****

**Vision Australia Submission to Consultation on the Design of Needs-Based Funding**

Submission to: Australian Universities Accord

Submitted to: AustralianUniversitiesAccord@education.gov.au

Date: 9 August 2024

Submission approved by: Chris Edwards, Director Government Relations and Advocacy, NDIS and Aged Care, Vision Australia

# Introduction

Vision Australia is providing comment on the proposal for the design of needs-based university funding for students from under-represented cohorts, including students with a disability (**the Proposal)** to note our support for the principle of needs-based, student-linked funding, but also to draw attention to the ongoing systemic barriers to university participation and attainment by students who are blind or have low vision. We also take the opportunity to express our view that the Proposal in its current form will not address any of those barriers, and in fact may make them worse by not disincentivising universities for failing to address them. We believe that the Proposal is a useful starting point for discussion, but that it does not reflect the reality that university students who are blind or have low vision experience, and that much more consultation needs to take place with the disability sector before the funding design is finalised.

Our comments focus on key concepts from the Consultation Paper rather than attempting to answer the specific questions contained in the Paper.

## Barriers to University Participation and Attainment

In 2017 Vision Australia conducted qualitative research into the online learning experiences of university students who are blind or have low vision. The results of this research are presented in our report titled “Online, But Offtrack: Barriers to Online Learning Experienced by University Students who are Blind or have Low Vision”. In essence, we found that 34 of the 35 students who participated in the research experienced barriers to online learning. In some cases, these barriers were so insurmountable that the students were forced to withdraw from their studies, usually in a state of despair and distress. One student commented in words that are compelling but typical:

"I spent years at university constantly trying to overcome barriers – online, offline, you name it - and constantly battling discriminatory prejudicial and hurtful attitudes and behaviour from support staff who were employed in roles where they should have known better. I'm finished now, and I never want to set foot inside a university again as long as I live. I'm totally repulsed by the idea of further study – it was a deeply traumatic experience for me, and I have emotional scars that may never fully heal."

Three categories of barriers were identified: inaccessibility of online learning systems because of a failure to design them in compliance with accessibility standards; inconsistent, inequitable and often inadequate application of concepts of reasonable adjustments across the sector; and substantial lack of awareness and training for specialist support and academic staff in how to assist students who are blind or have low vision.

Our report included 10 Recommendations that were primarily directed towards the various peak bodies in the sector that have the responsibilities and capacity to lead systemic change and thereby improve access and equity in the sector as a whole:

1. “That Universities Australia, in its role as the peak body representing Australian Universities, receive and give urgent consideration to the findings in this report.
2. That as part of its response to the findings in this report, Universities Australia undertake a comprehensive technical accessibility audit of the online learning environments used by Australian universities, and that the results of this audit form the basis of an Action Plan to achieve remediation and change.
3. That Universities Australia adopt the Australian Standard AS EN301.549:2016 for use in the procurement of online learning and other systems and software used by Australian universities.
4. That Universities Australia work with Vision Australia and other organisations in the blindness and low vision sector, to develop guidance material about best practices in the provision of assistance and reasonable adjustments in the context of online learning for students who are blind or have low vision.
5. That Universities Australia work with Vision Australia and other organisations in the blindness and low vision sector to develop a comprehensive training program for all staff involved in the provision of support services to students who are blind or have low vision.
6. That Universities Australia develop a tool that can be used by individual universities to provide consistent and comprehensive information to prospective and current students about the accessibility of all online learning components and the reasonable adjustments that are available.
7. That Universities Australia develop a national, consistent strategy for identifying students who may be at risk of falling behind in their studies due to barriers in accessing online learning.
8. That Universities Australia develop training resources to assist students who are blind or have low vision to become familiar with specialised software used as part of university courses.
9. That the Australian Government consider and act on the findings in this report, and that it works with Universities Australia to review current funding arrangements to allow universities to provide adequate support for students with a disability, and to ensure that accessibility outcomes in the area of online learning are consistent with legislative requirements, community expectations, and the principles of disability rights and Government policy.
10. That the Tertiary Education Quality and Standards Agency (TEQSA) consider this report in the context of the standards in Part A of the Higher Education Standards Framework (HESF), and work with the university sector to identify any relevant gaps in the standards, and any deficiencies in the application of and compliance with the standards in the context of online learning environments as experienced by students who are blind or have low vision.”

A crucial point to emphasise from these recommendations is that almost all of the barriers to higher education experienced by students who are blind or have low vision are systemic in nature and can only be removed through systemic action. They cannot be adequately addressed via individualised, “funding follows the student” approaches to equity funding, such as the Proposal outlined in the Consultation Paper. For example, if a blind student is unable to access an online learning system because it has not been designed to comply with accessibility standards, then no amount of individualised funding is going to address the issue. Once a university has spent millions of dollars on inaccessible institution-wide systems, it’s generally too late to retrofit them for accessibility, to the disadvantage of students who depend on such systems being accessible.

Since the publication of our report, we have become aware of several other systemic emerging barriers that are negatively affecting the ability of students who are blind or have low vision to succeed at university. These include:

* Differences of interpretation of relevant provisions of the Copyright Act mean that some students have to wait months for accessible versions of their course materials while the university engages in time-consuming and unnecessary negotiations with publishers.
* Some students feel that they are the “meat in the sandwich” because the university expects them to use their NDIS supports to assist them with access to courses, despite the clear expectation that it is not the role of the NDIS to support the higher education sector.
* Students say that they are constantly exhausted, stressed and behind in their studies because of the need to battle for basic access and supports with impersonal and intransigent bureaucracies over which they have no control and which they have little capacity to influence.
* Some students have only been provided with support to attend university event ceremonies when they signal their intention to alert the media to the lack of access and are unable to view the video of their graduation ceremony because the university chose to make it available on a streaming service known to be inaccessible to people who are blind or have low vision.

Again, it is difficult to see how needs-based, student-linked funding could help to directly address systemic barriers such as these.

Our view is that any needs-based funding must be contingent on universities demonstrating that they have robust and enforced accessible public ICT procurement policies, and that they have mechanisms in place for ensuring that teaching staff are meeting their obligations to make reasonable adjustments in the way they deliver course content. At present there appears to be little if any incentivisation or disincentivisation in the provision of Government funding to promote equity.

## Uses of Funding

The Proposal makes it clear that funding could not be used for items in a student’s Individual Education Plan, nor could it be used to fund services or programs that the university is required to provide under other legislation (presumably this includes compliance with the Disability Discrimination Act Education Standards). Since the majority of barriers to participation and attainment experienced by students who are blind or have low vision are systemic in nature, and relate directly either to items in the individualised plan or matters related to compliance, it is not immediately clear what exactly the funding could be used for that would have a beneficial purpose. Certainly none of the examples provided in Attachment B of the Consultation Paper are relevant to students who are blind or have low vision.

One possibility is that funding might be used to develop learning resources to assist students who are blind or have low vision to become familiar with university systems or software, for example, a tutorial on how to use the Endnote bibliographic software with a screen reader, or how to use the university’s library catalogue with an electronic braille display. There is currently a lack of resources of this kind, and many students who are blind or have low vision find it difficult or impossible to use mainstream resources because they are not designed to be used by a student who is blind or has low vision. However, it is unlikely that the funding for any one student would be sufficient for the development of these resources, and there is no guarantee that there would be a sufficient number of enrolled students at any one university for the funding to be aggregated. It is also unclear how resources at one university using needs-based funding could be transferred if the student(s) chose to continue their studies at other institutions.

There is a need for further targeted consultation to develop examples of legitimate and beneficial funding uses for students who are blind or have low vision, especially if the limitations outlined in the Proposal are retained.

## Funding and Full-Time Load

The Consultation Paper proposes that funding be calculated based on equivalent full-time student load (EFTSL). In our view this is not an appropriate metric to use for funding students who are blind or have low vision. Many students are unable to undertake a full-time study load due to the overwhelming participation barriers they face, but they are spending all their time studying nonetheless, and have the same level of need. One student recently told us:

“The lecturer uses images one after the other all through the lectures on their slides, and asks us questions about them. I’m the only one in the class who can’t answer any of them because I can’t see the images and have no idea what’s on them. I have to spend a lot of time with someone after each lecture who can tell me about the images. I’m always behind and never catch up and this is just one aspect of the lectures that takes me longer to process.”

As we have noted previously, the Proposal does not pay sufficient regard to the reality that students experience, and a consequence is likely to be that funding will not reflect actual need.

## Funding and Academic Preparedness

The Consultation Paper claims that a student’s level of academic preparedness is a “major factor influencing the likelihood of student success”, and therefore proposes that needs-based funding be scaled accordingly. In the case of students who are blind or have low vision we do not believe that this claim is correct. We are not aware of any evidence at all that correlates the level of academic preparedness against successful university participation and attainment by students who are blind or have low vision. In fact, anecdotally we know that the barriers that students face have little to do with their individual level of preparation. For examples, a student may be well-prepared academically, but if the university’s online learning platform is inaccessible, or if the lecturers refuse to make reasonable adjustments, then the student will fail – they will be in exactly the same position as a student who has little academic preparedness.

Any direct linkage between funding and academic preparedness will therefore disadvantage students who are blind or have low vision and thwart the fundamental purpose of the funding, unless it also takes other factors, such as the presence of systemic barriers into account.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.