

2015 Review of the Disability Standards for Education 2005

DSE Review

Economic and Social Advisory

Urbis

Level 12, 120 Collins Street

Melbourne, Victoria 3000

Submission by:

Australian Tertiary Education Network on Disability (ATEND)

The peak professional organisation for Disability Practitioners in the Higher Education and Vocational Training sectors in Australia

Do you wish your submission to be treated as confidential? No

The Australian Tertiary Education Network on Disability (ATEND) is the peak professional organisation for Disability Practitioners in the Higher Education and Vocational Training sectors in Australia. Our membership is predominantly individuals who are primarily employed as a disability practitioner in the tertiary education and training sector and National Disability Coordination Officers. A key role of the disability practitioners is to enhance tertiary education opportunities and access for people with disability.

In preparing for this submission we consulted with our membership base through an electronic survey. A total of 74 responses were received, with half of these from the University sector (51%) and approximately a third (36%) from the VET sector. A majority of the survey was based around the questions raised in the 2015 Review of the DSE discussion paper. We also took the opportunity to seek our member's views of the key recommendations made from the 2010 review that had not been adopted but would have had an impact on disability practitioner's work and practice.

This submission includes:

- ATENDs response to the review
- Future improvements identified from our members
- Seven key recommendations
- Question analysis from our survey
- Appendices of all comments received

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Area 1: Access and participation

An overwhelming majority of our respondents said that the Disability Standards for Education were considered to have been influential in providing a positive framework to encourage access and participation for students with a disability in all levels of education since their implementation in 2005. There were 96% of respondents who reported that the Standards had influenced access and participation in education. However it was reported that the Standards had less impact on some specific marginalised groups such as rural and remote, Culturally and Linguistically Diverse (CALD) groups and Aboriginal and Torres Strait Islander communities.

For example:

Structures taken for granted in metropolitan areas are not always available in rural and remote areas and do not always consider the needs of culturally diverse students.

The following summarises eloquently the impact of the Standards:

I think that standards have made a significant impact within the tertiary sector and has been the main driver for increased numbers of students with disabilities studying. However funding continues to be one of the major issues confronting education providers to date. Due to the success of the Disability Education Standards greater numbers of Australians with disabilities are taking up educational pursuits. Technology to support students with disabilities is constantly being refined and improved and with such innovation comes increased usage and costs for such technology and equipment.

Area 2: Knowledge and awareness

There was a majority view that the Standards had done much to raise awareness of and promote issues for students with disability and that this had improved over the last 5 years. However there was also a general feeling that further awareness raising on the Standards was required. Increased and sustainable professional development across the whole education sector was a theme to emerge. Our members felt that the tertiary sector was generally seen to have the highest level of awareness of the Standards. It was also stated that raising knowledge and awareness rarely automatically translated to the implementation of the standards and that additional work was required for this. The below quote illustrates some of the other factors that need consideration.

I think that awareness of barriers by the education community has improved. There are many committed professionals who go beyond their professional boundaries to make a difference who people with disability to access education. Many times what I hear / witness is the frustration about the lack of suitable options or the fact that the lack of appropriate support means that a person with disability cannot access education effectively. Lack of funding is also often cited for things such as personal care.

There was though a sizeable minority (20%) of our respondents who stated that the Standards had done nothing to advance understanding of students with disability as illustrated by this quote:

People don't realise the standards even exist and are to be followed in all aspects of education and employment.

Several people commented that although there had been increased awareness this was not the case for all disabilities. For example this quote which also mentions that awareness does not equal good solutions:

Insufficient awareness in invisible disability and medical and mental health conditions which make up most of the equity students covered by the legislation. Even in relation to visible equity categories such as vision and mobility there is low awareness of the way that lack of infrastructure and teaching style affect these students.

The level of knowledge and awareness amongst students with disability was considered to be generally poor. Although there were several respondents who advised that they had some individual students who had used the Standards to advance their own education prospects.

Area 3: Understanding and advocacy

There was support for the contention that the Standards had assisted in greater understanding of disability and could support advocacy action. The Standards were used frequently by staff who work as disability officers/support/resource as a guidance for practice when working with a student with disability. This is illustrated below:

I have found Standards to be very useful to guide myself and the organisation in ensuring we meet our obligations towards students with disabilities. It also helps to educate all staff on their rights and responsibilities and to better assist students with disabilities and when negotiating particular reasonable accommodation requests.

Several respondents specifically stated that the Standards assisted in advocacy within institutional settings often providing the 'evidence' to institutions that they needed to act in this area. However for students with disability it was considered that only a minority of students used the Standards to advocate for their own improved education access. This may reflect that many respondents thought students had a poor knowledge and understanding of the Standards, despite the fact that there was high agreement (83%) with the statement that the Standards made clear the rights of people with disability.

The following quotes illustrate two divergent views on the impact of the Standards on students with disability with their own advocacy actions:

I don't think they do. Students are mostly too afraid to advocate their rights for fear of being judged and not graduating in a University setting.

I think that standards have provided people with disabilities better opportunities to advocate for their rights. I believe that as a result more students are making complaints based on their understanding of the standards. I view this as a positive indication as to how the standards create opportunities for people with disabilities to raise their concerns.

Area 4: Non-discrimination in education

There was overwhelming agreement (96%) from our members that the Standards had contributed to addressing discrimination of students with disability in education. Several however thought that it was not just the Standards that had impacted on this but that the Disability Discrimination Act (DDA) was a stronger driver for improved access and participation and reduced discrimination.

The Standards were seen by many as being influential in informing policy within an institution some of which addressed obligations under the DDA. For example:

(The Standards) provides more teeth to ensure that Disability Services have absolute legitimacy. Unis know that they have to meet the requirements of the Standards and DDA.

Area 5: Future improvements

Improvements noted from our members included:

- There was a need for increased awareness training if progress was to be achieved. Some respondents would like to see the Standards include a mandatory training requirement. This view was not held by all.
- 'Reasonable adjustment' as used in the Standards was considered by many respondents as an area that required further clarification and definition as it was too open to interpretation. This was not supported by all, as some stated that there would always be a need for an individual approach and that some professional interpretation would always be required making it unrealistic to define this too narrowly.
- Mandated individual student plans for access and participation were supported by 87% and several reported they already had this in place in their institution. Others however saw such an individual approach as undermining a more systemic approach for structural change that would provide broad institutional acceptance of the need for access and participation for all. This is illustrated by this respondent's comment who is against mandated plans:

No (mandated plans). Other students are not required to have a plan, plus many people with disabilities are told they have to have 'plans' in so many aspects of their lives. Plans in my experience are not designed for the individual but for the organisation, helps increase uniformity and limits individual responses. If curriculum was more inclusive, plans would be required less.

- Improved support for implementing inclusive curriculum received some support. Several comments discussed the existing disconnect between the Standards and curriculum designers and academics.
- A couple of respondents called for audit/monitoring tools and regular audits to ensure continuous improvement and ensure that the Standards were being met especially by private education providers who were considered to be less likely to have enacted the Standards. It is unclear whether this should be in the Standards or developed outside the standard. This was illustrated by this quote:

Specific quality framework based around the standards that is audited on regular basis. Self-audit tools. Continuous improvement cycle in service delivery

- Several comments sought a better use of the Standards at the point of enrolment. Such a move would support students transitioning from one level of education to the next. As funding is related to the number who self-identified as students with disability this would result in more accurate picture and greater funding for institutions.
- Only 41% of respondents considered that the Standards made clear the rights and responsibilities of students with disability and this could therefore be an area for improvement.

- The development of sector specific guidelines to support the Standards was supported by 95% of respondents however again these were not seen as being the only solution to increasing access and participation as quoted below:

Should be upon Inclusion of people in classes / courses etc. not just around how to do a plan. We need focus at the core on the reason behind the inaccessibility. Not band aids when we notice an issue - while plans can be good and yes we need clear guidelines - but we need focus on the core issues not the band aids

- There was overwhelming support (97%) for the Government to ensure Standards are reflected appropriately for each sector.
- There was support for stronger, clearer Standards addressing issues of latest approved Standards with new plain-English and revamped literature supporting the Standards).
- Comments were made on the different levels of support and practice of the Standards of different institutions. There are challenges therefore for national Standards operating within a non-homogenous sector and there could be an argument for accommodating different requirements across the sector.
- The Standards needed to be matched with funding commitments if there was to be real advances. Funding constraints to the implementation of appropriate accessibility and participation measures were mentioned by many as being a major issue. Although the Standards are not a funding directive, it was considered a major barrier to their comprehensive use.

The consultation with our members has provided us a wealth of information and we offer this to the review. It has also affirmed for us the importance the standards play in our sector.

Key Recommendations

Along with future improvement areas as above, ATEND makes 7 key recommendations for the reviewers to consider.

1. The standards be updated to define and reference inclusive practices/universal design along with reasonable adjustments in all the areas covered by the standards.
2. Exemplars of best practice be developed to accompany the standards. These exemplars should be general and sector specific, updated annually, and be informed by case law.
3. Promotion of, and training relating to the standards be provided. This should be general and specific to various audiences, including those in rural and remote, Low SES and ATSI communities. ADCET is well positioned to contribute to training and promotion activities for the tertiary sector.
4. The standards be updated to make explicit that they apply to funders and policy makers of education providers.
5. Consideration be given to addressing transition between education sectors, and the intersection with employers contributing to education, (such as through placements), and education material providers (such as software developers and publishers).

6. Consideration be given to the role of individual student plans to assist student's access and participation.
7. The Standards be embedded into the Education Providers auditing requirements i.e. The Tertiary Education Quality and Standards Agency

QUESTION ANALYSIS

QUESTION 1

What sector do you work in?

Answer Choices–	Responses %, no.
Vocational Education and Training provider	35.62% (26)
University	50.68% (37)
NDCO	9.59% (7)
School	1.37% (1)
Other	2.74% (2)
Total	98.64% (73)

QUESTION 2

Do you think the Standards influence access and participation in education by people with disability?

Answer Choices	Responses %, no.
Yes	96.30% (52)
No	3.70% (2)
Total	72.97% (54)

There was almost universal agreement that the Standards had influenced access and participation in education for people with a disability. Comments (n = 32, see appendix 2) indicate that the Standards have been an important tool for raising awareness and provide a framework for addressing disability issues and support the Disability Discrimination Act (DDA) however there was still further work required. Overall the Standards had contributed to improvements for education to students with disabilities. However not all students and educators do not necessarily fully understand or embrace the Standards. This is summed up by the following quotes:

In saying yes, I think there is still a long way to go in stakeholder understanding of the Standards and how they can use these to ensure that access and participation in education continues to improve. At a policy / guidelines level there had been an improvement in stakeholder awareness, however, at the implementation / practice stage, there is still a lot that is not happening.

Provides a framework to promote equity and access to education; and provides clarity around service expectations/standards

Probably not as much as the DDA. Although as a Disability Adviser we make academics aware of the standards, they rely on us a lot to determine what a "reasonable adjustment" is. There appears to be a lack of awareness of the concept of inclusive practices and more of an attitude the "the Disability advisers will fix this".

QUESTION 3

Have the Standards impacted on support available for students with disability in your sector?

Answer Choices	Responses (% , n)
Yes	90.38% (47)
No	9.62% (5)
Total	70.27% (52)

From the 70% of respondents to this question there was strong support (90%) for the contention that the standards had impacted on the support available for students with a disability. Half of these respondents provided comments (n = 28, see appendix 3). These ranged from several respondents who said their institution was already doing very supportive work for students with disabilities, to those who say the Standards provide the teeth to ensure good support to students with disabilities. Several mentioned even if there was good support for the Standards funding limitation negatively affected their real impact. Illustrative quotes include:

No really my university offered everything in the Ed before they were even written. We do tend to use the Standards every time we are in conflict with an academic or staff from Capital Works & Facilities.

With increased awareness there has been dedicated support but it is often not enough or embedded into over the whole of sectors

We have used the standards to influence changes to academic support services via redesigned assessment processes and academic knowledge

Provides more teeth to ensure that Disability Services have absolute legitimacy. Unis know that they have to meet the requirements of the Standards and DDA.

Only in TAFE as this is the only VET provider that appears to be obligated to the Standards. Numerous private RTO's simply do not provide any student support, such as disability support, and often flatly refuse to provide disability support on the basis that they have no funding. There are also numerous examples of private RTO's telling potential students with disability that they can't enrol and that they should go to TAFE, as TAFE is government funded and has extra funds to support people with disability. There is blatant disregard of legal obligations under the Standards in the VET sector and to my knowledge TAFE is the only provider that meets these Standards.

QUESTION 4

Do the Standards influence access and participation by people with disability from regional, rural or remote Australia, from a culturally and linguistically diverse background (CALD), or who are Aboriginal or Torres Strait Islander?

Answer Choices--	Responses (% , n)
Yes	68.75% (33)
No	31.25% (15)
Total	64.86% (48)

This question sought to gauge the impact of the Standards on students from regional and remote areas; CALD and Aboriginal and Torres Strait Islander backgrounds. Twenty two comments were received (see appendix 4). While 69% of respondents to this question agreed that there had been an impact the comments indicated that there were extra challenges in servicing these groups and that there could be differences to metropolitan services. As illustrated:

Structures taken for granted in metropolitan areas are not always available in rural and remote areas and do not always consider the needs of culturally diverse students.

This next quote indicates the complexities in dealing with students with 'multiple disadvantage':

This statement is too broad; not all of these groups of people are covered by the DDA; and universities have other equity programs for these target groups, e.g. aboriginal students. Any student whose first language is not English is clearly disadvantaged but this is not the same as discriminated against. Students with multiple disadvantage are assisted into uni but not always supported once they are in.

QUESTION 5

Do you think that people in the education community are aware of the barriers faced by people with disability who want to access education?

Answer Choices--	Responses (% , n)
Yes	40.82% (20)
No	59.18% (29)
Total	66.21% (49)

The majority of respondents to this question (60%) thought that people in the education sector did not understand the challenges faced by students with disability. Over half of these provided comments (n = 31, see appendix 5). Some were very clear that there was now increased awareness however the solutions or assistance is not always available. See this illustrative quote:

I think that awareness of barriers by the education community has improved. There are many committed professionals who go beyond their professional boundaries to make a difference who people with disability to access education. Many times what I hear / witness is the frustration about the lack of suitable options or the fact that the lack of appropriate support means that a person with disability cannot access education effectively. Lack of funding is also often cited for things such as personal care.

Others were more adamant that there was little understanding, especially if the disability was 'hidden' as illustrated below:

Some but many are completely ignorant or just do not want to know, or they believe that 'treating everyone the same' means adjustments should not come in to play.

Insufficient awareness in invisible disability and medical and mental health conditions which make up most of the equity students covered by the legislation. Even in relation to visible equity categories such as vision and mobility there is low awareness of the way that lack of infrastructure and teaching style affect these students.

Lecturers often put up more barriers and seem to think that having a student with a disability will cause them more work. They are often resentful to having to think outside of the box. They do not always like preparing materials in alternative formats. More education is needed to educate the providers.

QUESTION 6

Have the Standards helped to raise awareness among educators and education providers about these barriers?

Answer Choices–	Responses (% , n)
Yes	79.59% (39)
No	20.41% (10)
Total	66.21% (49)

The Standards were seen as having helped raise awareness amongst educators about barriers faced by students with disability by 80% of respondents to this question (see appendix 6).

Yes. The DSE require education providers to raise awareness. In unis, disability staff have worked hard to educate academic and other staff.

Conversely twenty percent thought they had not assisted. For example:

People don't realise the standards even exist and are to be followed in all aspects of education and employment.

Overall although there was support for this statement, there was very much a feeling that much more needs to be done to raise and maintain this awareness. Comments were made that even where there was awareness this did not necessarily translate into good inclusive practice. Several comments indicated that awareness was only the result of dedicated and ongoing education and support from disability officers. One suggested such training should be mandated and not optional. Comments were received by 29 respondents.

QUESTION 7

Are there particular sectors or settings that are more aware of the Standards?

Answer Choices–	Responses (%, n)
Yes	77.27% (34)
No	22.73% (10)
Total	59.45% (44)

Respondents indicated there were specific sectors that were more aware of the standards (77%). Comments (n = 34, see appendix 7) indicated that the tertiary education sector specifically was more aware of the standards. Also those who come into contact with students with a disability either because it is their job e.g. disability officers, student support officers etc., or they had students with a disability were more likely to be aware. One response indicated work with the stakeholders in the VET sector:

In the VET sector we are working hard to ensure that all stakeholders are aware of their obligations toward students with disability

QUESTION 8

Are there particular sectors or settings that are less aware of the Standards?

Answer Choices–	Responses (%, n)
Yes	73.33% (33)
No	26.67% (12)
Total	60.81% (45)

A wide variety of sectors were listed as being less aware of the Standards (see full comments n = 31, see appendix 8). Private providers of education including registered training organisations (RTOs) and primary and secondary schools were mentioned by several respondents.

QUESTION 9

Are the Standards relevant across all education sectors?

Answer Choices–	Responses–
Yes	95.56% (43)
No	4.44% (2)
Total	60.81% (45)

There was almost universal support that the Standards were relevant across all sectors. The twelve comments received (see appendix 9) provided some further insight which suggested that while this should be the case this was not always the case. As one respondent said:

However there needs to be more guidance and supporting documentation to illustrate how they can be contextualised across each sector including the Adult Community Education sector.

QUESTION 10

Have the awareness of the Standards improved over the past five years?

Answer Choices–	Responses (% , n)
Yes	73.91% (34)
No	26.09% (12)
Total	62.16% (46)

When asked if awareness of the Standards had improved over the past 5 years nearly three quarters (74%) of respondents agreed. It was not possible to provide comments for this question.

QUESTION 11

Do you think the Standards make clear the rights of people with disability?

Answer Choices–	Responses (% , n)
Yes	83.33% (40)
No	16.67% (8)
Total	64.86% (48)

There was high agreement (83%) with the statement that the Standards made clear the rights of people with disability. Fourteen comments (see appendix 10) were received. These in general while agreeing with the statement, still considered there were areas that were vague or open to interpretation and hence it was not always a clear situation. The issue of a medical condition which depending on duration may be considered to be a disability and the interpretation of this was raised. The term 'reasonable' was mentioned in several comments as being open to interpretation, for example in this quote:

The term reasonable is too subjective to apply. Finding appropriate affordable VET pathways contradicts accessibility particularly in the case of limited entry level courses that may suit people with complex learning needs.

QUESTION 12

Do you think the Standards make clear the obligations of education providers?

Answer Choices–	Responses (% , n)
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Answer Choices–	Responses (%, n)
Yes	81.25% (39)
No	18.75% (9)
Total	64.86% (48)

Obligations of education providers under the Standards was considered to be clear by 81% of respondents. Comments received from 19 respondents (see appendix 11), revolved around the theme that there was still room for greater clarity and improvement and again the use of the term 'reasonable' was open to interpretation, was raised. Other comments included the need for universal access in design, and how to translate standards into practice. Individual comments often appeared related to having had to tackle a particular issue for example:

Clearer but not clear. i.e., is it a breach of the standard for curriculum development to have a program structures designed on a full time basis? Is it OK to make a 'reasonable adjustment' for individuals but have design (6.2.1) which is not inclusive?

This quote illustrates the difficult position disability advisors can find themselves in:

This need to be monitored more closely and there should be tougher sanctions to make sure the obligations are met. I am often faced with the answer that it will cause hardship to the University so we don't need to implement things!!! And that stinks.

QUESTION 13

Do you think the Standards make clear the responsibilities and obligations of students with disability?

Answer Choices–	Responses (%, n)
Yes	41.30% (19)
No	58.70% (27)
Total	62.16% (46)

The majority (59%) of respondents considered the standards did not make clear the responsibilities and obligations of students. Comments (n = 11, see appendix 10) provided more detail indicating additional work was required in this area and that there could be tension between adjustments and upholding academic integrity. The first comment echoed by several respondents is informative about lack of student responsibility and the second addresses the issue of maintaining academic integrity.

The Standards seem to focus much more on the responsibilities of the education provider and perhaps do not make clear enough the need for all parties (students included) to make reasonable adjustments. Students tend to be more vocal about their rights but are less willing to accept their responsibilities as well

The tension between a right to a reasonable adjustment and right to uphold the integrity of an award remains an issue that is not optimally addressed by ad hoc institutional responses or case by case negotiations - a more sophisticate treatment of this issue within the standards would be useful

QUESTION 14

To what extent and in what ways do you think the Standards are used effectively by people with disability to advocate for their rights?

In answer to the question seeking comments on how the Standards are used by people with disability to advocate for their rights resulted in 35 comments (see appendix 13). There was a general theme that people with disability do not understand the Standards well enough to provide a good advocacy tool and this is often coupled with lack of confidence to use them as such as illustrated by this quote:

I don't think they do. Students are mostly too afraid to advocate their rights for fear of being judged and not graduating in a University setting.

However the view of other respondents illustrated they thought the Standards were doing a good job in this area:

I think that standards have provided people with disabilities better opportunities to advocate for their rights. I believe that as a result more students are making complaints based on their understanding of the standards. I view this as a positive indication as to how the standards create opportunities for people with disabilities to raise their concerns. And

I think there a small number of Advocates/parents and students who are clear on the Standards to advocate their rights and often after having to battle the system. I think a greater awareness campaign about the Standards to a broader community would be great and perhaps as part of the NDIS planning model so that prospective students/current students are aware of their rights to assist with advocating for reasonable access and accommodations as part of their NDIS goal setting and plan.

QUESTION 15

What has been your experience of working with the Standards? Provide comments and/or examples

Thirty three comments (see appendix 14) were received in answer to this question. Most comments related to the fact that the Standards provided a good guidance for their own practice, or in dealing with students, management or academics. It provided a good framework for practice as illustrated below:

I have found Standards to be very useful to guide myself and the organisation in ensuring we meet our obligations towards students with disabilities. It also helps to educate all staff on their rights and responsibilities and to better assist students with disabilities and when negotiating particular reasonable accommodation requests.

I have found them useful to clarify for students the limits re accommodating disability e.g. students still must meet the inherent requirements of courses. Also clarifying student responsibilities.

Issues 'helping' senior management understand the complexity - it is not black and white in terms of what adjustments should and should not be made available 2. Managing support provision in a changing govt. framework (the end of the age of entitlement) - expectations do not change immediately so there is a major gap between how the standards are interpreted by community and legal entities and what funds are made available by governments to service providers. It is the service providers who bear the brunt of not meeting the standards and not the policy makers - at least in the short term.

Several respondents indicated they had not in fact used the Standards.

QUESTION 16

Do you think that the Standards help education providers eliminate discrimination and ensure equity of access and participation?

Answer Choices–	Responses–
Yes	95.65% (44)
No	4.35% (2)
Total	58.97 (46)

There was high agreement with this statement (96% agreed). Comments were received from 23 respondents (see appendix 15) with the general theme that the Standards had been useful in progressing equity of access and participation. There were few comments however that addressed the issue of whether it had helped eliminate discrimination. Comments discussed the fact that the Standards had helped with policy within institutions however there was still a gap between the Standards, policy and practice on the ground, e.g. *they help - they don't solve the issues but they help* as one respondent said. Other illustrative quotes:

It has certainly helped them define and articulate their responsibilities and has provided leverage with the broader staff in their organisation's to make necessary advancements in their practice in terms of access and inclusion as well as Universal Design

I think they make the DDA more explicit and so easier for education providers to know the areas they need to focus on and how to go about providing reasonable adjustment.

QUESTION 17

Have the Standards made a significant impact within your sector?

Answer Choices–	Responses (% , n)
Yes	77.78% (35)
No	22.22% (10)
Total	60.81% (45)

There was general agreement from 78% of respondents to this question that the Standards had made a significant impact within their sector. From the 17 comments (see appendix 16) the following themes emerged:

- They are responsible for highlighting rights and responsibilities for the provision of services to student with disability.
- They provided important guidance to those negotiating issues for students with disability especially disability advisor positions.
- Useful in supporting appropriate policy.
- They had resulted in an increase in numbers of students with disabilities in education
- They provided an important awareness raising function but this needed to be followed up with a real commitment to embed this into practice.

The following long quote encapsulates much of this:

I think that standards have made a significant impact within the tertiary sector and has been the main driver for increased numbers of students with disabilities studying. However funding continues to be one of the major issues confronting education providers to date. Due to the success of the Disability Education Standards greater numbers of Australians with disabilities are taking up educational pursuits. Technology to support students with disabilities is constantly being refined and improved and with such innovation comes increased usage and costs for such technology and equipment. The primary Commonwealth funding initiatives are the Higher Education Disability Support Program and the Performance-Based Funding Program. I support the government reviewing the Higher Education Disability Support Program and the formula used to calculate reimbursement back to education providers in an effort to combat rising costs associated with maximising the participation of students with disabilities on the same basis as other students without disabilities. This program makes up the bulk of Commonwealth Government funding to education providers.

QUESTION 18

What kinds of barriers remain for people with disability wanting to access and participate in further education?

Question 18 explored barriers that are still faced by people with disability in participating in further education. Thirty five comments were received (see appendix 17). While a wide variety of responses were received these can be grouped as follows:

- Financial constraints in the delivery of appropriate services within the education sector remained a barrier. Services to deaf students were seen as particularly problematic due to funding implications.
- There were still societal and academic attitudinal and social barriers to disability.
- Barriers related to the 'online' delivery of courses e.g. captioning remained.
- Anecdotes of academics who are unprepared/unsupported to put in the extra time required to support these students, or lack of knowledge about what 'reasonable adjustment means' were noted.
- A call for an understanding that the issue is about access to education not employment as illustrated below:

Still an element of ignorance within the academic sector. Also some academics question what the student will do in terms of employment when their studies are complete, not understanding the standards are for access to education, not necessarily employment related.
- VET sector needed more flexibility in working with industry to provide appropriate employment options.
- Commercialisation of courses where cost becomes prohibitive to those students with disability because of added financial burden was noted.
- Need for better career counselling about education and employment options as illustrated below:

Funded Career/Course Counselling to assist with creating strong pathways for people with disabilities as navigating the range of courses and understanding the study load and academic expectations and work in the industry all important part of making a good decision with course of study.

QUESTION 19

Can you identify gaps in the application of the Standards within your sector?

Comments were received from 27 respondents on the issue of identifying gaps in the standards (see appendix 18). Many of the gaps echoed comments noted in the previous question about barriers to access. A range of gaps

were identified (some of which may better have answered the previous question) which covered a range of issues as listed below:

- Need for mandatory Standards training
- Private providers/RTOs identified as often not adhering to or providing adequately for students with disability
- Lack of resources to respond to standards fully
- Need to extend fee exemptions for people with disabilities to all courses as this presents a very real barrier
- Inclusive curriculum design required
- Impact of students not identifying their disability when funding allocation is often dependent on this as stated by this respondent:

Students with disabilities/and or medical conditions sometime choose not to disclose (particularly those with mental health conditions) however allocation of staff in educational setting is often based on the number of enrolments of student that identify disability/and or medical condition

- Teaching staff may be concerned about 'doing the wrong thing' which results in a gap in services as illustrated by this quote:

While Disability -specific staff and other student service areas are more aware of the standards, some academic staff still wary and unsure about dealing with students with disabilities. Often not intentional but concerned about being seen to do the "wrong" thing. Especially so with Mental Health. Also such pressure on staff at present there is limited time for other considerations apart from their research/field focus.

- Need for Universal Design and Inclusion at all levels
- Need greater understanding of disability issues at the point of enrolment
- Inaccessibility of some course/curriculum material
- Lack of consistency of application across an organisation as stated by this respondent:

Consistency of application in some areas of my organisation especially when linked to some external factors i.e. industry regulatory bodies that mandate their own standards. DAIP committee in my organisation currently working on improving consistency, understanding, knowledge and compliance across the organisation.

QUESTION 20

What ideas do you have about how the Standards (or information about them) might be improved in future?

Ideas were sought from respondents on how to improve the use of Standards. Comments were received from 28 respondents (see appendix 19). Some respondents echoed earlier question responses and comments revolved around the following themes:

- Need for increased and improved information/training/awareness raising for appropriate staff including teaching staff (this was covered in approximately 9 comments)
- Provision of real examples and better clarification of what constitutes 'reasonable adjustment' (approximately 4 comments). However as one comment stated: *Reasonable adjustments' can't be defined, as that would create more exclusions, but it would be useful to have a variety of exemplars encompassing different disabilities and situations*, this is not an easy task.
- Stronger, clearer Standards required e.g. *Clarity about the status of the Standards - I believe this have been unclear since the review in 2012. New plain-English and revamped literature about the standards would be useful. Practitioners and others need to be confident that the information they are accessing online is current and accurate.* (3 comments)
- More attention to be paid to student obligations (2 comments)
- Clarity on what is covered by term 'assistance dog'
- Need for audit tools and regular audits to ensure continuous improvement as illustrated by this quote:
Specific quality framework based around the standards that is audited on regular basis. Self-audit tools. Continuous improvement cycle in service delivery
- Seeking higher levels of students identifying at point of enrolment that they have a disability

QUESTION 21

Do you agree the Standards should include a requirement to implement an agreed support plan for students with disability in the tertiary sector? The plan would set out the student's rights and responsibilities, the provider's responsibilities, any adjustments that have been agreed to, and mechanisms for review and support.

Answer Choices	Responses (% , n)
Agree	86.84% (33)
Disagree	13.16% (5)
Total	51.35% (38)

There was strong support from 87% of respondents to this question for the Standards to require provision of a 'plan' for individual students with disability in the tertiary education sector. Eighteen comments were received (see appendix 20).

Several comments (4) indicated that their educational institution currently undertook such an approach. Support also suggested that such a plan provides clarity for all parties on responsibilities and appropriate approach on an individual tailored basis.

There were also some comments that were very clear they did not support such an approach such as illustrated by the quote below:

No. Other students are not required to have a plan, plus many people with disabilities are told they have to have 'plans' in so many aspects of their lives. Plans in my experience are not designed for the individual but for the organisation, helps increase uniformity and limits individual responses. If curriculum was more inclusive, plans would be required less.

Problematic issues with such an approach were identified including the challenge of standardisation of such an approach across sectors, need for student buy-in, role of entry point to provide adequate information and support, and such an individual approach could undermine broader institutional commitment e.g. inclusive curriculum etc. Some of the complexity is captured in this following quote:

Agree in most situations. However with the expectation of when a student chooses not to have a formal support plan, and when the process is not done in a way that is meaningful to the student (e.g. tick flick templates that are process driven rather than student driven). It would be good to explore alternative ways (options) for plans to be developed particularly when a student identifies they are wanting to gain confidence in self-advocacy.

QUESTION 22

That the government develop sector specific materials for education providers that are easily accessible in an online format and take the form of good practice guides on developing individual disability support plans in the tertiary sector

Answer Choices	Responses (% , n)
Agree	94.74% (36)
Disagree	5.26% (2)
Total	51.35% (38)

The majority of respondents (95%) supported the above statement. A small number of comments (9) were received (see appendix 21) most of which could see the benefits of such a centralised approach. Two quotes stood out as providing comment on the challenge in doing this:

Should be upon Inclusion of people in classes / courses etc. not just around how to do a plan. We need focus at the core on the reason behind the inaccessibility. Not band aids when we notice an issue - while plans can be good and yes we need clear guidelines - but we need focus on the core issues not the band aids

There will always be a need for case by case reasonable adjustments - supported by good practice guidelines - the question is whether it becomes an administrative regulatory requirement that funnels more people with disability than necessary into a support plan model

QUESTION 23

That the Minister for Education and Training in consultation with state and territory education ministers, ensure that individual education plans are used to assist in transitions between early childhood education, primary, secondary and tertiary sectors and ensure that students with disability are given options on the same basis as all other students.

Answer Choices	Responses (% , n)
Agree	89.19% (33)
Disagree	10.81% (4)
Total	50% (37)

Again there was overwhelming support (89%) for this statement which would see individual plans developed for students with disability that would assist with transition through their education career. Eleven comments were received (see appendix 22) which while in general supported this statement also raised concerns on two levels:

Firstly that such a plan individualises the response rather than putting the emphasis on inclusive practice at an institutional level, as mentioned by this respondent:

Focus should be on inclusion not the plan. The Minister should ensure that education providers plan for and design all courses to meet the needs of all individuals, including those with disabilities - so they can participate on the same basis as all other students.

Secondly the practicalities of implementing such a plan need to be acknowledged as discussed by this practitioner:

Transitional planning in my experience is poor. Often students are put in situations where they need to re-tell their story, provide evidence (where evidence is already noted), and given inappropriate referral advice. There is need for a commitment to a formal process that has an appropriate lead time (e.g. 6 month prior to transitioning to next level of education). There needs to be a better connection/collaboration/commitment between education sectors to provide continuity of service delivery, understanding and compassion to students we work with.

QUESTION 24

The government should ensure that the Standards are reflected appropriately in national policy and regulatory frameworks for each education sector including: a) National Quality Framework for Early Childhood Education & Care; b) National Assessment Program – Literacy and Numeracy (NAPLAN); c) VET Quality Framework; d) National Professional Standards for Teachers and Principals; e) Higher Education Standards Framework.

Answer Choices	Responses (% , n)
Agree	97.37% (37)
Disagree	2.63% (1)
Total	51.35 (38)

There was almost universal agreement (97%) with the statement that the Government should ensure Standards are reflected appropriately for each sector. Four short comments supporting this contention were included (see appendix 23) and as expressed most strongly by one respondent who said: *This is not a question - it MUST occur*

APPENDICES

APPENDIX 1

Question 1: What sector do you work in?

Comments (n = 3)

1. RMIT
2. State Government
3. dual sector university/VET provider

Appendix 2

Question 2: Do you think the Standards influence access and participation in education by people with disability?

Comments (n = 32)

1. However I would say that most teachers do not understand, it difficult to get teachers and other staff to understand what they are they and work with them as well as how to implement them. People are still too scared to have people with disabilities in education.
2. They are more specific than DDA and pertain to issues and access that are relevant to the educational sector
3. I believe on the whole believe that the Disability Education Standards 2005 have been successful in meeting its objective of clarifying the rights of students with disabilities to access and participate in education and training, and give education providers more guidance on how they can meet their obligations under the Disability Discrimination Act 1992.
4. It gives a basis to work from to establish best practise and to provide argument when required.
5. In saying yes, I think there is still a long way to go in stakeholder understanding of the Standards and how they can use these to ensure that access and participation in education continues to improve. At a policy / guidelines level there had been an improvement in stakeholder awareness, however, at the implementation / practice stage, there is still a lot that is not happening.
6. From my experience students have never read the documents or indeed do not even know they exist.
7. I think they have raised awareness of providers about the rights and responsibilities of both themselves and the individuals with disabilities. There is however many people who do not know about them and should.
8. They provide some more clarity about what the DDA requires.
9. Yes - in addition to DDA they provide a legal basis for DLO to advocate for students with liaising with academic staff.
10. But the students or at least the potential or future students may not even be aware that the standards exist.
11. Help to clarify DDA in relation to education and can be used for education purposes
12. If students are aware of the standards it can be used as a powerful tool to engage with the education facility - in terms of the student understanding their rights and what the education provider is responsible for providing.
13. The ability of a student to both access and participate in education is influenced by so many aspects of a person with a disability i.e. support structure at home, income (Centrelink sets unrealistic study expectations on some people with a disability which does not consider their individual abilities, social and community groups/supports (respite for carers) transport costs (and timetabling), timetable offered by training provider.

14. provides a framework to promote equity and access to education; and provides clarity around service expectations/standards
15. Yes, and the statistics support this.
16. No as I do not believe that individuals are aware of the Standards.
17. The Standards form a basis to educate our co-workers about access and participation and also at times as leverage to prevent direct and indirect discrimination.
18. As the standards are the basis of how people with disability should be supported and treated, when liaising with personnel/lecturers the standards are used to explain and prove that people with disability need and are acknowledged to have access and participation in education courses of their choosing and that they will require adjustments to make them equal to other students.
19. It provides a plain English version that translates easily into language that can clearly demonstrate how students are supported.
20. To some degree it has made teachers more aware of access. Participation is still a concern because just by being there does not equal participation.
21. Probably not as much as the DDA. Although as a Disability Advisers we make academics aware of the standards, they rely on us a lot to determine what is a "reasonable adjustment". There appears to be a lack of awareness of the concept of inclusive practices and more of an attitude the "the Disability advisers will fix this".
22. Unfortunately I do not feel that they are placed in practise at all levels and are largely seen as the remit of specialised officers within education institutions.
23. The standards 'encourage' providers to make learning materials, facilities, online environment accessible for students with disabilities. Overcome the problem of education institutions putting access in the too-hard basket.
24. I just wish someone would actually monitor how Universities are implementing these standards and make them accountable for their actions in a more structured way.
25. They provide the basis and the rationale for the provision of adjustments to enable students to participate.
26. This is the objective of having the standards
27. Perhaps directly if they are aware of them and use them to enable access; but more likely it is indirect as institutions refer to the standards to help them refine their processes, procedures, and support systems.
28. They are more explicit than just the DDA which says that you just can't discriminate. Not prescriptive but more guidelines.
29. Only in a limited way for those people and advocates who are already aware of the Standards.
30. For those that have a sufficient understanding of them
31. The Standards have provided a strong framework to guide academic staff and the broader organisation in the rights and responsibilities of the college towards access and participation for people with disabilities. There has been a greater focus from my organisation (VET sector) on ensuring that people with disabilities have reasonable access and greater participation through awareness raising/education through PD to all staff from academic staff and support staff on Standards of Education and rights and obligations to students with disabilities. Still some way to go to ensure consistency of reasonable adjustment measures across all academic areas.
32. They provide guidelines for institutions to develop policies and strategies for delivering education/training/HE

Appendix 3

Question 3: Have the Standards impacted on support available for students with disability in your sector?

Comments (n = 28)

1. Support is rarely seen these days despite it desperately being needed, it comes down to funding, since the government won't fund the TAFE system for disabilities, Institutes think they need this funding, they just won't put money aside to support students. Rather frustrating!
2. The Institute responds more readily when the support can be shown to be in line with the Standards
3. To some extent they have as at least now there seems to be increased recognition / awareness of the obligation to provide support. Often lack of awareness about how, creative responses to individual needs, flexibility are lacking.
4. No really my university offered everything in the Ed before they were even written. We do tend to use the Standards every time we are in conflict with an academic or staff from Capital Works & Facilities.
5. With increased awareness there has been dedicated support but it is often not enough or embedded into over the whole of sectors
6. It's good to have the standards to support requests for reasonable adjustment
7. Some improvement in awareness over this period. Seems to be more limited awareness in the School sector.
8. Even though the Govt. had taken away specific funding for disability support, my TAFE has set aside funding for this support.
9. Yes - in addition to DDA they provide a legal basis for DLO to advocate for students with liaising with academic staff.
10. They have helped in creating a wider University, although limited knowledge that they exist...as they can be used to assist other university staff what are and why reasonable adjustments are important.
11. use of standards to provide clearer 'evidence' of universities requirements
12. We have used the standards to influence changes to academic support services via redesigned assessment processes and academic knowledge
13. School and universities are funded per person with a disability, the VET is not funded/supported this way.
14. Most Higher Education Providers have Disability Services or at least Equity Services in each institution which promote support and access for students with disability. These specialized services have constant dialogue with Academics and IT services to ensure that course materials are provided in accessible formats and if there are difficulties in a particular area, they problem solve with Academics to find an individualized solution.
15. But only because we make them aware of the Standards.
16. Specialised services for students with disability i.e. Disability Services section, although I believe the services were in place prior to the standards.
17. Our uni was already providing the supports and this didn't change when the standards came in.
18. Talking about legislation can sometimes be counterproductive and the Standards have a more applied focus.
19. For some individual students it has certainly made a difference where people have been aware of the standards and have been able to advocate on what is needed.
20. Unsure how to answer this question. As in question 2 I still feel the DDA has the biggest impact, but the standards do offer excellent interpretation and guidance.
21. As the officer responsible to assist students access education the standards have been useful as a substantive backing when making a non-economic argument into an economic paradigm.
22. I work for TAFENSW which has had a great record of providing access and support, but in the new competitive VET environment it would be very easy to see access as an expensive luxury rather than an essential. The standards give practitioners a legislative back-up when arguing for access.
23. They can help facilitate creative thinking in working out alternative approaches/adjustments and encourage a more inclusive approach to delivery and assessment
24. If access to education is not provided then the uni could be guilty of discrimination.

25. By providing clarity around the legislation.
26. Provides more teeth to ensure that Disability Services have absolute legitimacy. Uni's know that they have to meet the requirements of the Standards and DDA.
27. Only in TAFE as this is the only VET provider that appears to be obligated to the Standards. Numerous private RTO's simply do not provide any student support, such as disability support, and often flatly refuse to provide disability support on the basis that they have no funding. There are also numerous examples of private RTO's telling potential students with disability that they can't enrol and that they should go to TAFE, as TAFE is government funded and has extra funds to support people with disability. There is blatant disregard of legal obligations under the Standards in the VET sector and to my knowledge TAFE is the only provider that meets these Standards.
28. For those that have a sufficient understanding of them

Appendix 4

Question 4: Do the Standards influence access and participation by people with disability from regional, rural or remote Australia, from a culturally and linguistically diverse background, or who are Aboriginal or Torres Strait Islander?

Comments (n = 22)

1. Sorry I'm not sure
2. Yes as above. I continually battle with the Institute where I work for the provision of Sign Language Interpreters, and the Standards clearly outline the Institutes responsibility in providing access to Deaf people whose primary language is Auslan
3. Not enough. There are issues of knowledge and understanding along with actual numbers of people who have disabilities that impact on rural areas. I think the language needs to be stronger to include all potential students who have a disability.
4. I can only comment on the CALD community, and I don't think they have a lot. I suspect that a lot of the CALD community members (individuals, families and professionals), don't have a lot of awareness about the Standards. Have the Standards been translated into other languages or have community forums in other languages been held? More of this focussed awareness raising needs to happen for progress to be made.
5. Not in any particular way.
6. They should but many organisations are unaware of the standards
7. From my knowledge the Standards do not directly address these groups.
8. But not to the level of students outside those groups
9. couldn't say
10. Apply to all.
11. Structures taken for granted in metropolitan areas are not always available in rural and remote areas and do not always consider the needs of culturally diverse students.
12. Not sure as we do not have many regional students so hard to comment.
13. They provide a guide within which to consult with and understand the needs of individuals, so yes because that approach means that we will tend to take into account mediating effects of psychosocial barriers as well and this aligns with a social model of disability.
14. In my experience, work needs to be done around culturally appropriate services and supports for these cohorts.
15. unable to comment on this one way or the other

16. Again unsure. But I am presuming the DDA has the biggest influence. From conversations with students and parents of school age children, it appears much of the primary and secondary schooling system has only just become aware of the standards. From this I can only conclude that it has been the DDA that has given weight to children with disabilities being able to participate in pre tertiary education.
17. Without question - for the reasons stated above and in broadening awareness of target demographics within the entrenched and emerging work force.
18. This statement is too broad; not all of these groups of people are covered by the DDA; and universities have other equity programs for these target groups, e.g. aboriginal students. Any student whose first language is not English is clearly disadvantaged but this is not the same as discriminated against. Students with multiple disadvantage are assisted into uni but not always supported once they are in.
19. See Q 2.
20. I don't really think it has in a broader sense. It depends on the provider and these are limited in regional, rural and remote.
21. Very limited.
22. Cannot comment

Appendix 5

Question 5: Do you think that people in the education community are aware of the barriers faced by people with disability who want to access education?

Comments (n = 31)

1. Generally many teachers need to be made aware of the impacts
2. I think that awareness of barriers by the education community has improved. There are many committed professionals who go beyond their professional boundaries to make a difference who people with disability to access education. Many times what I hear / witness is the frustration about the lack of suitable options or the fact that the lack of appropriate support means that a person with disability cannot access education effectively. Lack of funding is also often cited for things such as personal care.
3. No really, people still only see disability as being blind or deaf then they can imagine how difficult it might be but for hidden disabilities (mental health in particular) or ADHD or Dyslexic staff have not got a clue in spite of the years and years of disability education
4. I think that on the whole they do, however there is significant room for improvement particularly in training for professionals who will have responsibility i.e. trainers, teachers, lecturers etc.
5. Not all people are aware of all barriers. Most are aware of some. More education of teachers, educators and other education staff would assist.
6. Unfortunately this is not well understood - I have in the past had conversations with academics and course coordinators around barriers and labels that impact on the lives of this student cohort.
7. Some but many are completely ignorant or just do not want to know, or they believe that 'treating everyone the same' means adjustments should not come in to play.
8. Not academic staff. Disability staff - then of course!
9. Still a mixed awareness
10. However the barriers are not always understood particularly associated with mental health conditions.
11. Yes, and there is becoming more so with articles in the newspaper and the work of NDCO and Disability Officers throughout educational institutions.
12. Insufficient awareness in invisible disability and medical and mental health conditions which make up most of the equity students covered by the legislation. Even in relation to visible equity categories such as vision and mobility there is low awareness of the way that lack of infrastructure and teaching style affect these students.
13. Teachers are still telling students to 'get on with it.'

14. Broadly speaking, for lecturers and administrators I think there is a poor awareness barriers and actually applying the Standards.
15. People in the education community perceive that having a person with a disability in a course is too much hard work and they tend to throw up barriers themselves so when Disability support staff/services assist with reasonable adjustments the education community already have a negative viewpoint. They don't realise that the person with the disability may find day to day activity challenging without adding education activity.
16. To an extent. In unis, Disability staff are well aware, and some academic and other staff. Most people don't think about it much unless it affects them.
17. Awareness is higher when disability is visible, but not otherwise.
18. Across the board I would say no. Certainly the people in the education community who are working with disability are aware.
19. In the tertiary sector I'd say yes. I think mostly as a result of Disability Advisers.
20. Again - specific officers responsible are marginalised within their fields of practice and organisations Overall is not seen as an issue of the broader community. I frequently hear " your students" - "one of yours"
21. I think the awareness varies from sector to sector and institution to institution. Organisations that employ specialist disability staff tend to have a higher level of awareness (because we keep banging on about it)
22. To qualify, people with direct experience are aware but the majority of educators are ill informed
23. My perspective is about universities; so access may be a right but there are other basic requirements to enter uni. There is an increasing tendency for uni's to develop inherent requirements which are being used as a filter to exclude PWD.
24. Lecturers often put up more barriers and seem to think that having a student with a disability will cause them more work. They are often resentful to having to think outside of the box. They do not always like preparing materials in alternative formats. More education is needed to educate the providers.
25. Many understand some of the barriers but do not realize the full extent of these
26. Not 100% but it is improving or at least people are more aware about where to find the information e.g. from an equity/EO department or disability support program.
27. My experience is generally no. I still think that students with disabilities are still quite invisible in the sector and that they are generally not considered proactively - rather reactively.
28. It is yes and no - some people are aware - but not all. Some have a level of awareness but not a depth. Some just know they have to support people with disabilities. Sometimes this is misguided out of sympathy and pity rather than reasonable adjustments. Some people are generally able to provided and feel more comfortable with supporting people with a physical disability but struggle to understand working with people with hidden disabilities in particular mental health.
29. I do not think that educators are sufficiently aware of how teaching practice can create barriers for people with disability
30. Yes in the main and will refer to Disability services to assist with discussing options for the student to ensure greater access and better participation. E.g. Disability Services has a presence at each enrolment day across all the campuses to ensure that prospective students can discuss the barriers that might prevent them from enrolling.
31. I think most institutions these days have a fairly good disability service that actively promotes and advocates for students with disability

Appendix 6

Question 6: Have the Standards helped to raise awareness among educators and education providers about these barriers?

Comments (n = 29)

1. More awareness and education on the standards need to happen.
2. To a degree, so much more work needs to be done to educate teachers.
3. When Disability Awareness training is provided and portion of the training is reviewing the Standards
4. Through extensive DSE training and on-line modules as well as inclusive leaders work being done across the state of Qld.
5. To some extent yes, but case studies and real life examples (and how to respond effectively to these) is what makes more sense to people (i.e. people need to see examples of how the standards are applied in a range of scenarios).
6. Occasional advertising of the standards and role of support staff in raising awareness.
7. To some degree but there's much awareness raising to be done
8. slowly over time but still a way to go
9. Again - still a lack of co-operation and understanding from academic staff.
10. Influenced policy direction, process and practice (service delivery) in the organisation I work within.
11. We use the standards to reinforce our point when advocating for reasonable adjustments.
12. In my experience I have had to inform some educators (who I certainly expected would already know) about the Standards and their professional responsibilities. One problem with the VET sector is that lecturers/educators do not need to have teaching qualifications so although skilful in their industry training knowledge, may not have explored the impacts and barriers of disabilities.
13. To some extent. Mostly with those that are aware of their obligations.
14. People may be aware of the Standards (or more to the point, they know the term Reasonable Adjustment) but they do not refer back to (specific definitions and requirements) and applying the Standards is poor. I really don't know if Industry Skills Councils give a great deal of consideration to the Standards in developing Training Packages? I saw a Unit of Competency for Legal & Risk Management in Small Business recently which refers to Oral Communication as a Foundation Skill and defines this as using specific and relevant language to clearly articulate legal issues, and using questioning and listening techniques to clarify solutions, as well as participating in verbal negotiations using language suitable to audience. It's just not inclusive
15. People don't realise the standards even exist and are to be followed in all aspects of education and employment.
16. Yes. The DSE require education providers to raise awareness. In unis, disability staff have worked hard to educate academic and other staff.
17. Yes, the Standard is a manageable, user friendly document that can be used as a ready reference.
18. Again yes in the tertiary sector. The pre tertiary sector appears to have a way to go.
19. But much more is needed and should be compulsory - optional best practise is a myth.
20. In my Institute the Teacher Consultants went to a lot of effort to ensure that staff were informed of the Standards and their obligations when the Standards were first introduced. Staff were generally very receptive.
21. The issue is getting academics to deliver an inclusive curriculum. There are many poor practices in the way subjects are being designed and delivered, e.g. the online content is not always accessible.
22. Although it needs to go further and general staff need more awareness rather than it simply being targeted at the Disability Officer who is already aware.

23. But I think it is variable depending on the interest and if there is a 'driver' around access and participation.
24. I think that Disability Practitioners in the Sector are aware of the Standards - but my experience is that educators (and folk from administrative parts of the University) are unaware of the Standards on the whole.
25. I can speak from the Uni perspective and I do believe that it has, in that the Universities have employed specific people to manage the student support. The Disability Advisers then work with the staff (academic and general) to provide support to students. In our institution we also have a focus on strategic approaches such as staff training, networking with key academic staff and support units (admin, library, IT and facilities).
26. If you talk to teachers they have usually not heard of them
27. The experience in my area is that Teaching staff are not released for training, they release support staff to attend training rather than teaching staff, keeping inclusive practice a specialised area for the 'other'.
28. As part of the Organisation's professional development days there are regular sessions on Education Standards and reasonable accommodations and also the type of learning support for students with various disabilities e.g. autism/ mental health/learning disabilities. As part of the new LLN component of the TAE new lecturers are now made aware of the Standards and their understanding of the barriers facing students with literacy numeracy issues and other learning conditions/disabilities.
29. Yes because as a disability practitioner I can use the Standards to help teachers identify their obligations to students with disability

Appendix 7

Question 7: Are there particular sectors or settings that are more aware of the Standards?

Comments (n = 34)

1. Education, University
2. Higher Education TAFE
3. Those that have a predominant portion of their students with disabilities
4. State schools.
5. I believe that tertiary education institutions are very aware of the standards.
6. Higher Education probably has the highest awareness. Schools still have a way to go. Community education providers and RTOs have even more progress to make.
7. Staff that come into contact with Disability Service are more aware of the DDA and the Ed Standards
8. Where a professional has particular responsibility for students with disability, there is usually a high level of awareness and this results in the majority of others deferring to them rather than increasing their own awareness
9. Higher Education is more aware I think.
10. Many sectors are ignorant of their existence
11. Usually individual staff across disciplines
12. Disability Services
13. unsure
14. Yes, Higher Education Institutions.
15. Disability/counselling, student support sectors
16. Faculties training "elite professions" such as medicine and law have barriers to implementation of the standards.
17. Tertiary (University) settings, where teacher training is offered.

18. Courses in Education Assistant within VET are a bit more aware
19. Disability Services Employment Agencies
20. Universities are very aware, also TAFE colleges.
21. State Education Department is aware
22. Tertiary, including TAFE. I worked in the VET sector non TAFE RTO for 5 years and there was no acknowledgement of the standards and DDA then. That was 6 years ago.
23. Tertiary
24. I believe that the TAFE sector in Victoria, by virtue of demographic market exposure is far more aware and proactive to the standards than University level higher Ed.
25. Equity sections
26. The main focus seems to be on primary and secondary sectors as these are a human right; higher education is not a right.
27. not sure
28. Large scale providers systems
29. Higher Education. Uni's have employed people to specifically provide support. TAFE also provide support but not necessarily to the same level. I have children in secondary school now. I have a son with a learning disability - diagnosed. The support that he has been provided has been poor. The primary schools and high schools do not have an understanding of their obligations as part of the DSE. The High School even wrote and said that he does not qualify for any support but just made the staff aware that he had an LD and sent them a link to a website on teaching students with LD - no conversation on support or assistance.
30. TAFE definitely is
31. Nothing comes to mind
32. In my experience tertiary providers are more aware than compulsory educators.
33. Can't comment as my experience is in VET Sector
34. In the VET sector we are working hard to ensure that all stakeholders are aware of their obligations toward students with disability

Appendix 8

Question 8: Are there particular sectors or settings that are less aware of the Standards?

Comments (n = 31)

1. Workplaces
2. Non-state schools - independent and catholic schools.
3. I don't feel that secondary and primary schools are as aware as I think they need to be.
4. Community education providers and RTOs
5. Capital Works & Facilities, Law Schools in general
6. Secondary schools
7. Early childhood and primary education are less aware.
8. Private training providers are not good in wanting to know the exist or implementing
9. student administration
10. some non-government agencies with exception of advocacy services
11. Many High Schools are not as aware of the Standards as the Higher Education facilities are.
12. Some Academics

13. VET
14. Not sure as I only have experience in one particular area
15. Educational staff Employers - big business/small business
16. Primary and secondary schools.
17. RTO's are not aware of the standards Independent and Catholic schools are not as aware of the standards.
18. Secondary. It also appears University, Schools of Education are very reluctant to offer student teachers part time placements.
19. Schools
20. Compulsory education appear determined to find avoidance solutions and Universities simple do not do that as ascribed or funded.
21. In the VET sector I believe that private training providers have less awareness of the standards and their obligations. They focus on meeting the minimum of the RTO standards.
22. trades and business teaching areas
23. Some of the private unis seem to lack awareness.
24. I find that Deans are very blinkered and don't seem to want to know anything more than they know they exists but do not want to implement the requirements.
25. not sure
26. Small scale providers
27. Primary school and secondary schools; only those with severe physical disabilities get support. Schools vary in the level of support that they provide. In many cases we get students coming to Uni's who do not have any strategic approaches to their learning, have not trialled or tried any technology to support their learning, many have just been sent to the learning centre for one on one support - but there has been no skill development. This is failing the children as they cannot transfer this support to other aspects of their lives.
28. The numerous private RTO's are not (or chose not to be aware).
29. Compulsory education providers
30. Can't comment as my experience is in VET Sector.
31. I think the private RTO's are not as aware as HE and TAFE institutions

Appendix 9

Question 9: Are the Standards relevant across all education sectors?

Comments (n = 12)

1. However there needs to be more guidance and supporting documentation to illustrate how they can be contextualised across each sector including the Adult Community Education sector.
2. Some tailoring of resources to each sector would help.
3. Relevant yes, understood no
4. Unsure.
5. mostly, but more specific information relating to settings would be useful
6. Should be but clearly they are not.
7. It is sometimes difficult to pin down inherent requirements in VET qualifications
8. Not sure as I don't have experience in all education sectors.
9. How could they not be

10. They ought to be BUT higher education is more about ability and performance not just access
11. Care needs to be taken though to make sure they are not 'absolute' for every sector; there are differences which mean that what is applicable for example in primary school is not applicable at university.
12. students with disabilities need to know that they are supported at all levels of education from birth onwards, the application needs to be consistent

Appendix 10

Question 11: Do you think the Standards make clear the rights of people with disability?

Comments (n = 14)

1. I think that the standards do make clear the rights of people with disabilities. I think the definition of disability under the law is reasonably understood throughout the community and the standards certainly strengthen this awareness. However medical conditions and illnesses are more problematic as depending on the duration they may also be considered as a "disability" under the Act. University staff struggle periodically to determine whether a student's presenting illness or medical condition should be considered under special consideration provisions or as a "disability". The difficulty arises around what is considered to be 'long-term' under the DDA 1992. I would like to see more clarification around the use of the term medical conditions and illnesses.
2. More work is needed to ensure that individuals with disability have the skill to exercise their rights.
3. In terms of access to education yes however they do not always make the individual's responsibilities clear
4. Clearer, but there are gaps. I.e. do students need to pay to get an Ed psych assessment and diagnosis to be covered by the standards for Dyslexia.
5. Mostly but is still vague at times
6. Once again, it depends on people's awareness.
7. There could be better clarification in some areas
8. But there is a jargon inherent to practitioners that makes them less than equally accessible - plain English with clear benchmarks would be better.
9. There is always a requirement to make a judgement about 'reasonableness' of adjustments and therefore different people/roles will interpret them differently
10. There is too much focus on rights and there needs to be more awareness of skill and ability. The education standards are not aligned with the employment standards
11. They clarify the application of the legislation. Guidelines designed specifically for people with a disability are generally better at making 'rights' clear.
12. Make it clearer than the DDA - they clarify the areas
13. The term reasonable is too subjective to apply. Finding appropriate affordable VET pathways contradicts accessibility particularly in the case of limited entry level courses that may suit people with complex learning needs.
14. I have some parent/advocates and students who are able to advise me of their rights under the Standards. Academic staff once made aware of the Standards are able to articulate the rights of people with disabilities.

Appendix 11

Question 12: Do you think the Standards make clear the obligations of education providers?

Comments (n = 19)

1. It's also how they interpret the standards also
2. I think that the standards go a long way to making education providers clear on what their obligations are. However the need for defined academic program level inherent requirements was highlighted in feedback to the previous review of the Disability Standards for Education. As far as I am aware, there were no

updates to the Standards undertaken as a result of the earlier review. I believe that if more institutions encouraged to develop inherent requirements this would provide greater opportunity for prospective students to make more informed enrolment decisions. This in turn would increase student success and retention and hopefully reduce the numbers of students at academic risk.

3. Education providers need more opportunity to see how the Standards operate and can be applied in various situations.
4. Yes if they are read
5. More resources/guidance required about inherent requirements, reasonable accommodations/adjustments is required
6. Although with the imposition of Vet Fee help where students are now charged to access courses, the education providers are blaming the government for changing the rules. These rules are in direct opposition of access to education for people with disability
7. Clearer but not clear. i.e., is it a breach of the standard for curriculum development to have a program structures designed on a full time basis? Is it OK to make a 'reasonable adjustment' for individuals but have design (6.2.1) which is not inclusive?
8. mostly but not always clear
9. In TAFE we have run workshops to explain the standards to staff at different levels in the organisation.
10. Can be improved though it doesn't matter how clear the Standards are if individuals do not follow the Standards.
11. With the exception of 'reasonable adjustments'. This seems to be open to interpretation.
12. What is "reasonable"? We will never resolve that debate without funding, education and compliance requirements.
13. There is always a requirement to make a judgement about 'reasonableness' of adjustments and therefore different people/roles will interpret them differently. The standards, rightly, ignore geographic and socio economic advantage/disadvantage yet the day to day decision making of a person with a disability or their carer/s is directly influenced by what services they have access to in their community. Decisions to participate in education in rural areas particularly are different to decisions made by people in urban areas where there are more service choices available.
14. We should be adopting universal design principles; more about inclusion and less about rights. Doing the right thing is often based on fear of the DDA.
15. This need to be monitored more closely and there should be tougher sanctions to make sure the obligations are met. I am often faced with the answer that it will cause hardship to the University so we don't need to implement things!!! And that stinks.
16. Makes it clearer than the DDA - they clarify the areas that need to be focussed on.
17. But only to those VET providers that feel they have these obligations.
18. Again reasonable is a difficult term
19. YES. The difficulty is often the practical application of those rights within a course/industry framework that may have yet to consider how to accommodate students with particular needs. Standards help to explain the critical importance of exploring new and creative ways to meet the additional needs of a student with disabilities whilst still complying with the industry regulations/curriculum framework.

Appendix 12

Question 13: Do you think the Standards make clear the responsibilities and obligations of students with disability?

Comments (n = 11)

1. More work is needed in this space.
2. No - I think a good deal more work needs to be done around this particularly in respect of disclosure as an enabling tool for access and inclusion
3. A separate section relating to this would assist.
4. students are less aware of their own responsibilities
5. But I think most students with a disability are unaware of the DSE. They know their rights under the DDA, but often don't realise there are obligations that go along with rights.
6. This is constantly unpacked with the confidentiality assumption breached far too frequently. Imputation is also rife.
7. This area is very unclear esp. relating to decision making about 'costs and benefits', the inherent requirements of the course, capacity to undertake the training, available resources to provide support Vs rights to choose, rights to participate without likelihood of completing. In VET, the introduction of completion based funding has created a whole new set of decision making.
8. The Standards seem to focus much more on the responsibilities of the education provider and perhaps do not make clear enough the need for all parties (students included) to make reasonable adjustments. Students tend to be more vocal about their rights but are less willing to accept their responsibilities as well
9. This is something most institutions are working on; to make clear the other side of the equation and what is expected from students.
10. Not really. There needs to be a more comprehensive section about what is reasonable adjustment - both for staff and students.
11. The tension between a right to a reasonable adjustment and right to uphold the integrity of an award remains an issue that is not optimally addressed by ad hoc institutional responses or case by case negotiations - a more sophisticate treatment of this issue within the standards would be useful

Appendix 13

Question 14: To what extent and in what ways do you think the Standards are used effectively by people with disability to advocate for their rights?

Comments (n = 36)

1. Clear guidance and principles
2. Only some know their rights
3. When they know the Standards they have a better understanding of their rights to access and service from the Education sector, they are then better able to advocate for themselves
4. Not in schools
5. I think that standards have provided people with disabilities better opportunities to advocate for their rights. I believe that as a result more students are making complaints based on their understanding of the standards. I view this as a positive indication as to how the standards create opportunities for people with disabilities to raise their concerns.
6. I'm not convinced that individuals with disability have the confidence and skills to advocate for their rights. More focus / exploration of what it takes to be a successful advocate is needed. It can be a stressful and emotional experience to try to advocate for one's rights and I imagine that a lot of skill is required in order to be effective and to be able to reach a satisfactory outcome for all concerned.

7. Very few students raise the Ed Standards with the Disability Service it is usually the other way around. Once they are aware then students tend to use to champion their own cause.
8. As a stick, which some providers are not frightened of.
9. Not to a large extent in the terms of self-advocacy but more in terms of creating increased expectations that on the whole they will be accommodated
10. Depends on their capacity to advocate and on the education providers level of awareness about their existence
11. little
12. Rarely used as many students do not know they exist
13. by citing relevant section of the standards
14. Not well used by students. In addition, I don't think the Schools teach the students about the standards and their rights, so when they enter university that are not very aware.
15. variable
16. It's not often that a student quotes the standards, but they do use our service which is based on the standards
17. Providing policy and legislative guidelines
18. This depends on the organisation and what specialist staff are available to raise awareness (and advocate) across the organisation.
19. Making individuals aware of reasonable adjustments
20. Very little. They may not even know about them
21. Not much at all (see 13).
22. They are not used specifically by people with disabilities, who rely very much on equity practitioners experience and knowledge.
23. BY very few and not effectively. A statement about rights immediately draws an organisational response of defence not activism.
24. Not as much as could be. I think students have tended to focus on complaints at the local level or have gone to AHRC, not used the standards.
25. Calling governments to account - although these agencies are often only implementing higher level policies.
26. Students may claim discrimination
27. I don't think they do. Students are mostly too afraid to advocate their rights for fear of being judged and not graduating in a University setting.
28. As per above, students tend to use them to advocate for their rights but are less willing to apply them in regard to their own obligations
29. Not sure.
30. Minimal. Very few students (with the exception of litigious students) appear to avail themselves of an understanding of the DDA or the Standards.
31. Limited. As the onus is on the student to make a complaint. It is very hard for parents to know how to work with their primary and secondary schools teachers/staff to ensure their child gets the appropriate support. I am aware of my child's rights and yet I still had a very hard time knowing what is possible as every time they threw up the fact that they did not have any funding. I was struggling to be able to balance working, raising a family and trying to help my child learn (who was very frustrated and if pushed would just give up - I didn't want my child to disengage with his learning so I couldn't push him too hard. Parents struggle anyway - try to advocate or fight for more it emotionally draining when you are time poor.

32. I think this is the wrong question - the Standards are not about assisting individual advocacy - but seek to normalise and legitimise the participation of people with a disability - and I think that it is progressing this outcome
33. This is very limited as students need to be aware that the standards exists
34. I think there a small number of Advocates/parents and students who are clear on the Standards to advocate their rights and often after having to battle the system. I think a greater awareness campaign about the Standards to a broader community would be great and perhaps as part of the NDIS planning model so that prospective students/current students are aware of their rights to assist with advocating for reasonable access and accommodations as part of their NDIS goal setting and plan.
35. Probably not a lot of awareness within the disability community (families, carer, community groups) as to the Standards and how they can be used to advocate on behalf of people with disability wanting to engage in further education (or for that matter, in the school system).

Appendix 14

Question 15: What has been your experience of working with the Standards? Provide comments and/or examples

Comments (n = 33)

1. In the Vocational education sector, providing inclusion and awareness for students with disabilities and staff on access and responsibility to provide that.
2. Providing reasonable adjustments I like them, they are clear and easy to read and understand
3. Great, as a means of justify the Reasonable Adjustments required for students. Good for raising awareness amongst teaching staff about their responsibilities to provide accessible teaching materials
4. Working in schools and access for students with disability into post-school.
5. My experience of the standards have been mostly positive. However while I recognise that the Disability Education Standards 2005 cover a range of providers and circumstances and provide some helpful advice on processes to be followed, some discretion is required in terms of assessing various situations in determining how the Standards apply. I feel that it would be helpful for government to provide more professional development opportunities for staff working in the education sector. For example yearly seminars/workshops. The Commonwealth funded Australian Disability Clearing House on Education and Training (ADCET) website is a very useful and well used resource by education providers. I would like to see this resource continue and develop as I believe that it is an excellent method of ensuring greater consistency across the education sector.
6. I don't have a lot of direct experience in working with the Standards - it's more the experience of hearing the frustrations / concerns of others.
7. little
8. This is a critical area of my work and more and more I am using them to educate individuals and their supporters as well as the education and training sectors. The more knowledge and understanding the more improved outcomes we get but this is often after the fact - reactionary. Professionals working in these sectors should have more training about this from the outset and education and training providers should have Access and Inclusion Planning to underpin their work
9. They are wonderful and provide hard evidence of what needs to be provided but many education providers haven't heard of the standards
10. Let students know about them. Host them on our websites, incorporate them into staff training.
11. In addition to DDA they provide a legal basis for DLO to advocate for students with liaising with academic staff.
12. I like having a document specific to education to refer to and to educate others
13. Daily in my work role as a Disability Liaison Officer. They underpin my service delivery
14. Provides basis/framework for developing policy

15. I would have like to see some more response based on the last review,
16. Constant consideration of the DSE in relation to my various positions ...
17. Our experience in the Western Institute has been that although it does provide clarity the standards were already being met in most instances (or at least actively being worked towards)
18. Informing departments of their responsibilities under the Standards. What their legal obligations are.
19. Found them really useful as a guide, but there are some aspects that need clarification, e.g. 'reasonable adjustments'.
20. I have found them useful to clarify for students the limits re accommodating disability e.g. students still must meet the inherent requirements of courses. Also clarifying student responsibilities.
21. Have assisted me to clarify obligations and have referred academics to it in my role.
22. Senior management and those in governance positions are largely ignorant of the Standards. Frankly I have used this to my advantage to better the issues of my students' advocacy - it should not be necessary and the ignorance should not exist.
23. Issues 'helping' senior management understand the complexity - it is not black and white in terms of what adjustments should and should not be made available 2. Managing support provision in a changing govt. framework (the end of the age of entitlement) - expectations do not change immediately so there is a major gap between how the standards are interpreted by community and legal entities and what funds are made available by governments to service providers. It is the service providers who bear the brunt of not meeting the standards and not the policy makers - at least in the short term.
24. Provided workshops for staff on standards and implications. Advise management on the standards and point out potential breaches.
25. The standards have influenced the uni's policies and services, e.g. establishing an access and equity unit; alternate formatting service.
26. Useful to refer to them when advocating for students with academic staff - e.g. I am not asking for adjustments for students because I am a "soft touch" (which has been said before) but because as a university we are legally obliged to make adjustments.
27. Use them regularly to provide examples for others of the legislation 'at work'.
28. I am a Disability Adviser in the higher education sector. My work is based around the standards and supporting students and staff.
29. The Standards form the basis of the provision of Disability Services for students at this University. The advisors attempt to make educators aware of the Standards through outreach into the Schools.
30. have been useful in legitimising service and policy innovation and enhancement within institutional settings
31. As an NDCO I have worked with 105 schools ranging from secondary government catholic and independent. This work has focused on the transition processes of people with disability from 14 years of age. I work with developing best practice networks understanding of applying the standards particularly in transition pathways into tertiary education and employment. Although there have been improvements in understanding schools responsibility to provide inclusive learning environments practices such as counselling students with learning disabilities out of completing the last 2 years of secondary school is still very common. I can guarantee that I will get several calls a week at around September each year from parents and careers advisers wanting to know where to 'send' students.
32. I have found Standards to be very useful to guide myself and the organisation in ensuring we meet our obligations towards students with disabilities. It also helps to educate all staff on their rights and responsibilities and to better assist students with disabilities and when negotiating particular reasonable accommodation requests.
33. Use the Standards to inform my practice as guidelines. Use the Standards to advocate on behalf of students with disability. Use the Standards in teacher professional development when delivering training for greater disability understanding of their obligations under the Act and the Standards.

Appendix 15

Question 16: Do you think that the Standards help education providers eliminate discrimination and ensure equity of access and participation?

Comments (n = 23)

1. to some extent
2. In theory but practice is different
3. If there is a person with some standing to push for compliance.
4. It has certainly helped them define and articulate their responsibilities and has provided leverage with the broader staff in their organisation's to make necessary advancements in their practice in terms of access and inclusion as well as Universal Design
5. Yes if the provider knows about them and no if they are replaced because of government commercialisation of courses
6. They should
7. They help - they don't solve the issues but they help.
8. Yes, because there are legal implications if they don't.
9. To a certain extent; there is always a new 'situation' that tests the Standards.
10. They help, but because Disability Services within an education provider are more familiar with their application, there is not a perception of shared responsibility and adversarial situations arise with Disability Services staff trying to advocate for students so as they are afforded their basic rights under the Standards
11. The DSE are very useful in getting academics to comply with Disability Service recommendations.
12. Gives some guidance to the DDA.
13. But at a low level - when it can be comfortably afforded and only when confronted.
14. BUT - is the service providers who bear the brunt of not meeting the standards and not the policy makers who direct funds - at least in the short term.
15. It is difficulty to unpack the real motivation; is it the standards or the fear of the DDA.
16. But again this needs to be monitored by a specific monitoring body to make sure that this is actually happening.
17. To a point - the standards perhaps need to provide greater clarity in regard to adjustments and inherent requirements
18. per previous comments
19. I think they make the DDA more explicit and so easier for education providers to know the areas they need to focus on and how to go about providing reasonable adjustment.
20. Only in TAFE
21. When training is provided and importance needs to be placed on this by schools particularly in modification of curriculum.
22. If they were used more and more people aware of them
23. The Standards form a major policy framework for our Institutes Disability Action Plan

Appendix 16

Question 17: Have the Standards made a significant impact within your sector?

Comments (N = 17)

1. It is ever increasing, acceptance, inclusion, breaking down those barriers and stigmas.
2. I think that standards have made a significant impact within the tertiary sector and has been the main driver for increased numbers of students with disabilities studying. However funding continues to be one of the major issues confronting education providers to date. Due to the success of the Disability Education Standards greater numbers of Australians with disabilities are taking up educational pursuits. Technology to support students with disabilities is constantly being refined and improved and with such innovation comes increased usage and costs for such technology and equipment. The primary Commonwealth funding initiatives are the Higher Education Disability Support Program and the Performance-Based Funding Program. I support the government reviewing the Higher Education Disability Support Program and the formula used to calculate reimbursement back to education providers in an effort to combat rising costs associated with maximising the participation of students with disabilities on the same basis as other students without disabilities. This program makes up the bulk of Commonwealth Government funding to education providers.
3. Disability Advisors use the standards every day either with students, Senior Management or Academics
4. There has always been provision for students with disability at this provider.
5. Provides a clear platform
6. In my job as an advocate for people with a disability but my organisation has many pockets of ignorance about their existence despite awareness raising sessions. It's easier for them to take a 'head in the sand' approach
7. Less so than the DDA. They have been a useful addition but not ground-breaking.
8. The Educational Standards only reinforced what was already happening
9. Yes - as above.
10. They are the benchmark by which my professional standards exist and I hope that allows me to disseminate into the broader VET sector.
11. ensuring that educators provide reasonable adjustments and employ staff with expertise to implement adjustments effectively
12. Our uni has approximately 4% of its students registered as having a disability. This is an interesting indicator.
13. Practitioners definitely rely on them; particularly those new to the sector.
14. In Higher Education - they have led to Uni's establishing specific units to support students. Without the standards this is less likely to have been achieved.
15. The standards have been a very effective way to draw responsibility back to educational institutes
16. only when you bring the standards up to people's attention
17. Teachers are more aware of their obligations

Appendix 17

Question 18: What kinds of barriers remain for people with disability wanting to access and participate in further education?

Comments (n = 35)

1. Preconceptions, social barriers, stigma. Fear of the unknown.
2. Lack of funding, funding for support staff, technology etc. Supporting deaf students is 300 times more expensive than supporting someone with an intellectual disability.
3. TAFE under severe financial constraints and so PWD are constantly having to battle to get the support they require when it is costly, particularly Deaf people who require sign language interpreters. Deaf

people are constantly saying to me they feel guilty at having to ask for interpreters. This then becomes an attitudinal barriers that Deaf have to also battle

4. Adjustments to content for people with cognitive impairment. Flexibility options.
5. the issue of personal care
6. Academics unwilling to provide 'individual assistance' that involves extra work. Students with Dyslexia are misunderstood and deem to be 'too difficult to provide appropriate assistance'
7. Information about Inherent/Core Requirements Insufficient preparation for post school pathways Limited support for transition Misguided career counselling
8. Commercialisation of courses where users are required to pay. The hidden cost of living with a disability is preventative of participation.
9. Mostly issues with attitude from time to time.
10. Standards do not address accessible curriculum so adjustments are still based on a deficit model of application
11. -- inaccessibility of online materials -- inaccessibility of materials created by academic staff
12. assignment deadlines requirements to do exams difficulties with compulsory on campus attendance variation in attitude Administration relating to studies (getting appropriate paperwork in on time) OH&S issues arising in work placements external to university
13. Policy directions e.g. removal of PES for student on a DSP (financial barriers)
14. physical and attitudinal
15. Large spending needs to take place to provide remote captioning for lectures and to improve physical access. As students on Autism Spectrum are better supported at primary school we see an increasing number at University; however to be successful they usually need intensive support which is not available at present.
16. Some barriers for "on line" and remote students still remain with some of the course material or if the student lacks the necessary technology to access the material. Availability of appropriate support can also be a problem in remote areas.
17. Teacher understanding and support Teachers making reasonable adjustments
18. Lack of awareness among the general public and staff in educational institutions. Assumptions made based on personal values and sense of natural justice of those that maintain the status quo
19. Accessible documents/formats to carry out their education. Negativity from the teacher/lecturer that impacts the accessibility to ask questions and get assistance.
20. There is still a great need for education about categories of disability that are not as visible as others to the eye, and therefore eliminating the stigma associated with particular kids of disability.
21. Finance, especially if they are not eligible for the DSP, (I think less than about 10% at our uni would be on DSP - the rest struggle with Centrelink).
22. Still an element of ignorance within the academic sector. Also some academics question what the student will do in terms of employment when their studies are complete, not understanding the standards are for access to education, not necessarily employment related.
23. FUNDING! FUNDING! MORE FUNDING!
24. ALL - everything is retro-fitted upon identification
25. attitudes expectations of employment outcomes are very low employment service providers have been too driven by their own outcomes support funding is shrinking and so too the govt. sector where the expert staff are largely located VET completion funding models limit access - RTOs will be very wary and I have personally experienced this
26. Cost is an enormous barrier to many students with disabilities. Reform in the VET sector has led to a 'race to the bottom' and this will have a negative impact on the availability of courses and access for people with disabilities.

27. Not all content is accessible and not all teaching methods are inclusive.
28. Accessible venues Differentiated Learning plans Accessible materials General discrimination from staff not wanting to alter materials from the NORM...
29. Access to accessible format in a timely manner - conversion can take some time and academic staff are often not aware of what constitutes accessible format or of the time to convert material; timeframes for unit/course completion are often limited in flexibility which can disadvantage students with disabilities
30. Poor teacher training for them to understand inclusive practise and attitudes to working with people with a disability. Lack of strategic focus at primary and secondary level to ensure appropriate support for teachers; lack of funding in primary and secondary for students with disabilities to ensure that they can provide appropriate teaching/learning support as well as equipment and technology.
31. There remains an implicit assumption within policy and service delivery that risks of rotting should be mitigated - putting a burden on students to provide medical documentation - and funding services on a case by case basis - there is scope to refine the mechanism by
32. Sadly, there are still attitudinal and knowledge barriers around RAs.
33. Lack of knowledge about how to apply the standards, insufficient follow through and hand over of learning strategies during school years, insufficient VET entry opportunities, poor expectations from some schools
34. -Funded Career/Course Counselling to assist with creating strong pathways for people with disabilities as navigating the range of courses and understanding the study load and academic expectations and work in the industry all important part of making a good decision with course of study. -More flexible delivery of courses for VET sector AQTF courses which caters for reduced study load/on line courses and completion of work placement hours over longer period than allowed for in national packages. VETHELP loan and the restrictions placed on study load and completion of course in set timeframe. - Also the entry level you are eligible for VETHELP loan currently Diploma/Advanced Diploma (limited Certificate IV course). For many students with disabilities in VET sector entry at Certificate II and III and can struggle with costs so courses become prohibited. - More traineeships available for people with disabilities to gain access to work skills and experience and training over a longer period of time than allowed for in the Semester based model of 20 weeks to complete course.
35. Participation in further education and training leading to poor participation in employment and the community

Appendix 18

Question 19: Can you identify gaps in the application of the Standards within your sector?

Comments (n = 27)

1. I think the standards awareness training should be a mandatory part of new staff recruitment and revisited each year to stay fresh in the minds of staff.
2. TAFE, private providers in the VET sector.
3. RTOs need more guidance
4. no
5. Not enough resources about inherent requirements, reasonable accommodations/adjustments
6. Exemptions for people with disabilities needs to apply to all courses regardless of the course level. Having a Vet Fee Help debt is unfair for people with a disability who also have additional costs of living with a disability and stops people applying for higher level courses (Degrees-\$60000; Advanced Diplomas - \$25,000; Diplomas- \$14,000).
7. Inclusive curriculum design. training of staff
8. Standards need to address making curriculum accessible
9. Lack of practical real life examples.
10. Students with disabilities/and or medical conditions sometime choose not to disclose (particularly those with mental health conditions) however allocation of staff in educational setting is often based on the number of enrolments of student that identify disability/and or medical condition
11. While Disability -specific staff and other student service areas are more aware of the standards, some academic staff still wary and unsure about dealing with students with disabilities. Often not intentional but concerned about being seen to do the "wrong" thing. Especially so with Mental Health. Also such pressure on staff at present there is limited time for other considerations apart from their research/field focus.
12. Courses such as medicine which can only be studied full time preclude many with a medical condition.
13. Gaps do occur with inaccessible material etc. and with changes in delivery/technology and changes in teaching staff. It is an ongoing process of raising awareness and trying to have proper checks and procedures.
14. Teacher awareness and understanding
15. The education provider (VET training provider) does not develop our own curriculum - Industry Skills Councils do. CSWE courses are poorly accessible to people with deafness or blindness
16. Much on-line material is still only available as PDF and has to be converted to Word for students with vision impairment.
17. Knowledge of and application of
18. Emphasis needs to be upon Universal Design and Inclusion - no matter who is in your class/ course/ program - full access - not just retro-fitting when a student identifies
19. high cost physical access unjustifiable hardship costs and benefits
20. I don't believe the Standards are being applied by private training organisations to the same extent as they have been applied by government vocational training institutions.
21. There is a gap between academic content and industry placements where there are different reporting requirements for reporting a disability and privacy laws seem in conflict. Education providers have to do things that employers do not.
22. Staff awareness is a gap s- more PD is needed but getting staff to attend PD is an issue
23. Not enough understand in the enrolment - as if students are seeking consideration as part of gaining entry there is not an explicit process to manage this.

24. Defining inherent requirements
25. Private providers have no knowledge of, or desire to meet their obligations - the sector is not regulated.
26. Curriculum modification, understanding of indirect discrimination
27. Consistency of application in some areas of my organisation especially when linked to some external factors i.e. industry regulatory bodies that mandate their own standards. DAIP committee in my organisation currently working on improving consistency, understanding, knowledge and compliance across the organisation.

Appendix 19

Question 20: What ideas do you have about how the Standards (or information about them) might be improved in future?

Comments (n = 28)

1. Information sessions for teachers should be run all the time.
2. I like the training modules that have been developed in Qld
3. As outlined in previous responses
4. Hold more info sessions and also for different community groups (including the CALD communities)
5. none
6. Embed more training for Teachers, Educators, Trainers etc. in their qualifications
7. Add a standard of open access for people with a disability
8. Section on student obligations. Sections for each sector. Resources and examples included as part of the standards.
9. See above comment
10. Examples of what is and is not reasonable & recommendations where possible. Clear guidelines on what qualifies a dog as an assistance dogs (other than guide dogs)
11. Specific quality framework based around the standards that is audited on regular basis. Self-audit tools. Continuous improvement cycle in service delivery
12. Should underpin all learning and teaching aspects so therefore should be integral to all program delivery. Ensure Standards become part of the training requirements for all staff working in education fields.
13. Needs a broad public campaign. Complex examples rather than simple obvious ones about the way the standards are applied should be available.
14. I think there needs to be consistency across the VET sector to ensure all providers are aware o and apply the standards
15. Awareness, awareness and awareness.
16. Supporting materials with lots of concrete examples, standardised training resources and maybe better access to advisory service (other than seeking a legal opinion), maintain and expand ADCET
17. Clarification around 'reasonable adjustments'; mandatory training for staff.
18. 'Reasonable adjustments' can't be defined, as that would create more exclusions, but it would be useful to have a variety of exemplars encompassing different disabilities and situations.
19. Plain English Clear definitions of key terms and objectives Compulsory obligations that are monitored and addressed when found lacking that do not involve civil action
20. the 'access to education on the same basis' needs to be clarified with examples
21. Clarity about the status of the Standards - I believe this have been unclear since the review in 2012. New plain-English and revamped literature about the standards would be useful. Practitioners and others need to be confident that the information they are accessing online is current and accurate.

22. The standards needs to be stronger; they current present as a guide or code not a requirement under law.
23. Only that Universities need to be correctly accountable to making sure they are actually meeting the standards.
24. A more equal balance clarifying rights and responsibilities for both institutions and students Greater clarity re inherent requirements
25. Resources for training should be developed at a national level for the various sectors and staff within these so there is accuracy, and it means that organisations are not repeating the resource development or could tweak training packages for their specific needs. This would be much more time efficient and financially more effective.
26. Improved clarity around balancing reasonable adjustments V award requirements
27. Improved the standards to apply to system changes that impact on access such as VET funding restructure in Victoria
28. Better promotion to all identified people with disabilities entering studies or contemplating studies. I.e. at point of interview when accessing Disability services at Education institutions, as part of NDIS planning meetings if focus of goal on education etc.

Appendix 20

Question 21: Do you agree the Standards should include a requirement to implement an agreed support plan for students with disability in the tertiary sector. The plan would set out the student's rights and responsibilities, the provider's responsibilities, any adjustments that have been agreed to, and mechanisms for review and support.

Comments (n = 18)

1. This is done at my Institute as a matter of course
2. At my university we develop for each student an Academic Integration Plan (AIP) which sets out the adjustments for lectures, tutorials, seminar, filed work, exams etc. the academics and other stakeholders are required to implement the AIP. We have developed a Glossary of Terms which spells out what is required of each adjustment and who is responsible for its implementation. We have in our reviewed Student Handbook (2015) a section spelling out the students' rights and responsibilities but it would be better if we had this attached to the AIP. We have developed an online training package for Academics in particular that makes clear the responsibilities of the university and the individual staff member and what happens if there is not compliance with the AIP.
3. Agreed but only to the extent that the student elects to participate. It should be an obligation that all tertiary providers should demonstrate they have a practice and process to support this
4. No, other students are not required to have a plan, plus many people with disabilities are told they have to have 'plans' in so many aspects of their lives. Plans in my experience are not designed for the individual but for the organisation, helps increase uniformity and limits individual responses. If curriculum was more inclusive, plans would be required less.
5. Is it possible to standardise this across the sector?
6. Agree in most situations. However with the expectation of when a student chooses not to have a formal support plan, and when the process is not done in a way that is meaningful to the student (e.g. tick flick templates that are process driven rather than student driven). It would be good to explore alternative ways (options) for plans to be developed particularly when a student identifies they are wanting to gain confidence in self-advocacy.
7. By doing this, it holds individuals accountable, both teachers and students. It works both ways.
8. Yes then it would be a known common practice and it would provide transparency and help support the student
9. This would back up the staff that assist the person with disability and provide reasonable guidelines to ensure unity within the disability sector.

10. The support plan approach works well already in my experience, but mandating it in the Standards would give it greater legitimacy and credibility.
11. While I think such plans are the easiest and best way to get needs met, I think having one should remain a personal choice, as the tertiary sector is an adult environment.
12. Best practise is already occurring - we need the force of the standards to access resources to make it happen everywhere.
13. Support Plans are a negative inclusion idea to accommodate a need that has not been included in design. Inclusion can happen also without a plan - our university does not do plans - but accommodates all needs and makes adjustments to assessments etc. without a special "plan" document
14. So that the support is transparent - for all parties.
15. I think this would cement a view that places emphasis on case by case adjustment validated by medical documentation - detracting from efforts to pursue inclusive course design, delivery, assessment etc.
16. Absolutely!
17. However this requires staffing to set-out and implement an agreed support plan and student support services have been drastically reduced over the last 18 months.
18. I agree with this but I also think that institutes need to be much clearer on entry requirements to participate in courses. No entry requirements have resulted in students with intellectual disability entering courses that they may not be able to undertake.
- 19.

Appendix 21

Question 22: That the government develop sector specific materials for education providers that are easily accessible in an online format and take the form of good practice guides on: Developing individual disability support plans in the tertiary sector

Comments (n = 9)

1. Having Support Plans or in our case AIPs makes it clear to everyone what is required and who is responsible for implementation - easy to keep track of to ensure compliance
2. A central Website/Hub about Educations Standards would be excellent - ADCET could do this if funded appropriately
3. This would need to be done in consultation with the sector, with practitioners and people with disability.
4. There is huge variation in such plans - it would be good for them to be more streamlined.
5. YES!
6. Desperately -and governance bodies an actually deliver the resources to the sector
7. Should be upon Inclusion of people in classes / courses etc. not just around how to do a plan. We need focus at core the reason behind the inaccessibility. Not band aids when notice an issue - while plans can be good and yes we need clear guidelines - but we need focus on the core issues not the band aids
8. Already noted this in earlier question. This would be a better use of resources for our sector.
9. There will always be a need for case by case reasonable adjustments - supported by good practice guidelines - the question is whether it becomes an administrative regulatory requirement that funnels more people with disability than necessary into a support plan model

Appendix 22

Question 23: That the Minister for Education and Training in consultation with state and territory education ministers, ensure that individual education plans are used to assist in transitions between early childhood educations, primary, secondary and tertiary sectors and ensure that students with disability are given options on the same basis as all other students.

Comments (n = 11)

1. Sounds Ok but need to be careful that each institution can write their own plans and not have to implement a plan that was developed by another organisation.
2. A Transition Plan and Profile at the least would be useful
3. Nice idea but not sure if this is logically feasible and plans could be quite different between high school and University. Variations in services and delivery varied across sectors.
4. Transitional planning in my experience is poor. Often students are put in situations where they need to re-tell their story, provide evidence (where evidence is already noted), and given inappropriate referral advice. There is need for a commitment to a formal process that has an appropriate lead time (e.g. 6 month prior to transitioning to next level of education). There needs to be a better connection/collaboration/commitment between education sectors to provide continuity of service delivery, understanding and compassion to students we work with.
5. Student support in mainstream primary/high school is quite limited. It has been noted at our institute that students really only receive appropriate supports once they get to TAFE.
6. I'm not sure about how this would work on a practical level. It would need to be developed jointly. If a plan is developed by a secondary school without the tertiary involvement, the plan may be inaccurate and create problems with expectations being met etc.
7. Such continuity will increase efficiency and enable more confidence for people with disability to access higher education in particular.
8. This is happening informally in some setting but a standardised approach is desperately need - the fracturing of the education life cycle leads to even greater disadvantage and financial hardship.
9. Focus should be on inclusion not the plan. The Minister should ensure that education providers plan for and design all courses to meet the needs of all individuals, including those with disabilities - so they can participate on the same basis as all other students.
10. This would improve the transparency of support and provide an improved transition process between the sectors.
11. Making this a requirement would see too many people erroneously caught in the net of individual planning - it would need to be designed such that only those that needed it could access it

Appendix 23

Question 24: The government should ensure that the Standards are reflected appropriately in national policy and regulatory frameworks for each education sector including: a) National Quality Framework for Early Childhood Education & Care; b) National Assessment Program – Literacy and Numeracy (NAPLAN); c) VET Quality Framework; d) National Professional Standards for Teachers and Principals; e) Higher Education Standards Framework.

Comments (n = 4)

1. As long as included accessible curriculum
2. Strongly agree with this
3. This is not a question - it MUST occur
4. It needs to be put in the appropriate sectors so that awareness is raised and they are clear about their responsibilities.