



ATEND

Australian Tertiary Education Network on Disability

18th December 2022

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

Monday 18th December, 2022

Dear Mary O’Kane and the Australian Universities Accord Panel,

The Australian Tertiary Education Network on Disability (ATEND) appreciates this opportunity to provide feedback on the Terms of Reference (TOR) for the Review.

ATEND is the peak body for disability practitioners in the Tertiary Education sector, and we strongly advocate for disability perspectives and voices to be adequately considered in this review.

ATEND joins EPHEA (Equity Practitioners in Higher Education Australasia) to support their submitted response to the Review TOR, similarly highlighting the two key areas and 12 recommendations for both longer term and more immediate action:

1. Access and opportunity

- Recommendation 1: Reintroduce Demand Driven Funding for targeted equity groups.
- Recommendation 2: Introduce national and institution-specific targets for access and completion established and monitored under a National Student Equity Strategy.
- Recommendation 3: Repeal the 50% fail rate as part of the Job-Ready Graduate package.
- Recommendation 4: Invest in national graduate employability programs for students from underrepresented backgrounds.
- Recommendation 5: Develop a national or (at minimum) state-based alternative assessment framework and university entry program.
- Recommendation 6: Sharpen the equity lens across the lifetime of learning, including postgraduate studies, microcredential and short courses.
- Recommendation 7: Introduce a National Scholarship and Study Support Scheme.
- Recommendation 8: Develop a National Student Equity Strategy that is inclusive of students with disability, as well as providing additional targeted support.
- Recommendation 9: Revisit the recommendations from the Review of Identified Equity Groups (Tomaszewski et al., 2018) and include invisible cohorts of equity.
- Recommendation 10: Legislate medium to long-term funding commitments for institutions to enable the access, participation and success of students from targeted equity groups.
- Recommendation 11: Review the ‘Partnerships’ component of HEPPP, alongside state and nationally based career development learning programs, to develop a Widening Participation partnership model that supports every student.

2. The connection between the vocational education and training, and higher education systems.

Recommendation 12: Develop a National Student Equity Strategy for the tertiary education sector.

These areas of focus can be summarised as follows:

- **1. Reintroduce Demand Driven Funding (DDF) for targeted equity groups.**
From 2012 to 2017, this was associated with significant increases in the participation of students from equity groups occurred (Indigenous undergraduate student enrolments had more than doubled (105 per cent); enrolments of undergraduate students with a disability had increased by 123 per cent; enrolments of students from regional and remote areas had increased by 50 per cent; and enrolments from students from low socio-economic status backgrounds (LSES) rose 66%), compared to overall growth of the undergraduate domestic population, which only rose by 45% (Norton, 2019).
- **2. Introduce a National Student Equity Strategy, with national and institutional access and completion targets.**
With the Widening Participation focus on enrolment figures, the most significant weaknesses of the DDF were public universities' subsequent high attrition rates at (Norton, 2020). Both national, and subsequently institutional, access/participation targets and also completion rate targets are necessary to increase equity student participation and encourage universities to invest in significant supports and alternative exit pathways for these students.
- **3. Repeal the 50% fail rate as part of the Job-Ready Graduate package.**
With a more equitable and appropriate focus on supporting student completion, Labor Government review of the Job Ready Graduate Package is possible, to address the inequitably impacting and punitive measures around the 50% fail rate and requirements for students seeking to then re-engage. Incentivising completion rates, as an alternative, enables a more strength-based (and strengths-developing) approach to higher education, particularly for the vulnerable and at-risk.
- **4. Invest in graduate outcomes via targeted national employability programs.**
Even with successful Program completion, the graduate employability rates for students from targeted equity groups continue to be lower than the all-student indicator, with only 59% of students with disability and 53% of students who speak a language other than English working full-time within four months post-graduation (2021 Graduate Outcomes Survey Report Tables), perpetuating cycles of disadvantage. Employability increases for some groups are already being generated via targeted career pathway programs such as CareerTrackers (Aboriginal and Torres Strait Islander university students) and CareerSeekers (refugees and people seeking asylum); further investment in national career programs, including for students with a disability, is strongly supported for a meaningful and long-term approach to university access and participation.
- **5. State and national alternative entry pathways.**
As the most significant predictors of a young person's ATAR are their socio-economic status, postcode and the school they attend, this entry measure for university inadvertently reinforces disadvantage. While many students are already accessing university via other entry means, this is an ad hoc melange of approaches across the nation, and a coherent national approach would encourage rather than repel those with the least higher education experience.

- 6. Sharpen the equity lens across the lifetime of learning, and emerging formats.
Requirements for institutions to apply equity considerations, from the design stage, across all levels and formats of student engagement allow all these forms of education to be accessible and considered for participants from equity groups.
- 7. Introduce a National Scholarship and/or Study Support Scheme.
Already disadvantaged equity-group members arguably feel the impact of subsequent external factors – financial stress, family and cultural obligations, distance from family and community and intermittent additional disability considerations – even more, and these factors contribute to lower completion rates. Current study support initiatives, including Abstudy, Austudy, Youth Allowance and the Tertiary Access Payment Scheme are complex, and relatively rigid in considering some of these factors, resulting in gaps of students being eligible for such support. A national scholarship and study support scheme, with eligibility criteria aligned to the national higher education equity agenda and timely application and response times would contribute actively to student decision making for a higher education pathway. Important elements might be universal basic income for school leavers until age 25, rental subsidies, and free transport for students.
- 8. Review of Student Equity Groups for a disability-inclusive National Equity Strategy.
While appreciated, broad and general equity policy and programs will not address the specific impacts of different types of disability: funding and policy arrangements need to address Disability independently, specifically and flexibly-for-need, as well as within broader equity approaches. These disability arrangements should enable
 - Outreach and seamless transition from school records and adjustments to tertiary education,
 - supported by verified, non-ableist and informative-for-disability Program information, including documented Program descriptors and identified Inherent Requirements/essential components, and
 - engagement programs, Universal Design for Learning, and reasonable adjustments that enable empowered self-determination for students with disability in higher education.

A coherent strategy across all levels of education will be consistent with Australia’s commitments under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), institutional legislative obligations under the Disability Discrimination Act (DDA 1992), and contribute to the Education and Learning outcome and policy priorities identified in Australia’s Disability Strategy (2021 -2031).

- 9. Review Identified Equity Groups and include invisible cohorts of equity.
More inclusive definitions of disadvantage are required, to reflect our nation today and the complexity of the lives of many, including those in less visible groups (Pasifika, refugees and students in care), with multiple bases of disadvantage, with additional impacts of intersectionality, and/or with context-specific impacts. The flexibility for contextualised institutional responses may be indicated, as well as over-arching national approaches.
- 10. Legislate a medium to long-term commitment to institutions’ equity funding for access, participation and success of students from targeted equity groups.
Once appropriately identified, these students need to be included in the overall strategy.
- 11. Develop a Widening Participation partnership model that supports every student .
Leverage the ‘partnerships’ component of Widening Participation activities via the RUC model combined with state-based strategies on career development learning in schools for regionally-focussed enhanced access to both Widening Participation activities and effective and tailored career advice.

- 12. Develop a National Student Equity strategy for the tertiary education sector.
A national student equity strategy encompassing the ecosystem of education systems, including early childhood, primary secondary, VET and higher education in order to address systemic disadvantage early and inclusively. Closer VET and higher education sector connections for seamless funding options and transition from Vet to/from higher education would make decision making for study more relevant and responsive to individual and societal circumstances.

Further input and consultation on the Accord

Along with EPHEA, ATEND strongly encourages and supports the Accord Panel engaging with both students and equity practitioners in the higher education sector on the development of the Accord throughout 2023. ATEND is happy to assist in any way appropriate.

Please contact me if further discussion will assist in any way.

Kind Regards,



Cathy Easte

President, Australian Tertiary Education Network on Disability (ATEND)

