

About ADCET

The [Australian Disability Clearinghouse on Education and Training \(ADCET\)](#) is funded by the Department of Education, Skills and Employment as a component of the Higher Education Disability Support Program and is hosted by the University of Tasmania. The aim of ADCET is to facilitate equitable access to education and training for people with disability by facilitating the exchange of information and resources to support disability practitioners, academic staff, teachers and students with disability in the post-secondary education and training sector. This includes relevant information on reasonable adjustments, inclusive teaching and assessment strategies. ADCET therefore plays a critical role in enabling fair and equitable access to and participation of students with disability in tertiary education.

Our Response

ADCET has approached this submission through the lens of access, participation, and success in tertiary education. ADCET's usage data on pages, topics and recordings relating to the Disability Standards for Education (the Standards) indicates that interest in this information continues to grow.

ADCET plays a role in the dissemination, education, and facilitation of the Standards, however it is not involved in the direct delivery of education or training. This enables ADCET to have a broad and unique perspective on issues relating to the Standards and the communities, projects and programs that support the access, participation, and success of students with disability in tertiary education.

Whilst the Standards do provide an essential legislative framework to support the rights of students with disability to fairly and equitably access and participate in education, ADCET advocates for strengthening of the Standards' alignment with other relevant legislative instruments to overcome legislative and policy conflicts, and to ensure the provision of an inclusive education environment underpinned by Universal Design for Learning principles.

Data from ADCET

ADCET analytics demonstrate a strong upward trend of people looking for information relating to the Standards in the tertiary education context.

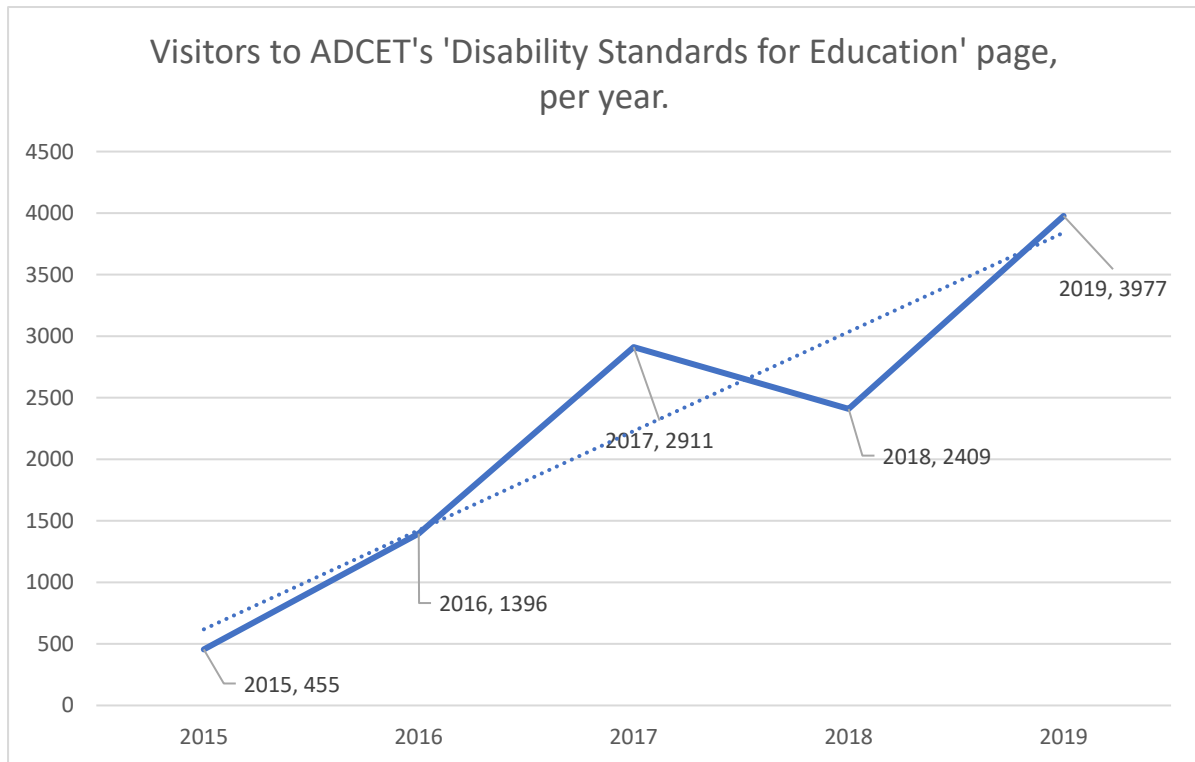
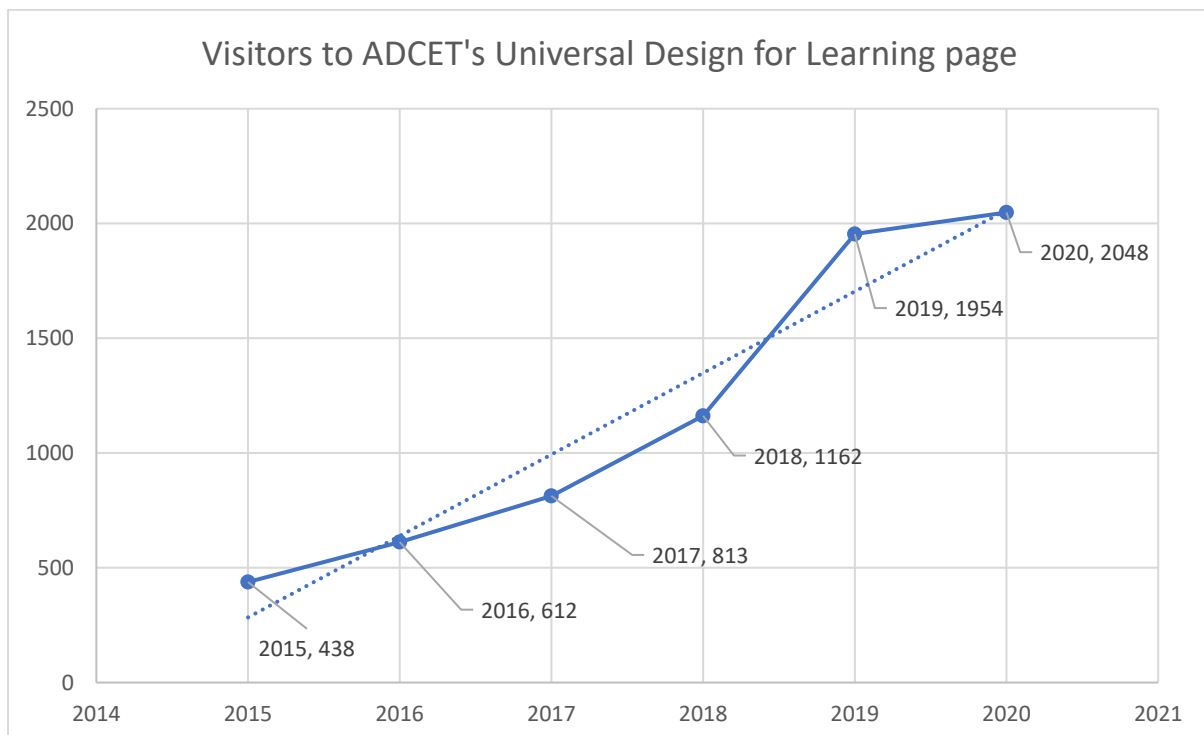


Figure 1 Trend of visits to information relating to the Disability Standards for Education 2015-2019

Fifty-eight percent of visitors who have visited the Disability Standards for Education page since 2015 have then gone forward to the downloads page where they can obtain a copy of the Standards. This data demonstrates that ADCET has seen growth in its users looking for and downloading the Standards since the last review.

ADCET also has a [general information page](#) regarding obligations under the Disability Discrimination Act (1992) and the Disability Standards for Education, which has had 9,024 visitors since the last review period.

Of particular note and relevant to the themes within this submission is the growth of interest in the [Universal Design for Learning content](#) over the last five years.



This 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).

Disability Awareness in VET

ADCET plays an active role in raising disability awareness. In 2018 ADCET began managing <https://disabilityawareness.com.au/> website that hosts an introduction to disability awareness. In the most recent metrics available about the training usage, 9,512 people have completed this training. This generalist training program now sits alongside specialist training in VET.

The [Disability Awareness in VET](#) was designed in collaboration with the NDCO Program, and is separated in to two categories – one for VET staff, and one for VET educators. Since it was launched in late 2019 there have been 1,428 people complete this VET training.

The Disability Awareness in VET training program includes information about VET providers' obligations under the Standards and collects usage data and feedback from educators and practitioners. Data from this resource is included in this submission, to highlight some of the opportunities and gaps emerging in the sector relevant to the Standards.

The feedback gathered from VET educators indicates the critical value of providing awareness about the inherent requirements and obligations under the Standards. The results suggest that almost one third of VET Educators surveyed **did not** have an understanding of the Standards, or relevant practices prior to engaging in the training, however this substantially dropped after training (see Table 1).

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

The following are some key quotes from VET Educators in response to the question 'What might you do differently after undertaking this training?':

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

While our feedback indicates that the VET Disability Awareness training is valuable and effective at addressing current gaps in knowledge and skills in the sector, there is still scope for much more to be done. Specifically, the training is voluntary and would benefit from stronger commitment from the VET sector to embed this into their staff training processes.

Additionally, ADCET, in collaboration with the NDCO Program, is in the planning process for the development of a 'Disability Awareness in Higher Education' training program, and a 'Universal Design for Learning in Tertiary Education' training program.

ADCET's Response to the Disability Standards for Education

Staff within tertiary providers have varied knowledge about students with disability and their needs, which impacts upon an inclusive culture and curriculum. All staff would benefit from having a comprehensive understanding of their responsibilities under the Disability Standards for Education and a sound knowledge about the application of strategies and solutions. Data from our Disability Awareness in VET training indicates that educators are open to training opportunities and that the training improves their understanding of their obligations under the Standards.

***Recommendation 1 :** Build in obligations across other legislative and policy instruments (for example TEQSA and ASQA regulation) relative to tertiary education provider registration for compulsory annual staff training in the Standards and Disability Awareness for all (academic and professional) staff, similar to training such as cultural awareness, code of conduct, privacy and confidentiality. This regulation should extend to TEQSA and ASQA's internal staff being required to undertake this training, to support structural understanding and change.*

A lack of clear commitment to professionalising the sector and adequately funding practitioners. While it is important that all staff are knowledgeable and work within the Standard's legislative framework, the role of Disability/Access Practitioners within the tertiary sector remains vital. Their expertise cannot be underestimated, as the practitioners are the drivers of disability inclusion across the tertiary sector and play a pivotal role in enabling their institution's obligation to consult with students regarding reasonable adjustments. For example, recently a scoping survey of practitioners in the sector highlighted the depth and breadth of their commitment to ensuring equity in education, even in very challenging times.¹ There are currently no benchmarks or indicators for appropriate level of service or caseload numbers.

The risks of the unavailability of knowledgeable staff within institutions has been compounded during COVID-19, with news of redundancies and restructures effecting these vital student support services. Expert individual advice for students is necessary and should be universally available regardless of budget constraints, inclination, or leadership within individual institutions.

***Recommendation 2:** Professionalise the practice of disability practitioners in tertiary education by scoping the development of a Graduate level qualification in disability practice and a Continued Professional Development system.*

***Recommendation 3:** Establish nationally consistent benchmarks or indicators of student caseloads across the tertiary sector. While we realise that institutions can vary in expectations of the requirements of the role, this would enable conversations about quality consultations and provision of adjustments.*

¹ <https://www.adcet.edu.au/resource/10398/survey-report-beyond-covid-19/>

Adjustment requests, complaints and resolutions occur at the individual level within institutions, driven by the way the Standards are written and constructed. There is no central platform for building on and sharing experiences of meeting obligations under the Standards to promote a culture of continuous improvement – in particular, one that is accessible to students. This is perpetuated by the Standards as a one-person focus.

ADCET is often contacted by individual students asking about their rights and seeking ideas for potential solutions and remedies. However, ADCET does not have the resources to employ legal expertise to provide advice, nor is able to identify any appropriate and affordable alternative points of referral. Potentially the system could therefore be discriminating against those who do not have the financial or psychological resources to pursue a complaint through to resolution, and is a significant gap in the system.

Over the last 15 years disability practitioners from the Australian and New Zealand tertiary sector have shown initiative in developing a peer support network through an email list - established by ATEND, Australian Tertiary Education Network on Disability – to share information and knowledge about complex scenarios and reasonable adjustments. This list serves as an exemplar in the tertiary education sector in the manner it facilitates discussion and information-sharing on inclusive teaching, learning and support for people with disability.

Recommendation 4: *The provision of a central, specific contact point for students to receive advice about requesting adjustments and lodging complaints regarding their access to tertiary education. Ideally this would include free expert legal advice for students with disability and staff on appropriate adjustments, rights and obligations.*

Recommendation 5: *Students and staff should have easy access to national information about requests and precedents for reasonable adjustments & resolutions, aggregated from all tertiary providers. This could enhance practitioner knowledge and empower students to know their options.*

Recommendation 6: *While ADCET utilises the ATEND list to inform content, remain informed of current trends and develop resources on key issues, there exists a missed opportunity to maximise the learnings and information from this due to inadequate resources. The sector would benefit from capturing and collating more of the information to inform practice both within and beyond the group membership.*

Accessing print in an online tertiary education environment including textbooks, learning management systems, booking appointments, on-line learning content, and accessing and using relevant assistive technology options. For example, when students come across materials that are inaccessible, there is no requirement in the Standards for education providers to rectify this in a specific timeframe beyond a ‘reasonable’ time frame. However, the significant roadblocks with

publishers can delay access to materials which sets back the students learning. Also, while some institutions are well resourced with assistive technology advice, there is scope to take a more coordinated national approach.

Recommendation 7: *Considerations to support providers to learn from and pivot toward better collaborative practice regarding the design and construction of materials correctly in the first instance. Where materials are retrofitted for students, legislation could enable the sharing of this with other tertiary institutions to avoid the duplication of this work.*

Recommendation 8: *A more coordinated and informed resourcing of a central point of excellence for assistive technology within tertiary education environments. For example, the provision of an Assistive Technology position within ADCET.*

A requirement for stronger strategy regarding the inclusion of students with disability in tertiary education. There is a critical need for a *Students with Disability in Tertiary Education Strategy* in order to propel the sector beyond the individual focused approach of the DDA and Standards, particularly given the rapid growth of students with disability in Higher Education² and VET³. For example, recently the Australian Government invested in a National Regional, Rural and Remote Education strategy. This strategy has arguably been the impetus of recent increases in funding allocations for this cohort (*IRLSAF, Regional University Centres, Rural and Regional Enterprise Scholarships Program, Demand driven funding for Indigenous students from regional and remote areas*), yet students with disability remain left behind in per student funding allocations.

Recommendation 9: *Adequately resource, develop and implement a National Strategy for Students with Disability in Tertiary Education.*

Conclusion

Prior to conclusion ADCET would like to reiterate that ultimately the Universal Design in Learning principles need to be embedded in all tertiary education settings and thereby reducing the need for an individual adjustment approach.

ADCET thanks the Department of Education, Skills and Employment for receiving this submission for the review of the Disability Standards for Education, 2020. We look forward to continuing to work in partnership to propel the success of students with disability as they access, participate & succeed in tertiary education in Australia. ADCET is open to further consultation about this submission and welcomes open communication throughout the review process.

² <https://www.adcet.edu.au/inclusive-teaching/understanding-disability/Higher-Education-Statistics/>

³ <https://www.ncver.edu.au/research-and-statistics/data/databuilder>