

Professor Mary O’Kane
Chair, Australian Universities Accord
Higher Education Division
Australian Government Department of Education

1 September 2023

Dear Professor O’Kane and members of the Australian Universities Accord Panel,

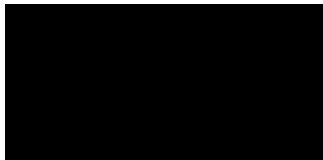
Re: ADCET submission in response to the Australian Universities Accord Interim Report.

The Australian Disability Clearinghouse on Education and Training (ADCET) is Australia’s leading resource supporting disability practitioners, educators and students with disability (and their families) to navigate post-secondary education and training opportunities.


ADCET welcomes the opportunity to contribute to this important consultation on the future of Australia’s Higher Education System. Enclosed is our response to the Interim Report and to requests discussed with the Panel on 8 August 2023.

Please don’t hesitate to contact us for any further detail, clarification or questions.

Regards



Darlene McLennan
Manager, ADCET

Phone: 
Email: darlene.mclennan@utas.edu.au
Web: www.adcet.edu.au

Contents

About ADCET	3
Executive Summary.....	4
Putting equity first.....	5
Four system solutions which put equity first	6
1. Demand driven funding for equity groups	6
2. Structural reform through a disability inclusion lens	6
3. A funding model which asks Universities to drive change for people with disability	7
4. A model which is accountable and transparent putting students first.	9
Case Studies	11
Case Study 1: Universal Design for Learning.....	12
Case Study 2: Reforming Accessible ICT procurement in universities	14
Case study 3: Work-integrated learning and graduate employment.....	16
Case Study 4: Disability Awareness eLearning	17
Appendix 1: ADCET’s response to the University Accord Panel (19 December 2023)	19
Appendix 2: Key statistics.....	25

About ADCET

ADCET provides national leadership in the inclusion of people with disability in tertiary education by providing information and professional development for disability practitioners, educators and support staff. ADCET is primarily focused on people with disability but recognises the intersectionality people with disability have with other identities including Aboriginality, gender diversity, socio-economic and geographic, and how this can further impact their access to and participation in tertiary education.

Our approach is sector-led, drawing on good practice, research and the lived experience of people with disability to develop resources and content of national significance which drives positive change in the tertiary education sector (Higher Education and VET). Our projects, activities and resources are highly strategic, building capacity within and across the tertiary education sector to enable full access, participation, retention and success of students with disability.

ADCET has been in operation for over 20 years in the tertiary education sector and has high levels of [impact and engagement](#). This includes over 1.1 million website engagements annually; 33,000 enrolments in Disability Awareness eLearning; and 3,000 social media and newsletter subscribers.

ADCET is funded through the Higher Education Disability Support Program (HEDSP) within the [Higher Education Support \(Other Grants\) Guidelines 2022](#). Under this legislation Part 3, Division 2, 42) ADCET has two key program objectives:

- specified as a program for the purpose of promoting equality of opportunity in higher education¹
- provides information, advice, and online resources (including in a form able to be downloaded and used) through a website, hosted by a provider, to disability practitioners, teachers, and students to promote inclusive teaching and learning practices for students with disability.

ADCET receives \$150,000 annually and *ad hoc* project funding. Additional staffing (the Manager, Assistive Technology specialist, and Administration Officer) is supported via National Disability Coordination Officer (NDCO) funding. Nationally there has been significant collaboration between ADCET and NDCOs around the country. All of this has enhanced ADCET's capacity to develop into Australia's leading resource for supporting students with disability in the tertiary education sector.

The University of Tasmania has hosted ADCET for 20 years, and the administration of ADCET is managed through the Department of Education, Higher Education Division.

The NDCO Program ceases 31 October 2023. Beyond this date, ADCET will only have its core funds of \$150,000 pa to support website updates and promotion of existing resources. Its capacity for national leadership in disability inclusion, and collaboration with the tertiary education sector will be completely diminished.

¹ Until recent changes in the legislation ADCET has always supported both HE and VET sectors.

Response to the Interim Report

Executive Summary

ADCET applauds the Panel's big, spikey ideas for reform to the higher education system which are underpinned by equity principles. We agree with the five immediate priorities recommended for immediate action including:

- local access through Regional Universities Centres (Priority 1) which we hope will be fully accessible for people with disability
- removing the 50% pass rate element of the Jobs Ready Graduate (JRG) package (Priority 2) as it was particularly punitive for students with disability
- support to First Nations people regardless of location
- funding certainty through extending the Higher Education Continuity Guarantee (Priority 4). ADCET is seeking similar funding certainty during the reform period and beyond.
- improved governance (Priority 5) as a way of improving employment, student and staff safety and diverse voices. Again, we hope a disability lens is used to review this action.

In reviewing the Interim Report ADCET remains committed to the key priorities we set out in our original submission.

- **Priority 1:** A National Strategy for Students with Disability in Tertiary Education, inclusive of national and institutional targets
- **Priority 2:** Embedding disability inclusion into all elements of higher education
- **Priority 3:** Seamless transition between school and tertiary education including appropriate funding
- **Priority 4:** Improved staff awareness of disability and professionalisation of disability practitioners within the sector
- **Priority 5:** Improved teaching quality and inclusive pedagogies
- **Priority 6:** Better data collection, measurement, and evaluation of outcomes for students with disability
- **Priority 7:** Improved integration between higher education providers, industry, and professional accreditation bodies for better graduate outcomes for students with disability
- **Priority 8:** Increased diversity of the higher education workforce to better reflect equity groups
- **Priority 9:** An integrated and whole-of-government response to supporting people with disability.

Having now had some preliminary discussions with the Accord Panel and within the context of the Interim Report, we would now like to focus on four main areas of reform which we think will drastically improve the outcomes for people with disability.

Putting equity first

“9 out of 10 jobs will require a post-secondary qualification by 2025” according to the National Skills Commission. However, the number of students with disability who have a disability in school (~19%) is much higher than those that go on to post-school study (9.4% in higher education and ~6% in VET). What’s more the retention and success rates for these students are abysmal and students with a disability who do graduate with a bachelor’s degree are not appropriately supported to enter the workforce, consequently they have one of the worst overall labour participation rates of any equity group. People with disability want to work! Graduates want work that is commensurate with their skills!

While we applaud the Panel’s commitment to population parity this will not happen without structural change and meaningful, direct investment. Higher Education has not adequately kept pace with current enrolments, let alone be able to keep pace with the increasing proportion of the community with disability who wish to, and need to, have a post-secondary education.

All universities have a legislative obligation under the *Disability Discrimination Act 1992 (DDA)* and the *Disability Standards for Education 2005 (DSE)* to provide tertiary education opportunities to students on the same basis as all other students, yet the participation, retention, and success of students with disability remains poor. Previous reforms right across our education ecosystem have done little to address, and less to remedy this.

Universities must be incentivised, monitored and evaluated to ensure that they are providing appropriate support to students with disability across the whole student journey and supported by coordinated and strategic approaches to sector improvement.

We have conceived of four system solutions which can achieve systemic change within the higher education sector to drastically improve the outcomes for students with disability and these should be done together.

1. **Demand driven funding for equity groups** with a particular focus on opening up the system to people with disability. This includes dedicated CSP places for people with disability, funding for sub-bachelor programs to support transition, and improved funding to support better inclusion
2. **A sector which commits to structural reform through a disability inclusion lens** including the adoption of a disability inclusion framework which addresses structural barriers to participation for people with disability such as digital/technological accessibility, physical accessibility, learning and teaching and culture and disability confidence.
3. **A funding model which asks Universities to drive change for people with disability.** This requires a multi-pronged approach including guaranteed CSP for students with disability, improved monitoring of providers through performance-based funding mechanisms, and increased funds under the Disability Support Program.
4. **A model which is accountable and transparent putting students first.** A National Equity Commission where governance and accountability are monitored and measured to ensure providers are delivering for people with disability. This would also include improvements to the Disability Standards for Education 2005 legislation, improved data collection and analysis and better reporting by providers.

These four points are outlined below in more detail.

Four system solutions which put equity first

1. Demand driven funding for equity groups

In the same way that the Accord Panel has recommended that all First Nations students should receive a Commonwealth Supported Place (CSP) so should people with disability and other equity groups. The Job Ready Graduate (JRG) Package 50% pass rule has been particularly problematic for students with disability whose achievement is often impeded by disability or health conditions, so we are glad to see it has been abolished. However, we also believe access to a guaranteed CSP will further assist students with disability to retain their place even when their disability or health condition impedes or slows progression.

Demand driven funding (DDF) for equity groups acknowledges the systemic disadvantage students across all equity groups face in terms of the impact of disadvantage on achievement in school, the arbitrary admissions processes which don't adequately compensate for equity and disadvantage (Jackson et al, 2023; O'Connell et al, 2019), the culture of low expectations, low or varied cultural capital, and the impacts of cumulative disadvantage (Tomaszewski et al, 2020).

The DDF demonstrated advantages in creating more spaces for students from equity groups and partnered this with additional equity-based support funding. Funding streams such as the Indigenous Student Support Program (ISSP), Higher Education Partnership and Participation Program (HEPPP) and Disability Support Program (DSP) have provided some capacity to support these additional students – although in the case of students with disability the DSP funding is extremely low comparatively.

While the DDF also received mixed outcomes (Productivity Commission, 2019) in terms of retention and success of equity students it does allow for non-competitive spaces for equity groups and improved access to the system. However, retention and success were lower due to issues such as preparedness and academic achievement such as language and literacy. If the DDF had also provided funding for sub-bachelor programs such as bridging, enabling or foundation programs then issues such as preparedness and language, literacy, numeracy and digital literacy (LLND) challenges identified by the Productivity Commission would have been addressed.

The support of a guaranteed place and an approach to lifelong learning allows the most disadvantaged students to benefit from the positive social and economic outcomes that a post-secondary education offers on an equitable basis with other students. This must include learning entitlements and financial support that compensates for disadvantage.

2. Structural reform through a disability inclusion lens

Support for people with disability in tertiary education has been largely overlooked in terms of appropriate strategy, policy and funding settings which properly support access, participation, retention, and success. In the last decade the number of people with disability entering and completing higher education has improved but is still significantly lower than for people without disability (see [Appendix 2](#) for key statistics).

Universities have failed to collectively focus on students with disability. ADCET is the only centralised and national organisation which approaches disability inclusion comprehensively thus supporting the

sector towards greater inclusion yet has been left behind and lost in funding allocations. ADCET's [disability inclusion framework](#) recommends an approach which addresses disability inclusion across four domains:

- **intentional strategy to support people with disability** (i.e., development of an active and accountable Disability Inclusion Action Plan and associated interventions and programs)
- **appropriate policy and processes** which meet legislative obligations and view the efficacy of these through a disability inclusive lens
- **addressing structural barriers to access, participation, retention and success** namely digital/technological, built environment, and learning and teaching
- **culture** – provision of mandatory disability awareness/responsiveness to change ableist attitudes and ensure organisation meets legislative obligations and strategic intent. It is particularly important to build capacity within the tertiary education institution areas such as learning and teaching, digital/technological and physical accessibility

As previously indicated in our initial response this can only be achieved through:

- a **National Strategy for Students with Disability in Tertiary Education** which includes the appropriate drivers of change, commitment and accountability for Universities.
- **national targets which reflect community representation.** Current 18% of the Australian population have a disability, over 19% are enrolled at school, and as of 2021, 9.4% of domestic undergraduates are enrolled in Higher Education. This is almost double the number of students with disability in the past 10 years. (See [Appendix 2](#) Key Statistics)
- **centralised and coordinated support to the sector** to build capacity, professionalise the sector, encourage cross-sectoral and inter-sectoral evidence-based and practice-based sharing of research, knowledge and interventions (See [Case Studies](#))
- **stable funding** that allows for sustained and long-term change. Below we talk about the three tiers of funding needed to improve disability inclusion in the higher education sector.

3. A funding model which asks Universities to drive change for people with disability

A multi-pronged approach to funding in the disability space is needed to support the rapid pace at which students with disability are enrolling and to address challenges around the participation, retention and success that is required. It must also be nuanced enough to balance system change as well as the individualised support needed for students with disability and other equity groups. It should include:

- **guaranteed CSP** for all students with disability (as discussed above)
- **performance-based funding (PBF) which includes mechanisms to address retention, success and graduate employment for students with disability.** At present the PBF scheme does not explicitly include equity group participation for students with disability (only Regional/Remote, Indigenous and LSES students). If disability was included this would elevate the onus on universities to properly address participation, graduate employment, student experience and student success for students with disability through this process and funding stream. Furthermore, it would ensure universities meet their legislative obligations. Universities would still be able to contextualise thresholds and measures involved in the compact or agreement each university makes under the PBF scheme including those based on the various equity characteristics with their institutions but with focused attention on students with disability.

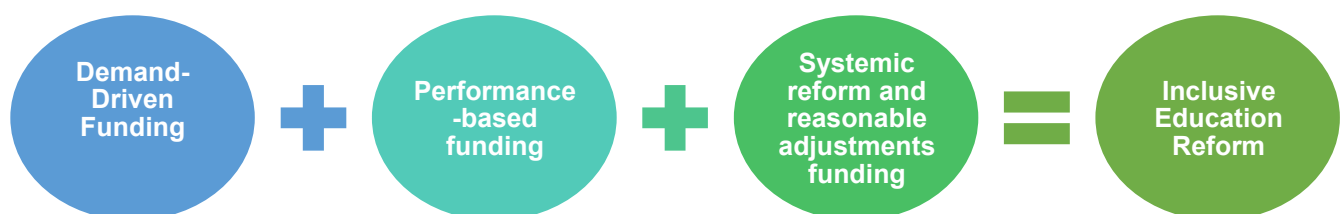
- **increase funds under the Higher Education Disability Support Program** to allow for more nuanced arrangements to support students with disability. Up until the May budget the DSP was only \$7.9 million per annum (indexed) and was provided to the sector to support students with disability. This equates to approximately \$104 per student². At the May 2023 Budget the DSP has increased to \$13 million (or approximately \$135 per student). This funding is in stark contrast to the investment being made by the Commonwealth in schooling from 2018 to 2029, where it will invest an estimated \$28.8 billion for students with disability loading⁴. On average, funding for students with disability in schooling will grow by 5.1% each year over this period and each funded student would be allocated between \$4,704 through to \$35,350 per student.

In the May 2023 budget, the Australian Government removed \$4.3 of disability focused funding from the NDCO Program and allocated it to the DSP, with a public announcement that there had been a “‘boost’ in funding for students with disability³. This action lacked transparency and accountability in the decision-making process and reallocated funding from a strategic program to prop up an already woefully under resourced operational funding system (DSP). This decision should be appropriately scrutinised and redressed, with the aims of the NDCO Program adequately funded elsewhere in addition to more significant and meaningful increases in the DSP.

ADCET has provided the Australian Government Department of Education with a detailed proposal to adequately fund and support a centralised and coordinated response to supporting disability inclusion in the sector, via an expanded remit for ADCET which draws on their expertise developed through over 20 years collaborating with and serving the tertiary education sector, to support institutions during what will hopefully be a significant reform for the betterment of students with disability in Higher Education. We have devised two options – one funded at \$1.5 million per annum and an expanded version at \$4.5 million per annum. We are happy to furnish the detail on request.

ADCET believes that a combination of Demand Driven Funding, Performance Based Funding and strategic sectorial support to achieve inclusive education reform in Higher Education is a solid starting point for significant shifts in the access, retention and success for students with disability. This model is depicted in Figure 1.

Figure 1: Inclusive Education Reform Funding Model



² [A request for support for disability inclusion and ADCET in Universities Accord submission](#)

³ [Budget 23-24 Factsheet - Higher Education Support Students with Disability - Department of Education](#)

4. A model which is accountable and transparent putting students first.

ADCET welcomes the idea of a National Equity Commission to provide governance and accountability to the sector around improving equity outcomes – especially for people with disability. Currently, there are no consequences for universities who don't fulfil their commitments and the current regulatory body TEQSA makes no specific provision to ensure universities are addressing structural barriers across digital/technological, physical, learning or cultural domains.

Consequently, the outcomes for people with disability are borne out in the [Selected Higher Education Statistics](#) with consistently lower retention and success rates ([see Appendix 2](#)). These annual statistics do not provide nuanced information about students with disability and require more detailed public information to assist institutions to respond accordingly. In addition, QILT data⁴ shows graduates with disability have had consistently the second lowest graduate outcomes for full employment, overall employment and labour force participation with no consequences for universities through PBF. Again, QILT data does not provide any nuanced or detailed data on types of disability or longitudinal analysis to assist universities to build capacity within their institutions to better prepare students with disability for post-graduate employment.

An Equity Commissioner and/or a specific Disability Commissioner having oversight of how universities meet their performance targets would ensure accountability to the PBF Scheme and TEQSA to ensure institutions are actively pursuing the structural change needed. A *National Strategy for Students with Disability* would include appropriate targets and monitor and evaluation performance against these targets recognising any institutions lagging and help them take remedial action.

At the moment students or staff with complaints around failures in support, disability discrimination or exclusion must enact internal (e.g., Student Ombudsman, Student Union Advocate) or external mechanisms (e.g., state or federal human rights commissions) to address breaches of the DDA and DSE. The onus is on individuals advocating for their rights when in fact it is the responsibility of universities and other educational settings to ensure inclusive education and employment.

Some of these issues could be resolved by enacting the recommendations from the *2020 Review of the Disability Standards for Education 2005*⁵. In particular, 'strengthening the knowledge and capability of educators and providers', 'embedding accountability for the Standards throughout the education system' and 'empowering and supporting students with disability and their families' – recommendations which ADCET reinforces through our work.

The other important element of accountability and transparency is collecting, analysing and understanding data which identifies students with disability and other equity characteristics appropriately. Currently, the data collection for students with disability; the nature of their support needs; their intersection with other equity characteristics; and their access, participation, retention, success and graduate employment is fraught. At best, the *Selected Higher Education Statistics* provide a blunt instrument of outcomes for students with disability. They rely on self-disclosure through a highly medicalised model and provide lack of detail such as disability type and level of support in order to determine sector approaches to support. While many institutions have more detailed data there is a disconnect between how this data is collected, analysed and used by disability

⁴ [Current HE Data Analysis - ADCET](#)

⁵ [Final Report of the 2020 Review of the Disability Standards for Education 2005 - Department of Education](#)

service units and how the institution might utilise the data to improve strategies to support students with disability.

It is worth the Panel considering an [Nationally Consisting Collection of Data](#)-style approach where all equity groups have a learning access plan which captures the needs of students based on equity characteristics including reasonable adjustments for disability which carries through from schooling to tertiary education using the Unique Student Identifier which was created to better track student movement throughout the tertiary education sector⁶.

⁶ To date the USI registry only provides students with VET records and from January 2023 with higher education records and is a requirement for CSP and HECS-HELP. It doesn't appear to have any capacity to retroactively record higher education records prior to 2023.

Case Studies

ADCET has a very deliberate model of project engagement with every activity they undertake. Every project, intervention or resource is sector-driven, evidence-based, and collaborative. There are six key steps:

- **Consider the problem strategically:** through engagement with sector stakeholders
- **Research and Analyse:** collect evidence base, within the context including current and emerging trends
- **Ideate:** Convene experts and key stakeholders (including people with lived expertise and lived experience), generate ideas and devise key objectives within a project plan
- **Engage:** Draw on sector for further feedback from stakeholders including students, Government, peak bodies, sector networks and industry e.g., through advisory group
- **Review and Implement:** Test outcomes, implement training, promote to sector, including developing Communities of Practice
- **Evaluate and Report:** draw down relevant data analytics and user-experience feedback.

This approach has enabled ADCET to understand the sector, the barriers for students, the needs of staff, and how to support stakeholders to produce the best 'bang for buck'. Below are some case studies to illustrate some of the large-scale activities that ADCET has coordinated to deliver sector-wide change in order to build capacity within the tertiary education sector and contribute to better outcomes for students with disability.

Four case studies are presented:

- Universal Design for Learning
- Reforming Accessible ICT procurement in universities
- Work-integrated learning and graduate employment
- Disability Awareness Training

Case Study 1: Universal Design for Learning

What if there was a paradigm for higher education that would simultaneously address issues of equality, accessibility, social integration, and community?"

Sheryl Burgstahler

Universal Design for Learning (UDL) is defined as a framework to improve and optimise teaching and learning for all people based on scientific insights into how humans learn¹. Learner diversity can comprise physical, visual, hearing, sensory, attention, and communication barriers. UDL can address many issues of equality and access in tertiary education and is especially useful for supporting students with disability who don't disclose disability and other equity groups. While reasonable adjustments for students with disability will always be required, these adjustments can be reduced by applying a UDL framework to learning.

From a human rights perspective, disability should not deprive people from equal opportunities in education⁷. UDL can improve universal access for students with disability, with the aim to reduce the need for requests for reasonable adjustments in the future. This approach aligns with supporting evidence and legislative levers including:

- Australia's commitments to the *United Nations Convention of the Rights of Persons with Disabilities*, Article 24, section 5 – access to general tertiary education; the *Disability Discrimination Act 1992 (Cth) (DDA)* and the *Disability Standards for Education 2005 (Cth) (DSE)*
- the 2016 *Final Report on the Evaluation of the Disability Support Program (DSP)* advising that Universal Design for learning may have long term administrative efficiencies and that there is an "... opportunity to promote efforts to mainstream services and employ universal design principles..."⁸
- ADCET's *Disability Standards for Education (2005) (Cth) (DSE)* submission⁹ in 2020 which provided data to highlight the sector's need for support to implement UDL. "... *this* [increase in people looking for information about UDL] *demonstrates a growing swell of interest in Universal Design for Learning within tertiary education, which at this time is not supported in current policy or legislation, including the Disability Standards for Education (2005).*"
- research by Dr Tim Pitman¹⁰ which included recommendations on the adoption of mandatory disability awareness training, Universal Design principles around technology, learning and built environment, and the adoption of Universal Design for Learning with explicit inclusion within the DSE.

At present, UDL principles are not yet embedded consistently in the development of tertiary education coursework or curriculum across the sector. The initial proposal to develop an eLearning module aimed to enhance the knowledge and capability of educators to move away from a one-size fits all

⁷ Burgstahler, S. (2011). *Universal Design: Implications for Computing Education*. ACM Transactions on Computing Education, 11

⁸ <https://www.adcet.edu.au/resource/9187/evaluation-of-the-disability-support-program-dsp>

⁹ [ADCET submission to the 2020 Review of the Disability Standards for Education](#)

¹⁰ Pitman, T. (2022). *Supporting persons with disabilities to succeed in higher education*. National Centre for Student Equity in Higher Education.

approach to the evidence based UDL framework. The eLearning module was released in December 2021 and sits alongside existing and impactful national training on the [Disability Awareness](#) training website. To date 1266 individuals have enrolled in UDL eLearning and 60 institutions have downloaded the product to their Learning Management System.

ADCET and several National Disability Coordination Officer (NDCO) regions have collaborated with the sector to continue to promote UDL across our tertiary education providers nationally. Additional activities funded through a 2023 Department of Education grant of \$110,000 has enabled ADCET to provide ongoing promotion of the UDL eLearning package, support a Community of Practice with over 150 members nationwide, host regular webinars showcasing good practice (to date in 2023 979 registrations across four webinars), and develop further web resources on the ADCET inclusive teaching webpages). In addition, ADCET has hosted two Masterclasses with 150 participants and is holding a virtual UDL Symposium in September with over 800 registrations to date.

Progress is slow especially with the limited funding allocated to ADCET and lack of accountability for institutions in developing UDL as a key pillar for inclusive education alongside their responsibilities under the DSE. However, ADCET remains committed to supporting the sector to build the knowledge and skills amongst academic and professional staff involved in learning and teaching as long as we can and commend the significant engagement we have seen in our work in this space.

Case Study 2: Reforming Accessible ICT procurement in universities

The Accessible (Information and Communication Technology (ICT) Procurement project was a collaboration between ADCET, the NDCO Program, the Council of Australasian University Information Technology Directors (CAUDIT), Vision Australia and Intopia. The project stemmed from a Vision Australia report outlining the challenges for Blind and Vision-impaired people accessing Information and Communication Technology products and services in Australian universities titled [On-Line but Off-Track](#).

This report itemised a series of changes that would support more accessibility by design, including the adoption of AS EN 301 549 in ICT procurement policy and procedures in our universities. ADCET assembled a national advisory panel and a project team to develop guidance for universities to do this. The Guidelines were launched in 2022 by Australia's Disability Discrimination Commissioner, then Dr Ben Gauntlett, who said of the work:

I commend the Australian Disability Clearinghouse on Education and Training, the National Disability Coordination Officer Program, the Council for Australasian University Directors of IT, Vision Australia and Intopia for working together in a collaborative manner which included relying upon the lived experience of people with disability to action the recommendations that are contained within Vision Australia's Online but Off-track Report which was published in 2018. This type of investment in coordinated responses to systemic issues in our tertiary institutions is important. It can change the lives of people for generations.

The [Guide](#) is now hosted by CAUDIT and remains available to Higher Education providers to use as a guide to embed accessible ICT procurement into their procurement policies, procedures, and practice, with a view to building a more accessible future by design.

In addition to hosting this resource, CAUDIT has identified options via this project to encourage more vendors to meet the requirements of AS EN 301 549 and WCAG 2.1 and other standards which will supporting the sectors engagement in accessible ICT procurement. To support the adoption of the guide ADCET and the NDCO Program in collaboration with Intopia and CAUDIT recently ran a series of training workshops for the sector to learn more about the adoption of accessible ICT procurement policies and procedures. Workshop participants totalled 238 participants from 24 Universities which is now hosted as ongoing available professional development for the sector with CAUDIT.

With a \$2 billion dollar ICT spend, if all universities adopt accessible ICT policies and procedures that ensure the purchase of accessible ICT products & services, we can ensure that the student experience for students with disability improves by default. ADCET commends CAUDIT for their commitment to working with us on this, and for the sector who have started to review and enhance their procurement practice and is proud to have played our part in bringing this forward for the sector.

ADCET has also started conversations with the Council of Australasian University Libraries (CAUL) about options for improving the accessibility of library collections and materials for students with

disability, including exploring options for the faster sharing of accessible resources between university libraries.

These types of collaborations wouldn't occur without ADCET fostering partnerships with these organisations bring our considerable knowledge and expertise to the table. The collective expertise of ADCET and NDCO staff also contributes through their decades of expertise, lived expertise, and lived experience of the issues facing students with disability attempting lifelong learning through the tertiary education sector.

Case study 3: Work-integrated learning and graduate employment

ADCET takes a holistic approach to supporting the career development journey of students with disability from transition into the tertiary education system to their journey into graduate employment. ADCET has undertaken, and is undertaking projects, which both build capacity for educators and professional staff within the tertiary sector as well as teachers, families and individuals.

Some key projects which help to support course choice and career development include:

Journey	Resource	Audience	Purpose
Transition from school to tertiary education	Planning for post-secondary education	Students, parents/carers, teachers	Helping educators to provide practical, student-centred support and guidance empowering the students to thrive in an adult learning environment.
	How to Transition to Tertiary Education - Helpful hints for people with ASD	Students, parents/carers, teachers	Helpful hints for people with Autism Spectrum Disorder preparing for the adult learning environment
	Secondary Education - Disability Awareness	School staff and educators	Training for school staff and educators to support students with disability
Career Development – developing career trajectory, work-integrated learning, capacity-building	Career Development Learning Hub for students living with disabilities	Tertiary educators and professional staff	Repository which provides resources which complement what already exists by developing, piloting and showcasing examples of best practice programs to students living with disabilities, including the development of practical resources.
	Work-integrated Learning Community of Practice	Tertiary educators and professional staff	The CoP is developing two important elements to foster change to the way students with disability access WIL – guidelines for disability inclusive WIL and a framework for targeted education and training on inclusive WIL experiences.
Graduate Employment	Employment (including Work-integrated learning and graduate employment)	Current tertiary education students	Resources to assist commencing and current students on their career development journey including Work-integrated learning and graduate employment)
	USEP (University Specialist Employment Partnership)	Tertiary educators and professional staff	USEP supports final year university students with disability to prepare for the workforce, by honing their ability to compete for employment opportunities related to their area of study, and make key connections with employers who offer graduate and corporate roles

Case Study 4: Disability Awareness eLearning

An important element of ADCET hosts the [Disability Awareness eLearning website](#) which now provides free training programs to the tertiary education sector. The current eLearning offerings include:

- [Introduction to Disability Awareness](#)
- [External Support Workers on Campus](#)
- [VET Sector \(Staff\)](#)
- [VET Sector \(Educators\)](#)
- [Online Access for Tertiary Students who are Blind or Vision Impaired](#)
- [Universal Design for Learning in tertiary settings](#)

These eLearning packages are free and publicly accessible to anyone. Organisations can also download the SCORM (Shareable Content Object Reference Model) files for some of these training programs, which can be embedded into their own Learning Management System (LMS).

So far there have been 488 downloads from over 520 organisations that have adopted our eLearning training within their organisation.

ADCET has received funding to support the free provision of SCORM files for the following [four eLearning packages](#):

- [External Support Workers on Campus](#)
- [VET Sector \(Staff\)](#)
- [VET Sector \(Educators\)](#)
- [Universal Design for Learning in tertiary settings](#)

The [Introduction to Disability Awareness eLearning training](#) attracts a small fee for SCORM files. Sixty-five (65) organisations have purchased these files to embed into their own Learning Management System (LMS). Further information on SCORM file purchases is below.

As of the 31 January 2023 there have been 34,712 registered to undertake one or more of the eLearning training programs. In 2021 the total number registered was 25,613. This means there has been an increase of 35%. Detailed statistics of registrations and completions of these eLearning products is outlined in Figure 8 and [Appendix 3](#).

I think this was a great course. It was concise, informative, educative, and not complicated. It has useful resources and would be of benefit for all people working or commencing work in the disabilities sector. I am considering using it as a training course for any people I might employ.

(Disability Awareness participant)

The greatest challenge for ADCET is being able to provide dedicated support to garner regular feedback from experts to keep the content current, updating and providing regular updates of SCORM files, and tracking usage from organisations which have embedded the eLearning courses into their LMS.

SCORM File Purchases

The Introduction to Disability Awareness SCORM file is available to interested organisations to embed into their Learning Management System (LMS) and provides professional development opportunities for staff. The SCORM (Shareable Content Object Reference Model) file is provided to organisations for a small administrative fee and updates are provided as needed. From 1 Jan 2022 to 31 Jan 2023 there were 20 purchased totalling \$11,363. Sixty-five organisations in total have embedded these files into their LMS. **The ability to disseminate these eLearning programs is now on hold due to the funding uncertainty for ADCET.**

Sectors and organisations who have embedded SCORM files in their LMS include as Social Services e.g., NDIS, Social Services and Disability Employment Services; city and regional councils; government agencies such as Department of Environment and Water (SA) and Department of Energy and Mining (SA); and private organisations such as PWC, The Smith Family, Airservices Australia, and Pacific Hydro.

The advantage for organisations who purchase the SCORM file is the ability to track registration and completion rates of their staff. Unfortunately, this also means that ADCET is unable to track this information as closely. However, ADCET does have a survey embedded in the SCORM file so that participants can provide feedback.

Disability Awareness goes International

The Tertiary Education Commission in New Zealand purchased the 'Introduction to Disability Awareness' and 'Supporting Students with Disability in VET' eLearning programs. The Commission are updating the content to include a New Zealand perspective and will be acknowledging Disability Awareness and ADCET as the source. Similarly, we have worked with Australia Awards Vietnam to translate the eLearning content 'Supporting Students with Disability in VET' for their local audience.

Appendix 1: ADCET's response to the University Accord Panel (19 December 2023)

About our submission

It is of the utmost importance that the University Accord and potential reforms be viewed through an inclusive lens. Diversity and inclusion in our higher education system should be at the centre of all decisions relating to this review.

While the last significant review of higher education, the Bradley Review, rightly prioritised Aboriginal and Torres Strait Islander peoples, people from low socio-economic backgrounds and regional and remote students there has been limited focus on people with disability. In addition, there has been a lack of recognition about the intersectionality between disability and other equity characteristics.

In addition, people with disability are not a homogenous group and have a wide range of disabilities, with different impacts on participation in learning. Their increased participation in tertiary education over the past 10 years has not been rewarded with retention and success rates at parity with other groups and therefore require more strategic approaches, funding, and support to enable equivalent outcomes. To date there has not been a cohesive strategy or funding to keep pace with the enrolments and a culture of low expectation pervades with limited leadership, and ad hoc strategies and programs.

We see a specific focus on disability and systemic cultural change to the higher education sector through the 9 key priorities outlined in this submission as the best way to ensure students with disability can achieve their full potential. We have further detail, research, statistics and case studies we are happy to share on each of these points as required.

Our priorities

Priority 1: A National Strategy for Student with Disability in Tertiary Education, inclusive of national and institutional targets

Key areas of alignment with the Accord: 1, 2, 3 and 4

The development of a National Strategy for Students with Disability in Tertiary Education as distinct from a broader student equity strategy is vital. This would recognise and intentionally plan for, and consider, the diversity within the students with disability cohort whilst still considering and addressing intersecting equity characteristics and the unique and cumulative impacts of educational disadvantage for students with disability.

ADCET has been championing this approach for a long time given the diversity of the students with disability cohort, and the unique legislative framework which governs the rights of people with disability in education¹¹. Such a strategy would be similar to the *Regional, Rural and Remote Education Strategy* or the *Indigenous, Regional and LSES Attainment Fund* which provides targeted support for students in a holistic way including Tertiary Access Payments, Scholarships across sectors, and guaranteed Commonwealth-supported places.

This would address the fact that people with disability have not been specifically targeted through the Higher Education Participation and Partnerships Program (HEPPP) and that institutions do not always work strategically towards disability inclusion. National and institutional targets would ensure that access, participation, retention, and attainment for people with disability are all considered as equally important by institutions and that national targets would foster inclusion within the tertiary education sector commensurate with community representation.

Taking this approach would ensure that people with disability are considered appropriately across all strategic initiatives and activities including outreach programs, retention, support activities, graduate outcomes and through evaluation and reporting (SEHEEF – Student Equity in Higher Education Evaluation Framework) and performance-based funding (PBF).

¹¹ *People with disability are supported by the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the Disability Discrimination Act 1992 (Cth) and the Disability Standards for Education 2005 (Cth)*

Priority 2: Embedding disability inclusion into all elements of higher education

Key areas of alignment with the Accord: 1, 2, 4 and 6

Disability Inclusion Action Plans, Universal Design for Learning, disability responsiveness or awareness training, and accessible and inclusive procurement must be embedded within whole of institution 'business as usual' processes, with executive leadership and university governance accountability.

Over 4 million people have a disability and tertiary education providers need a culturally capable workforce which is strengths-based, non-ableist and inclusive of people with disability. Without a social model of disability in place reflected through a Disability Inclusion Action Plan and other strategic initiatives, education providers are failing to address systemic learning, digital and physical barriers to participation for people with disability (AHRC, 2021; ACOLA, 2022).

Without strategic, intentional, and embedded approaches to disability inclusion within our tertiary education providers students with disability (SWD) will continue to have lower retention (79.55% for SWD compared with national total of 82.52%) and success rates (82.47% for SWD compared with national total of 88.38%)¹².

The number of students with disability accessing higher education has increased from 3.66% in 2009 to 6.82% in 2020 but graduate outcomes are much poorer, with Quality Indicators for Learning and Teaching (QILT, 2021) reporting that undergraduates with a reported disability had a full-time employment rate of 58.7% compared with 70% for undergraduates with no disability¹³.

Priority 3: Seamless transition between school and tertiary education including appropriate funding

Key areas of alignment with the Accord: 1, 2, 4, 5 and 6

Seamless transition of Nationally Consistent Collection of Data on School Students with Disability (NCCD) processes and funding into the higher (and VET) education system is required to support more students with disability to make the transition to post-secondary education settings.

The numbers of students with disability enrolling in higher education and VET has increased, however there is lower transition from school to post-secondary education for students with disability compared to those without. While not every high school student goes on to post-secondary studies the National Skills Commission has said that more than 9 out of 10 new jobs to be created in the next five years will require post-secondary qualifications¹⁴. It is vital that appropriate strategies and commensurate funding is put in place to foster aspiration for, and seamless transition to, post-secondary education for better educational opportunities and outcomes for people with disability.

Priority 4: Improved staff awareness of disability and professionalisation of disability practitioners within the sector

Key areas of alignment with the Accord: 1, 2, 4 and 6

Improving access and inclusion for students with disability in tertiary education requires a disability confident workforce who have completed disability responsiveness training. In addition, better recognition and valuing of the role of disability practitioners through the establishment of a

¹² [Selected Higher Education Statistics – 2020 Student data - Department of Education, Australian Government](#)

¹³ [Graduate Outcomes Survey \(qilt.edu.au\)](#)

¹⁴ [Projecting employment to 2026 | National Skills Commission](#)

professional accreditation framework which includes professional recognition of their qualifications and expertise in the area of disability inclusion.

Higher education providers need to foster a workforce which demonstrates a strengths-based, non-ableist and inclusive approach across the entire student learning journey and across physical, digital, and learning environments. This requires at least a minimum level of disability responsiveness or awareness to be embedded across the sector (Pitman, 2020; ACOLA, 2022).

Priority 5: Improved teaching quality and inclusive pedagogies

Key areas of alignment with the Accord: 1, 2, 4, 6 and 7

Improved higher education teaching quality through better recognition and valuing of the role of educators can make a big difference to educational outcomes of people with disability. This would include the establishment of a professional accreditation framework for university educators, including minimum teaching qualification levels on par with VET educators and core learning units in inclusive pedagogies.

By implementing Universal Design for Learning universities can ensure that inclusive curriculum design, development, and delivery fosters greater inclusion. UDL embraces learner variability, designs for it, and reduces barriers to learning, creating a greater sense of belonging.

Teaching staff are more likely to adopt inclusive teaching methods and materials if they are more knowledgeable about disability and understand that students with disability have limitations that arise from external barriers and not from an inherent deficit. It is critical that teaching staff in higher education attain and maintain suitable levels of professional qualification which include disability responsiveness and instruction in inclusive pedagogies.

Priority 6: Better data collection, measurement, and evaluation of outcomes for students with disability

Key areas of alignment with the Accord: 1, 2 and 4

There are several areas of data collection, measurement and evaluation which could be improved to monitor access, participation, retention, and attainment for students with a disability. Key areas include:

- monitoring the learning journey of students with a disability using the Unique Student Identifier and NCCD. This would assist in providing better tracking of students with disability in and between education systems, support additional resources to build capacity and support disability practitioners and educators, and improve provision of reasonable adjustments between high school and the tertiary education sectors
- better measurement of student success indicators, including additional targeted questions for students with disability in the QILT Graduate Outcomes Survey
- targeted approaches to improving graduate outcomes for priority groups, including students with disability
- more nuanced reporting of people with disability in higher education statistics including intersection with other equity groups
- better monitoring and evaluation of higher education providers for the purposes of performance-based funding (PBF)
- support for ADCET to continue benchmarking within the sector.

Priority 7: Improved integration between higher education providers, industry, and professional accreditation bodies for better graduate outcomes for students with disability

Key areas of alignment with the Accord: 1, 2, 4 and 7

Improved integration with industry, including professional accreditation bodies, to scope and deliver appropriate, relevant, flexible, accessible, and inclusive work-integrated learning (WIL) opportunities to meet the needs of the emerging graduate workforce.

A range of barriers are experienced by students with disability often limit successful and positive experiences of WIL including lack of reasonable adjustments, financial considerations, lack of disability responsiveness by universities and industry, and discrimination. The Government should consider additional financial support options for students with disability undertaking WIL including for those students wishing to pursue WIL in regional and remote locations.

As part of Performance-based Funding Scheme guidelines higher education providers are funded subject to meeting four core measures: graduate employment outcomes, student experience, student success and equity group participation by Indigenous, low socioeconomic status and regional/remote students. Universities have a responsibility to improve graduate outcomes for students with disability including more inclusive career development and careers services which contribute to improved graduate employment for this cohort.

Priority 8: Increase diversity of the higher education workforce to better reflect equity groups

Key areas of alignment with the Accord: 2 and 4

Employment targets for the higher education workforce should reflect the diversity of the Australian population. Diverse recruitment has great economic benefits (AHRC, 2021) but requires specific targeted recruitment strategies that signal to prospective staff and students that the institution welcomes diverse backgrounds, ideas, and contributions. There is currently limited data on people with disability in the Australia higher education workforce. This is due to concerns about the impact of disclosure, low disability confidence, a deficit approach to disability employment, and casualised or temporary employment.

Priority 9: An integrated and whole-of-government response to supporting people with disability

Key areas of alignment with the Accord: 1, 2, 3 and 5

Consider the opportunity for whole of Government responses to the interaction between the higher education sector and other systems, such as income support, employment services, housing, transport, including implementation of a national education strategy within the NDIS to build aspiration and capacity for people with disability to participate in tertiary education to mitigate the need for students and prospective students to choose between priorities such as caring or work responsibilities and higher education.

References

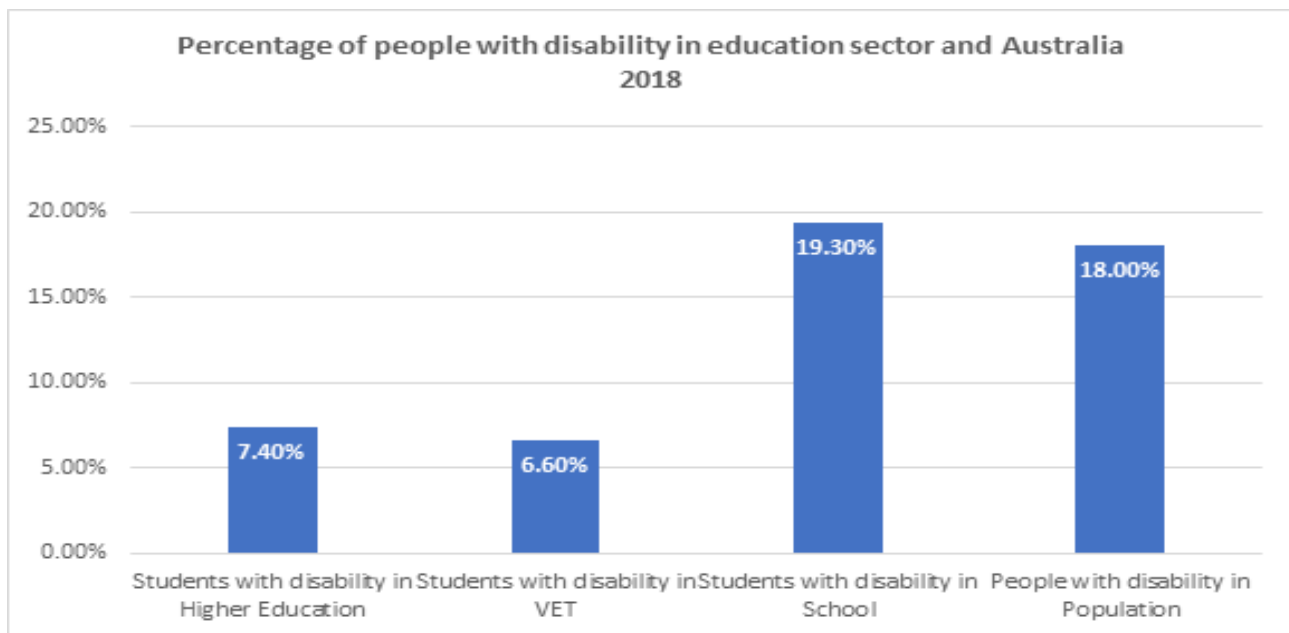
- ACOLA (Australian Council of Learned Academies). (2022). *Ensuring Occupations are Responsive to People with Disability*. www.acola.org
- AHRC (Australian Human Rights Commission). (2021). Disability Action Plan Guide. <https://www.humanrights.gov.au/our-work/publications>
- AHRC. (2021). The economic and business benefits of employing people with disability in *Includability*. <https://includeability.gov.au/resources-employers/economic-and-business-benefits-employing-people-disability>
- CAST (Centre for Applied Special Technology). (2022). *About Universal Design for Learning*. <https://www.cast.org>
- Collins, A., Azmat, F., Rentschler, R. (2019) Bringing everyone on the same journey: revisiting inclusion in higher education. *Studies in Higher Education*, Vol. 44 Issue 8, p1475-1487, 13p, 2 Charts; DOI: 10.1080/03075079.2018.1450852
- Department of Education (DE). (2020). 2020 Section 11 Equity groups. In *Higher Education Statistics Student Data 2020*. <https://www.dese.gov.au/higher-education-statistics/resources/2020-section-11-equity-groups>
- National Skills Commission. (2022). Projecting employment to 2026. <https://www.nationalskillscommission.gov.au/insights/projecting-employment-2026>
- Pitman, T. (2022). *Supporting persons with disabilities to succeed in higher education: Final report*. Research Fellowship final report. National Centre for Student Equity in Higher Education, Curtin University.
- Quality Indicators in Learning and Teaching (QILT). (2021). *Graduate Outcomes Survey 2021*. [https://www.qilt.edu.au/surveys/graduate-outcomes-survey-\(gos\)](https://www.qilt.edu.au/surveys/graduate-outcomes-survey-(gos))

Appendix 2: Key statistics

To put the issues facing students with disability in the tertiary education sector into context it is important to understand some of the data collected about students with disability. In the last decade the number of people with disability entering and completing higher education has improved but is still significantly lower than for people without disability. The increase in figures is also related to higher reporting of disability, health and mental health conditions, improved data collection, and increased need for people choosing to share to access adjustments for their study.

Educational participation

As evidenced in Graph 1 there is a gap between the number of students with disability in secondary education compared with those that transition to either university or VET studies. Given that 9 out of 10 jobs created in the next 5 years will require formal post-secondary credentials¹⁸ there is work to be done to improve uptake to post-secondary education and training.



Source: Department of Education, Skills, and Employment 2018; ADCET VET Statistics 2018; NCCD 2018; Australian Bureau of Statistics 2018

*2021 figures for SWD in Higher Education are now 9.4%

Educational participation and attainment

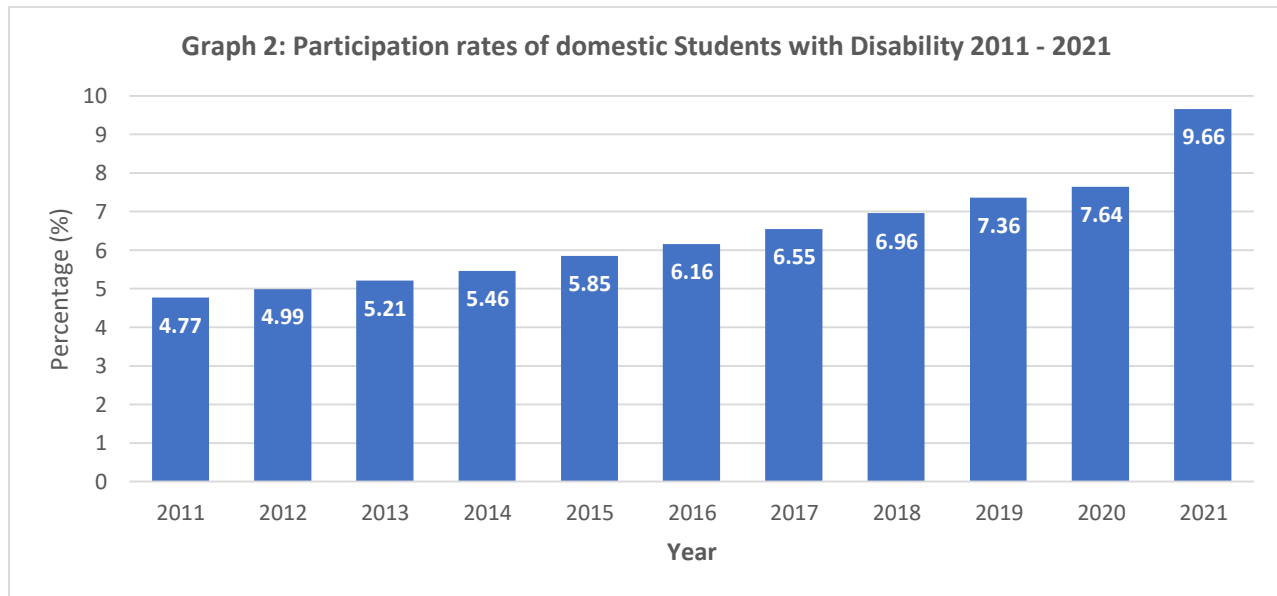
The [Selected Higher Education Statistics – 2021 \(Equity Performance Data\)](#) student data shows lower retention and success rates for students with disability compared with all students.

- The **retention rate** for students with disability is 79.87 compared with all students at 83.35 (Retention is 2020 figure)
- The **success rate** for students with disability is 82.35 compared with all students at 88.37 (2021 figure)
- The [AIHW](#) states the highest level of educational attainment was a bachelor's degree or higher for:

- 17% (or 614,000) of people with disability aged 20 and over
- 11% (or 107,000) of those with severe or profound disability in the same age range (This compared with 35% (or 5 million) of people without disability ([ABS 2019](#))).

Domestic students with disability

In the last 10 years the percentage of domestic students with disability has increased from 4.77% (in 2011) to 9.66% (in 2020)



Source: [Selected Higher Education Statistics](#) – 2021 Equity Performance Data

Employment

The increasing importance of tertiary education and skills development beyond secondary school is highlighted by the five-year projections that show more than nine-in-ten new jobs are projected to require post-school qualifications.¹⁹

- 53% of working age people with disability are in the labour force compared with 85% of people without disability
- Undergraduates with disability had a full-time employment rate of 68.4% per cent, compared with those without disability at 79.5% ([QILT, 2022](#))
- Labour force participation for undergraduates with disability is 88.9% compared with those without disability at 92.8% (this is the lowest of all equity groups except people who main language spoken is not English)
- 22 out of 43 universities are utilising [University Specialist Employment Program](#) (USEP) or [Gradwise](#) to help support graduates with disability.