

Vision Australia Response: Australian Universities Accord Interim Report

Date: 1 September 2023

Submission approved by: Chris Edwards, Director Government Relations and Advocacy, NDIS and Aged Care, Vision Australia

Vision Australia is providing this short response to the Australian Universities Accord Interim Report because we share a vision of a future higher education system that is empowering, equitable and energising at both an individual and a national level. However, we believe that the full realisation of this vision can only be achieved through detailed, nuanced planning that takes into account the unique needs of students who are blind or have low vision. We strongly recommend that the Accord Review Panel engage directly with the blindness and low vision sector to gain a greater appreciation of the significant barriers that higher education students who are blind or have low vision currently face, and to inform the development of policy initiatives that will remove those barriers.

Since 2007 Vision Australia has undertaken or contributed to a number of research projects investigating levels of employment and unemployment in the blind and low vision community. Findings have consistently and clearly shown that people who are blind or have low vision experience much higher levels of unemployment, and much lower levels of employment than the rest of the community, including the rest of the disability community. More than 50% of the blind and low vision community are unemployed, and a 2018 international study found that only 24% of Australians who are blind or have low vision are employed fulltime.

The same research has also consistently and clearly shown that having a post-secondary qualification is an important predictor of positive employment outcomes for people who are blind or have low vision. The 2018 study mentioned above found that only 10.6% of people without a post-secondary qualification were in fulltime employment, compared with 28% who did have such a qualification. A Previous research survey conducted by Vision Australia in 2012 found that 78% of respondents who had a tertiary qualification were in “stable employment.” This included part-time and under-employment, but it illustrates the link between post-secondary qualifications and employment. When the trends towards future demand for higher qualifications in

employment noted in the Interim Report are taken into account, it is imperative that barriers to the pursuit of higher education by people who are blind or have low vision are removed.

In 2017 Vision Australia conducted qualitative research into the online learning experiences of university students who are blind or have low vision. The results of this research are presented in our report titled "Online, But Offtrack: Barriers to Online Learning Experienced by University Students who are Blind or have Low Vision", a copy of which is uploaded as an attachment to this response. In essence, we found that 34 of the 35 students who participated in the research experienced barriers to online learning. In some cases, these barriers were so insurmountable that the students were forced to withdraw from their studies, usually in a state of despair and distress. One student commented in words that are compelling but typical:

"I spent years at university constantly trying to overcome barriers – online, offline, you name it - and constantly battling discriminatory prejudicial and hurtful attitudes and behaviour from support staff who were employed in roles where they should have known better. I'm finished now, and I never want to set foot inside a university again as long as I live. I'm totally repulsed by the idea of further study – it was a deeply traumatic experience for me, and I have emotional scars that may never fully heal."

Three categories of barriers were identified: inaccessibility of online learning systems because of a failure to design them in compliance with accessibility standards; inconsistent, inequitable and often inadequate application of concepts of reasonable adjustments across the sector; and substantial lack of awareness and training for specialist support and academic staff in how to assist students who are blind or have low vision.

Our report included 10 Recommendations that were primarily directed towards the various peak bodies in the sector that have the responsibilities and capacity to lead systemic change and thereby improve access and equity in the sector as a whole.

1. "That Universities Australia, in its role as the peak body representing Australian Universities, receive and give urgent consideration to the findings in this report.
2. That as part of its response to the findings in this report, Universities Australia undertake a comprehensive technical accessibility audit of the online learning environments used by Australian universities, and that the results of this audit form the basis of an Action Plan to achieve remediation and change.
3. That Universities Australia adopt the Australian Standard AS EN301.549:2016 for use in the procurement of online learning and other systems and software used by Australian universities.
4. That Universities Australia work with Vision Australia and other organisations in the blindness and low vision sector, to develop guidance material about best

practices in the provision of assistance and reasonable adjustments in the context of online learning for students who are blind or have low vision.

5. That Universities Australia work with Vision Australia and other organisations in the blindness and low vision sector to develop a comprehensive training program for all staff involved in the provision of support services to students who are blind or have low vision.
6. That Universities Australia develop a tool that can be used by individual universities to provide consistent and comprehensive information to prospective and current students about the accessibility of all online learning components and the reasonable adjustments that are available.
7. That Universities Australia develop a national, consistent strategy for identifying students who may be at risk of falling behind in their studies due to barriers in accessing online learning.
8. That Universities Australia develop training resources to assist students who are blind or have low vision to become familiar with specialised software used as part of university courses.
9. That the Australian Government consider and act on the findings in this report, and that it works with Universities Australia to review current funding arrangements to allow universities to provide adequate support for students with a disability, and to ensure that accessibility outcomes in the area of online learning are consistent with legislative requirements, community expectations, and the principles of disability rights and Government policy.
10. That the Tertiary Education Quality and Standards Agency (TEQSA) consider this report in the context of the standards in Part A of the Higher Education Standards Framework (HESF), and work with the university sector to identify any relevant gaps in the standards, and any deficiencies in the application of and compliance with the standards in the context of online learning environments as experienced by students who are blind or have low vision.”

A crucial point to emphasise from these recommendations is that many of the greatest barriers to higher education experienced by students who are blind or have low vision are systemic in nature and can only be removed through systemic action. They cannot be adequately addressed via individualised, “funding follows the student” approaches to equity funding. Such approaches may have merit if they are co-designed with the disability sector and adequately support students as their needs change throughout their courses and if they study at multiple institutions, but these approaches can never, in and of themselves, be sufficient to lay a firm foundation for equity in higher education. For example, if a blind student is unable to access an online learning system because it has not been designed to comply with accessibility standards, then no amount of individualised funding is going to address the issue. Once a university has spent millions of dollars on inaccessible institution-wide systems, it’s generally too late to

retrofit them for accessibility, to the disadvantage of students who depend on such systems being accessible.

After the publication of the report, we promoted it widely within the sector and to Government with the aim of raising awareness of the barriers students were experiencing, and also to highlight the urgent need for systemic sector-wide action to address them. We have been encouraged that the Online, but Offtrack report has served as a catalyst for some proactive initiatives undertaken by the Australian Disability Clearinghouse on Education and Training (ADCET) in partnership with the National Disability Coordination Officer (NDCO) program and with collaborative expertise from the blind and low vision sector. Supporting Blind and Vision Impairment Students Online is a set of best-practice guidelines, available as an e-learning module, that aims to assist disability support staff within universities to provide comprehensive and consistent support.

Another important project undertaken by ADCET/NDCO resulted in the production of an implementation guide for accessible ICT procurement: "Procuring with everybody in mind: A guide to Procuring accessible ICT in the Tertiary Sector". Some of the most intractable barriers experienced by university students who are blind or have low vision result from inaccessible systems, platforms and software, and this implementation guide provides best-practice approaches for ensuring that university learning infrastructure is accessible.

These initiatives are extremely important and encouraging because they help disseminate knowledge and, over time, will hopefully contribute to greater accessibility awareness. They also demonstrate the benefits of collaboration and co-design with the disability sector. However, the guidelines and best practices that they describe are not mandated, normative or even endorsed across the higher education sector. We continue to hear from students about barriers they experience in attempting to pursue higher education. In addition to those discussed in our report, we have become aware of the following:

- Differences of interpretation of relevant provisions of the Copyright Act mean that some students have to wait months for accessible versions of their course materials while the university engages in time-consuming and unnecessary negotiations with publishers.
- Some students feel that they are the "meat in the sandwich" because the university expects them to use their NDIS supports to assist them with access to courses, despite the clear expectation that it is not the role of the NDIS to support the higher education sector.
- Students say that they are constantly exhausted, stressed and behind in their studies because of the need to battle for basic access and supports with impersonal and intransigent bureaucracies over which they have no control and which they have little capacity to influence.

- Some students have only been provided with support to attend university event ceremonies when they signal their intention to alert the media to the lack of access and are unable to view the video of their graduation ceremony because the university chose to make it available on a streaming service known to be inaccessible to people who are blind or have low vision.

The future of people who are blind or have low vision is inextricably bound up with higher education. The community will not flourish, and people will experience increasing exclusion from meaningful participation in economic, social and civic life if the higher education sector is allowed to perpetuate its deep inequities. The sector must be assisted to embark on a process of cultural and leadership transformation whose endpoint will be a clear, consistent and resourced commitment that students with a disability, including students who are blind or have low vision, are welcome, supported, valued, and respected.

We would be most happy to engage further with the Review Panel as it develops ideas for the future of higher education.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Felix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses, and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.