

2025 Review of the Disability Standards for Education

ATN Universities

20 November 2025

Key takeaways:

1. ATN Universities calls for additional training and sharing of case studies as the Disability Standards for Education are currently not fully diffused through different sub-sections of education professionals
2. ATN Universities recommends that the draft principles for consultation, issues resolution and complaints handling be enacted through inclusion in the Standards
3. ATN Universities calls for better delineation of responsibilities and clearer expectations for partners in work-integrated learning (WIL) contexts

ATN Universities welcomes the opportunity to contribute to the 2025 Review of the Disability Standards for Education (the Standards). Our members are strongly committed to improving access, participation, completion, and post-study outcomes for students with disability. ATN Universities educates the largest share of university students with disability in Australian higher education (31%). As Australia's most industry-oriented university network and leaders in work-integrated learning (WIL), we also have wide and deep experience with the challenges that students with disability can face in the workplace. Better delivering for these students as they graduate and move into the workplace is a key contribution our universities can make.

The Australian University Accord set a target of 80% of Australia's working-age population having a tertiary qualification; better attraction and retention of people with disability will support achievement of this goal. This also supports skilled-worker participation in the economy and contributes to the Commonwealth's productivity agenda.

Despite real progress since the introduction of the Standards, tertiary students with disability continue to encounter barriers to academic participation, social inclusion, and course completion. Research on attracting and retaining students with disability shows that Australia has not yet achieved its goal of eliminating discrimination. 9% of Australians aged 15-64 with a disability are studying for a non-school qualification, compared to 15% of those who do not have a disability, and students with disability have lower progression rates at university (HILDA 2021). These disparities highlight limits in the effectiveness of the Standards as presently implemented. The 2025 Review is therefore a timely opportunity to improve practices and move towards systemic, anticipatory inclusion. This work should also recognise the role of intersectionality, including culturally appropriate supports for Indigenous students and others with overlapping forms of disadvantage.

In preparing this submission, ATN Universities convened a workshop of expert practitioners at the forefront of the field from our member universities. Our experts and the wider literature advocate for a Universal Design for Learning (UDL) approach. UDL builds flexibility into curriculum and assessment from the outset so that learning is accessible to the widest range of students. The approach contrasts with a reactive approach whereby students with disability must obtain adjustments to enable their full participation. The Department of Education (the Department) can play a vital role in driving this shift by incentivising and guiding providers to embed proactive and inclusive design in their offerings. This is especially important in WIL contexts, where proactive education and support of third parties is key to providing accessible experiences.

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1. ATN Universities calls for additional training and sharing of case studies as the Disability Standards for Education are currently not fully diffused through different sub-sections of education professionals

Topic 1 of the Review deals with effective implementation of the Standards. There remains inconsistent awareness of the Standards and the additional resources released since the 2020 Review. ATN's experts advise that while Disability Services teams are well aware of the Standards, such knowledge has not diffused consistently through teaching, placement coordination, course development, student administration and frontline academic staff. Much of the system remains reactive, meaning the Standards are invoked at points of friction rather than shaping practice from the outset.

Training can help address this if deployed more widely among staff, especially for those with student-facing roles. Staff (including staff at third parties like WIL/placement providers or exam invigilators) should be trained in: specific disability types with suggested approaches for supporting that disability in class settings; intersectionality and its impact on the provision of appropriate adjustments/processes; and for course designers, incorporation of UDL approaches within course design.

Disability practitioners and students themselves report that students often operate with partial information. Many are unsure how the reasonable adjustment process works and may assume there are limits on what they can request. The National Student Ombudsman's annual report for 2024-25 notes student reports of "inconsistencies in what documentation is needed and a lack of clarity" around requirements. Many also delay disclosing their disability due to internalised stigma or concerns about being judged. In fact, students with disability report lower rates of feeling a sense of belonging at their institution, at 40% compared to 45% of students with no disability reported (Student Experience Survey 2024).

Recommendations

- **Providers should ensure training material is readily accessible for all staff** including academic, professional, and sessional staff and ensure that mandatory training for staff with student-facing roles includes knowledge of the Standards, supporting a shared baseline understanding of responsibilities and processes under the Standards. The Department should identify and prioritise key training areas for national consistency and replicability, including resources delivered through peak bodies such as the Australian Disability Clearinghouse on Education and Training (ADCET).
- **The Department should develop a collection of case studies demonstrating the importance of broader institutional commitment beyond disability practitioners**, co-designed by people with disability, following the approach used in developing the Disability Standards for Education resources with Children and Young People with Disability Australia (CYDA), to promote consistent and practical implementation.

2. ATN Universities recommends that the draft principles for consultation, issues resolution and complaints handling be enacted through inclusion in the Standards

Topic 2 of the Review deals with inclusive decision-making and how to operationalise the draft principles for consultation, issues resolution and complaints handling. ATN Universities supports embedding the draft principles into the Standards and requiring that published policies and procedures adhere to them.

Achieving equity for all students with disability requires that the draft principles be implemented consistently across all providers. There are existing inconsistencies between education providers and risks of significant harm to students where providers fail to meet expectations. This calls for a higher enforcement standard than only providing examples of best practice. The draft principles should therefore form part of the Standards.

We also recommend a version of the Review's option 2 for requiring published policies and procedures. Requiring providers to take reasonable steps to demonstrate through policy and procedure how they operationalise the principles would provide enforceability through clear regulatory expectations, transparency for students and stakeholders, and flexibility for institutions to implement the principles in ways that reflect their specific contexts.

Recommendation

- **ATN Universities recommends that a version of options 2 (requiring published policies and procedures) and 3 (integrating the draft principles into the Standards) be implemented together** to give effect to the draft principles in Attachment B of the Discussion Paper. The draft principles should form part of the Standards, and a new item should be added to the draft principles that requires the provider to take reasonable steps to ensure its published policies and procedures are consistent with the principles for consultation, issues resolution and complaints handling.

3. ATN Universities calls for better delineation of responsibilities and clearer expectations for partners in work-integrated learning (WIL) contexts

Topic 3 of the Review deals with responsibilities for assessment authorities and course developers. ATN's member universities are leaders in delivering applied learning and industry-engaged curriculum. Each ATN member offers financial support for students to undertake WIL such as Deakin's WIL Student Support Scheme and Curtin's Fieldwork and Placement Bursary. Their extensive networks of partnerships to deliver WIL provide a wealth of experience to draw on.

ATN experts advised that the Standards do not clearly define responsibility for adjustments when students undertake assessments or placements outside of their home institutions. The current ambiguity leads to gaps in support in WIL and professional accreditation contexts, and can lead to delayed decisions, reluctance among placement providers to engage, and elevated withdrawal risk for students.

Recommendations

- **The Standards should explicitly recognise professional accreditation bodies as "education providers"** under section 2.1.
- **The Department should publish national guidance** on reasonable adjustments in WIL, co-developed with professional bodies, expert practitioners and people with disability.
- **Providers should clearly outline inherent requirements** in publicly available course and subject information, using language that is accessible to prospective and current students.
- **The Department should provide national shared responsibility protocols** for universities and placement providers to clarify roles, obligations and processes in WIL settings, either as a part of the Standards, or independent of it.

ATN Universities appreciates the opportunity to provide this input to the Review. We look forward to ongoing collaboration with the Department, the sector and student partners to strengthen the implementation of the Standards and to support inclusive, high-quality learning environments across Australian higher education.

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Appendix

Supporting resources were provided by the workshop participants for the Review's information:

- Roger Wilkins, Esperanza Vera-Toscano, Ferdi Botha and Sarah C. Dahmann (2021) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 19*. Melbourne Institute: Applied Economic & Social Research, the University of Melbourne.
- Duncan, J., Punch, R., Gauntlett, M., & Talbot-Stokes, R. (2020). Missing the mark or scoring a goal? Achieving non-discrimination for students with disability in primary and secondary education in Australia: A scoping review. *Australian Journal of Education*, 64(1), 54-72. <https://doi.org/10.1177/0004944119896816>
- Duncan, J., Butler, K., & Punch, R. (2025). Exploring the experiences of undergraduate students with disability who withdraw from university studies. *Aust. Educ. Res.* 52, 4195-4219. <https://doi.org/10.1007/s13384-025-00894-6>