

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

11 April 2023

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

Re: ADCET submission for the University Accord: Discussion Paper Questions

ADCET (Australian Disability Clearinghouse on Education and Training) is Australia’s leading resource for 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 do not hesitate to contact us for any further detail, clarification or questions.

Regards

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About our submission

It is of the utmost importance that the Universities 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 answering the 49 questions put forward by the Universities Accord we have grouped and answered key questions with people with disability as our primary lens. We have not answered all the questions, preferring to leave some elements with those with more expertise.

Our submission has four parts in answering the Accord's questions.

Part 1: [the role and importance of ADCET](#)

Part 2: [Structural reform](#)

Part 3: [Access participation retention and success](#)

Part 4: [Cross-sectoral alignment](#)

In answering these questions ADCET has made 11 recommendations supporting our position which includes an expanded role for ADCET. As part of this submission and our recommendations, [Appendix 1](#) includes an outline of an expanded ADCET as a national and centralised centre for disability inclusion to assist in the transformation in the higher education sector.

Part 1: The role and importance of 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, content and projects of national significance which drive 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 working with the tertiary education sectors for more than 20 years.

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 dimensions which can further impact access and participation in tertiary education.

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.

Figure 1: ADCET at a glance



ADCET funding

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 between \$75,000 and \$150,000 annually and *ad hoc* project funding. At present, ADCET relies on supportive funding for three staff (the Manager, Digital Accessibility and Assistive Technology specialist, and administration support) via the National Disability Coordination Officer (NDCO) Program so that it can function at its current capacity. 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.

Our submission to the Accord includes a range of strategic recommendations to the Panel about whole-of-sector transformation which addresses the underlying barriers to participation in tertiary study that exist for people with disability. These include cultural, physical, digital and learning environments which are inconsistently addressed and managed through government policy and strategy, funding to the sector, and the work of tertiary education providers to support authentic and practical disability inclusion.

Despite the very low amount of core funding ADCET receives, it provides a proven sector-led and industry respected central platform that could assist in a sector wide transformation. We have developed and outlined proposals to the Department of Education which would see ADCET consolidate existing activities and expand its influence on the sector. One such proposal is outlined in [Appendix 1](#). This proposal would assist the sector by:

1. **Aligning with relevant strategy, policy and legislation – educating and promoting it through our work.** This includes:
 - [Australia’s National Disability Strategy 2021 – 2031](#)
 - *Disability Discrimination Act 1992* and the *Disability Standards for Education 2005* (currently recommendations from the 2020 review are yet to be actioned), *Premises Standards 2010*, *Web Content Accessibility Guidelines (WCAG)*, *Higher Education Standards Framework 2021*

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

- the *Higher Education Disability Support Program, Job Ready Graduates Package*, and performance-based funding
- Australian Skills Quality Authority (ASQA) and Tertiary Education Quality and Standards Agency (TEQSA) obligations, Australian Skills Quality Authority (ASQA) and Tertiary Education Quality and Standards Agency (TEQSA) obligations²
- potential outcomes of the Accord aimed at increasing equity group participation which hopefully includes a greater emphasis on people with disability.

2. Broadening capacity-building and consultation with our sector partners and stakeholders. This includes:

- expansion of **projects of national significance** to address systemic barriers such as [Universal Design for Learning](#) eLearning, resources, and community of practice; [Accessible ICT Procurement](#) with the Council of University Directors of IT (CAUDIT); Supporting Blind and Vision Impaired Students Online eLearning with Vision Australia and Blind Citizens Australia; eLearning programs for VET providers; Career Development Learning Hub with the National Careers Institute
- enhancing the **provision of our [Disability Awareness eLearning](#)** programs to include a specific training package for the Higher Education sector. There are over 30,000 enrolments to date for our *Introduction to Disability Awareness* course. This kind of training has been recommended by NCSEHE research (Pitman, 2022) as something all universities should adopt as mandatory. Under the DDA and the DSE there are positive obligations to supporting people with disability which are not consistently applied through training and compliance across the sector.
- **engaging and collaborating** with the sector through fortnightly webinars, email list, communities of practice, and online resources. ADCET's 20 years of sector engagement means we already have significant and established networks and collaborations with both the higher education and VET sectors.

3. Providing a centralised centre for disability inclusion for the tertiary education sector that would drive change based on four strategic pillars that guide our work:

- **policy and advocacy:** To influence national policy to impact positively on the inclusion of people with disability within tertiary education environments.
- **engagement:** To promote inclusion and provide practical solutions in education and employment by building networks and collaboration with key strategic partners within tertiary education environments.
- **Universal Design:** To promote the principles of Universal Design (UD) by creating an understanding of, and practical solutions to, UD across the learning, physical and digital contexts within tertiary education environments.

² Note: ADCET believes the TEQSA guidance note on equity requires significant review to align with our international commitments to ensure access to general tertiary education as outlined in the *United Nations Convention on the Rights of Persons with Disabilities*.

- **good practice:** To promote good practice in disability inclusion by providing advice and practical solutions on emerging trends, research and practice within tertiary learning environments.

The proposal for an expanded ADCET ([Appendix 1](#)) would allow ADCET to provide a centralised and nationally coordinated approach to disability inclusion in the tertiary education sector. This includes directing funding from the NDCO program to assist an expanded ADCET to work as an effective change agent for the sector. The advantages to this approach would include:

- **capitalising on ADCET's existing position** as Australian's legislated supporting body within the Higher Education Disability Support Program (HEDSP) within the [Higher Education Support \(Other Grants\) Guidelines 2022](#) (Part 3, Division 2, 42)
- **consolidating and enhancing the 20 years of work** ADCET has undertaken to engage stakeholders and drive greater disability inclusion within the sector
- **providing efficient economies of scale**, consistent guidance and advice, quality resources backed by good practice and research and reduced duplication are supported by a centralised and national approach collaborating across the sector
- **supporting professionalisation** of disability practitioners and educators through professional development opportunities
- **responding to sector needs and changes** through sector-led, evidence-based and practice-based initiatives e.g., responses to COVID-19; online learning; rapid changes in assistive technologies; and the needs of particular disability types such as mental health, blind and vision-impaired students, and neurodiversity
- **addressing disparities in allocation of funds** to universities by having a centralised function on strategic and whole-of-sector or whole of institution issues such as Universal Design for Learning, accessible ICT procurement, disability training, building standards, inclusive language and reasonable adjustments.

Recommendation 1

Continue to provide adequate funding to ADCET, provided on 3-year cycles, to continue its remit to support disability inclusion in the tertiary sector. This support will enable ADCET to continue to develop and deliver projects of national significance to the tertiary education sector to foster greater disability inclusion under its four strategic pillars: policy and advocacy, engagement, Universal Design and good practice.

Part 2: Structural reform

ADCET welcomes the Universities Accord as a long-needed opportunity to rethink the current higher education system. 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. [Appendix 2](#) outlines some key statistics in relation to people with disability that illustrate why targeted structural reform is needed to support this cohort.

This is despite people with disability being the only equity group specifically protected by legislation through the Disability Standards for Education which aims to ensure that people with disability are treated on the same basis as other students in order to realise their full potential in education and employment.

While out of scope for the Universities Accord's Terms of Reference a powerful recommendation of the Panel would be to review the *Disability Discrimination Act* and the *Disability Standards for Education* in order to improve positive obligations in relation to the legislation. A public review of the Disability Discrimination Act would better align with Australia's obligations to the *United Nations Convention on the Rights of Persons with Disabilities* in relation to access to general tertiary education and would be a very strong step toward better inclusion by default for people with disability in tertiary education.

Key priorities for structural reform

Key priorities for structural reform which properly includes people with disability must include:

- **a National Strategy for Students with Disability in Tertiary Education** as distinct from a broader student equity strategy or a broader national disability strategy. 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
- **a requirement for universities to have a Disability Inclusion Action Plan** which encompasses a national strategy and intentionally addresses the physical, digital, learning and cultural barriers to inclusion for people with disability
- **national targets which reflect community representation** The measure of bachelor's degree attainment for people aged 25 to 34 across OECD countries is 47.1% in 2021 and while Australia's percentage is above this at 54.3%, we still lag behind similar countries including Canada (66.4%), the UK (57.5%) and the Netherlands (54.3%)³. According to the OECD that even though the disability education gap has closed slightly, the share of people with disability with a low education attainment remains higher than those without by about 10 percentage

³ [Education attainment - Population with tertiary education - OECD Data](#)

points⁴. Closing the educational attainment gap and the transition to the labour market for people with disability is still a major issue for OECD countries. See [Appendix 2](#) for further statistics)

- **stable funding that allows for sustained and long-term change**, authentic partnerships, stable human resource management and effective program planning. Currently HEPPP, DSP, the NDCO Program and ADCET are annually renewed with last minute confirmations of funding which impacts the quality and types of supports and services students receive.
- **funding which addresses the needs of the sector, especially people with disability**. Australia also has one of the lowest rates of public expenditure on tertiary education compared with its OECD counterparts⁵. The realignment of higher education funding through the Indigenous, Regional and Low SES Attainment Fund (IRLSAF) did nothing to improve funding for students with disability. Specific funding grants for activities such as Higher Education Participation and Partnerships Program (HEPPP) represents around \$145 million (indexed)⁶ to support selected equity groups whereas the funding for people with disability under the Higher Education Disability Support Program is only \$7.9 million per annum (indexed)³. This equates to approximately \$104 per student⁷. This 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.

This funding disparity has been compounded by unfinished business from the last significant higher education reform agenda – *the Review of Australian Higher Education: Final Report* (the Bradley Review). In the Review (2008, p.160) recommendations specifically addressed the need for support for people with disability:

Recommendation 31

That the Australian Government increase the funding for the access and participation of under-represented groups of students to a level equivalent to 4 per cent of the total grants for teaching. This would be allocated through a new program for outreach activities and a loading paid to institutions enrolling students from low socio-economic backgrounds. Funding for the Disability Support Program would be increased to \$20 million per year (Chapter 4.2).

- **allow for nuanced support arrangements** where disability and other equity characteristics intersect due to the cumulative disadvantage experienced by individuals from multiple equity groups e.g., First Nations people with disability, people

⁴ [Disability, Work and Inclusion: Mainstreaming in All Policies and Practices – OECD](#)

⁵ [Education resources - Education spending - OECD Data](#)

⁶ [2010-2023 Higher Education Participation and Partnerships Program \(HEPPP\) Participation Allocations](#)

⁷ [Calculating the costs of supporting people with disability in Australian higher education - NCSEHE](#)

with disability in regional and remote areas, people with disability experiencing financial hardship, and people from culturally and linguistically diverse backgrounds for which disability may impose additional financial, social or cultural impediments to help-seeking.

Recommendation 2

Develop and implement a *National Strategy for Students with Disability in Tertiary Education* which sets out key obligations and vision for tertiary education providers around disability inclusion. The Strategy designed by the Government in consultation with the sector, would set requirements for tertiary education providers to have active Disability Inclusion Action Plans, strategies to improve student outcomes for people with disability across key elements of physical, digital, cultural and learning accessibility. This national strategy should be accompanied by appropriate funding to support providers through the assistance of ADCET.

Driving data and performance

The access, participation, retention and success of students and funding allocations for equity groups is based on data collected on access, participation, retention and success Tertiary Collection of Student Information (TCSI) and Performance-Based Funding (PBF) indicators such as QILT surveys. PBF measures under this funding include graduate employment outcomes, student experience, student success and equity group participation by Indigenous, low socio-economic status and regional/remote students.

However, there are some fundamental issues with the way the data is collected, the funding allocated, and performance assessed which requires a complete revision in order to accurately understand students and drive performance.

These issues include:

- the use of blunt indicators such as participation and attrition rates which do not account for nuanced and complex analysis needed for analysing equity target groups and especially the categories of disability. For example, 'mental health' has only recently been added as separate category from 'other' and in the current climate with mental health amongst the 18 to 24-year age group rising, capturing better data around disability types is crucial for planning and funding
- the need to better understand the high growth in numbers of students with disability, including the increases in self and consented disclosure, the inclusion of mental health, and increased pressure resulting in an increased need for adjustments
- data anomalies which make it difficult to track improvements over time
- the outcomes for each equity group do not represent parity of these groups as a percentage of community representation (taking into account state/territory and regional variations)

- inconsistent levels of funding provided and ways they are used across the sector to different equity groups through the DSP, HEPPP and ISP
- inconsistent application of the funds across the student lifecycle to support equity groups e.g., more money spent to generate enrolments but not enough spent on participation, retention and success. The PBF process does not assist in demonstrating the success factors of individual universities in contributing to representation of equity target groups in higher education. There is no transparent evaluation undertaken to assess efficacy, to recommend improvements or harness good practice
- lack of transparency and accountability of funding types e.g., DSP funding has a higher reporting burden than HEPPP and ISP which is not commensurate with the amounts
- not enough depth of data collation and analysis which is nuanced to understand different equity groups e.g., investigation of students with disability in QILT surveys

As an example, despite exponential increases in the number of students with disability enrolling in university participation, retention and success rates are still much lower than those without disability. The limited funding provided through the DSP is mainly devoted to supporting reasonable adjustments with a forensic review by the Department of Education conducted annually (yet no such detailed analysis is undertaken for HEPPP funding).

Universities are inconsistently tackling the systemic barriers to participation and success for people with disability partly due to lack of funding and lack of accountability to address fundamental issues of inclusion which not only benefit students with disability but all students. ADCET could support institutions to share good practice and improve outcomes through implementing a [Disability Inclusion Framework](#) which supports the student journey and encourages good practice across the sector.

Recommendation 3

Develop an appropriate evaluation and performance framework for tracking the access, participation, retention and success of people with disability in and between education sectors in order to better understand and support their success in education. Performance assessment of tertiary education providers would be an essential feature of any performance and evaluation framework.

Part 3: Access, participation, retention and success

The development of appropriate strategies which support access, participant retention and success for people with disability is vital in a reformed higher education system.

Part of the responsibility of higher education is a vision and commitment to equitable lifelong learning. The National Skills Commission predicts that ‘more than nine out of 10 new jobs to be created in the next five years will require post-secondary qualifications’⁸. People with disability enrolling in higher education over the past 10 years⁹ has been exponential and they want, and need, to be part of the future economy.

Below are some specific considerations needed in order to better support people with disability across the student lifecycle.

Access

To better support students transitioning from school to tertiary education there are a range of interventions that require attention:

- **specific funding for prospective students with disability** which supports outreach, access and pathways into tertiary education. This includes more flexible admissions and entry processes which better capture the impact of disability on achievement and access to more disability-friendly enabling and bridging programs.
- **explicit reference to disability in HEPPP** in order to facilitate better outreach by universities to people with disability. This would include building capacity around disability awareness and responsiveness amongst schooling staff, university-based outreach practitioners and educators to foster greater inclusion of students with disability
- **better integration between high school and university in relation to reasonable adjustments** through integration of the National Consistent Collection of Data (NCCD) mechanism with a university sector using the Unique Student Identifier as identified in the 2020 review of the Disability Standards for Education (DSE).

Recommendation 4

Review and increase funding to support initiatives specifically aimed at the transition of students from the schooling to tertiary education sector including outreach activities, pathways, enabling programs, capacity-building for staff in school and tertiary sector in order to increase the awareness of post-secondary school options for people with disability.

⁸ [Projecting employment to 2026 | National Skills Commission](#)

⁹ [2021 Selected Higher Education Statistics – Section 16 Equity Performance](#)

Participation, Retention and Success

To improve the participation and retention of people with disability we suggest:

- **capacity building of staff and educators in the higher education sector** around disability awareness, responsiveness and compliance in order to better support students with disability. For example, ADCET provides [free eLearning packages](#) on disability awareness, UDL, supporting students in transition to tertiary study and more, enhanced by additional professional development opportunities through the website.
- **sharing of good practice** from all equity groups and further development of disability appropriate supports to students in the first-year experience, and into subsequent years (e.g., first year and transition programs for equity groups, mentoring programs, enabling programs, peer support programs, inclusive learning and teaching strategies for equity groups). ADCET already provides opportunities for sharing of good practice such as webinars, web resources, feature articles, newsletter and could continue to collaborate with the sector to showcase this work
- **appropriate support for students with disability through the DSP** to ensure all universities are consistently providing support including appropriate levels of support through disability practitioners, assistive technologies and specific costs for high needs/high-cost students
- ensure that performance-based funding includes activities which **promote student satisfaction including embedding of inclusive teaching practices** such as Universal Design for Learning (UDL) and digital accessibility and that assistive technologies and are legitimate learning tools
- ensure that performance-based funding includes activities which **promote student satisfaction through appropriate digital and physical accessibility** including compliance with good practice in accessibility and appropriate ICT procurement which ensures accessibility for all students and staff with disability
- **Reduce the burden of study costs for students with disability** by:
 - providing better living allowances through Centrelink (e.g., Youth Allowance, Disability Support Pension, study supplements and extend Tertiary Access Payments to all equity groups
 - remove loan contingent Start-Up Scholarships and return them to their previous capacity as loan-free scholarships
 - ensure students with disability on reduced study loads are not disadvantaged financially through Centrelink benefits, HELP system, or scholarship
 - revise HECS-HELP in line with the review of Higher Education funding including reintroducing demand driven funding and reviewing HECS-HELP for better targeting of investment as per the Productivity Commission's latest report – Recommendation 8.4 and 8.5). The belief that these changes to student contributions incentivises choice which benefit skills gaps is false and leads to limitations around student choice. HECS-HELP student contributions are meant to support access to higher education for all regardless of socio-economic status

and reflect the cost of course delivery and expected earnings by field of study. Equity groups are not averse to paying a HECS-debt, but they are price sensitive when the expected salary outcomes are not commensurate with the cost of their degree. In the case of students from equity groups this limits course choice and impacts retention and success.

- raise repayment threshold of HECS-HELP especially for students with disability, women and other equity groups who commence their working life on lower salaries
- provide additional accommodation scholarships for people with disability who need accessible accommodation especially in the current rental market and in regional and remote locations
- **revise the Job Ready Graduate (JRG) package** to include people with disability as part of IRLSAF funding, allow for additional time for students with disability and other equity groups to complete their degrees under a Commonwealth Supported Place (CSP) [Student Learning Entitlement](#) , review the [Low Completion Rate](#) provisions which penalise people with disability and revise student contribution bands.

Recommendation 5

Provide meaningful centrally coordinated funding to address disability inclusion across key elements of digital, physical, cultural and learning inclusion including building workforce capacity to support people with disability across the student lifecycle.

Recommendation 6

Review higher education policy settings to review cost implications of study through a disability inclusive lens including addressing study costs, barriers to participation and retention.

Graduate Employment

Students with disability experience lower rates of employment and labour force participation and lower median salaries than those without a disability¹⁰. There are a range of reasons for this notwithstanding poor career transition support within university career services and Disability Employment Services (DES), a culture of low expectation, inaccessible or discriminatory hiring practices, and limited flexibility for people with disability (Eckstein, 2022).

Supporting the success of students with disability starts with organisational change and universities need to do better at disability inclusion as a whole. As previously stated, mandatory Disability Inclusion Action Plans which address disability awareness and responsiveness, implement disability-friendly recruitment processes so that people with

¹⁰ [Current HE Data Analysis - ADCET](#)

disability are embedded within the organisation, and practical and sustainable strategies around accessibility signal a welcoming space for students and the expectation that industry partners will also share these values.

Recent high-profile research (Eckstein 2022, Pitman, 2021) has made specific recommendations. A national body like ADCET is well-placed to undertake the capacity building needed to develop disability responsiveness and disability awareness within the tertiary education sector.

Additional success factors for graduating students must include:

- **a formalised graduate capability framework** operationalised through curriculum-based career development so that students develop skills in lifelong career development skills, develop a professional identity and can identify employability skills to future employers.
- **better support for students with disability undertaking work-integrated learning (WIL)** including capacity-building for university staff involved in placements and working in collaboration with industry partners to develop and deliver disability-confident industry experiences.
- **work-integrated learning (WIL) grants to support students** who need to travel, give up paid employment, manage carer responsibilities and cover other expenses. Students may be more inclined to undertake regional and remote activities if they had access to funding to facilitate this. Consideration of the additional needs of students with disability in undertaking WIL needs to be considered including access to accommodation, transport and reasonable adjustments
- **capacity-building in university career service providers** around supporting people with disability into graduate employment. Existing programs such the [University Specialist Employment Program \(USEP\)](#) created by the National Disability Coordination Office (NDCO) and housed on ADCET website and [GradWise](#) are good examples of this capacity building which could be expanded upon with appropriate funding
- **capacity-building amongst DES providers** to better understand the needs of graduates with disability
- **capacity-building around industry** to better attract, support and retain people with disability in employment including linking organisational strategy to the National Disability Strategy or developing a Disability Inclusion Action Plan which includes affirmative action strategies to recruit people with disability, graduate employment programs that target people with disability, and staff awareness training. Industry compliance as a disability friendly recruiter could include a Workplace Gender Equity Agency (WGEA) style reporting framework that tracks disability engagement

Recommendation 7

Build capacity within the sector and engage relevant stakeholders to improve graduate employment outcomes for students with disability.

Recommendation 8

Develop specific performance-based targets for tertiary education providers which support formalises a graduate capabilities framework, accessible work-integrated learning experiences, capability-building amongst key employment stakeholders and flexible and accessible industry experiences.

Part 4: Cross-sectoral alignment

All students need to be able to seamlessly move from and between the different education (schooling, VET and higher education) sectors to support their own needs in those wanting to study and work and in the interests of lifelong learning.

Students with disability need the flexibility and agility to move from high school to tertiary education with the appropriate support to thrive and succeed. A number of factors impact people with disability in their pursuit of education and training across schooling and tertiary education sectors.

Factors which need addressing for better cross-sectoral alignment include:

- managing and providing flexibility for disability or health condition which may have unpredictability over the course of their education causing disruptions and impacting achievement
- gaining access to the appropriate reasonable adjustments which align to the level of education and support needs
- disproportionate and inconsistent funding in schooling, VET and Higher Education sectors which impacts access to support
- lack of awareness by providers around supporting the educational needs of people with disability under the *Disability Standards for Education (DSE)*
- inconsistent approaches to admissions and enrolment processes which adjust for disability
- inconsistent accessibility within education providers including physical and digital access, cultural issues and learning support

Some solutions to addressing barriers to cross-sectoral alignment include:

- **holistic career and transition information across the student lifecycle** including between high school and tertiary education sectors, and then in transitioning to employment once graduated. ADCET hosts a range of [career and transition resources](#)

including a Career Development Hub (available end of April) in conjunction with the National Careers Institute, a pilot eLearning program for school staff (available end of April) to assist with transition, [pre-planning information](#) including NDIS planning, and the USEP for university graduates

- **capacity building** amongst schooling staff especially career transition staff, VET and University staff involved in outreach, marketing and admissions; disability practitioners; educators; tertiary education careers services, and DES providers. For example, ADCET has a range of free or subsidised [eLearning programs](#) to assist providers to build capacity in their workforce including understanding their positive obligations and implementing disability inclusive practices across the institution.
- **build capacity in NDIS to support people into tertiary study** through package support. Currently, the NDIS has no strategic plan specifically relating to skill attainment through education. It only has a '[Participation Employment Strategy](#)' which focusses on getting people with disability into paid employment and a one page '[NDIS Participation Employment Strategy Action Plan](#)' which includes a priority to 'strengthen the link between education and employment' but limited actions on how to foster study and training opportunities in tertiary education contexts. This further reinforces low expectations about what NDIS participants are capable of and potentially negates the strategy goals to 'give greater financial independence' and 'improve health and wellbeing' by limited access to tertiary education.
- **better tracking of students with disability across education sectors** using the Unique Student Identifier and Nationally Consistent Collection of Data (NCCD) to assist students with disability provide portable information about their adjustment needs across education sectors.
- **foster sustainable practice amongst providers by incentivising institutions to embed disability inclusion.** Two key areas that could be addressed with appropriate funding include top-up grants or special project monies to assist universities to upgrade their digital accessibility and the implementation of Universal Design for Learning in all teaching and learning areas. For example, recently ADCET has developed an Accessible ICT Procurement Guide to assist universities to ensure that all ICT is accessible to people with disability. Top up grants similar to the National Priority Pool could assist universities to audit, review and implement fully accessible ICT. The same approach could be used around curriculum reform (e.g., previous examples include internationalisation and embedding Indigenous perspectives). By using the resources of ADCET such as UDL eLearning, Disability Awareness Training, inclusive teaching strategies and Communities of Practice would support the implementation of UDL for both online and face-to-face learning and build capacity across the teaching and learning workforce.

Recommendation 9

Address cross-sectoral barriers to seamlessly moving between education sectors by promoting and developing resources and building capacity amongst schooling and tertiary education providers to support students with disability across the student lifecycle.

Recommendation 10

Investigate opportunities to track students with disability across education sectors using the Unique Student Identifier and Nationally Consistent Collection of Data (NCCD) to assist students with disability to provide portable information about their adjustment needs to practitioners across education sectors.

Recommendation 11

Review and strengthen the interface between tertiary education and the National Disability Insurance Scheme (NDIA) to ensure scheme participants have better access to post-secondary education.

Summary of recommendations

Recommendation 1

Continue to provide adequate funding to ADCET, provided on 3-year cycles, to continue its remit to support disability inclusion in the tertiary sector. This support will enable ADCET to continue to develop and deliver projects of national significance to the tertiary education sector to foster greater disability inclusion under its four strategic pillars: policy and advocacy, engagement, Universal Design and good practice.

Recommendation 2

Develop and implement a *National Strategy for Students with Disability in Tertiary Education* which sets out key obligations and vision for tertiary education providers around disability inclusion. The Strategy would set requirements for tertiary education providers to have active Disability Inclusion Action Plans, strategies to improve student outcomes for people with disability across key elements of physical, digital, cultural and learning accessibility. This national strategy should be accompanied by appropriate funding to support providers through the assistance of ADCET.

Recommendation 3

Develop an appropriate evaluation and performance framework for tracking the access, participation, retention and success of people with disability in and between education sectors in order to better understand and support their success in education. Performance assessment of tertiary education providers would be an essential feature of any performance and evaluation framework.

Recommendation 4

Review and increase funding to support initiatives specifically aimed at the transition of students from the schooling to tertiary education sector including outreach activities, pathways, enabling programs, capacity-building for staff in school and tertiary sector in order to increase the awareness of post-secondary school options for people with disability.

Recommendation 5

Provide meaningful centrally coordinated funding to address disability inclusion across key elements of digital, physical, cultural and learning inclusion including building workforce capacity to support people with disability across the student lifecycle.

Recommendation 6

Review higher education policy settings to review cost implications of study through a disability inclusive lens including addressing study costs, barriers to participation and retention.

Recommendation 7

Build capacity within the sector and engage relevant stakeholders to improve graduate employment outcomes for students with disability.

Recommendation 8

Develop specific performance-based targets for tertiary education providers which support and formalises a graduate capabilities framework, accessible work-integrated learning experiences, capability-building amongst key employment stakeholders and flexible and accessible industry experiences.

Recommendation 9

Address cross-sectoral barriers to seamlessly moving between education sectors by promoting and developing resources and building capacity amongst schooling and tertiary education providers to support students with disability across the student lifecycle.

Recommendation 10

Investigate opportunities to track students with disability across education sectors using the Unique Student Identifier and Nationally Consistent Collection of Data (NCCD) to assist students with disability to provide portable information about their adjustment needs to practitioners across education sectors.

Recommendation 11

Review and strengthen the interface between tertiary education and the National Disability Insurance Scheme (NDIA) to ensure scheme participants have better access to post-secondary 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>
- Eckstein, D. (2022). *Meaningful jobs for students with disability: From luck to business as usual*. Research Fellowship Report. National Centre for Student Equity in Higher Education, Curtin University.
- 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 Report. National Centre for Student Equity in Higher Education, Curtin University.
- Pitman, T, Ellis, K., Brett, M., Knight, E., & McLennan, D. (2022). Calculating the costs of supporting people with disability in Australian higher education. Perth: 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 1: Expanding ADCET: a Bold Idea for Student Equity in Higher Education

Prepared by ADCET
April 2023

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Introduction

In light of the Universities Accord consultation process and ADCET's additional submission has 11 recommendations on how to improve disability inclusiveness within the tertiary education sector. The following proposal outlines an expanded national and centralised role for ADCET in order to support our recommendations and contribute to the overall transformation of the Higher Education sector for the benefit of students with disability.

An expanded ADCET would build on the 20 years of work already undertaken in supporting tertiary education providers to improve support for students with disability. Since the *2021 Review of the National Disability Coordination Officer (NDCO) Program* which supports ADCET there has been much uncertainty in relation to ADCET's future and funding. Currently ADCET and NDCO program are only funded until October 2023 awaiting the outcome of the Accord.

This submission proposes options for a reimagined ADCET (encompassing some of the elements of the National Disability Coordination Officer Program) which is strategic, sustainable and focused on improving disability inclusion in a reformed higher education sector which is better suited to the needs of people with disability as well as other equity groups.

An expanded ADCET would:

- continue to take a strategic approach to sector leadership and coordination, policy and advocacy, engagement and good practice
- retain and expand the work of ADCET as part of key engagement strategies
- sharpen the remit of the NDCO Program to address systemic issues at a national and/or state level
- create further opportunities for interdisciplinary evidence-based practice in areas such as Disability Inclusion and Universal Design (e.g., in learning, education, built environment, technology)
- create further opportunities for people with subject matter expertise and lived experience to collaborate on key projects. This would include cooperation with the National Centre for Student Equity in Higher Education (NCSEHE), tertiary education institutions, and peak bodies
- ensure people with disability are a critical part of ADCET strategic planning, decision-making and staffing.

Rationale

In evolving to an expanded remit which is centralised and coordinated disability inclusion in tertiary education is addressed on a national scale more effectively. A number of strategic considerations would drive ADCET and include:

Alignment with national strategic priorities and legislative framework

Key national priorities and legislation to be considered includes:

- [Australia's National Disability Strategy 2021 – 2031](#)
- Disability Discrimination Act 1992 and the Disability Standards for Education 2005 (currently recommendations from the 2020 review are yet to be actioned), Premises Standards 2010, Web Content Accessibility Guidelines (WCAG), Higher Education Standards Framework 2021
- the [VET Reform Roadmap](#)
- the [Higher Education Disability Support Program](#), [Job Ready Graduates Package](#), and [performance-based funding](#)
- [Australian Skills Quality Authority \(ASQA\)](#) and [Tertiary Education Quality and Standards Agency \(teqsa.gov.au\)](#) obligations.

Fostering economic benefits

Better disability inclusion can:

- reduce barriers to participation enabling people with disability to fully participate in the economic fabric of society thus reducing reliance on welfare and empowering self-determination
- provide strategic and coordinated approaches to sharing information, resources, capacity building and advocacy support across the tertiary education sector through a central repository
- minimise duplication and provide consistent information and good practice which is 'fit for purpose'
- develop a disability confident workforce and graduate employment pool for the 21st century through training and resources for key stakeholders.

Improving workforce capability

Supporting tertiary education providers and practitioners towards disability inclusion to:

- ensure people with disability can access and benefit from a high-quality tertiary education of their choice

- recognise intersectionality of people with disability and their inclusion in other marginalised groups such as First Nations peoples, people from low socio-economic backgrounds, people from culturally and linguistically diverse backgrounds and regional and remote backgrounds which further marginalises them from education and employment opportunities
- address structural adjustments which inhibit full participation of people with disability in tertiary education (i.e., inclusive and social justice approaches across the student journey including admissions, teaching and learning design, digital and physical environments, staffing, graduate employment)
- upskill the tertiary education workforce and develop graduating students with inclusive graduate attributes
- contribute to the intellectual, research, social and economic reform agenda which improves the lives of people with disability.

Tackling emerging issues

A proactive and centralised approach through ADCET would tackle emerging issues such as:

- the increasing demand and need of people with disability to pursue tertiary education (see Key Statistics in [Appendix 2](#))
- potential outcomes from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability as they impact education¹¹ and employment¹²
- access, participation, retention and success rates including graduate outcomes for students with disability
- the rapid pace of digital technology in enabling accessibility and online learning and how tertiary education providers embed these technologies and how these technologies impact people with disability
- workforce changes in relation to managing staff with disability (e.g., managing wellbeing, workplace injuries and reasonable adjustment for disability; mental health; the aging workforce; improving recruitment for diversity; vicarious liability)
- opportunities to embed inclusive teaching practices and accessibility into all tertiary education courseware including developing courses and education pathways which address skill shortages and expertise requirements in supporting people with disability (e.g., teaching, social and health care, built environment, business etc.)
- the increased focus on inclusive teaching strategies and Universal Design (UDL) for Learning in tertiary education to support better outcomes for people with disability
- improved collaboration and coordination between the tertiary education sector and the NDIS, to ensure prospective and current students with disability are able to avail themselves of support provided in both contexts. This work only represents a small

¹¹ [Education and learning | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

¹² [Employment | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

portion of people with disability, but it is essential that all opportunities for NDIS participants are explored and available

- the currently small number of NDIS participants engaged in, or recorded as participating in, postsecondary education – with granular data unavailable and a lack of visible priority and knowledge relating to participants engaging in tertiary education
- the ongoing impacts of COVID-19.

Other issues

Graduate employment

There are also specific long-term considerations around participation of people with disability in employment, **including graduate employment and diverse workforce needs**. These include:

- the rising necessity of the need for formal post-secondary qualifications to secure long-term positive employment outcomes¹³
- the recognition of persistent poor outcomes for people with disability in graduate success outcomes in tertiary education¹⁴
- the recognition of increasing demands by employers for developing a diverse workforce¹⁵
- the recognition by employers for developing a disability confident workforce¹⁶
- recognition of current employment and skills shortages in Australia¹⁷
- the shifting nature of people with disability in our schooling system as the Nationally Consistent Collection of Data (NCCD) dataset matures, and the onward increased flow to tertiary studies.

Specific research and best practice

There is a great deal of expertise developing across universities in practice, teaching and research areas to improve disability participation, health, inclusive education to draw from to support collective knowledge across member universities. This includes:

- universities with research centres focused on disability inclusion and inclusive education
- membership with Australian Network on Disability
- specific programs to support graduate employment such as USEP/Gradwise
- specific mentoring programs for SWD especially ASD
- recruitment and widening participation activities to improve student access and participation

¹³[2020 Employment Projections - for the five years to November 2025 | National Skills Commission](#)

¹⁴[Graduate Outcomes Survey \(qilt.edu.au\)](#)

¹⁵[AHRI Diversity & Inclusion Maturity Model | Australian HR Institute](#)

¹⁶[Increasing employment for people with disability](#)

¹⁷[National Skills Commission Annual Report 2020-2021](#)

ADCET would be in the best position to capitalise on existing relationships with these institutions on a national scale ensuring an emphasis on evidence-based and practical solutions.

ADCET already delivers value for money and significant impact given the current resources available. As an example of the level of engagement ADCET has in 2021 the ADCET website had over 1 million website engagements, 1.6k social media followers, 1.5k newsletter subscribers, and 4.7k webinar recordings accessed. Further to our demonstrated capability we have created a skilled workforce of [consultants and staff](#) (Figure 1) and work in partnership with a number of NDCOs across Australia producing a range of [resources](#) for practitioners and students.

Figure 1: Current organisational structure of ADCET



*Funded via NDCO Program | ^Part-time

Strategy for an expanded ADCET

An expanded ADCET would continue to be positioned within the sector as collaborative, practitioner-led and evidenced-based practice. It also provides a way for a disconnected sector and stakeholders to come together on the topic of disability inclusion in tertiary education by:

- exploring the barriers to inclusion or people with disability (through research and expertise from the sector)
- trialling, implementing, evaluating and monitoring practical solutions to systemic issues and challenges
- assisting tertiary education providers to drive change within their organisations.

ADCET would focus on three key priority areas in the lifelong learning journey of people with disability and education ecology:

- School / Community to Tertiary Education
- Tertiary Education – Access / Participation / Success
- Graduate Employment

ADCET would create and maintain effective national strategic partnerships across these priority areas to support cross-sectoral disability inclusion for the benefit of people with disability navigating lifelong learning.

The ADCET would focus on four central pillars outlined in Table 1. These strategic pillars incorporate the current work of ADCET and the NDCO program. Within this framework ADCET would build on existing work as well as expand its conceptual approach to national disability coordination within the tertiary sector.

Table 1: Strategic pillars for ADCET

POLICY & ADVOCACY	ENGAGEMENT	UNIVERSAL DESIGN	GOOD PRACTICE
To influence national policy to impact positively on the inclusion people with disability within tertiary education environments.	To promote inclusion and provide practical solutions in education and employment by building networks and collaboration with key strategic partners within tertiary education environments.	To promote the principles of Universal Design (UD) by creating an understanding of, and practical solutions to, UD across the learning, physical and digital contexts within tertiary education environments.	To promote good practice in disability inclusion by providing advice and practical solutions on emerging trends, research and practice within tertiary learning environments.

These pillars include key strategic objectives outlined below:

Policy and advocacy

ADCET responds collectively to policy and advocacy in an agile way leveraging this engagement, providing thought leadership, and enabling a sector and student voice to government. This includes:

- working with the Government to create a *National Strategy for Disability Inclusion in Tertiary Education* which guides and informs all future work in this area. Aligned with the National Disability Strategy and underpinned by the *UN Convention on the Rights of Persons with Disabilities* and the *Disability Discrimination Act 1992*.
- engaging in useful dialogue with government agencies and peak bodies to champion the rights of people with disability in the tertiary education sector
- monitoring current and emerging issues at local national and international levels
- supporting tertiary institutions to meet their responsibilities under the relevant legislation such as the Disability Discrimination Act, the Disability Standards for Education, Premises Standards 2010, Web Content Accessibility Guidelines (WCAG) and other relevant legislation and standards.
- providing systemic advocacy on the rights of people with disability in the tertiary education sector
- providing professional development around disability rights including working with Federal and State human rights commissions and drawing on specialist staff such as legal practitioners for stakeholders to engage with.

Engagement

ADCET provides deep and authentic engagement with the sector by strengthening and developing key partnerships to address sectoral and inter-sectoral issues which impact people with disability in tertiary education. This would include:

- place-based and context-based activity which recognises intersectionality, demographic and geographic contexts which can create barriers to participation in tertiary education and employment. ADCET would facilitate projects which have local application and national impact. Projects would be trialled, implemented, evaluated and monitored (TIEM) and shared with the sector as appropriate.
- collaborating with stakeholders through a framework of advisory committees, communities of practice and online forums (e.g., [AUSTED](#)) to support co-designed, scalable solutions to improve outcomes for people with disability
- promoting the transfer of knowledge and ongoing professional development through multiple communication channels, web-based resources (e.g., ADCET), and e-learning programs. This includes the [Disability Awareness](#) Training website providing tailored disability awareness modules for VET and Higher Education practitioners, Universal Design for Learning modules for educators, and online learning for Blind and Vision-impaired students
- building efficiency across the tertiary sector by providing a crucial point for advocacy, knowledge, training and collaboration on the topic of disability in tertiary education
- developing a nexus between good practice and research which supports and advances education and employment opportunities for people with disability.

Universal Design and inclusive practice

The ADCET will be a central resource for Universal Design for Learning (UDL) and inclusive practice by building and promoting expertise in and knowledge of Universal Design principles across the student experience including:

- promoting UDL training, resources and coaching for tertiary providers to build their capacity to implement Universal Design for Learning at their institution including through inclusive learning practice and embedded UDL within courseware.
- providing expertise in assistive technology and digital accessibility to the sector and to students relating to the uptake of inclusive and accessible technologies (including a Community of Practice and one-on-one support)
- developing guidelines and resources to support Universal Design for built environments as part of compliance and best practice in relation to campus-based building standards for people with disability
- promoting and supporting implementation of guidelines for ICT accessible procurement
- coordinating good practice in graduate employment for people with disability
- promoting student-focused materials and resources to assist students to transition successfully to tertiary study through career planning resources

- providing comprehensive resources for disability practitioners to support their knowledge, skills and professional development.
- collaborating with schools, tertiary institutions and students with disability to design processes that would address systemic barriers to participation and enable better transitions to tertiary education.

Good practice leadership

Promote good practice and research which advances access and inclusion for people with disability in tertiary education by:

- collaborating with practitioners, educators, researchers and people with disability to set the agenda for the priorities within research and best practice collaborating with other stakeholders such as the National Centre for Student Equity in Higher Education and the National Disability Research Partnership
- collaborating with practitioners, educators, researchers and people with disability to develop and co-design resources which contribute to learning
- showcasing best practice and research at national and international levels from across the tertiary education and graduate employment sectors
- working with key data sources such as Nationally Consistent Collection of Data on Students with Disability (NCCD), National Centre for Vocational Education Research (NCVER), National Centre for Student Equity in Higher Education (NCSEHE), and Australian Bureau of Statistics (ABS) to support benchmarking and good practice
- promoting research and good practice that is necessary to the creation and development of inclusive learning environments and inclusive workplaces.

Hosting and funding arrangements

One possible means of facilitating the expansion of ADCET is a merger of existing funding from the *Higher Education Disability Support Fund* (which funds ADCET) and the NDCO program, to provide a centralised and coordinated response to national issues underpinned by a knowledge and resource centre.

ADCET has been hosted by the University of Tasmania (UTAS) for almost 20 years. During this time ADCET has become known across the sector as a reputable, reliable and up-to-date source of information for practitioners and increasingly, students. The University of Tasmania also hosts two NDCO regions and holds a strong track record of delivering quality projects on time relating to grants from the Department of Education.

ADCET has strong collaborative partnerships with a wide range of organisations. This includes a wide number of Australia's universities and TAFEs, Registered Training Organisations (RTOs), and non-profit disability organisations. Partnerships where there is a shared focus on advancing people with disability and those support staff, students and community include the National Disability Coordination Officer (NDCO), Australian Tertiary Education Network on Disability (ATEND), the Equity Practitioners in Higher

Education Australasia (EPHEA), the National Centre for Student Equity in Higher Education (NCSEHE), the National Centre for Vocational and Educational Research (NCVER), Office of Disability Issues (ODI) New Zealand, and AHEAD (Association of Higher Education and Disability) in Ireland and the USA.

The strong positioning of ADCET within the sector and the community means it is well-placed to continue and expand strategic and high-quality work across Australia in an efficient and timely manner. **Early discussions with UTAS indicate they would be open to ongoing hosting arrangements in place.**

Proposed structure

To ensure the four pillars are appropriately put into practice, the proposed structure would have three central portfolios – Education and Training, Projects and Evaluation and Policy – which work in an integrated and strategic way. Each portfolio would be overseen by a manager who has oversight for the key projects and activities within that portfolio.

The ADCET Program would have a Director with responsibility for the strategic approach for the Program reporting regularly to the Department of Education, the host provider, and the Advisory Committee.

A Business Services area would have responsibility for administrative (human and physical resources, finance etc.), technical elements (web management and implementation), and marketing and communications to underpin the work of the three portfolios and provide comprehensive communications to stakeholders.

The three portfolios are as follows:

Education and Training portfolio:

This portfolio would build on ASCET's current repository of good practice and expand opportunities to raise awareness and build capacity within the Sector. ADCET is currently legislated within the *Higher Education Other Grants and Guidelines* for the purposes of Higher Education support, however, ADCET has developed content that is useful to the whole tertiary sector through special projects.

Having ADCET as a critical element to the Education and Training portfolio will allow for expansion to create appropriate information, resources, and training opportunities to build capacity across VET and Higher Education. Some key examples include:

- [Inclusive Teaching resources](#) including online eLearning in University Design for Learning (UDL)
- [Disability Awareness eLearning modules](#)
- [ICT Procurement guidelines](#)
- [COVID-19 resources](#)

- [Guidelines for students](#) e.g., for students who are blind or vision-impaired, or Deaf/hard of hearing
- [Planning for post-secondary study.](#)

Project portfolio.

This portfolio would absorb the work of NDCOs as three main project areas which mirror the student journey and reflect the student life stages outlined in the Student Equity in Higher Education Evaluation Framework (SEHEEF):

- pre-access (outreach and transitions from school into tertiary education)
- access and participation (all aspects of participation within VET or Higher Education)
- attainment and transition out (graduate employment).

Projects and activities across these three areas will aim to address the systemic issues and barriers for students with disability at these three key junctures. Projects would be developed based on known barriers, research and good practice. Project development, piloting and implementation would place-based and context-based working on issues and barriers at the local level which can be tested, evaluated and scaled to address systemic barriers at a national level.

Projects would draw on the expertise of expert project advisory groups working in collaboration with partners and those with lived experience. All project deliverables would include robust evaluation (developed and monitored by the Evaluation and Policy team and drawing on relevant models such as SEHEEF). The outputs of activities from all projects would be filtered through to the Evaluation and Policy portfolio for advocacy with relevant stakeholders such as government and education providers. Any relevant resources that can further enhance practitioner and educator knowledge will be developed through the Education and Training portfolio and communicated to the Sector.

Evaluation and policy portfolio.

This portfolio would absorb some of the work of the NDCOs but would also provide a new aspect to the existing NDCO program, which is to evaluate program outputs, consider any policy or legislative implications or improvements, share findings with support from robust evaluation and research practices and implement as good practice opportunities. This implementation would be provided through the Education and Training portfolio. The Evaluation and Policy portfolio would also work closely with Government, peak bodies, and sector representatives to support change which supports better inclusion of people with disability in education.

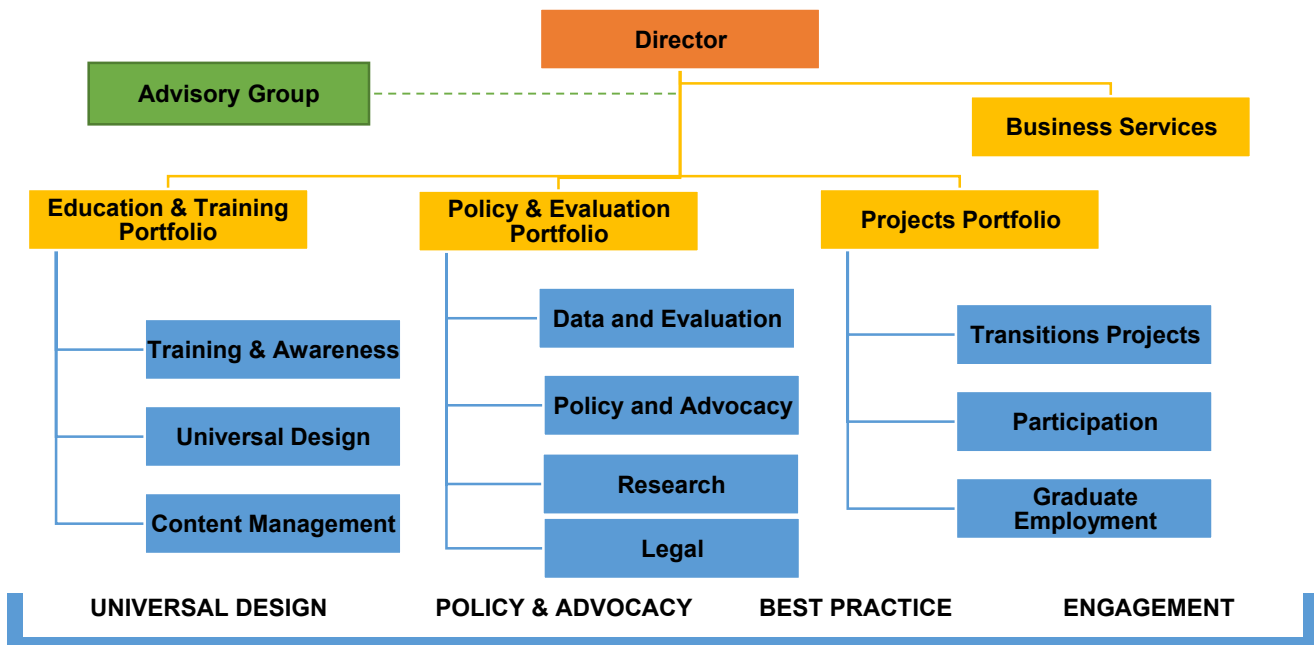
Both ADCET and the NDCO Program work with a wide range of stakeholders with a shared focus on advancing people with disability and those support staff, students and community include:

- Federal Government departments – Education, Skills and Employment, Australian Human Rights Commission, TEQSA and Australia Skills Quality Authority (ASQA)

- Vocational Education and Training (VET) providers and Registered Training Organisations (RTO)
- partner organisations including NDCO host organisations
- peak bodies such as the Australian Tertiary Education Network on Disability (ATEND), the Equity Practitioners in Higher Education Australasia (EPHEA), and Universities Australia
- research, practice and data organisations such as the National Centre for Student Equity in Higher Education (NCSEHE) and the National Centre for Vocational and Educational Research (NCVER)
- international organisations such as Office of Disability Issues (ODI) New Zealand, and AHEAD (Association of Higher Education and Disability) in Ireland and the USA.

The structure below (Figure 4) outlines some of the key areas for focus from the four strategic pillars and the proposed concepts of the NDCO review as well as existing work undertaken by ADCET. The structure reflects a combination of policy and practice, enabling direct solutions to be evidenced, built, provided and implemented with tertiary providers in Australia in a timely and effective end-to-end manner.

Figure 2: Proposed structure for the ADCET Program (overview)



Governance

The ADCET Program would have an overarching Advisory Committee which could include key leadership from the Host organisation, Department of Education representatives, representatives from peak bodies and the Higher Education, VET and RTO sectors, ADCET representatives, and student representatives. Lived experience of people with disability and those with an understanding of intersectional issues who are part of the sector (i.e., students, educators, practitioners, peak bodies etc.) will be essential.

Evaluation

ADCET will use an evaluation framework which supports the strategic work being undertaken drawing on models such as the [Student Equity in Higher Education Evaluation Framework \(SEHEEF\)](#). The evaluation framework will be designed to have a particular focus on measuring implementation of disability rights and measuring capacity and impact relating to disability inclusion in all activities.

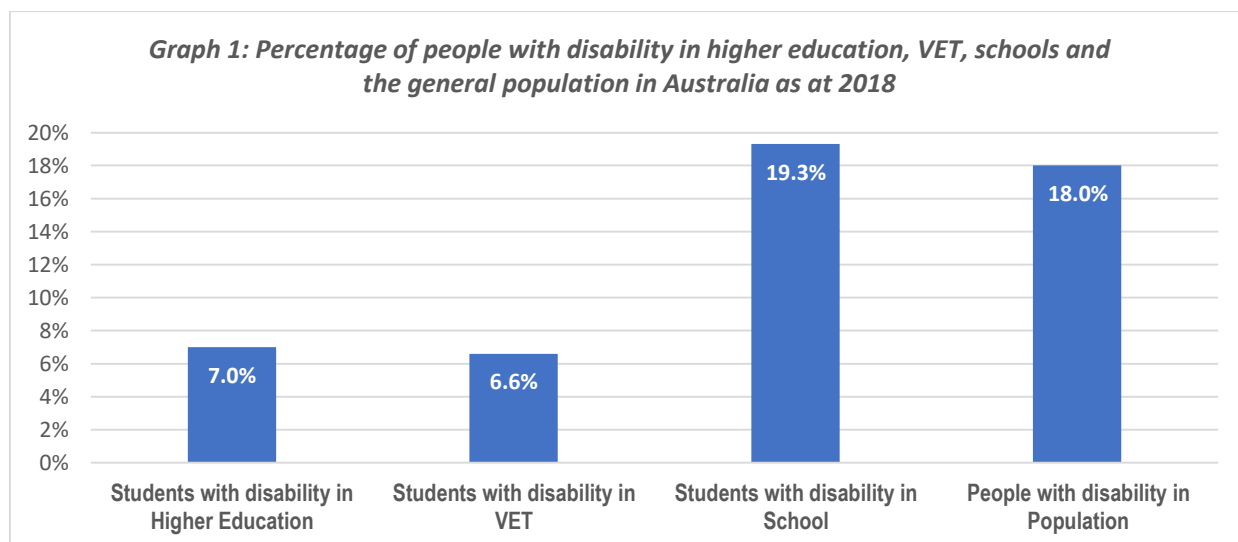
The evaluation will cover key disability inclusion benchmarks including monitoring the implementation of UDL, accessible ICT procurement processes, disability responsiveness training and existing data and performance indicators such as access, retention and success. Interaction with activities such as training, engagements in projects, pilot projects, good practice, and the experiences and interactions of various stakeholders are important areas for monitoring disability inclusion. The evaluation framework will include qualitative and quantitative measures and importantly, will also be designed to learn from participants and stakeholders about current trends and issues.

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

Educational participation and attainment

The [Selected Higher Education Statistics – 2020](#) student data shows lower retention and success rates for students with disability compared with all students.

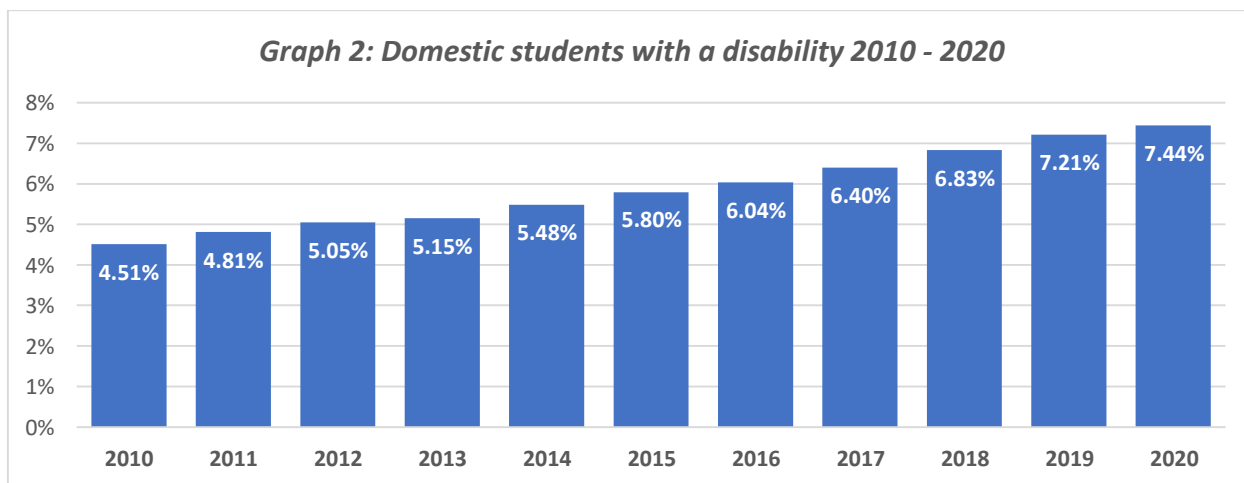
- The **retention rate** for students with disability is 79.58 compared with all students at 82.81

¹⁸ [2020 Employment Projections - for the five years to November 2025 | National Skills Commission](#)

- The **success rate** for students with disability is 82.96 compared with all students at 88.37
- 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 4.51% (38,102 in 2010) to 7.44% (83,686 in 2020)



Source: [Selected Higher Education Statistics](#) – 2020 Student data (Section 11: Equity Performance)

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 58.7% per cent, compared with those without disability at 70% ([QILT, 2021](#))
- 22 out of 43 universities are utilising [University Specialist Employment Program](#) (USEP) or [Gradwise](#) to help support graduates with disability.

¹⁹ [National Skills Commission Annual Report 2020-2021](#)