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Blind Citizens Australia

Submission to 2020 Review of the Disability Standards for Education 2005

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1. Introduction

1.1 About Blind Citizens Australia

Blind Citizens Australia (BCA) is the national representative organisation of people who are blind or vision impaired. Our mission is to inform, connect, and empower Australians who are blind or vision impaired and the broader community.

1.2 About Australians who are blind or vision impaired

There are currently more than 575,000 people who are blind or vision impaired in Australia¹ with estimates that this will rise to 564,000 by 2030.²

1.3 About Australians who have a disability

According to the Australian Bureau of Statistics (ABS), over 4.4 million Australians have some form of disability. This roughly equates to 1 in every 5 Australians having a disability.²

In considering how many of these Australians with disability are participating in education, a divide is revealed for people with disabilities comparative to those without disability. Considering data for secondary education, completion of Year 12 was less common for older Australians, with or without disability, however ABS data indicates that in the age bracket of 20-24, 64% of people with disability had completed Year 12 or equivalent, compared with 81% of people without disability (50–54, 31% compared with 51%; 85 and over, 15% compared with 16%).³

The World Blind Union (WBU) substantiates that "children with visual disabilities are among the most excluded group from the education system. The World Report on Disability 2011 by WB and WHO clearly articulated that education outcomes are lowest among children with sensory disabilities such as visual disability in comparison with children with physical disabilities."⁴

2. 2020 Review of Disability Standards for Education 2005

Blind Citizens Australia (BCA) are making a submission regarding the Review of Disability Standards for Education 2005. Additionally, BCA has included and gratefully acknowledges the work of South Pacific Educators in Vision Impairment (SPEVI) in their contribution to the COVID-19 pandemic section of our submission. SPEVI is a major professional association for educators of students with vision impairments in Australia, New Zealand, and the South Pacific region.

3. Survey results and discussion

BCA conducted an online survey over two weeks, completed by 61 participants. Out of these participants, 21 participants were blind, and 33 participants were vision impaired.

In terms of demographic data, ages of participants ranged from under 19 to over 65, with a majority between the ages of 36 and 65 years old (n=39). Nearly two thirds of participants were female (n=36). In terms of highest level of education, most participants had completed TAFE or vocational study (n=10), a bachelor's degree including Honours (n=15), and / or a graduate diploma or certificate (n=10). A few participants completed additional postgraduate qualifications (n=8). A smaller subsection had studied to year 12 or equivalent (n=6).

Participants were currently studying (n=15), had completed study within the past 5 years (n=12), or completed study more than 5 years ago (n=18). A small minority of participants (n=7) where either an educator or disability liaison officer in a school or university.

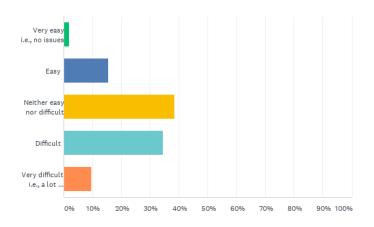
Whilst it was clear that some participants were aware of the Standards (n=22), many did not, (n=19), or were unsure what they were about (n=15).

Participants were surveyed about their experiences based on the questions asked in the Discussion Paper for the Standards Review. The following sections discuss these results.

3.1 Enrolment and access

In terms of enrolment, participants indicated that the process had been difficult (35%) or very difficult (10%). Many participants found it neither difficult or hard (38%) with a few indicating it was easy (15%) or very easy (2%).

Q9 What has been your experience with enrolling in education for yourself or for anyone you support with vision loss?

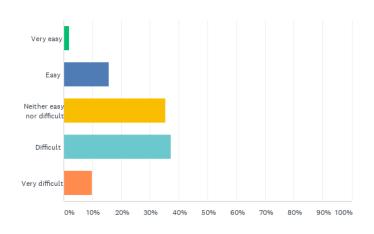


Participants who had difficulty with the enrolment process predominantly indicate this was due to accessibility issues, whether that be online accessibility, or physically accessing buildings, to complete enrolment. Many participants reported difficulties in finding information on websites relating to their course, often requiring assistance to find it. A further source of frustration was filling in online enrolment forms, when the forms were incompatible with screen reader technology being used. Printed forms were often inaccessible, due to being neither in large print or braille, and therefore, requiring the participant to get assistance to complete it.

Other issues raised included disclosing disabilities, then being requested to meet with department / faculty heads to discuss whether they should be doing the course. This included participants being refused access to education based on their disabilities. For a participant completing TAFE studies, "the Head of the school said I shouldn't waste my time doing the course, as no-one would hire a person with a vision impairment. She made sure the lecturers did nothing to support me, however my classmates gave me the support I needed, [e.g.,] note-taking, explaining what was on the blackboard, assisting me with group projects."

3.2 Participation in education

In terms of enrolment, participants indicated that the process had been difficult (37%) or very difficult (10%). Many participants found it neither difficult or hard (35%) with a few indicating it was easy (16%) or very easy (2%).



Q10 How have you found the experience of participating in education?

Participants indicated mixed experiences in participation. Some participants had excellent experiences with all of their requirements met by both Disability Liaison Officers and educators.

Other participants indicated that difficulty encountered was due to accessibility issues, whether that is online, or physical. In terms of

online accessibility, e-learning environments where often incompatible with screen-readers, and it is difficult to locate learning material. In terms of physical accessibility, preferred format material is often not offered of physical course content. More on these issues are covered in section 4.3 Supporting students.

Participants also differentiated between difficulty in participating in the education system in primary, secondary and tertiary education. Some participants indicated extreme difficulty in participating in primary or secondary education, with one noting they had "an ISTV [Iterant Support Teacher Vision] with no experience in working with a vision impairment."

Others noted that the experience they had was dependent on the educators themselves, and their level of willingness to make accommodations. Speaking about experiences in tertiary education, a participant noted, "[I was] made to disclose disability, discuss accommodations to assist and compete accessibility plans with institutions, but [these were] never followed by lecturers or assessors. [I] have had to advocate for myself over the past 5+ years of study, at every turn. So frustrating."

Many participants talked about social support from their peers. Some participants indicated that their peers provided support, rather than their educators. Other participants indicated that a lack of social support was the major inhibitory factor for their education success.

3.3 Supporting students

Several questions were asked to our survey participants around the reasonable adjustments made in education for students to be able to participate equitably. The questions specifically pertained to reasonable adjustments for coursework, assignments, examinations and physical access within the education institution. The level of

support experienced varied considerably, by level of education e.g., primary, secondary, tertiary, or vocational training, across institution, and by individual educators.

Some participants mentioned getting learning materials in their preferred format, although many complained that the time delays to get these materials meant they were constantly behind in their study. Many participants indicated that they had access to assistive technology to assist in their study like screenreaders or magnification devices. The access to AT though did not always guarantee accessibility. "As TAFE does more online courses, they need to ensure these are accessible for those with vision impairments using [assistive] tech and that contact can be made to discuss [someone's] needs." Educators reported frustration in attempting to procure the technology for their students, with "unjustifiable hardship" being used as a reason to refuse funding requests.

Many participants also said that they were offered additional time, separate rooms and other support to finish examinations.

Additionally, extensions were granted to finish assignments.

In some instances, though, there appeared to be a failure for reasonable adjustments agreed upon by a Disability Liaison Officer (or equivalent) to be passed on to educators. "My teachers have been very supportive, but they have little understanding of the needs of vision impairment and / or blind people. Communication between the Disability Liaison Officer and my teachers doesn't seem to be happening. Every time I start a new unit, or encounter a new teacher, I have to start from scratch again, educating them on my needs." This results in accommodation like extra time for examinations and assignments not being implemented, or learning materials not being converted into an appropriate format. To overcome barriers to education, participants frequently referenced

having to self-advocate for their needs. "I had a very difficult time at university, and I found... they were very... [unhelpful] but I learnt how to communicate effectively to get my assignments completed... [I] completed my Bachelor of Arts degree and I am so very, very proud." Other participants noted that having an allocated mentor or support person improved their experience in education. A participant noted that they only had improved access to support after BCA became involving in advocating for the support.

In terms of access to physical facilities in education institutions, a participant remarked "I was discouraged – and forbidden – from using my long cane in the school yard." Additionally, participants referenced the lengthy Orientation and Mobility training they required to orient themselves with the education institution. "Yes, the access to facilities were there but difficult at times to get to [them]." A source of difficulties were placements, where accommodations weren't made. "Advised a month beforehand and provided accessibility plan from uni... No accommodations made whatsoever. [I] spent the whole week unable to see – difficult to participate [and] comply with the assessments during that week."

Unfortunately, some participants had no support at all, and often the attitude of educators proved to be a significant barrier to receiving the support required.

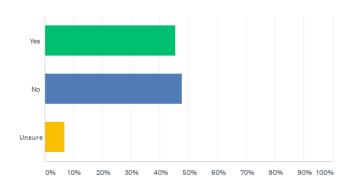
"What support? I mostly did it for myself... The head of the school didn't want me doing the course, so she made sure that the lecturers did nothing extra to support my needs. I think she was hoping I would drop out before finishing the course. It was a battle the whole way... I was told by the head of school that no-one would ever employ a person with vision impairment, so I was wasting their [the TAFE's] time by doing the course."

A disappointing outcome of a lack of support indicated by participants was often a discontinuation of study. This is discussed further in section 4.4. Harassment or victimisation.

3.4 Harassment of victimisation

In terms of harassment and victimisation, 45% of participants indicated they had experience either or both during their study.

Q16 Have you had a situation where you experienced harassment or victimisation in the course of your study?



Participants were asked to elaborate on their experiences. A participant who is deafblind explained "my supervisor in my doctorate did not support me. They would not look at my work, would not agree to my reasonable adjustments, and she was quite demeaning towards me when we would meet for supervision." This ultimately resulted in the student failing an internship and being unable to proceed with the degree. After lodging a formal complaint, first within the faculty, and then with the University Senate, the student could continue their degree, re-enrolling in the internship. Unfortunately, the discriminatory experiences continued, with reasonable adjustments not being made, resulting in the faculty failing the student again after they were unable to satisfactorily complete an assignment without reasonable adjustments.

Another participant who is deafblind explained that the effects of discrimination continued beyond employment, "in my last Bachelor's

degree, I had challenges with lecturers not believing in my capabilities and this led to a few years later to discrimination in my workplace and my redundancy, as the course of study directly related to my employment."

Other examples of discrimination or harassment included:

- Reasonable adjustments like extra time for examinations not being granted or being refused access to Braille examination papers.
- Physical violence against the student being ignored by educators.
- Being told they are "too expensive to support so should not apply for a particular course or should not receive adjustments because it is not fair on others" or that they should not be doing the course due to visual components e.g., seeing client anger or dissociation.
- Being segregated from their peers in primary and secondary education or segregated from peers when group work is completed during class time.
- Cancelling indemnity insurance on placement after realising the student was legally blind, thus denying the student the opportunity to complete a placement.

A legal case was detailed in which the Australian Human Rights Commission determined that a student had been discriminated against, by an Australian university. Another case taken to the AHRC resulted in resolution during the mediation stage. This student was expelled whilst undertaking postgraduate research and states "my expulsion still distresses me... The loss of my research is a loss to the disability community, academia and myself." During their study, they were physically assaulted, which lead to a court case where "the

magistrate stated they [the university] failed to behave appropriately."

3.5 Compliance with obligations

As the previous sections indicate, there is non-compliance with the obligations that education institutions have under the Education Standards, that are part of the Disability Discrimination Act 2005.

There needs to be greater accountability applied to institutions to ensure compliance. Mandatory audits are needed whereby institutions have their accommodations practices verified, to ensure that they are meeting the Education Standards written under the DDA.

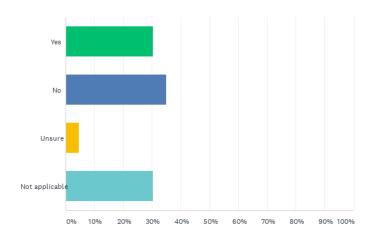
At present, auditing processes particularly in the primary and secondary education system only determine statistical information about students with disabilities engaging in education, rather than verifying that the institutions they attend are making the necessary reasonable adjustments for them to have a truly inclusive, equitable education. This is done via the Nationally Consistent Collection of Data on School Students with Disability (NCCD).⁵

3.6 Transition between education sectors

BCA consulted the Australian Disability Clearinghouse on Education and Training (ADCET) about the challenges posed by transition from secondary education to higher education. There is an immense difficulty posed by the transition, with a student traditionally gaining greater independence, and requiring a different skill set to cope with the transition.

The participants in our survey had mixed experiences with being supported during transitions between education levels. 30% of participants indicated they did have difficulty, whilst 35% indicated they had no difficulty.

Q18 Did you feel supported in transition from one educational experience to another? For example, in moving from high school to TAFE or University.



Participants who had a positive experience tended to be transitioning from secondary education into TAFE. It was noted though that a mentoring system would have assisted in the transition to TAFE, and attending TAFE one day a week, whilst completing secondary education.

The transition between secondary education to university tended to raise more difficulties. Additionally, participants reported problems transitioning between institutions at tertiary level.

After an unsatisfactory experience during school, a participant transitioned from public school to home-schooling, then to completing a Victorian Certificate of Education (VCE) at Distance Education Centre Victoria (DECV). Finally, they moved to the tertiary sector to university. "Honestly, this has to be the best thing that has happened to me. Of course, I had to fight for all my exam arrangements at both DECV and Uni. DECV were more accommodating... With Uni, it has been a continuous struggle."

A participant who is deafblind indicated that the transition between a small private college from a large university was "extremely difficult, as staff who set things up for me moved on and I was then very unsupported by my college throughout that particular education experience."

Disconcertingly, participants reported feeling like the lack of support was expected. "Same general lack of support as every other kid. It is a standard part of moving up to the next level." Additionally, participants indicated that were transition support was lacking, they acted entirely independently to meet their own needs, and / or relied on family.

In terms of positive experiences, a participant who is deafblind indicated that a major positive step to independence at university was living on campus at a residential college and having the support of Student Services (disability support and counselling). The participating felt this assisted enormously in making a transition from a small country town to the city, and greater independence moving from the family home to a residential college. Additionally, Orientation and Mobility (O&M) training, and Assistive Technology (AT) training support from specialists at blindness service providers assisted in the transition.

Resources which have been developed which could be used to develop transition resources for students who are blind or vision impaired, and educators or parents of students who are blind or vision impaired. For example, Autism Queensland created a guide which assists parents and educators of young children with autism spectrum disorder in transitioning to school.⁶

3.7 COVID-19 pandemic and education in Australia

In the COVID-19 pandemic, education shifted from the physical classroom to an online learning environment, causing issues for people who are blind or vision-impaired.

It is critical that online environments for people who are blind or vision-impaired are completely accessible for both education and workplaces, with compliance with Website Content Accessibility Guidelines 2.0 (WCAG 2.0) to ensure that online material is able to be used in conjunction with screenreaders and voice navigation software, e.g., Zoomtext and JAWS. In the shift to an entirely online environment, the issues relating to digital accessibility increased for students, especially those at tertiary level, and for people working from home.

"[It's] great to have Zoom, MS Meeting & Go To Meeting but when you cannot see and committees you serve on want to use its hard to set these up and learn a new method to navigate." - BCA member

At present, online learning systems at university particularly create accessibility issues for people who are blind or vision impaired. The shift to a completely online experience amplifies the issues of inaccessible online learning environments for assessments, discussion boards and other activities. Vision Australia's *Online but Off Track* report highlighted that for 35 students, studying at 24 out of Australia's 37 public universities, most participants reported problems using their university's online learning system.⁷

Parents who were blind or vision impaired experienced additional challenges in having accessibility considered when they were overseeing arrangements for their sighted children studying from home due to COVID-19 restrictions closing schools. A BCA member reflected on their experience during the pandemic. "Where their need for accessibility usually extends only to communication about tasks and classroom management, during the pandemic it became imperative to access and monitor their children's work and instructions. Communications with teachers were understandably limited, due to teachers' other work commitments, and there was

nowhere for parents to go to address their accessibility needs or problems. This causes potential disadvantage to the children of parents with disability, which will often be attributed by schools and potentially by the parents themselves to their disability rather than to their lack of accessible options."

Additionally, parents of children who were blind or vision impaired expressed the need for children who are blind or vision impaired to require greater time for access to the teacher not just for their technology needs, but also time with the teacher to ensure their overall needs are being met in regards to their education, especially for students in senior levels of their secondary education. Unfortunately, the pandemic situation has resulted in less access to classroom teachers. Future crisis situations need to ensure the educational needs of students with disabilities are still met.

BCA has received feedback specifically on the impact of the COVID-19 pandemic on education from the South Pacific Educators in Vision Impairment (SPEVI).

In late March 2020, as a response to the Covid-19 pandemic, SPEVI initiated an online 'Community of Practice' to share opportunities and barriers in education provision for learners with vision impairment during the COVID-19 pandemic. To date, three online meetings have been held, with participants including Australian and New Zealand professionals in vision impairment education and parents of children with vision impairment.

Summarised below are key issues identified by professionals and parents in the field of vision impairment education within the context of the COVID-19 pandemic in Australia.

Issue 1: Communication with students

Not all students with vision impairment could be reached at home; some could not be located. As a result, emergency response or educational intervention was delayed or impossible. We recommend that a better system be put in place so that in any future national or state emergency, every student's location is registered or can be traced.

Issue 2: Student access to educational materials in accessible formats.

Many students who are blind or vision impaired require texts and other educational materials in alternative formats, such as braille, digital, tactile graphics or large print, or a combination of formats. During the crisis, post/mail services were down or limited in different regions of Australia. Furthermore, state and territory departments of education sometimes did not know whether individual students with disabilities were at home or at school. Students first needed to be located, then educators needed to communicate with each student and his or her family to ascertain how best to teach the student and send and receive learning materials and accessible resources.

Issue 3: Communication with teachers

State and federal government communication regarding the changing requirements and restrictions in educational practices have at times been not sufficiently detailed or accessible, resulting in uncertainty for educators and families in how to adapt and best to support their students.

Issue 4: Online learning - Decision making

Because of the unprecedented nature of the pandemic and the need for a rapid transition to home based education, some education decisions were made in a hurry at all levels of education systems (federal, state, and local schools). Some online learning platforms, for example, were officially recognised as accessible, however in practice, access issues were experienced by students with specific vision requirements. Furthermore, resources were shared by schools and individual teachers via the online school platforms without consideration for accessibility of the platform itself or the lessons to be completed by students with vision impairment or other disabilities.

Issue 5: Online learning – Technical problems

Many specialist vision teachers reported spending considerable amounts of time trouble shooting technical problems experienced by students with vision impairment and parents at home, rather than delivering teaching and learning activities. The specialist teachers also found it hard to access support from Information and Communications Technology (ICT) professionals with knowledge and skills in vision impairment (VI) education services. There is a need for better and easier access to VI-specific technical support for teachers and parents, and provision of professional learning for teachers and students so that they can better respond to future changes in education due to emergencies.

Issue 6: Predicting required student support

The current global COVID-19 pandemic has highlighted that a national or state crisis can produce a clear change in the level of teacher support needed by students with vision impairment or other disabilities. Students with vision impairment who under normal circumstances only require low tech solutions at school may require different kinds of teacher support during an emergency. Students who are skilful in independently using assistive technology at school

are in a better position to work independently at home – if the school online platform and learning materials are accessible.

Issue 7: Self-advocacy more difficult in crisis

Students with vision impairment require individualised accommodations and adjustments to curriculum, pedagogy, and learning environments to receive a quality education without discrimination and on the same basis as their sighted peers. In normal times, equitable education for students with vision impairment is achieved through collaborative partnerships between class and specialist vision teachers and parents/carers. During the COVID-19 pandemic, these partnerships have at times broken down and as a result, students with vision impairment have struggled to access learning. Specialist vision teachers recognise that self-advocacy is essential to resolve such problems, however, self-advocacy can become more difficult in an emergency or when individuals are under undue stress.

4. Recommendations:

Enrolment and participation in education

- Any online enrolment process and online learning environment needs to be hosted on websites that meet the Website Accessibility Compliance Guidelines (WCAG) 2.1.
- Any enrolment forms that need to be downloaded or completed in the enrolment process need to be provided in the preferred format of people who are blind or vision impaired.
- All enrolment or learning materials associated with course content need to be provided in preferred format e.g., electronic, large print hardcopy, braille or audio.

- The Guidelines on Information Access for Students with Print Disabilities⁸, published by Australian Vice-Chancellors' Committee, was created in 2004 and it needs to be updated in accordance with best practice for students who are blind or vision impaired. Resources by the Round Table on Information Access for People with Print Disabilities⁹ should be used by educators to help improve these guidelines.
- Conversion of materials into preferred format by education institutions needs to be completed in a timely manner, allowing the student to keep up with their studies.
- Under the DDA, refusal to access in education is prohibited.
 Further, it is strongly recommended that discussions around enrolments with administrators of programs are based on how inherent requirements of study can be met through reasonable adjustments.
- The facilitation of social support could be handled with the creation of groups specifically for socialisation e.g., at the University of Queensland, the Abilities Collective provides support for people with disabilities, chronic illness mental health conditions.
- The access to Assistive Technology (AT) is critical for students who are blind or vison impaired, especially if accessing online learning. Procurement of technology needs to a high priority, whereby education institutions assist students to get the AT to meet their needs, through the appropriate channels. Educators reported frustration in attempting to procure the technology for their students, with funding not allocated to procure specific technology. This needs to be rectified.

 Physical access to buildings and facilities both on- and offcampus at placements, is critically important. Under the DDA, people who are blind or vision impaired must be able to efficiently access physical sites.

Supporting students

- Students who are blind or vision impaired need to be equipped with self-advocacy skills, provided by education institutions and blindness service providers in a training course.
- Mentoring programs at all levels of education can help to equip students with important skills and confidence by being paired with an older student who is blind or vision impaired. There are mentoring programs provided by blindness service providers and some education institutions at present. This could be extended to more education institutions.
- Improved communication between previous and current educators is critical, both across sectors e.g., secondary to tertiary study, and within the institution i.e., previous to current educators. Any information about the reasonable adjustments and accommodations that a student requires must be passed on in the process of handover.

Compliance with obligations

 Mandatory audits conducted by the Nationally Consistent Collection of Data on School Students with Disability (NCCD) are needed whereby institutions, especially at primary and secondary education levels, have their accommodations practices verified. Institutions must be accountable for adhering to the Education Standards under the DDA. A ramification of non-compliance would be no longer being registered to be an education provider. Similar auditing processes at tertiary level should also occur, with the ramification of deregistration for non-compliance.

Harassment and victimisation

- Harassment and victimisation need to be addressed by education institutions through awareness raising and staff training. This training needs to include information about the DDA and the obligations that education providers have under the DDA for disability education.
- Educators who fail to comply with obligations and found to be engaging in harassment or victimisation through auditing processes needed to be held accountable through revoking their teaching license with a temporary suspension.
 Additionally, these educators must undergo mandatory training in disability education requirements.
- Segregation must not occur in education institutions, with reasonable adjustments being made to ensure that a student can be accommodated and included in activities.

Transition between education sectors

- Blindness service providers need to develop training to target students transitioning between sectors. This would include key skills in independence, Orientation and Mobility (O&M) training, procurement of Assistive Technology (AT) and AT training.
- Blindness organisations need to work with education providers in the development of resources specifically targeting transition between education sectors for students

who are blind and vision impaired, and educators or parents of students who are blind or vision impaired.

COVID-19 pandemic, other emergencies and education

- Government leadership in producing and distributing information for education and ICT leaders and decision makers on how to create accessible learning platforms, emergency information bulletins, and educational resources and learning materials that are founded on universal design for learning (UDL) principles. Such information should highlight that digital information does not necessarily equate with "accessible information". Ideally, state, and federal governments should be able to make well-informed, empirically based decisions that support and promote the selection of the best education solution and the required learning tools and technology, under all circumstances.
- Government organise a technical helpdesk to provide knowledgeable practical support to educators (i.e., classroom and specialist teachers (Vision Impairment), and to provide essential support to parents and students regarding accessibility, alternative formats (braille, digital, large print), and assistive technology software and hardware.
- Government provide efficient and effective ways for teachers to upskill and learn how to use such technology as online communication and learning tools; how to offer accessible formats on online platforms; and what platforms are preferable for ensuring equitable access to learning for students with vision impairments, including those with additional disabilities.

- Government facilitate the upskilling of students with vision impairment in the use of new accessible, assistive technologies to empower the students to independently access their education in future emergencies.
- Government and education sector recognition that in an emergency, students' need for support will change, and specialist and class teachers need to be prepared to assess and respond quickly and effectively to student needs so that no disruption to learning occurs.
- Education sector awareness and understanding of the personal stress and self-advocacy challenges that may be experienced by students with vision impairment (as with all students) during emergency situations.

http://www.vision2020australia.org.au/our-work/avoidable-blindness-and-vision-loss

https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/educationand-skills/educational-attainment/highest-level-of-education

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² Australian Network on Disability. *Disability statistics*. https://www.and.org.au/pages/disability-statistics.html

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⁴ World Blind Union. (2015). *Right to Education UNCRPD WBU ICEVI submission for April 15, 2015 discussions*. http://worldblindunion.org/English/Pages/default.aspx

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⁶ Autism Queensland. (2020). *ASD online transition resource package*. https://autismqld.com.au/page/page-asd-online-transition-resource-package

⁷ Vision Australia. (2018, October 24). *Online, but off-track* [Press release]. Retrieved from https://www.visionaustralia.org/community/news/2019-08-23/online-track

⁸ Australian Disability Clearinghouse on Education and Training. *Universities Australia guide - Information access for students with print disabilities.*

https://www.adcet.edu.au/resource/5352/universities-australia-guide-information-access-for-students-with-print-disabilities/

⁹ Round Table on Information Access for People with Print Disabilities. *Guidelines*. http://printdisability.org/guidelines/