ADCET

Australian Disability Clearinghouse on Education and Training

Supporting you, Supporting Students

Submission to the Australian Tertiary Education Commission

Draft Statement of Strategic Priorities 2027–28 and draft Workplan 2027 and 2028

October 2026

Introduction

The Australian Disability Clearinghouse on Education and Training (ADCET) is pleased to comment on the Australian Tertiary Education Commission (ATEC) draft Statement of Strategic Priorities (SSP) and draft Workplan. [iii] ADCET is a national resource on disability in tertiary education, funded by the Australian Government Department of Education under the Higher Education Disability Support Program and hosted by the University of Tasmania. [iii]

ADCET welcomes ATEC's plan to develop a National Disability Strategy for Higher Education (the Strategy). The need for the Strategy is longstanding, with known and persistent barriers in the tertiary sector requiring clear national policy responses beyond the reach of advocates, individual programs and institutions.

In 2002, the National Regional Disability Liaison Officer (RDLO) Initiative made a submission to the Senate Employment, Workplace Relations and Education References Committee inquiry into the education of students with disabilities. The submission described inconsistent eligibility and documentation requirements across sectors, poor transfer of assessment and adjustment information, costly assessments and uneven staff capability. [iv]

In October 2026, the National Student Ombudsman (NSO) released its annual report, providing current evidence that related barriers remain within higher education. Fifteen per cent of students who contacted the NSO identified as having disability or an accessibility requirement. Complaints from students with disability concerned learning access plans, onerous documentation, inconsistent staff practice, delayed or refused support, and repeated requirements to establish their needs. The report also noted that intersecting identities can compound disability-related barriers. [v]

The 2002 RDLO submission and the NSO's current complaint evidence are separated by almost 25 years, yet together they identify related barriers that still require policy responses:

- inconsistent requirements for recognising disability and establishing eligibility for support across schools, vocational education and training (VET), and higher education.
- documentation and assessment requirements that can be costly, onerous or difficult to obtain, and variable by provider as to what is required
- poor continuity of assessment, adjustment and support information, leaving students to re-disclose their needs including during transitions between sectors or providers

- additional barriers for students with disability who have intersectional equity and support requirements
- uneven disability capability among educators, administrative and support staff

There is a clear need for a national strategy for disability in Higher Education, and for ATEC's SSP and work plan to consider disability at each opportunity. This submission proposes practical changes to the draft SSP and Workplan so disability is more clearly addressed across ATEC's priorities and projects while the Strategy is developed.

Summary of recommendations

ADCET recommends that ATEC:

1. revise the wording of the SSP to be specific at each opportunity about ATEC's section 14 objective of improving outcomes for persons with disability
2. revise the Workplan so each project considers the section 14 groups relevant to its scope and expected effects, and include work to map national disability-enabling infrastructure
3. use the planned reviews of needs-based funding and outreach, and include FEE-FREE Uni Ready (FFUR) courses, to assess whether these programs are accessible to students with disability by design and in implementation, and how they interact with the Disability Support Fund (DSF); and monitor and review implementation of the revised DSF guidelines

Recommendation 1: Make disability explicit across the outcomes and relevant strategic priorities

Section 14 of the Universities Accord (Australian Tertiary Education Commission) Act 2026 (ATEC Act) sets an objective of improving outcomes for groups facing systemic barriers to education, including persons with disability. [vi] The two drafts provide opportunities to strengthen implementation of this objective. Recommendations 1.1 to 1.4 identify changes that would ensure ATEC's strategic direction and activities are more clearly guided by, and assessed against, section 14.

Recommendation 1.1: Name section 14 groups in the equity outcome

Revise the Equitable access, participation and success outcome so the supporting text explicitly names the groups identified in section 14 of the ATEC Act, including students with disability.

The draft outcome refers broadly to "all Australians" and access "regardless of their background or circumstances". [vii] Explicitly naming the groups in section 14 within the explanatory text, including students with disability, would align the outcome with ATEC's

statutory objective, provide a clearer basis for assessing whether ATEC's work improves their outcomes, and better link with the subsequent equity priority.

Recommendation 1.2: Specify disability inclusion in quality teaching

Revise the Quality teaching priority to state that inclusive and supportive learning environments must be accessible to students with disability, and require ATEC's planned advice to the Minister on teaching quality to address how this will be achieved.

The draft priority commits to meeting the educational needs of all students through "engaging, inclusive and supportive learning environments" and to ensuring academic staff are well prepared to facilitate good teaching. [viii] However, it does not yet identify specifics needed related to accessibility, students with disability, universal design options or reasonable adjustments.

The NSO's report illustrates a need for granular specificity in this space, calling for academic staff—not only disability support staff—to be equipped to implement learning access plans promptly.[ix]

ATEC's planned advice to the Minister on teaching quality should address accessible curriculum and assessment design, timely implementation of reasonable adjustments, accessible teaching technologies and practices, and academic staff capability to implement these measures.

Recommendation 1.3: Measure employment outcomes for priority groups

Revise the Graduate capability and national benefit outcome to include graduate employment outcomes for section 14 groups, including graduates with disability.

The draft SSP links graduate capability to workforce needs and national benefit but does not explicitly address employment outcomes. Graduates with disability continue to report lower full-time employment rates than graduates without disability. [x] Including employment outcomes, reported for section 14 groups, would enable ATEC to assess whether tertiary education is delivering equitable workforce outcomes and identify where further action is needed.

Recommendation 1.4: Reference disability discrimination obligations

Refer to the Disability Discrimination Act 1992 (DDA) and the Disability Standards for Education 2005 (DSE) in the student experience and safety priority and in the Workplan's disability work [xi][xii]

The student experience and safety priority calls for high-quality student experiences and environments "free from harm, discrimination and harassment". [xiii] These also relate to providers' obligations under the DDA and DSE. Referring to students with disability in the priority and relevant Workplan items would connect ATEC's proposed work to the legal

duties that already apply to providers about student experience & safety and strengthen the broader signal about institution-wide responsibilities relating to the DDA.

The NSO's 2025–26 report noted that providers have a legal obligation to take reasonable steps to accommodate students with disability, and that learning access plans should be implemented in both learning and administrative environments. Universities often implement the DDA through learning access plans and related documentation, but their responsibilities are not confined to those processes or activities funded through the DSF. Subject to the scope and application of the DDA and DSE, responsibilities can extend across services, programs, staff and facilities, including but not limited to work-integrated learning and higher degree by research study.

Recommendation 2: Embed disability across the Workplan

ADCET welcomes the draft Workplan's proposed Strategy and its ongoing contribution to whole-of-government disability reforms. However, disability also needs to be addressed across the rest of the Workplan. Recommendations 2.1 to 2.3 propose a standing provision for relevant projects, immediate application to relevant work due in 2027, and a project to map the national enabling environment for disability inclusion in tertiary education.

Recommendation 2.1: Require equity consideration in every project

Include a standing provision requiring each project to record how it has considered the section 14 groups relevant to its scope and expected effects.

Any item in the draft Workplan may affect students with disability or another section 14 group. One risk in the current draft is that planned work may defer consideration of disability to the Strategy. ADCET therefore recommends a standing provision requiring each project output to explain how it has considered the section 14 groups relevant to its scope and expected effects.

NSO complaint data supports this concern. In 2025–26, disability-related barriers arose in other areas including placements, recognition of prior learning and course progression, not only in teaching. A standing provision would help each project identify these types of barriers in its own area of work. [xiv]

Recommendation 2.2: Address disability in 2027 Workplan items

Apply the standing provision in Recommendation 2.1 to every relevant Workplan item so disability is addressed before and alongside development of the Strategy.

Recommendation 2.1 should apply immediately to relevant Workplan items from 2027 onward. This would ensure that disability is addressed before and alongside development of the Strategy, while also identifying issues and evidence that can inform it.

Some examples of how disability could be actively considered in draft Workplan items include:

- teaching quality advice could build on existing practices in Universal Design for Learning, good practice examples of implementing the Disability Standards for Education, and accessible teaching technology.
- the outreach funding review could consider how students with disability are supported as they prepare for, transition into and participate in tertiary study, noting the interaction with the DSF.
- the First Nations Higher Education Framework could specifically consider First Nations students with disability, including how the Framework will work alongside the Strategy.

ATEC should therefore apply the standing provision from Recommendation 2.1 when scoping, delivering and reporting every relevant Workplan activity.

Recommendation 2.3: Map national disability enabling infrastructure

Include a Workplan project to map the national enabling infrastructure that supports students with disability in higher education, including transition pathways, cross-sector responsibilities, national programs, guidance, data use and systemic policy capability.

Although ATEC's primary remit is higher education, disability inclusion is shaped by the wider education and legal environment across schools, vocational education and training and higher education. Students with disability move between these systems. Providers in each sector operate within the applicable scope of the Disability Discrimination Act 1992 and the Disability Standards for Education 2005. [xv][xvi]

Noting the joined-up tertiary system priority, a focused national mapping project would help ATEC understand the enabling environment around higher education before developing the Strategy. ADCET considers this increasingly important given the Accord's tertiary attainment goals, growth in reported school adjustments for students with disability, and projected labour-market demand for post-school qualifications. [xvii][xviii]

ADCET recommends that ATEC review:

- current and past national programs, resources and guidance that support disability inclusion in higher education or have potential to do so, noting the importance of transitions between sectors
- how responsibility and resourcing for Disability Discrimination Act implementation are shared across higher education, VET and schools, insofar as this affects higher education access, transition, participation and success

- how disability-related data is collected, defined, used and shared across sectors, including any impacts created by self-disclosure and imputation
- how existing access planning can better support students with disability across transitions, including transitions from school to tertiary education, between tertiary sectors, and from tertiary education to employment (for example, enabling portable education access information that students can take with them).

This review would provide a practical evidence base for the Strategy on the ecosystem supporting implementation of the DDA across education sectors.

Recommendation 3: Review funding accessibility and implementation

The barriers outlined in the introduction will not be resolved through individual adjustments or the DSF alone. Students with disability also participate in major access, participation and enabling programs. Recommendation 3 therefore addresses both parts of the funding system: whether needs-based funding, outreach and FFUR are accessible by design, and whether the revised DSF guidelines support effective implementation of individual adjustments, disability-specific reform, specialist staffing and sector coordination.

Recommendation 3.1: Review accessibility across equity programs

Include FFUR courses alongside the needs-based funding and outreach reviews, and use these reviews to assess whether each program is accessible to students with disability by design and in implementation, and how each interacts with the DSF.

Departmental program information expressly identifies students with disability in relation to FFUR, but not as a separate target cohort in the current needs-based funding or Outreach program settings. [xix] Students with disability will nevertheless participate in all three programs, including as low socioeconomic status, First Nations, regional and remote students. Each review should therefore assess accessibility by design and how the program works alongside the DSF.

The reviews should examine:

- whether Needs-based Funding activities are designed and delivered to be accessible to students with disability within the eligible cohorts.
- whether Outreach Funding activities are designed and delivered to be accessible to and welcoming for prospective students with disability, noting the requirement to use the DSP for specific disability focused outreach.
- whether FFUR courses build accessibility into course design, teaching, assessment and support.

The findings could inform program guidelines, funding conditions and reporting, so accessibility is built into each program from the start and provide insight for the Strategy.

Recommendation 3.2: Review the Disability Support Fund guidelines

Include monitoring of the revised DSF guidelines in ATEC's 2027 disability work and review the implementation, including opportunities for stronger national coordination.

The DSF has increased fourfold from $13 million to $53 million a year, indexed, and revised accountability and transparency requirements include a disability governance committee, a disability education inclusion strategy and a disability workforce inclusion strategy. [18] The increase is welcome and necessary. Separate from these program settings, ADCET's sector engagement indicates that institutions would benefit from stronger national coordination and implementation support.

ADCET has observed:

- similar initiatives and projects starting at different stages and in different forms across the sector
- a need for more coordinated and stronger advice surrounding governance arrangements and requirements
- a need for information sharing and distribution relating to new specialist roles
- a difference in pace of rollout of responses in readiness for the 2027 requirements
- reported difficulty obtaining approval for staff appointments where institutions interpret eligible staffing costs as excluding salary on costs
- a positive uplift in senior university executive investment and involvement since the new governance and strategy requirements were released.

ADCET is currently supporting communities of practice for disability-service managers, staff new to Universal Design for Learning roles, neurodiversity related roles and assistive technology staff.

These networks identify issues that could be addressed once by the communities of practice and shared across institutions, provided sector coordination is adequately resourced. Despite current resourcing constraints, ADCET continues to support and grow these communities.

ADCET recommends that ATEC monitor early implementation of the revised DSF guidelines, then review their impact at the earliest practical opportunity, with a focus on staffing investments and opportunities to improve national coordination and consistency.

Contact

ADCET would welcome the opportunity to discuss this submission and contribute to the Strategy.

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