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Department of Education, Skills and Employment
2020 Review Disability Standards for Education 2005
DisabilityStrategy@dese.gov.au.

University of Wollongong response to the 2020 Review of the Disability Standards for Education

Thank you for the opportunity to contribute to the 2020 Review of the Disability Standards for Education. This response makes 6 recommendations.

Recommendation 1: *rename and reframe the Disability Education Standards to facilitate a shift in practice culture from the current deficit view of disability where disability is a “problem in need of a solution” (Titchkosky and Michalko, 2012), and establish standards and guidelines that facilitate Universities’ capacity to address the issue arising from this deficit model of undisclosed impairments*

The adjustment support model is not inclusive as it does not respond to the needs of students who choose not to disclose disability. Universities currently experience students, (often from identified disciplines and from identified ethnic backgrounds) who elect not to register as having disability. This is reflective of students who did not associate their condition with disability (for example, a mental health condition), or who were oblivious to their eligibility for disability services, or who had previous negative reactions from others, or who had concerns regarding community stigma. Some participants disclosed only certain disability but not other types of disability (**NB:** often mental health disability is not divulged). Thus, there may be many students who are not served by the current adjustment support model.

The adjustment support model is failing students with disability at university highlighting the need to adopt a more inclusive model as a mode of operation. The adoption of an inclusive model is likely to be less personally taxing for students with disability and facilitate their capacity to succeed.

Recommendation 2: *establish greater clarity and consistency between the Disability Education Standards and the TEQSA guidelines for admissions transparency.*

Part 4 of the Disability Education Standards articulate the enrolment standards that education providers must comply with in order to ensure that students are able to seek admission into or apply for enrolment in the institution on the same basis as a prospective student without experiencing discrimination. Since the last review of the Disability Education Standards, TEQSA has released guidelines for admissions transparency. Greater clarity is needed in both the Disability Education Standards and the TEQSA Admissions Good Practice Guidelines on the information that higher education institutions need to make available to ensure that students with a disability are making informed choices about their degree selection and the level of support that they can access to enable success in their chosen degree.

In particular, work is needed to guide practice in relation to the use of inherent requirements, to ensure that these are not inadvertently creating additional barriers to University study



Recommendation 3: include guidelines on widening participation activities in the Disability Education Standards, and provide additional targeted funding through the Disability Support Program to address this need. Key elements of importance include:

- Development of material and strategies (including through open days) that enable students with disabilities to make informed choices about study at individual Universities
- Sector leaders to work collaboratively with schools, health professionals and communities to develop a series of guidelines that support aspiration and successful transition into university by students with disability
- Develop clear guidelines for school students with disabilities and their families that highlight their rights with respect to education at a tertiary level
- Develop strategies that link school students with disability to university role models and mentors to support aspiration and participation in university study

The standards currently encompass the following areas:

- enrolment;
- participation;
- curriculum development, accreditation and delivery;
- student support services; and
- elimination of harassment and victimisation.

And apply across education providers from preschools through to tertiary education providers and accrediting bodies. Although progress has been made over the last five years to widen participation rates in higher education by students with disability, students with a disability are not accessing higher education at a rate reflective of proportion of people with a disability in the Australian population.

The participation of students with a disability in higher education has grown by 2.04% since 2012 (5.23% in 2012, compared with a 7.72% participate rate of all university students in 2018). In the 2018 ABS Survey of Disability, Ageing and Carers (SDAC), people with a disability made up 17.7 per cent of the Australian population.

Recent proposed changes to higher education as part of the ‘Job-Ready’ package increases the focus on targeted equity group participating in higher education, such as students from low socioeconomic (LSES) backgrounds, Aboriginal and Torres Strait Islander students and students from regional, rural and remote areas. Students living with a disability require unique and specific support and adjustments that are different and specific to their needs in addition to the needs generated by being resident in a rural or regional area, or being from an Indigenous or LSES background. Disability requires its own response in widening access to higher education, and therefore requires funding commensurate with the present and increasing numbers of students.

The Disability Education Standards could be extended to provide guidelines for higher education institutions to design widening participation activities specifically for students with a disability. In particular, the guidelines should ensure that Universities act in partnership with students, families, schools and community disability services to address the gap in university participation rates between students with disability and students without disability.

In recommending this, we advise that additional funding needs to be provided through the Disability Support Program to design and implement tailored outreach activities to enable students with a disability to access higher education.



Recommendation 4: *extend the TEQSA regulation of higher education provider registration to include:*

- The adoption of the principles of UDL and the flexible learning model advocated by Edwards (2000) to provide a blueprint for universities to implement the benefits of inclusive education for all students, while minimising the cost associated with applying custom solutions
- Sector leaders working collaboratively with stakeholders to develop guidelines across the student lifecycle that support the adoption of the principles of UDL, improve the experience, retention levels and success of students with disability
- Provision of professional development opportunities and resourcing to ensure that university staff receive adequate training and have sufficient time to support students with disability and understand the cumulative impacts of studying with a disability, in particular, levels of tiredness experienced

Attrition rates for students with a disability in higher education have grown by 2.2% since 2011. In 2011, 16.54% of students with a disability withdrew from their degrees, climbing to 18.74% in 2017. A large component of the Disability Education Standards are focused on standards for participation and curriculum development, accreditation and delivery. The focus of these standards is largely focused on adjustments rather than universal design principles.

Whilst the recent changes to the Additional Support for Students with Disabilities (ASSD) funding program allows for the provision of funding for universal design, whole of institution approaches to universal design continue to be a challenge for higher education institutions. Applying the principles of universal design for learning (UDL) (CAST, 2011) can enable a more flexible learning approach that minimises the need for adjustments (Edwards, 2000). The principles of UDL focus on developing flexible goals, methods, materials, and assessments that are designed to meet the needs of all learners, and thereby reduce the need for expensive and time-consuming retrofitting of curricula to meet the needs of specific learners (Wood et al., 2017). There are three principles underpinning the UDL framework: 1) Provide multiple means of representation; 2) Provide multiple means of action and expression; and 3) Provide multiple means of engagement. Most importantly, this approach shifts the focus from deficit discourses that view disability as a problem to be managed, to a more affirming approach: one that embraces diversity and promotes a more accepting learning environment for all students.

It is important to recognise the impact of limited Universal Design standards in publishing (textbooks and journal papers etc), and the resultant impact this has on the need for Universities to provide alternate formats and transcripts for students as a major component of making reasonable adjustments.

Recommendation 5: *provide guidelines in the Disability Education standards that explicitly address participation in activities that enhance employability for graduates with disabilities.*

Poorer employment outcomes exist for university graduates with disability. In Australia, the full-time employment rate for undergraduates who reported a disability was much lower than those without (62.8% and 73.5% respectively), and a higher proportion (44.7%) than average graduates (38.9 per cent) were in a job that did not fully utilise their skills or education (QILT, 2019). Currently, the Disability Education Standards focus on the access, transition and participation of students with a disability in education. The provision of tailored career development learning (CDL) and Work



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Integrated Learning (WIL) for students with a disability is diverse across higher education institutions. There is a need for higher education institutions to embed CDL opportunities that are informed by universal design from university commencement through to two years post-completion to increase employment outcomes of students with a disability.

Addressing this is also important to enhance the capacity for students with disability to participate in WIL experiences and to gain employment during their participation at University. It is important to note that poverty and disability impact cumulatively on students with disability. That is, high numbers of university students with disability are also identified as being of low socioeconomic status

Recommendation 6: implement a Universal Student Identifier (USI) to capture information necessary to enhance educational participation and transition between primary, secondary and tertiary levels of education, and across the student lifecycle.

Students with a disability must repeatedly disclose their disability as they transition between education providers or at different phases of their educational journey. Currently, little if any coordination occurs between primary, secondary and tertiary levels of education. Added complexity occurs with differing responses and funding levels in particular with respect to the provision of Assistive Technology between the various levels of education.

A universal student identifier (USI) that commences in the early years and follows a student through to adult learning could assist with individual's learning journey, and establish more coherent approaches to reasonable adjustments, in particular for students with highly complex needs.

This response has been drafted, in part based upon recent research funded through the Higher Education Participation and Pathways Program National Priorities Pool (see final report [here](#)) *Understanding how Regionality and Socioeconomic Status Intersect with Disability*.

Contact for further information or discussion

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