House Standing Committee on Employment, Education and Training

[ee.reps@aph.gov.au](mailto:ee.reps@aph.gov.au)

1 March 2023

To the House Standing Committee on Employment, Education and Training

**Re: Inquiry into the Perceptions and Status of Vocational Education and Training**

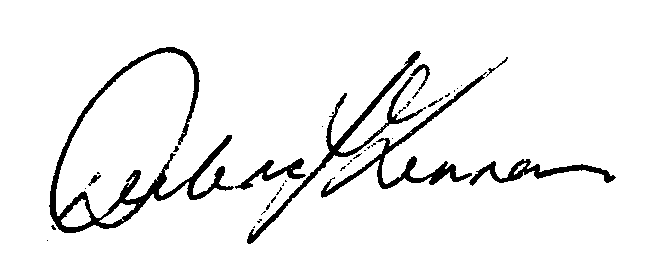
The Australian Disability Clearinghouse on Education and Training (ADCET) is Australia’s leading resource on disability in tertiary education. ADCET works strategically to build capacity across the tertiary education sector to improve the access and participation of students with disability.

ADCET welcomes the opportunity to contribute to the House Standing Committee on Employment, Education and Training on the important topic of the perceptions and status of vocational education and training as it applies to people with disability.

This particular focus aligns with our core goals as an organisation but also highlights the particular challenges for people with disability having fair access to vocational education and training compared with their peers without disability. We hope you will pay particular attention to this cohort as you review responses.

Please do not hesitate to contact us for any clarification or questions.

Regards



Darlene McLennan

Manager, ADCET

Phone: 0419 154 368

Email: [darlene.mclennan@utas.edu.au](mailto:darlene.mclennan@utas.edu.au)

Web: [www.adcet.edu.au](http://www.adcet.edu.au)

Contents

[About ADCET 3](#_Toc128578509)

[Alignment and context with Standing Committee’s Terms of Reference 4](#_Toc128578510)

[ISSUE 1: Failure of some tertiary education providers to address physical, digital, learning and cultural environments within their organisations adequately. 5](#_Toc128578511)

[ADCET recommends: 7](#_Toc128578512)

[Current ADCET strategies: 7](#_Toc128578513)

[ISSUE 2: a culture of low expectations around people with disability and their ability to engage with post-school study. 9](#_Toc128578514)

[ADCET recommends: 10](#_Toc128578515)

[Current ADCET strategies: 10](#_Toc128578516)

[ISSUE 3: Lack of understanding and awareness by some tertiary education providers to understand the legislative framework for disability 12](#_Toc128578517)

[ADCET recommends: 15](#_Toc128578518)

[Current ADCET strategies: 15](#_Toc128578519)

[ISSUE 4: insufficient funding for students in tertiary education. 17](#_Toc128578520)

[ADCET recommends: 18](#_Toc128578521)

[Current ADCET strategies: 18](#_Toc128578522)

[References 20](#_Toc128578523)

# About ADCET

ADCET (Australian Disability Clearinghouse on Education and Training) provides national leadership in the inclusion of people with disability in the tertiary education sector by providing information and professional development for educators and support staff.

Our approach is sector-led drawing on good practice, research and the lived experience of people with disability to develop resources and content of national significance which drives positive change in the tertiary education sector (Higher Education and VET). Our projects, activities and resources are highly strategic building capacity within and across the tertiary education sector to enable full access, participation, retention and success of students with disability.

ADCET has just celebrated 20 years in the tertiary education sector and has high levels of [impact and engagement](https://www.adcet.edu.au/20-years-with-adcet/our-impact). This includes over 1.1 million website engagements annually; 33,000 enrolments in Disability Awareness eLearning; and 5,000 social media and newsletter subscribers.

ADCET is funded through the Higher Education Disability Support Program (HEDSP) within the [Higher Education Support (Other Grants) Guidelines 2022](https://www.legislation.gov.au/Details/F2022L00347). Under this legislation Part 3, Division 2, 42) ADCET has two key program objectives:

* specified as a program for the purpose of promoting equality of opportunity in higher education[[1]](#footnote-2)
* provides information, advice, and online resources (including in a form able to be downloaded and used) through a website, hosted by a provider, to disability practitioners, teachers, and students to promote inclusive teaching and learning practices for students with disability.

ADCET receives between $75,000 and $150,000 annually relying on *ad hoc* project funding and a small grant for two staff (the Manager and Assistive Technology specialist) via the National Disability Coordination Officer (NDCO) Program. ADCET has been hosted by the University of Tasmania for 20 years and administration of ADCET is managed through the Department of Education.

ADCET is primarily focused on people with disability but recognises the intersectionality of people with disability with other identities including Aboriginality, gender diversity, socio-economic and geographic can further impact their access and participation in tertiary education.

## Alignment and context with Standing Committee’s Terms of Reference

In the context of the terms of reference ADCET’s submission will specifically address the perspectives and status of VET and Commonwealth supported information on VET as it pertains to the “education and training choices of students, particularly those who lack the necessary foundation skills, or experience other disadvantages”. In particular our focus is on people with disability (noting that intersectionality can further impact access, participation and success).

Recent reports from the National Skills Commission report that “more than nine out of ten jobs will require further study after school[[2]](#footnote-3)”. Yet of the 19% of students with disability go to school only about 7% of students enrol in higher education have a disability and around 6% of students with disability are enrolled in VET[[3]](#footnote-4).

ADCET draws on the experiences of disability practitioners, educators, staff and students within the tertiary education sectors (Higher Education and VET) and has identified four key underlying causes to inclusion of people with disability in post-secondary education.

1. failure of some tertiary education providers to address physical, digital, learning and cultural environments within their organisations adequately which enable people with disability to participation
2. a culture of low expectations around people with disability and their ability to engage with post-school study
3. failure of tertiary education providers to understand the legislative framework for disability and how to support people with disability appropriately
4. insufficient funding for students in tertiary education broadly but specifically in the VET sector.

These key issues are outlined below with reference to some potential solutions as well as strategies ADCET has in place to facilitate change.

## ISSUE 1: Failure of some tertiary education providers to address physical, digital, learning and cultural environments within their organisations adequately.

This issue occurs when there is a gap in strategic and cohesive whole-of-institution disability inclusion action or strategy which address structural barriers. Common solutions to this include the development of a Disability Inclusion Action Plan (AHRC, 2021) which encompasses recognition of legislative obligations[[4]](#footnote-5), disability responsiveness training, embedding inclusive teaching strategies such as Universal Design for Learning (CAST, 2018), inclusive recruitment strategies for students and staff, inclusive language and communities, and accessible and inclusive procurement. Such a plan and key components must be embedded within whole of institution ‘business as usual’ processes, with executive leadership, governance and accountability.

When an organisation has this in place then it is well on its way to attracting, supporting and graduating students with disability with the appropriate qualifications to contribute to skills shortages and fully participate in social and economic life.

There are a number of perceived and real assumptions about the ability of VET providers to support students with disability adequately. These include:

* lack of disability awareness and responsiveness within the VET workforce
* lack of attention to structural barriers such as the physical and digital environments
* lack of inclusive learning and teaching strategies which embrace inclusive practice
* over-reliance on reasonable adjustments as a means of addressing the needs of individuals rather than a systemic approach
* limited understanding of legislative obligations under the DDA and the DSE with no mechanisms to address compliance
* poor cultures of inclusion which attract people with disability and foster success across the learning lifecycle.

The issues for people with disability accessing VET providers across the four domains of physical, digital, learning and culture include:

**Physical**

* access to, and accessibility of, local VET providers
* having to relocate to find a suitable accessible education provider
* accessing appropriate and accessible transport to their education provider (this includes accessible pathways to and from transport options in a timely manner)
* negotiating physical access within tertiary providers including access to wayfinding, accessible signage and facilities, provision of appropriate reasonable adjustments, failure to meet [*Disability (Access to Premises-buildings) Standards 2010*](https://www.legislation.gov.au/Details/F2010L00668)*.*

**Digital**

* accessibility of ICT platforms and technologies of the provider including barriers to application, enrolment and participation in online learning activities or access to online support
* lack of expertise within education providers on how to make digital information and content accessible including marketing courses, enrolment, learning materials, and learning management systems.

**Learning**

* lack of expertise of inclusive pedagogies such as Universal Design for Learning
* lack of understanding how to apply reasonable adjustments to facilitate appropriate learning support and minimise the impact of disability on learning including accessing industry placements
* the cost of relocating to study including finding accessible and safe housing
* appropriate levels of income support to compensate for the loss of income due to class schedules, work-integrated learning or placement activities
* access to employment to support education or training or appropriate levels of support through apprenticeships and traineeships to adequate and self-sustaining
* the ability to access properly funded reasonable adjustments through the education provider
* the ability to access properly funded support through the NDIS for people with disability who have NDIS plans.

**Cultural**

* lack of strategic commitment to disability inclusion through a Disability Inclusion Action Plan
* unfamiliarity with legislative obligations.
* lack of professional development opportunities for staff to improve their disability awareness/responsiveness
* lack of awareness and institutional commitment by NDIS to fostering educational opportunities for people with disability.

These issues are compounded by issues such as

* postcode or geographical remoteness, socioeconomic status
* provider funding (at state and national levels)
* the siloed nature of the Departments that look at education and training in the current Australian Government structure.

### ADCET recommends:

1. a sector-wide solution could include a similar process to that of the Workplace Gender Equity Agency (WGEA) which requires Australian organisations with over 100 employees to [report](https://www.wgea.gov.au/what-we-do/reporting) on strategies to improve gender equality. This includes strategies to support gender parity, eliminate discrimination and address gendered work issues such as parenting responsibilities. To support disability inclusion organisations could be mandated to have a current Disability Inclusion Action Plan (DIAP) registered with the Australian Human Rights Commission’s [DIAP register](https://humanrights.gov.au/our-work/disability-rights/register-disability-discrimination-act-action-plans) and report regularly on outcomes. Pitman (2020) recommends mandatory training, physical accessibility and inclusive teaching strategies for education providers and this could be an element of a DIAP.
2. Alternatively, more explicit compliance on disability could be managed through the Australian Skills Quality Authority (ASQA). At present there is little or no focus on strategies to support people with disability in VET and no reference to prioritising disability in ASQA’s priorities. ASQA has one [fact sheet](https://www.asqa.gov.au/resources/fact-sheets/providing-quality-training-and-assessment-services-to-students-with-disabilities) pertaining to obligations for providers on providing support services to students with but no mechanisms for mandating basic disability awareness for providers or monitoring compliance of DDA and DSE. This includes no mention of explicit support for people with disability in ASQA’s [ASQA's regulatory risk priorities 2022-23](https://www.asqa.gov.au/how-we-regulate/regulatory-priorities/asqas-regulatory-risk-priorities-2022-23), minor mention of providing reasonable adjustments for students under the [Guidance & Resources for Student Support Strategies](https://www.asqa.gov.au/guidance-resources) and no reference to disability support strategies in the [Self-assessment tool](https://www.asqa.gov.au/rtos/users-guide-standards-rtos-2015/self-assessment-tool).

### Current ADCET strategies:

ADCET already recognises the challenges for VET providers in embedding disability inclusive strategies across the four domains (physical, digital, learning and culture) and has a range of resources to assist in addressing disability inclusion in a strategic way and building workforce capacity. Some examples of these include:

* A guide for disability practitioners on developing [Disability Action Plans](https://www.adcet.edu.au/disability-practitioner/your-role/disability-action-plans)
* [Free Disability Awareness eLearning](https://disabilityawareness.com.au/) including introductory training. There are six e-Learning programs that are free for individuals to undertake online including [Introduction to Disability Awareness](https://disabilityawareness.com.au/courses/introduction-to-disability-awareness/), [VET Staff Supporting Students with Disability](https://disabilityawareness.com.au/courses/program-1-vet-staff-supporting-students-with-disability/) and [VET Educators Supporting Students with Disability](https://disabilityawareness.com.au/courses/program-2-vet-educators-supporting-students-with-disability/)   
  Over 35,000 people have undertaken these courses to date and over 500 organisations have incorporated the Introduction to Disability Awareness into their learning management systems. Mandatory training such as this has been recommended by Pitman, 2020 as a way to address issues of culture and awareness within organisations.
* [Accessible ICT procurement guidelines](https://www.adcet.edu.au/resource/11182/accessible-it-procurement-in-higher-education-caudit) with practical information about procuring ICT products and services with accessibility as an essential criterion
* Assistive Technology (AT) resources such as [ADCET Assist](https://www.adcet.edu.au/our-work/adcet-assist) and [Inclusive Technology](https://www.adcet.edu.au/inclusive-technology) resources to build capacity and understanding of AT as a means of supporting students.
* [Information on Inclusive Teaching](https://www.adcet.edu.au/inclusive-teaching) including Universal Design for Learning [eLearning](https://disabilityawareness.com.au/elearning/udl-in-tertiary-education/)
* A new toolkit (coming soon) for VET providers on supporting students across the student lifecycle.

## ISSUE 2: a culture of low expectations around people with disability and their ability to engage with post-school study.

This issue is borne out of negative and pervasive stereotyping of people with disability. In addition, suitable strengths-based and inclusive models of disability inclusion which support positive transition to post-secondary education are largely missing from strategic planning at all levels of government in relation to education and training (as outlined in [Issue 1](#_ISSUE_2:_a)).

This has resulted in a gap between the number of students with disability represented at school compared to those represented in the tertiary education sector. As previously stated despite the increased numbers of people with disability flocking to post-secondary education there is not community representation in either the VET or Higher Education sector. This is reflected and reinforced in the funding arrangements for students with disability in schooling compared with that for students with disability in post-secondary education.

A particular challenge for students with disability and their families is their ability to advocate for reasonable adjustments with school staff via the [Nationally Consistent Collection of Data](https://www.nccd.edu.au/) on Disability (NCCD). When appropriate supports are put in place students are funded appropriately across their school experience. However, students with little experience of advocating for support in school are then expected to negotiate their own adjustments in post-secondary study in a sector that does not have the same funding levels.

In addition, for NDIS participants who wish to pursue post-secondary education there is no strategic focus on study and training for participants. Furthermore, there is limited understanding by NDIS staff on how to plan for the transition to study or training e.g., NDIS Planners and Local Areas Coordinators (LAC) don’t know how to incorporate education and learning opportunities within participant’s plans.

ADCET primarily provides advice, professional development and resources to support those who support students with disability in post-secondary study (VET and Higher Education) and the transition by high school students coming into post-secondary education.

There are key factors impacting students with disability transitioning to tertiary education including:

* culture of low expectation that potentially streams students into certain types of education environments
* lack of disability responsiveness or awareness of educational providers at all levels
* lack of quality career development and disability-friendly careers information provided to students with disability so they can make informed decisions about post­secondary education opportunities
* lack of inclusive teaching pedagogies to support achievement between high school and post-secondary education
* lack of continuity of reasonable adjustments between school and post-secondary study (e.g., National Collection of Consistent Data for Students with Disability supports students through better funding and includes imputed disability as a means of support students more holistically. This is in contrast to the funding provided to VET and Higher Education providers).
* lack of support for people with disability with NDIS support to get the appropriate assistance to facilitate opportunities for post-secondary education. This includes again a culture of low expectations amongst NDIS workers, limited understanding of pathways and options for education and training, and a lack of understanding about the provision of support provided by NDIS vs that provided by tertiary education providers
* the impacts of disability on achievement through extended time away due to disability or health and for which reasonable adjustments in examinations, assessment and entry requirements to courses may not be appropriately adjust for. This can lead to delays in transition for students wishing to pursue tertiary education opportunities.

### ADCET recommends:

Key areas to address the culture of low expectation include:

* building capacity amongst schooling staff to support people with disability into post-secondary education
* better connectivity between schooling and VET through the National Collection of Consistent Data (NCCD). The unique student identifier is one way to improve information collected about students with disability as they navigate various education pathways and enable providers to get information on previous reasonable adjustments provider to students
* improving access to support for students with NDIS plans including capacity building for NDIS staff on transition to tertiary education through the NDIS planning process.

### Current ADCET strategies:

ADCET recognises the challenges for education providers in supporting the transition of students from school to post-secondary including building workforce capacity and addressing planning with the NDIS. These include:

* [Information for students with disability transitioning to post-secondary study](https://www.adcet.edu.au/students-with-disability/planning-for-post-secondary-education) This accessible web-based guide provides students and their parents with information on every aspect of planning for tertiary study. It links to the career development materials provided through the National Careers Institute (NCI). ADCET will soon be hosting NCI resources supporting students with disability on our website.
* [Disability Awareness eLearning](https://www.adcet.edu.au/our-work/disability-awareness) and coming soon eLearning for secondary schools on assisting students with disability transition to tertiary study
* [Career Planning for students](https://www.adcet.edu.au/students-with-disability/planning-for-post-secondary-education/career-planning) with Career Development Hub coming soon
* Support for Disability Practitioners on [Reasonable Adjustments](https://www.adcet.edu.au/disability-practitioner/reasonable-adjustments) and [Legislation](https://www.adcet.edu.au/disability-practitioner/legislation-standards)
* [NDIS Pre-planning Toolkit for people with disability entering Higher Education or Vocational Education and Training](https://www.adcet.edu.au/students-with-disability/planning-for-post-secondary-education/ndis-and-further-education-resource)

## ISSUE 3: Lack of understanding and awareness by some tertiary education providers to understand the legislative framework for disability

This includesthe United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the Disability Discrimination Act 1992 (Cth) (DDA) and the Disability Standards for Education 2005 (Cth) (DSE).

ADCET takes an intersectional approach to disability who have multiple equity characteristics such as Aboriginality, gender diversity and sexual identities, cultural and linguistic diversity, socio-economic status and geographic location. As such we recognise that this cumulative disadvantage and the power differential experienced by people with disability can further impact their access and participation in tertiary education.

However, this is not always the approach taken by tertiary education providers who don’t address structural inequalities within their institution and may not have the expertise to understand applying a disability inclusion lens to their processes practice which is strengths-based and non-ableist let alone considering intersectional considerations.

A fundamental issue is lack of awareness of the legislative framework which governs education providers and nuanced understandings of direct and indirect discrimination in education and training. In addition, experiences of racism; ageism; gender inequality (especially in non-traditional areas of learning); homophobia, biphobia, intersexism and transphobia further compound the ability of people with disability and intersecting characteristics to have a positive and inclusive learning experience.

Already marginalised groups experience greater levels of discrimination and lack of inclusion due to a lack of nuanced understanding of intersectional disadvantage. For example, 45% of Aboriginal and Torres Strait Islander peoples live with a disability or long-term health condition, they are twice as likely to be living with a disability than other Australians and five times more likely to experience mental illness that other Australians[[5]](#footnote-6).

The experiences of Aboriginal and Torres Strait Islander peoples with education are impacted by their experiences of racism and results in negative impacts on engagement, attainment and avoidance of educational settings impeded a range of benefits for which education can provider (Temple et al, 2020). For other racial or ethnic minorities issues around language literacy, disclosure and how disability is accepted in other cultures can become a challenge for students with disability seeking support or agency.

A 2021 national report (Hill et al, 2021) LGBTIQA+ communities with disability in educational settings experienced exclusion to varying degrees resulting in a range of impacts on their learning including:

* varying awareness of policies, processes and strategies such as anti-bullying policies, discrimination processes, safe spaces, inclusive language and Ally networks
* varying levels of visible inclusion and sense of belonging through inclusion strategies and inclusive learning materials/curriculum
* experiencing higher rates of discrimination thus limiting attendance, safety and attainment feeling unsafe in learning environments
* experiencing higher rates of mental illness
* experiencing issues such as discrimination, homophobia, violence, limited family support, homelessness
* feeling social isolated and lacking cultural safety when accessing services.

These structural inequalities and the experiences of people with disability who also have multiple identities are manifested in a variety of ways including as previously described physical, digital, learning and cultural barriers.

The particular challenges and solutions to people with disability receiving fair access to support in VET include:

**Understanding of the legislative obligations for tertiary providers.** Variations in the understanding and application of legislative obligations under the DDA and the DSE by tertiary education providers is mixed. While specialist staff such as disability practitioners and complaint management areas (mainly in larger providers such as TAFE) provide advice and guidance on the application of the DDA and DSE it is the everyday adherence and application that causes friction and difficult for people with disability. Again, the lack of strategic intent and disability responsiveness of tertiary education providers and their staff is a major pain point for people with disability. There is also a gap between the capacity for larger organisations to facilitate support for students with disability vs small and private VET providers who may not have the capacity for specialist staff.

Apart from the disability awareness training provided by ADCET a key consideration is **strengthening the DDA and the DSE** to ensure education providers meet their legislative obligations. The DDA has not been reviewed since 2004 and while it provides a level of protection to people with disability and aims at eliminating discrimination it still fails to drive the change needed for real cultural and systemic change.

Legal obligations around the DDA mean that organisations, especially education providers, should have robust Disability Action Plans and mandatory education about the DDA and relevant standards (e.g., DSE, standards for access to premises).

When students with disability do disclose, receive reasonable adjustments, self-advocate for adjustments or things go wrong i.e., indirect or direct discrimination the onus for self-advocating, challenging policies or procedures, or making a complaint (either internally or externally) is on the student.

There are some concerning impediments to making a complaint and being appropriate heard, for people with disability in tertiary education environments. These include:

* the complaints-based compliance mechanism places the onus on students to know and pursue their rights
* complaints-based compliance frameworks disadvantages those who may be less able to initiate and pursue a complaint. This may include issues relating to culture, socio-economic status, regionality and availability of advocates and supports to do so
* there is no publicly available data about provider compliance with the legislation, so we don’t know how many providers are in breach of the legislation[[6]](#footnote-7)
* students may be reluctant to share information about their disability to a provider and/or be unable to access or afford an assessment to verify it – and the requirement for clinical verification of disability (a medical model) is at odds with longstanding national policy settings (which recognise a social model of disability)
* institutions can decline to make a reasonable adjustment if they deem the needed adjustments cause unjustifiable hardship, even if the adjustment itself is deemed reasonable – placing the onus back on students to start again with another institution (if there is an alternative option where they live) or pursue a discrimination complaint
* there are additional barriers to access arising from building design and publishing standards which are not addressed in legislation.

In August 2020, the NDCO Program surveyed 131 people with disability, disability practitioners, families and supporters to inform the NDCO submission into the *2020 Review of the Disability Standards for Education 2005*. Survey respondents described the complaints process as long and drawn out, resulting in unfamiliarity with the process, missing educational opportunities, additional stress, withdrawing from study altogether, poor or no resolution including failure to implement recommendations from conciliation processes. From the survey, respondents were asked why they chose not to pursue a complaint. A variety of reasons cited include:

* time constraints
* work/family commitments
* feelings of powerlessness and the DDA having no impact
* not feeling safe to complain or wanting to ‘cause trouble’
* didn’t know how to engage the complaints process
* no training or information provided about discrimination and how to make a complaint
* lack of emotional capacity to deal with the process
* education providers discouraging people from making complaints
* no support to make the complaint
* cuts in advocacy services
* inadequate support and expertise.

### ADCET recommends:

* a discussion with the Australian Human Rights Commission to pursue a review of the DDA. In addition, we also recommend revisiting the recommendations of the *2020 Review of the Disability Standards for Education* which remain unfinalised.
* a discussion with ASQA to improve compliance processes for supporting students with disability.

### Current ADCET strategies:

As previously mentioned ADCET has a range of resources to build capacity in the VET community around building a disability confident workforce which recognises and embeds legislative obligations in its business processes, teaching and learning activities and student support strategies. These include:

* A guide for disability practitioners on developing [Disability Action Plans](https://www.adcet.edu.au/disability-practitioner/your-role/disability-action-plans)
* Support for Disability Practitioners on [Reasonable Adjustments](https://www.adcet.edu.au/disability-practitioner/reasonable-adjustments) and [Legislation](https://www.adcet.edu.au/disability-practitioner/legislation-standards)
* [Free Disability Awareness eLearning](https://disabilityawareness.com.au/) including introductory training and specific programs for the VET sector such as [VET Staff Supporting Students with Disability](https://disabilityawareness.com.au/courses/program-1-vet-staff-supporting-students-with-disability/) and [VET Educators Supporting Students with Disability](https://disabilityawareness.com.au/courses/program-2-vet-educators-supporting-students-with-disability/)
* [Accessible ICT procurement guidelines](https://www.adcet.edu.au/resource/11182/accessible-it-procurement-in-higher-education-caudit) with practical information about procuring ICT products and services with accessibility as an essential criterion
* Assistive Technology (AT) resources such as [ADCET Assist](https://www.adcet.edu.au/our-work/adcet-assist) and [Inclusive Technology](https://www.adcet.edu.au/inclusive-technology) resources to build capacity and understanding of AT as a means of supporting students.
* [Information on Inclusive Teaching](https://www.adcet.edu.au/inclusive-teaching) including Universal Design for Learning [eLearning](https://disabilityawareness.com.au/elearning/udl-in-tertiary-education/)
* A new toolkit (coming soon) for VET providers on supporting students across the student lifecycle.

## ISSUE 4: insufficient funding for students in tertiary education.

Whilst it is true that tertiary providers are required to fund reasonable adjustments for students with disability, there is a vast chasm between the funding provided in schools compared to that provided in the tertiary sector. The Australian Government funding for reasonable adjustments in schools totals $28.8 billion in 2018-297, ranging from $4,704 through to $35,350 per student[[7]](#footnote-8).

This is in stark contrast to the funding for reasonable adjustments in higher education which totals $7.78 million annually through the Disability Support Program (DSP) including funding for ADCET. This amount equates to an average of $110 per student with disability annually. This funding per student has more than halved in real terms since 2008 – down from $265 per student.

The funding for VET providers is even worse. While there is an employer incentive program for businesses engaging people with disability in apprenticeships or traineeships (Disabled Australian Apprentice Wage Support), only 3% of trainees or apprentices shared information about having a disability, suggesting that this pathway is particularly difficult to access for students with disability (NCVER 2021).

There are few equivalent systematic funding program across all State and Territory Governments for reasonable adjustments in vocational education and training unless the tertiary qualification is a traineeship or apprenticeship[[8]](#footnote-9).

There is also a perception that the National Disability Insurance Scheme (NDIS) in some way bridges this gap. The NDIS is a once in a generation human service reform, which has proven to be life changing for some who access it, but:

* only about 10% of people with disability will be eligible to access individual funding through it
* there is no obligation for VET practitioners to familiarise themselves with the NDIS framework and the implications for funding of vocational education courses and necessary reasonable adjustments for learners with disability at their institutions. This means that opportunities to access additional resources to fill support funding gaps may be missed
* we don’t know if it’s improving access to tertiary education (and given there is no specific strategic focus on education and training this is unlikely)
* the NDIS won’t fund educational supports, which may discourage collaborative planning between the NDIS and education services to deliver coordinated supports for people with disability (Whitburn et. al. 2017).

There is no publicly available data on reasonable adjustments made by providers, the location where this occurs, the cost, nor the outcome achieved – including whether the adjustments were applied in ways that influenced the future inclusiveness of the course or program.

In short, we don’t know how well the system is working, but anecdotal evidence suggests it can be challenging for students to know and pursue their rights. In addition, public funding support for reasonable adjustments is well below funding for Australian schools or higher education students

### ADCET recommends:

1. a review of funding arrangements for the tertiary education sector with specific focus on funding in the VET sector to ensure that VET providers are getting sufficient funding to support students with disability including through whole-of-institution changes such as embedding inclusive teaching practices and transforming physical and digital spaces to make them fully accessible
2. A grant scheme to assist issues such as ICT procurement and transformation of learning could assist some smaller providers. In addition, strategic and practical changes to the NDIS to focus on post-secondary education as a pathway for people with disability is strongly advised. Currently the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability is exploring this issue through its [education and learning issues paper](https://disability.royalcommission.gov.au/publications/education/responses-first-education-and-learning-issues-paper). ADCET has also provided a submission to the Commission on this issue.

### Current ADCET strategies:

ADCET produces work of national significance for the sector as demonstrated in the resources mentioned above. However, the funding provided is indicative of the low levels of funding provided to the sector to support students with disability to access, participate and succeed in post-secondary education. Without the support of ADCET disability practitioners, educators and students would find it challenging to find targeted, evidence-based research, practice and support. The ADCET site is regularly sourced across a wide range of organisations and highly prized by users as evidence by some of the testimonials below.

7-star status for ADCET! For myself, the team of Accessibility Liaison Officers and the teaching teams at Victoria University, ADCET is a fantastic support! A TAFE QLD practitioner for 28 years; I moved into a disability educational role in 2017. The ADCET team and their amazing suite of innovative and inclusive resources immediately made me feel comfortable, in control and totally supported. Through their modelling and encouragement, I now get involved with the development and trialing of resources for our industry! The ADCET team genuinely cares for student and practitioner growth, both professionally and personally, **(Meredith Jackson, Leading Vocational Teacher, Student Support, TAFE Queensland)**

As a disability practitioner who often provides discrete support to our students, ADCET has been my ‘go-to’ resource for technology know-how, practitioner best practice and often just the simple but vital confirmation that I’m doing the best I can for our students' engagement, independence and progression. ADCET is a wonderful resource. Happy 20th birthday! **(Brandon Taylor, Manager, TAFE Queensland)**

ADCET has been an invaluable source of knowledge. Through their webinars, I have been able to keep my knowledge up to date and I have also been able to see how the knowledge about digital accessibility I have applies in the context of higher education. **(Ronny Andrade, Digital Accessibility Lead, RMIT University)**

ADCET is the go-to resource for both new and experienced DLO’s, teachers and students. The resources and PD offered are invaluable for all in the sector to understand and benchmark best practice. ADCET responds to emerging issues and trends through its links with NDCO’s and practitioners to provide much needed information and guidelines. Adult Education is more inclusive in Australia because of the work of ADCET. Thank you for supporting us, to support students. Particularly, given the tenuous situation ADCET faces regarding funding, it’s more important than ever that the work done by ADCET is recognised. **(Tracey Stewart, Convenor: TAFE Disability Network (TDN), Victoria)**

Starting out in the tertiary sector, I found ADCET resources incredibly helpful and engaging. ADCET is an amazing hub for industry information that I access regularly. ADCET supports best practice and continuously strives for equitable access in the tertiary education sector. Thank you ADCET. **(Jessy Olech, Disability Liaison Officer, Student Wellbeing, Holmesglen TAFE)**

# References

ABS (Australian Bureau of Statistics). (2019). *Disability, Ageing and Carers, Australia: Summary of Findings.* <http://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>

ACOLA (Australian Council of Learned Academies). (2022). *Ensuring Occupations are Responsive to People with Disability*. [www.acola.org](http://www.acola.org)

ADCET. (2018). *Vocational Education and Training Statistics.* <https://www.adcet.edu.au/inclusive-teaching/understanding-disability/vet-statistics>

AHRC (Australian Human Rights Commission). (2021). *Disability Action Plan Guide.* <https://www.humanrights.gov.au/our-work/publications>

AIHW (Australian Institute of Health and Welfare). (2022). *People with Disability in Australia.* <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia>

Avery, S. (2018). *Culture is inclusion: a narrative of Aboriginal and Torres Strait Islander people with disability.* First Peoples Disability Network. [www.fpdn.org.au](http://www.fpdn.org.au)

CAST (Centre for Applied Special Technology). (2022). *About Universal Design for Learning.* [https://www.cast.org](https://www.cast.org/)

Department of Education (DE). (2020). 2020 Section 11 Equity groups. In *Higher Education Statistics Student Data 2020*. <https://www.dese.gov.au/higher-education-statistics/resources/2020-section-11-equity-groups>

Fossey, E., Chaffey, L., Venville, A., Ennals, P., Douglas, J., & Bigby, C. (2015) *Supporting tertiary students with disabilities: individualised and institution-level approaches in practice.* National Centre for Vocational Education Research (NCVER) Adelaide. 51 pp. (ED561748), <https://files.eric.ed.gov/fulltext/ED561748.pdf>

Hill, AO., Lyons, A., Jones, J., McGowan, I., Carman, M., Parsons, M., Power J., Bourne, A. (2021). *Writing Themselves In 4: The health and wellbeing of LGBTQA+ young people in Australia.* National report, monograph series number 124. Melbourne: Australian Research Centre in Sex, Health and Society, La Trobe University. [Writing Themselves In yes4, Australian Research Centre in Sex, Health and Society, La Trobe University](https://www.latrobe.edu.au/arcshs/work/writing-themselves-in-4)

 KPMG. (2015). *Evaluation of Disability Support Program.* Canberra: Department of Education and Training, Commonwealth of Australia

Department of Education, Skills and Employment.(2018). *Nationally Consistent Collection of Data on School Students with Disability (NCCD).*  <https://education.qld.gov.au/about-us/reporting-data-research/data/disability-data-collection>

National Skills Commission. (2022). *Projecting employment to 2026.* <https://www.nationalskillscommission.gov.au/insights/projecting-employment-2026>

NCVER (National Centre for Vocational Education Research). (2021). *Student equity in VET 2020: participation, achievement and outcomes.* [Student equity in VET 2020: participation, achievement and outcomes (ncver.edu.au)](https://www.ncver.edu.au/research-and-statistics/publications/all-publications/student-equity-in-vet-2020-participation-achievement-and-outcomes)

Pitman, T. (2022). *Supporting persons with disabilities to succeed in higher education: Final report*. Research Fellowship final report. National Centre for Student Equity in Higher Education, Curtin University.

Quality Indicators in Learning and Teaching (QILT). (2021). *Graduate Outcomes Survey 2021.* <https://www.qilt.edu.au/surveys/graduate-outcomes-survey-(gos)>

Temple, J. B., Wong, H., Ferdinand, A., Avery, S., Paradies, Y., & Kelaher, M. (2020). Exposure to interpersonal racism and avoidance behaviours reported by Aboriginal and Torres Strait Islander people with a disability. *Australian Journal of Social Issues*, 55(4), 376–395.

Whitburn, B., Moss, J., & O’Mara, J. (2017). The policy problem: the National Disability Insurance Scheme (NDIS) and implications for access to education, *Journal of Education Policy,* 32:4, 467-479, DOI: 10.1080/02680939.2017.1280185.

1. ADCET has always supported both the Higher Education and VET sector. Recent changes to the legislation specific funding to Higher Education which presents challenges to adequately supporting both sectors. [↑](#footnote-ref-2)
2. [Projecting employment to 2026 | National Skills Commission](https://www.nationalskillscommission.gov.au/insights/projecting-employment-2026) [↑](#footnote-ref-3)
3. Department of Education, Skills, and Employment 2018; ADCET VET Statistics 2018; NCCD 2018; Australian Bureau of Statistics 2018 [↑](#footnote-ref-4)
4. Key legislation includes the [Disability Discrimination Act 1992](https://www.legislation.gov.au/Details/C2018C00125) (Cth) (DDA) and the [Disability Standards for Education 2005](https://www.legislation.gov.au/Details/F2005L00767) (DSE) [↑](#footnote-ref-5)
5. First Peoples Disability Network www.fpdn.org.au [↑](#footnote-ref-6)
6. Limited data is published by the Australian Human Rights Commission about complaints made relating to disability discrimination in education, but the data is high level. For example, there is no data on the outcomes of disability complaints in education and therefore no conclusions can be drawn about provider compliance or the impact of the legislation for people with disability. Additionally, this data does not cover complaints pursued via other regulatory bodies nor compliance action taken, and what data is held is not used publicly to drive good practice. [↑](#footnote-ref-7)
7. Department of Education, Skills, and Employment 2018; ADCET VET Statistics 2018 [↑](#footnote-ref-8)
8. Queensland has a Skills Disability Support program for training providers [↑](#footnote-ref-9)