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

19 December 2022

Dear Mary O'Kane and members of the Australian Universities Accord Panel

Re: ADCET submission for the University Accord: Review of Australia's Higher Education System

ADCET (Australian Disability Clearinghouse on Education and Training) is Australia's leading resource supporting disability practitioners, educators and students (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

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

Regards

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Manager, ADCET

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About ADCET

ADCET (Australian Disability Clearinghouse on Education and Training) provides national leadership in the inclusion of people with disability in tertiary education through providing information and professional development for disability practitioners, educators and support staff.

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 just celebrated 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 education[1]
- 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, and a small grant for two staff (the Manager and Assistive Technology specialist) via the National Disability Coordination Officer (NDCO) Program. 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.

ADCET is primarily focused on people with disability but recognises the intersectionality of people with disability with other identities including Aboriginality, gender diversity, socio-economic and geographic can further impact their access and participation in tertiary education.

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

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 education[2]. 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).

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[2] *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%)[3].

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 disability[4].

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

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[3] _Selected Higher Education Statistics – 2020 Student data - Department of Education, Australian Government_
[4] _Graduate Outcomes Survey (qilt.edu.au)_

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 qualifications[5]. 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 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 is 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

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[5] *Projecting employment to 2026 | National Skills Commission*

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.

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