

The Honourable Dan Tehan MP,

Minister for Education,

Parliament of Australia

190 Gray Street
Hamilton, VIC, 3300

Monday 29th June 2020

Dear Minister Tehan,

I write to you, as President of the Australian Tertiary Education Network on Disability (ATEND), to firstly commend the Federal Government for delivering responsive equity policy during COVID-19, and for your demonstratable commitment to addressing the needs of Indigenous, Regional and Low Socio-Economic Status (Low SES) Students in your proposed Higher Education Reforms, as articulated in your National Press Club address on 19th June 2020. I also write to draw your attention to key issues pertaining to the needs of Students with Disability in Higher Education, which do not appear to have been considered in the proposed reforms.

I seek your commitment to work with ATEND, and the Higher Education sector, to disrupt the trend of disability equity being omitted from consideration in Higher Education Policy, as evidenced by:

* *Higher Education in Australia: A review of reviews from Dawkins to today[[1]](#endnote-1)* in which disability fails to be mentioned
* *Performance-Based Funding for the Commonwealth Grant Scheme[[2]](#endnote-2)* in which disability is notably absent from the recommendations, including Recommendation 12, which states that ‘Equity group participation should be a performance measure’

To meet Australia’s obligations in accordance with ratification of the *United Nations Convention on the Rights of Persons with Disabilities*, in particular *UNCRPD Article 24 - Education*[[3]](#endnote-3), and aligned to the *National Disability Strategy 2010-2020 Learning and Skills policy direction* to ‘Improve the pathways for students from school to further education, employment and lifelong learning’*[[4]](#endnote-4)* we must build on the key findings and recommendations of the *National Regional, Rural and Remote Tertiary Education Strategy*[[5]](#endnote-5) and achieve the target of parity established by *A Fair Chance for All[[6]](#endnote-6)* by ensuring that:

* Tailored support for Students with Disability is designed into all wider initiatives from the outset
* Funding to meet the specific needs of Students with Disability is proportionate to the participation rate of Students with Disability in Higher Education, and is increased comparably to funding increases proposed for Indigenous, Regional and Low-SES Students
* Commitment is made to scoping the development of a National Strategy for Students with Disability in Tertiary Education.

# Inequity in Higher education equity policy

Amongst equity cohorts, Students with Disability are the:

* second least funded ($173.36/student p.a.),
* fastest growing equity group in Higher Education (growth rate of 50% compared to all students 12.6% from 2013 – 2018)[[7]](#endnote-7)
* second lowest graduate employment outcome (66% full-time) of any measured equity group[[8]](#endnote-8).

*See Appendix A for detailed source information*

Figure 1 reflects the unbalanced investment on equity groups in Higher Education to the particular detriment of Students with Disability. The funding allocations for Students with Disability contribute towards the cost of meeting very real access requirements – including assistive technology, modifications and adaptions, captions and Auslan, providing specific disability related services on campus, and more. This data showcases the inequity experienced by Students with Disability in Higher Education Equity Policy.

Students with Disability are the fastest growing equity group in Higher Education in Australia, far outpacing any other measured equity group. Recent Ministerial announcements, including those described in your National Press Club address on 19th June 2020, highlight a renewed focus on performance-based measurements for students in equity groups, yet all recent announcements omitted either discussion of, or allocation of funding for, Students with Disability, as demonstrated by Table 1 below.

Table 1: Breakdown of Equity Groups included in the Performance-Based Funding Technical Guide, released February 2020, under equity group participation measures[[9]](#endnote-9):

|  |  |
| --- | --- |
| Equity Groups included in Core Measures (weighting) | Itemised Yes or No |
| **Students with Disability** | **No** |
| Indigenous | Yes |
| Low Socio-Economic Status (Low SES) | Yes |
| Regional | Yes |
| Remote | Yes |
| Non-English Speaking Background (NESB) | No |

Whilst ATEND does not advocate for Universities to compel students to share information about their disability on enrolment to meet equity targets and obtain performance-based funding, we do believe Students with Disability are under-funded for access, participation and success initiatives when compared with other equity groups.

To broaden this discussion, Table 2 showcases the growth rates of equity groups in Higher Education in Australia and raw enrolment numbers, to attempt to determine focus based on data:

## Table 2: Equity Group Growth and Participation Rates in Higher Education 2013 - 2018

|  |  |  |  |
| --- | --- | --- | --- |
| Equity Group | Growth (percentage) 2013 - 2018 | Participation Rate (number) 2018 | Participation Rate (percentage) 2018 |
| **Students with Disability** | **50.0%** | **70,143** | **6.92%** |
| Indigenous | 42.9% | 19,167 | 1.89% |
| Low Socio-Economic Status (Low SES) | 21.1% | 162,871 | 17.66% |
| National (All Students) | 12.6% | 1,014,022 | - |
| Non-English Speaking Background (NESB) | 12.5% | 36,730 | 3.62% |
| Regional | 7.9% | 194,669 | 20.07% |
| Remote | 6.9% | 8,858 | 0.87% |

*Source: The Australian Government (2019) as cited in Koshy, P. (2019), The Australian Government – Power BI Tool, Accessed June 2020.*

Despite the rapid growth in participation of Students with Disability in Higher Education, the downstream effect of widening participation policies that are not specifically designed to meet the needs of Students with Disability is reflected in graduate employment outcomes, data indicates that Students with Disability perform less well than almost all other measured equity groups.

## Table 3: Equity Groups and Full-time Employment Rates, 2019

|  |  |
| --- | --- |
| Equity Group | Full-time Employment 2019 |
| Indigenous | 78.2% |
| Regional/Remote | 76.6% |
| Low Socio-Economic Status (Low SES) | 69.5% |
| **Reported Disability** | **66.6%** |
| Non-English Speaking Background (NESB) | 57.0% |

*Source: QILT-GOS, Data Tables.*

According to the Quality Indicators for Learning and Teaching (QILT) 2018 Graduate Employment Outcomes Survey, the labour force participation rate for students with a reported disability was 85.9% in comparison to those with no disability of 92.3%[[10]](#endnote-10). The interruption and compounding stresses of COVID-19 are likely to present long-term challenges to access and participation in study and employment for Students with Disability, and the negative economic and social impacts are likely to be felt for many generations. Labour force participation rates are directly linked to GDP. If the Government aims to drive the nation’s economic recovery, there is a strong economic imperative to ensure that Students with Disability are included and supported to contribute.

ATEND acknowledges that consideration needs also to be given to the specific needs of Students from Non-English-Speaking Backgrounds, however ATEND is not qualified to address these issues, and suggests relevant expertise be sought.

It could be argued that Students with Disability are covered by the other equity categories, and therefore do not need separate identification and funding, however, this argument fails to address the unique and specific support, adjustment and employment needs of students living with disability that are different and specific to their needs in addition to the needs generated by being resident in a rural or regional area, or being from an Indigenous or low SES background. Disability requires its own response, and therefore requires funding commensurate with the present and increasing numbers of students.

# RECOMMENDATIONS

* Tailored support for Students with Disability is designed into all wider initiatives from the outset

Grant Agreements for all investments in Regional University Centres, the proposed Indigenous, Regional and Low-SES Attainment Fund (IRLSAF) and all related funding must be specifically required to embed tailored support for Students with Disability and universal design principles into proposed initiatives. . As a minimum, this would include; all Grant funded positions are required to complete Disability Awareness in Higher Education training, accessible content, flexible delivery and co-design and co-implementation.

* Funding to meet the specific needs of Students with Disability is proportionate to the participation rate of Students with Disability in Higher Education, and is increased comparably to funding increases proposed for Indigenous, Regional and Low-SES Students

Across 5 amendments[[11]](#footnote-1) to the Other Grants Guidelines (Education) 2012 from October 2012 to December 2019, there has been zero per cent (0%) additional specific grant funding awarded beyond indexation for students with disability*[[12]](#endnote-11)*. During the same period, the number of Students with Disability participating in Higher Education in Australia grew from 43,732 to 70,143 (sourced from [*The Australian Government – Power BI Tool*](https://app.powerbi.com/view?r=eyJrIjoiOTljMTY5YzYtYzYwNS00YjFlLWE1YTEtZTg2ZmMwNWU0MzRiIiwidCI6ImRkMGNmZDE1LTQ1NTgtNGIxMi04YmFkLWVhMjY5ODRmYzQxNyJ9)*,* Accessed June 2020). This presents an opportunity to reform the Other Grants Guidelines (Education) 2012 and review the criteria and model for the Higher Education Disability Support Fund, to ensure support for Students with Disability is equitable and specifically designed to meet the needs of this equity group.

* Commitment is made to scoping the development of a National Strategy for Students with Disability in Tertiary Education.

We applaud the work undertaken to highlight the issues Indigenous, low SES, regional, rural and remote students face when accessing, participating in and succeeding in Higher Education. We note that this has resulted in a National Regional, Rural and Remote Tertiary Education Strategy – which underpins many of the funding increases and changes currently proposed. Given the rapid growth of Students with Disability in Higher Education, and the demonstrably disproportionate funding for equity groups, ATEND recommends that 2020 is the right year to begin the work of scrutinising the issues experienced by Students with Disability, and for the making of Federal Government commitments commensurate with those made for students from Indigenous, low SES, regional, rural and remote locations.

ATEND is confident that the information we have presented herein will spark Ministerial action to adequately and proportionately support Students with Disability to access, participate and succeed in Higher Education.

ATEND represents a national membership base of disability practitioners in tertiary education and is well positioned to facilitate consultation with Government and relevant stakeholders across the Tertiary Education sector. We look forward to furthering this conversation with you, so that together we can achieve Tertiary Education reforms that benefit all Australians.

Yours sincerely,



**Anthony Gartner**

President

Australian Tertiary Education Network on Disability

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# APPENDIX A

|  |  |  |
| --- | --- | --- |
| Table Grouping or Equity Category | $ Spend Per Student, Higher Education Equity Programs | Annualised, Equity Group Specific Funded Program(s) Cost $millions |
| **Students with Disability** | **$173.36** | * **Disability Support Fund (DSF) and Australian Disability Clearinghouse on Education and Training (ADCET) $7.78m**
* **National Disability Coordination Officer Program (NDCO) *(partial HE program)* $4.38m**
 |
| Indigenous | $3,573.85 | * Demand Driven Funding $4.25m

*(not included in calculation)** Indigenous Student Success Program (ISSP) $68.5m
 |
| Low Socio-Economic Status (Low SES) | $826.68 | * Higher Education Participation and Partnerships Program (HEPPP) (current) $134.643m
 |
| Regional | $608.98 | * A “range of measures” pending $100m
* Regional University Centres $18.55m
* Rural and Regional Enterprise Scholarships

*(not included in calculation)* |
| Remote | $5,000 | * Tertiary Access Payment $40.8m
 |
| Non-English Speaking Background (NESB) | $0 |  |

# APPENDIX B

|  |  |
| --- | --- |
| Recorded amendment to Other Grants Guidelines (Education) 2012 | Specific allocated funding beyond indexation from Higher Education Support Act (2003) for Students with Disability |
| October 2012 | 0% |
| August 2013 | 0% |
| November 2014 | 0% |
| October 2019 | 0% |
| December 2019 | 0% |

# REFERENCES

1. Higher Education Funding in Australia, Department of Education and Training, Canberra 2015. https://docs.education.gov.au/system/files/doc/other/higher\_education\_in\_australia\_-\_a\_review\_of\_reviews.pdf [↑](#endnote-ref-1)
2. Wellings, P., Black, R., Craven, G., Freshwater, D., & Harding, S. (2019). *PERFORMANCE-BASED FUNDING FOR THE COMMONWEALTH GRANT SCHEME Report for the Minister for Education – June 2019*. Department of Education, Skills and Employment. Retrieved from https://docs.education.gov.au/system/files/doc/other/ed19- 0134\_-\_he-\_performance-based\_funding\_review\_acc.pdf [↑](#endnote-ref-2)
3. UNCRPD Article 24 Education: https://www.un.org/development/desa/disabilities/convention-on-the-rights-of- persons-with-disabilities/article-24-education.html [↑](#endnote-ref-3)
4. Commonwealth of Australia, 2010-2020 National Disability Strategy, 2011, p56 <https://www.dss.gov.au/sites/default/files/documents/05_2012/national_disability_strategy_2010_2020.pdf> [↑](#endnote-ref-4)
5. Commonwealth of Australia 2019, National Regional, Rural and Remote Tertiary Education Strategy <https://docs.education.gov.au/system/files/doc/other/national_regional_rural_and_remote_tertiary_education_strategy.pdf> [↑](#endnote-ref-5)
6. Australia. Department of Employment, Education and Training & Australia. National Board of Employment, Education and Training 1990, *A Fair chance for all : higher education that’s within everyone's reach*, The Department, Canberra <http://hdl.voced.edu.au/10707/152620> [↑](#endnote-ref-6)
7. Koshy, P. (2019). Equity Student Participation in Australian Higher Education: 2013 – 2018. National Centre for Student Equity in Higher Education (NCSEHE), Perth: Curtin University http://www.ncsehe.edu.au/wp- content/uploads/2019/12/NCSEHE-Equity-Student-Briefing-Note\_2013-18\_Accessible\_Final.pdf [↑](#endnote-ref-7)
8. https://www.qilt.edu.au/docs/default-source/gos-reports/2019-gos/2019-gos-national- tablesd73b8891b1e86477b58fff00006709da.xlsx?sfvrsn=ccceec3c\_16 [↑](#endnote-ref-8)
9. Performance-Based Funding for the Commonwealth Grant Scheme: Technical Note – Details of the Performance-Based Funding Model <https://docs-edu.govcms.gov.au/system/files/doc/other/performance-based_funding_scheme_technical_guide_final_3feb2020.pdf> [↑](#endnote-ref-9)
10. QILT 2018 Graduate Employment Survey p6 <https://www.qilt.edu.au/docs/default-source/default-document-library/qilt-gos-national-report-2018.pdf?sfvrsn=23f7ec3c_0> [↑](#endnote-ref-10)
11. See Appendix B [↑](#footnote-ref-1)
12. Federal Register of Legislation, Other Grant Guidelines (2012) <https://www.legislation.gov.au/Series/F2012L00281> [↑](#endnote-ref-11)