



QUT's Centre for Inclusive Education (C4IE) produces research on matters that affect students in education with the aim of improving the educational experiences and outcomes of *all*, particularly those experiencing marginalisation. One of C4IE's objectives is to address knowledge gaps and positively influence attitudes by disseminating research evidence, engaging in public debate, and providing quality professional learning opportunities. C4IE makes this submission in response to the Australian government's Post-Budget Implementation—Needs-Based Funding Implementation Consultation Paper.

Inclusive education is a human right across all levels of education, including higher education. This right is articulated in General Comment No. 4 (GC4; United Nations, 2016) on Article 24 of the *Convention on the Rights of Persons with Disabilities* (CRPD; United Nations, 2006). GC4 is the most comprehensive and authoritative international instrument explaining the human right to inclusive education and how to achieve it (Graham et al., 2023). It defines inclusive education as:

a process of systemic reform embodying changes and modifications in content, teaching methods, approaches, structures and strategies in education to overcome barriers (para 11).

GC4 stresses the use of universal design—as opposed to relying on retrospective adjustments or supports—to proactively remove or reduce barriers to access and participation. Importantly, it emphasises that:

[t]he *entire* education system must be *accessible* ... [not simply] buildings, information and communications tools ... [but also] *the curriculum, educational materials, teaching methods, assessments and language and support services*" (emphasis added, para 22).

Inclusion in higher education has improved over the last 20 years, but this progress is limited compared to that made in school education. This is partly due to the emphasis in higher education policy since the 2008 Bradley Review on increasing representation of equity groups, without due attention to addressing the many barriers these students face once enrolled.

More supportive and effective inclusive education in schools, along with a diversification of pathways into higher education, is resulting in an increased number of students with disability entering universities for the first time. One side-effect of this increase in access to higher education is attrition and the accumulation of debt by a growing number of students who could succeed if better supported to do so.

Our first message in response to the Consultation Paper is that this is not all due to a lack of academic preparedness on the part of students. **Our second message** is that the necessary support for students will not be achieved through more “**traditional**” support services, at least not on their own. **Our third message** is that the Consultation Paper is informed by an “old school” support approach, but this will not achieve the systemic reform that our students need nor will practice in Australian higher education comply with the CRPD (United Nations, 2006), which we reiterate applies to all levels of education, including university education.

Disability support services are particularly unwieldy, as they often require students to:

- gain updated medical documentation to confirm eligibility for support,
- disclose an impairment or medical/mental health condition to numerous academic and professional staff to receive that support,
- expend time and effort negotiating support plans,
- regularly renew those support plans.

While disability support services can and do provide some students with valuable adjustments, such as note-taking support, study materials in large-print and braille, and assessment extensions without the need for a doctor's certificate each time, these adjustments do not proactively address barriers in curriculum, pedagogy, assessment, or staff knowledge, skill and attitudes (Graham et al., 2018). They are also only relevant to a relatively small number of students with, for example, sensory impairments and can be at best ineffective or at worst overwhelming to students with disabilities impacting language and information processing, e.g., attention deficit hyperactivity disorder (ADHD), Developmental Language Disorder (DLD), autism, hearing impairment. **Importantly, these students are just as capable as any other if barriers to access and participation are addressed. The issue for them is not academic preparedness but rather the inaccessibility of higher education curriculum, pedagogy, and assessment.**

Access to higher education needs to be considered not simply in terms of physical or enrolment access, whether that be through hubs to serve students in regional areas of Australia or through the provision of adjustments to students with sensory or mobility impairments. To drive greater inclusion of students across *all* disability groups, including those with disabilities impacting language and information processing (many of whom are unidentified and therefore unknown to disability support services), the concept of access must broaden to include the **accessibility of curriculum, pedagogy, and assessment.**

What is 'accessibility'?

Accessibility in education extends beyond the provision of lifts, ramps, tactile signs, adjusted materials, and websites able to be read through the use of screen readers. Accessibility is also more than the provision of reasonable adjustments through disability support services, which are often generic, retrospective, and logistically tedious to access. Many students do not bother applying for these supports or give up trying, which means they must grapple with the barriers they experience alone and unsupported. Prominent among these students are those with attention deficit hyperactivity disorder (ADHD) or Developmental Language Disorder (DLD), who account for around 14% of school-age students (Graham & Tancredi, 2019). Australian schools are more successfully including these students with the result that more are qualifying for university. University education must also change to ensure these students continue to succeed. **To successfully include students with disabilities impacting language and information**

processing, universities must improve the comprehensibility of teaching and assessment, learning management systems, and support provision processes.

What does accessible teaching and learning look like?

Researchers from QUT's Centre for Inclusive Education (C4IE) recently applied accessibility principles that were developed and tested in the award-winning [Accessible Assessment ARC Linkage](#) project with three Queensland state secondary schools to create and deliver a new university-wide undergraduate unit called Living and Working Collaboratively, Ethically and Inclusively.

In designing the unit, we maximised comprehensibility by removing all unnecessary [linguistic, procedural, and visual complexity](#). For example, all unit content was purpose written using clear and concise language and housed in the Learning Management System. This reduced the navigational burden on students as it did not require them to locate academic readings. It also eliminated the financial burden imposed by textbooks. Low frequency words and specialist vocabulary were defined using student-friendly terminology in a hyperlinked glossary. Procedural barriers were removed through logical content sequencing, clear signposting, and a carefully scaffolded assessment task with clear [Steps for Success](#) aligned to weekly tutorials.

Students were provided with micro tasks to complete in the weekly tutorial where they could access support from expert teachers and feedback from their peers. Together, the micro tasks helped students produce around a third of the content they needed for their final assessment, ensuring that students were provided with ample opportunity to prepare their submission in time and to receive feedback along the way. Student outcomes were positive with the team receiving an [Accessibility in Action Award](#) from the Australian Disability Clearing House on Education and Training (ADCET).

What is needed to make all university teaching accessible?

The value of accessible curriculum, assessment, and pedagogy is that all students benefit: not just those with disabilities, but also those from socioeconomically, and culturally and linguistically diverse backgrounds, and Indigenous students. Accessibility reduces the likelihood of students experiencing confusion, frustration, and poor self-esteem, and it also reduces the load on other support services as students' learning needs are better met in the lecture or tutorial space. Accessibility also means that students' needs are met whether they have been identified as having a disability or not (Tancredi et al., 2024). However, the knowledge and skill required to proactively design inclusive curriculum and assessment for universal access is not yet widespread in higher education and it will take significant upskilling of academic staff to achieve this. Our third message is that the Consultation Paper is informed by an "old school" approach of direct and indirect additional supports, but this approach will not achieve the systemic reform that our students need nor will practice in Australian higher education comply with the CRPD (United Nations, 2006), which we reiterate applies to all levels of education, including university education.

Achieving accessibility in higher education will require significant investment in professional development of teaching staff, as has been required in the school education sector, to make all teaching staff aware of their obligations to consult students in the design and implementation of adjustments. This task is currently left to disability support services, however, the result is that generic adjustments are made (e.g., note-taking, additional time in exams, assessment extensions, scribing). Unfortunately, these types of adjustments do nothing to improve the accessibility of curriculum, pedagogy, and assessment at Tier 1. Tier 1 is otherwise known as the ‘universal’ level of provision (universal meaning that ‘everyone gets’ not that ‘one-size-fits-all’) in a Multi-Tiered System of Support (MTSS) framework.

MTSS is a framework informed by preventative public health science which is increasingly being implemented in school education, particularly in the United States (de Bruin et al., 2024). Best practice involves the use of universal design principles to anticipate and proactively remove barriers to access and participation at Tier 1. Academic staff, who have in most cases not been teachers, need support to learn and apply these principles in their development of curriculum content, formative and summative assessment, and pedagogy, particularly in relation to their scaffolding and use of specialist vocabulary. Without this support, those with common disabilities like ADHD and DLD, who we reiterate account for around 14% of school-aged students and are likely overrepresented in university attrition, will encounter instructional barriers that “bolt on” support services will not resolve.

Needs-Based Funding

On the specific issue of funding, we highlight errors made in the development of a needs-based funding mechanism in school education to warn against the inadvertent creation of perverse incentives. The Nationally Consistent Collection of Data on School Students with a Disability (known as NCCD) is a needs-based mechanism designed to allocate funding to schools on the basis of adjustments made to support the education of students with a disability. It has been plagued by problems since its implementation a decade ago and needs to be redesigned to address these. One major problem with the NCCD is that it does not attach funding to baseline practice (a level described as “Quality Differentiated Teaching Practice” or QDTP). As such, there is no incentive for schools to invest in the practice of classroom teachers to ensure that students’ learning needs are met at Tier 1. The result is that proactively designing out barriers in curriculum, assessment, and pedagogy (of which we speak above) is not rewarded and students whose needs should be met in the classroom are instead being provided with supplementary, substantial, or extensive adjustments. Note what we said earlier about confusion, frustration, and poor self-esteem, but this time add disruptive and disengaged behaviour, underachievement, social-emotional difficulties, truancy, and early school leaving.

We are concerned by the suggestion that higher education providers might be prevented from using Needs-Based Funding to “deliver any good or service they are otherwise obligated to provide through existing legislation”. Education providers are currently obligated to provide reasonable adjustments under the *Disability Standards for Education 2005*, however, the

current retrospective “add-on” approach does not serve all students well. Preventing education providers from using Needs-Based Funding in this way will also prevent financially strapped universities from investing in education and upskilling of academic staff. In school education, teachers are provided with release from face-to-face to attend evidence-based professional learning, to collaborate with peers in curriculum development. This type of ongoing support is rarely offered in the higher education sector. Needs-Based Funding could and should be invested in academic staff to ensure that inclusive practice and the use of universal design principles in curriculum, pedagogy, and assessment is both well understood and becomes automatic.

C4IE is supportive of needs-based funding to be calculated based on equity groups, particularly for groups such as students with disability, students from remote and regional areas and Indigenous students, who often experience higher costs to attend university. However, universities should receive adequate CSP funding to meet the legislated support requirements for all students. Needs-based funding should be used to offer additional support services, beyond the core provisions, specifically for underrepresented student groups. The allocation of funds must also consider systemic barriers that are created by universities preventing students to participate and succeed in higher education. While the needs-based funding may address many of the financial barriers that some groups experience, other barriers such as cultural differences, language expectations, discrimination and stereotypes (Belando-Montoro et al., 2022) will remain unaddressed if a broader view of student experience is not considered.

C4IE suggest that a needs-based funding system be based on headcount rather than EFTSL. Students from equity groups, particularly students with disability (Australian Department of Education, n.d.) are more likely to complete their studies part-time, and the costs of supporting students often do not differ if a student is studying part-time to full-time. For example, the *Regional Universities Network’s Submission to The Australian Universities Accord Discussion Paper* (Regional Universities Network, 2023) indicates that part-time students access a higher average number of supports per EFTSL than full-time students. Due to earlier and ongoing disadvantages, equity cohorts rely on supportive pathways both in terms of academic and personal support, including access to skills development, counselling and financial services. Institutions with a high number of students from equity cohorts face significant challenges in managing and supporting student progression (Hurley et al., 2023), so funding based on headcount is more likely to support students in a more equitable way.

Additional contribution amounts for students who are experiencing cumulative disadvantage is welcomed. There is evidence that equity loading can help reduce gaps in educational outcomes (Hurley et al., 2023). There is also evidence that equity cohorts have lower completion rates and that attrition rates increase disproportionately when disadvantage intersect, as noted by the Universities Accords Report (Australian Department of Education, 2024).

Direct funding could support equity cohorts during placement or work integrated learning. There is evidence that internships and placements during degree programs can perpetuate

inequalities and create further barriers for some equity students (Bennet et al., 2024). These include loss of income, travel and accommodation costs, the need to make alternative care arrangements for dependants and the risk of losing current employment (Bennet et al., 2024). We note that these costs would likely be higher for students with disability.

However, further funding should be allocated to provide indirect supports that will benefit students in equity cohorts, whether they have been identified or not by institutions. Indirect supports include teaching staff professional development on universal design principles, accessibility and legislation (as discussed above). Professional development could be offered in the format of micro credentials to implement inclusive practices in curriculum design, pedagogical practice and assessment.

Accountability measures could then focus on universities demonstrating how they are implementing programs and practice to increase accessibility and universal design to support students from a range of backgrounds. Government could consider accountability measures that focus on student feedback on accessibility and inclusion supports, besides course completion outcomes. Institutions could demonstrate improvements in feedback from student experience surveys, but also ensure they provide additional ways for students to provide feedback that is specific to inclusion and accessibility of curriculum, pedagogy and assessment. Data should be disaggregated data to identify the feedback from equity cohorts. Government could leverage existing expertise in inclusive education to enable innovation and grow the evidence base.

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