership model adopted. We envisage a model that is aligned with the adoption of a partnership delivery model.

Adopt a partnership delivery model

The current Host Provider model is seemingly becoming of less value to host organisations and limiting the broader impact of the program. Host Providers have noted the contractual arrangements in place confuse and limit their ability to support strategic endeavours of the program. NDCOs and practitioners, while disposed to retaining multiple partners for delivery, express the need for greater coordination of activities.

We recommend that this current model of Host Provider arrangements be reformed to a 'partnership' model that provides partners with a greater input and stake in the delivery of the program's strategic activities. This partnership would be based on mutual benefit for the partner, and the program outcomes based on the revised priorities.

While the partnership delivery model would be dependent upon priorities and activities adopted, we would recommend the following be considered in taking the program forward:

- To align with the strategic objectives of the program, it would be prudent to consider delivery partner(s) of peak, industry, professional associations etc. and / or where specific areas of excellence and leadership are observed.
- It would be likely that multiple partners would be required to enable:
  - o expertise and the requisite skill in the delivery of the priority activities; and
  - o specialisation and coverage of the disability and tertiary sector, including higher education and vocational education and training.
- Aligned to the need for specialisation, consideration might be given to partnering with specific organisations for discrete activities, depending on the expertise required.
- Where relevant, the ability to support national program activities, particularly local access to the consultation model.
- Any partnerships for delivery should be clear about retaining a discrete focus on students with disability in the tertiary sector to ensure it is not diverted by other priorities.
- Delivery partners engaged should be able to demonstrate their ability to work collaboratively to support national coordination and reporting across the program; and their connection to the broader sector, and how this supports the reach and impact of program activities.
- As the ecosystem evolves along with the project priorities, it would be important to review any partnership arrangements in place.

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During the desktop research and consultation with stakeholders, different models were identified beyond the traditional contractual relationship. We have included these to stimulate consideration on possible arrangements that might be considered, either for the next phase or to work towards in time. Section VI covers the following arrangements:

- A central coordinating body with delivery partnership arrangements within industry;
- Independent government seeded organisation;
- Membership based independent networks; and
- A government-industry partnership approach.

C. Suggested priorities for the next three years

Students and graduates with disability find increased challenges as they move into, participate in and move out of tertiary education into graduate employment.

To respond to these needs of tertiary students, and not duplicate activities that will be undertaken as part of other reforms, we recommend that the program focus on the problem described as:

> *Tertiary students with disability should have the opportunity to access the supports they need for successful course completion, and to obtain related employment. Students with disability are behind the general population in tertiary education and graduate employment outcomes, limiting their right to social and economic participation. Students are uninformed on tertiary institutions' offerings for inclusive learning and miss out on what can be provided, or pay for a course with little confidence they will get the support they need to successfully participate and complete. Students' disability inclusion needs are not well planned or implemented in the tertiary sector. Students bear a significant responsibility in self-disclosure of disability and self-advocacy in order to access learning adjustments. Diversity of student needs, variability in practitioner knowledge and skills to provide reasonable adjustments means students' learning and future career opportunities are not optimised.*

For the next three years of the program, we would recommend a focus on the following priority areas:

1. Strategically connect and leverage the national tertiary equity disability ecosystem to support inclusive practices through establishing a tertiary disability equity 'backbone';
2. Support tertiary institutions' to translate information and research into practice via a consulting approach; and
3. Continue to progress universal design for learning in tertiary settings.

The strategic program of work does not negate the need for local engagement for implementation, rather it provides a tiered approach to obtain greater traction on the ground by working with national and / or strategic stakeholders focusing on the priority areas.

Background to development of the program initiative concepts

During the review, common themes emerged about the needs of students with disability and questions or ideas around how these could be addressed. These have continued to evolve from the initial desktop research, throughout our stakeholder engagement and in co-creation workshops. A short summary is presented below.

Concept 1: 'Backbone organisation' – the early consultation and the literature review highlighted the challenges in program authority for greater program impact. Students particularly questioned why there was great confusion in roles, why policy and information is not better connected and the need to work together with people with disability and the broader disability sector. The literature review also included the benefits of bringing diverse stakeholders together – i.e. not just tertiary institutions, in order to collectively share the challenge of and solutions for inclusion. It noted the need for an organising body, which borrows from the collective impact approach with students with disability having 'a seat at the table'.

Concept 2: 'Consulting approach' – This concept was originally seeded based on student and program stakeholders referring to challenges in getting lasting change within institutions for implementation of adjustments, and the value stakeholder and practitioners saw in retaining local practice support and knowledge. Students, student representative peaks and external stakeholders initially raised this as an audit / quasi regulation model. However, it has evolved to a voluntary 'support' model. Students prioritised this concept as the most practical and tangible way to create a change for students.

Concept 3: 'Progress universal design for learning' – This is not a new concept given work is underway by NDCOs working with ADCET and NSCEHE, and is highly promoted as a long-term but necessary pursuit in literature. Students questioned the lack of progress on accessibility within the tertiary sector more generally, with many lamenting the need for common accessible approaches such as captioning, and recorded lectures for all students.

As part of the co-creation workshops, the three program concepts were presented to participants. During the consultation, stakeholders indicated that they all had merit, but needed to be integrated, rather than discrete projects. Each of the concepts received positive and negative feedback, and as such, the consensus was that there were elements from each that warranted further consideration by the department when redesigning the program.

However, there was agreement that the revised program:

♦ should build upon the perceived strengths of the current NDCO program in developing the next iteration of the program;
♦ needed to have a clearly defined purpose and communicated outcomes;
♦ provide clarity around the role of those delivering or partnering on the program; and
♦ should be more strategically focused (i.e. to potentially concentrate on areas where it has the greatest potential to improve the outcomes for students with disability accessing and participating in tertiary education and obtaining related employment).

While each concept was presented separately in the co-creation workshops, we have provided an overview of the connected program of work below, followed by more detailed design considerations resulting from co-creation workshops.

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Table 4: Indicative program priorities and initiative concepts

Priority area	Initiative Concept	Problem	Description
Strategically connect and leverage the national tertiary equity disability ecosystem	Establish a tertiary disability equity 'backbone'	**Many players that have a role in improving tertiary education to employment outcomes for people with disability are not well connected, and it is unclear who is doing what.**	Formally bring key players together for greater collective impact.
Support tertiary institutions' to translate information and research into practice	Consulting approach	**Students' disability inclusion needs are not well planned or implemented despite the resources available, with stakeholders identifying the need for practical support and guidance.**	Establish a team with skills and expertise to provide a consulting approach the tertiary sector to support implementation of the DDA and the Standards.
Continue to progress universal design for learning in tertiary settings.	Universal design for learning	**Students don't always know what's available, identify with or want to disclose disability, and therefore don't receive inclusion supports.**	Contribute to the progression in the design and implementation of universal design in tertiary education settings to ensure inclusion for all students.

Establish a 'backbone' to engage the broader tertiary disability equity ecosystem

This priority was based on the need to improve and influence how schools, tertiary education providers, peaks, leaders, disability groups work better together. The aim would be to improve communication, collaboration and coordination on change activities; and inform progress of implementation of government initiatives – including implementation of the Standards in tertiary settings, challenges and successes. This may also be a vehicle to progress partnerships at the transition points and promote scaling of strategic projects.

Design considerations identified at the co-creation workshops:

- Membership would need to be at the right level (i.e. with some authority, in order to harness the expertise, strong connections and influence required within the sector).
- Students expressed concerns that managing a large group might result in smaller voices being lost. Therefore, the stakeholders engaged would need to be carefully considered and perhaps change over time in response to the program priorities.
- Appropriate governance and administration support is required including a Terms of Reference, and clarity of purpose and responsibilities aligned to the program intent.
- A very focused agenda to ensure deep engagement on topics by stakeholders.
- Based on the above, the initial area of focus could be on the implementation of the Standards and supporting the design and development of the consulting approach, as described below.

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This initiative of a centralised infrastructure to bring diverse stakeholders together is drawn from the 'collective impact' model aimed at collaborating and mobilising members based on a common yet complex goal for social change.

The mechanism to bring together this tertiary disability equity ecosystem may take the form of management or advisory board, national program executive or steering committee – depending on the desired level of program leadership and if any existing mechanism could be enhanced to focus on tertiary disability equity.

Develop a 'consulting' model to provide advice on implementation of the Standards

This program initiative is based on incentivising tertiary education providers to embed inclusion through the support of an independent assessment and 'report card' detailing areas of strength and advice for improvement.

This draws on similar efforts in other areas including childcare, and could evolve to a program similar to the 'rainbow tick' program. Students with disability strongly supported a 'report card' approach to help inform customer choice by making transparent what support is available to them. It also provides an opportunity and support for providers to self-assess and help them to translate their Disability Action Plans into practice.

Design considerations identified at the co-creation workshops:

- Students saw this as an audit / quasi regulation approach that provides tangible public information to inform students that require inclusive supports on the institution's performance.
- Conversely, other stakeholders felt it would work better as expert advice and support to encourage change, and to ensure it is not seen as another administrative process.
- Access to this consulting model was largely seen as a voluntary process, but it would be possible to tie it to other government initiatives to increase the uptake of this process and optimise government funding for inclusion supports or initiatives.
- All stakeholders felt it should be conducted independently, and a pilot approach was suggested.
- Independence is key to alleviate concerns of possible gaming of the process, i.e. using this approach as a mechanism to promote an organisation without the substance behind it.
- Specialisation for higher education, TAFE and RTOs may be required to provide the depth of knowledge and expertise for that sector.
- Utilise this as a channel to promote uptake of practice and training resources.
- Ensure the voice of students with disability is heard as part of the process via consultation and / or survey.
- Ensure that the advice provided through this 'consulting approach' also focuses on pathways into tertiary education and pathways out for graduate employment including linkages for work placement and building relationships with prospective employers.
- Some form of 'scorecard' for those institutions who claim to provide reasonable adjustments, that are tailored to the individual needs of students has significant appeal, particularly if published on a recognised website.
- The need to promote this offering to institutions that need this support, not just the high performers. Conversely, if visible it might incentivise involvement by other providers.
- Beyond the assessment process, consider the ability for tertiary institutions to seek ad-hoc advice on program or policy issues, or in relation to developing Disability Action Plans.

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Some NDCOs currently provide advice and support to tertiary institutions in the development of Disability Action Plans. **This concept extends this approach to provide independent and expert advice to tertiary institutions to support implementation of the Standards.** Extending the advice beyond the Standards to include tertiary providers' role and partnerships to create entry and exit pathways may also allow for promotion of scaling the University Specialist Employment Partnership (USEP) and TAFE Specialist Employment Partnership (TSEP) projects[5], and in time provide a platform for the third concept, a Universal Design Framework.

This would also facilitate greater awareness and utilisation of other government initiatives such as the Higher Education Participation and Partnerships Program (HEPPP) National Priorities Pool; National Priorities and Industry Linkage Fund (NPILF), Stepping into Internships program via Australian Network on Disability, and others as identified in the desktop research as relevant in Appendix B.

Students saw this concept as having the most tangible impact on the experience of students, and aligned to the need for tertiary institutions to have greater accountability in their role for providing inclusive education.

Progress a 'Universal Design Framework' for learning

While NDCOs have been working with ADCET and NCSEHE on the development of resources for universal design for learning, development of a comprehensive framework that is adopted within the sector is a longer-term pursuit. This program initiative responds to the diversity in learning needs of students and reduces the need for students to evidence and disclose disability. The role of the program may be to contribute to the framework and materials developed over time, including utilising the tertiary disability equity network, and supporting implementation through the consulting role.

Design considerations identified at the co-creation workshops:

- Concerns that institutions may not invest for broad universal design; however the value of this model is that it supports all students, not just students with disability.
- The legislation only requires institutions to offer reasonable adjustments and therefore whilst the concept of universal design is endorsed, implementation may require a legal / compliance framework.
- Supports the perspective that disability is a social construct – that is, people with disability face barriers as a feature of society rather than due to their impairment or difference – which should also underpin the 'backbone'.
- Tailoring for individual support needs would still be required, therefore students will still need to know what options are available as relevant to their needs.
- May require resources to support the model being implemented, particularly in setting a baseline for all institutions.
- Progression of universal design assistance to embed a culture of acceptance of different student learning needs.
- Could become part of the consulting model over time.

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[5] NDCOs identified a gap in services provided to graduates with disability in finding employment. Both initiatives follow a similar model and place a specialist disability consultant from an employment provider onto a university campus or TAFE campus weekly, to work with career advisors in placing graduates into employment.

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Given the breadth of issues universal design for learning could cover, it would be important to identify what work has been done to date and by whom, and agree on what elements should be progressed that would have the most impact for students.

D. Improve the operational efficiency through one-program-one-plan

As identified in our review, **one of the weaknesses of the current program is the lack of coordination, leading to operational inefficiencies including duplication and wasted effort – both for government and for program partners.**

We recommend that the department take a one-program-one-plan approach and consider the following actions that would need to be taken to.

- Establish one strategic plan to be accompanied by a program action plan which details the program initiatives, program outputs, target milestones, responsible owner or lead, articulated role of program staff and approach for external engagement, as required. While delivery partners and/or program staff may have project plans to support execution, the program plan would form the basis of program performance review. This should also translate into a single final report that documents the outputs of the program as a whole.
    - This eliminates the need for 30 workplans and 30 reports.
    - This model would also provide clarity on specific contribution where there are multiple delivery partners.
    - Contract KPIs should be aligned to execution of the program as per the plan.
    - More explicit engagement and communication plan could be developed for the program initiatives, and should form part of the program KPIs.
- Consolidate online resources onto one central online platform, and publish the strategic plan to provide greater sector awareness of the program activities and how to connect to these initiatives.
- Reconsider the need and ownership for the local network mailing list. Current mailing lists might be useful to communicate program changes and promotion of the activities, however the management of these could be centralised.
- Collect data on program outputs and outcomes informed by the longer term outcomes as indicated in Australia's Disability Strategy (see also Section V) and the broader whole of government reporting requirements.

It is recommended that changes in the program model, including its leadership structure and activities, be undertaken with the careful consideration of change impacts.

This might include a staged approach where further co-creation with stakeholders occurs, and a planned approach to knowledge retention and/or system centralisation.

V. Revised program logic based on the recommendations

The purpose of a Program Logic is to communicate how a program is intended to work – enabling all stakeholders involved to understand the intended impact of the program and, working backwards, the required resources and activities that lead to the short-, medium- and longer-term program outcomes.

Measurement factors:

The Department has established social outcome measures for equitable opportunities of tertiary access, participation and graduate employment as documented in Australia's Disability Strategy. The program logic above, aligns with these aspirations given it contributes to these outcomes. However the program alone cannot be responsible for this change. Program measures should be based on the successful delivery of program outputs given their alignment in producing the intended short- and medium-term outcomes. They should also be aligned to the whole of government outcomes as documented in Australia's Disability Strategy. Considerations for program measurement are provided below.

- Delivery of strategic action plan and related KPIs including reach of activities via partners, uptake of the consulting approach, engagement with the 'backbone', and demonstrated influence on sector priorities/activities.
- Student and stakeholder surveys – Department national annual survey as identified in Australia's Disability Strategy and/or institution-based surveys as part of consulting approach.
- Network stakeholder surveys – including increased knowledge of the program, the Standards and actions to support equitable tertiary access for students with disability.
- Execution of communication and engagement plans.

Impact *(Intended societal change)*
People with disability have equitable opportunity to access, participate and achieve their goals in tertiary education and subsequent employment

Inputs	Activities	Outputs	Short term outcomes	Medium-term outcomes	Long-term outcomes
The tangible resources needed to do the work	*Processes or actions to accomplish objectives*	*What is produced or created as a result of the work*	*What the outputs will create*	*Change in <u>people</u> or organisations as a result of these outputs*	*Change in <u>people</u> or organisations as a result of these outputs*
Resourcing: • $4.4 million annually • Delivery partners and program staff • DESE contract management and program monitoring Program skills: • Negotiating and influencing • Strategic planning and project management • Specialised knowledge - tertiary sector, inclusive practices • Communications and engagement Program • Program strategy and annual activity plan including KPIs • Engagement and communications plan	• Strategic planning and prioritisation • Strategically connect and leverage the national tertiary equity disability ecosystem – enlist industry support, develop partnerships/ alliances – promote inclusion in national policy / initiatives – support project scaling • Support tertiary institutions' translation of information and research into practice – provide advice on practice – promote uptake of resources and training – promote awareness of government intersection programs – support project scaling	♦ Establishment and operational support for 'backbone' ♦ Agreed partnership outputs via backbone i.e. linkages to programs, support for activities, co-design ♦ National collaborations for program priorities ♦ Pilot testing of tertiary consulting model and products ♦ Tertiary institutions assessment and support cards undertaken (national & diverse institution coverage) ♦ Consultancy advice provided based on translation of research into practice ♦ Universal Design framework	• Strategic stakeholders commit support progress in tertiary disability equity as per the program (national / state) • Tertiary stakeholders promote inclusive learning approaches • Improved knowledge of rights and responsibilities in implementing the Standards • Tertiary stakeholders are aware of practicable ways to support inclusive education • Greater student awareness and confidence in tertiary options to meet career goals and the support available	• Students with disability choose tertiary education as a pathway to employment, and access adjustments if required • Tertiary stakeholders are capable in identifying, planning and implementing adjustments • The tertiary education system supports students with disability to successfully participate in tertiary education and transition to related employment	• Reduction in the gap of tertiary students' access, participation and graduate employment outcomes between students with and without a disability • Improved student experience in accessing flexible and inclusive learning

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	• Continue to progress universal design for learning in tertiary settings – contribute to priorities, framework and promotion of universal design for learning	♦ New resources produced via program and/or in collaboration ♦ Engagement resulting in extended reach of program information, adoption of resources / projects etc.			

Assumptions	Enablers	Derailers / External Factors
Increase in students with disability is related to new enrolments (increased demand) and comfort in people disclosing their disability (latent demand) Supporting systemic change and practice implementation will support a change in attitudes, behaviour and commitment to disability inclusion Broader systemic engagement and specialisation of program will increase status and influence in the sector	Increased student aspiration and career planning in school. Alliances / Influencers extend the reach and advocacy for inclusive practices Research partnerships with NCVER and NCSEHE, and Australian Disability Clearinghouse on Education and Training (ADCET) as centralised hub for information on inclusive teaching practices for the tertiary education sector. Enrolment based model of access to the Disability Support Program Intersecting government programs support inclusion of people with disability (e.g. tertiary grants and student support funding for Indigenous, low SES and regional / remote students, tertiary capacity building grants)	Policy promoting disability employment does not identify tertiary options as a pathway Students' choice in not identifying, evidencing or disclosing their disability Unintended consequences of emerging policy (e.g. work first policy and employment strategies that don't promoting graduate pathways with disability) Students not finding work in their related field of study.

| | Programs and initiatives that improve tertiary work placement experiences and/or connection to employers e.g. Work Integrated Learning, TSEP, USEP. | |

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VI. Examples of partnership structures

Government Initiative: Boosting Local Care Workforces (Aust)
https://blcw.dss.gov.au/

The Boosting the Local Care Workforce Program (BLCW Program) is delivered by Ernst & Young, with the First Peoples Disability Network (Australia), and the Community Services Industry Alliance.

Up to 25 Regional Coordinators work with existing and prospective service providers and key stakeholders in their geographic area to provide localised support, gather intelligence on local issues, facilitate workshops and connect stakeholders with complementary programs and initiatives in the disability and aged care sectors.

Government seeded / Membership based: ACHIEVE (NZ) https://www.achieve.org.nz/

A national network seed funded by Tertiary Education Commission (TEC). Achieve largely operates from members and sponsors. TEC sees Achieve as an independent network with a 'stronger more relevant voice'.

A coordinated national effort in securing quality educational opportunities for students with impairments in post-secondary education and training. Members network, support and learn from each other. They also: monitor and advocate equal education policies developed by Government, TEC and post-secondary institutions; liaise with groups and bodies who have similar interests; provide advice, support and information; and host TEC resources.

Independent / Member based: Association on Higher Education and Disability

US model https://www.ahead.org/ Professional Association facilitated by membership – focuses on diverse practitioners.

Ireland model https://www.ahead.ie/ - Not for Profit/Registered Charity. Provides resources to students and graduates with disabilities, teachers, guidance counsellors and parents on disability issues in education. Other activities include national research, contributing to national policy forums and providing professional development opportunities to staff. Part of LINK network.

Government Partnership: Support Centre Inclusive Education (Belgium)
https://www.siho.be/

Partnership between the five universities associations and the Flemish Government – to create/build regional and international partnership and network between institutions, stimulate research, strengthen positive image of inclusive education, develop coaching initiatives for students. Website has information for all audiences, provides university contact points, guidance. Program coordinator with project, communication and administrative staff.