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Submission to the Higher Education Standards Panel Consultation on the Threshold Standards

From the La Trobe University Disability Advisory Group (DAG)

To the Higher Education Standards Panel Secretariat,

The La Trobe University Disability Advisory Group welcomes the opportunity to provide feedback on the Higher Education Standards Panel consultation regarding potential amendments to the Higher Education Standards Framework (Threshold Standards) relating to disability inclusion. We will confine our focus to the material concerning disability.

The Disability Advisory Group is a university-level advisory body that brings together staff perspectives on disability access and inclusion across La Trobe University. Its role is to identify systemic barriers, promote inclusive practice, and provide advice on institutional policy and governance related to disability, whilst incorporating the principle of intersectionality. The Group's work emphasises coordination of inclusion initiatives, strengthening accessibility across physical and digital environments, improving processes for students navigating support systems, and ensuring that lived and living experience of disability informs institutional decision-making.

The Disability Advisory Group strongly supports the direction outlined in the consultation paper. In particular, we welcome the Panel's focus on inclusion, universal design, and inherent requirements as central themes for strengthening the Threshold Standards. These themes would help address longstanding concerns raised by students and staff with disability at La Trobe University, disability practitioners, and universities across the sector, and they align with widely recognised approaches to improving participation and success for students and staff with disability.

Question 6

To what extent would the proposed themes (inclusion, universal design and inherent requirements) drive a more inclusive and equitable higher education system and improve student outcomes?

The proposed themes have strong potential to drive meaningful improvements in equity and participation for students and staff with disability across the Australian higher education sector.

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First, embedding inclusion as a core institutional responsibility is essential to shifting disability support from a reactive and individualised model towards a systemic and preventive approach. Historically, many higher education systems have relied heavily on case-by-case adjustments initiated by individual students and staff. While reasonable adjustments remain an essential safeguard (including legally), over-reliance on individual accommodation can create administrative burden, delay support, and place the responsibility for accessibility on individual students and staff themselves. By contrast, strengthening inclusion requirements within the Threshold Standards would encourage institutions to design environments, systems, and learning experiences that anticipate human diversity, of which disability is a natural part, from the outset. From an intersectional perspective, the focus on inclusion in conjunction with incorporating an explicit anti-racism commitment (as proposed) reduces the impact of compounded marginalisation experienced by staff and students due to overlapping inequities such as ableism, racism, classism, sexism and ageism. The proposed amendments would assist in driving change to improve student outcomes beyond the lifespan of their education, extending to real-world impacts within their communities. Second, the emphasis on universal design is particularly important. Universal design principles support accessibility in curriculum design, digital platforms, learning environments, and institutional processes. When implemented effectively, universal design improves learning experiences for all students and staff, not only those who identify as having a disability. For example, accessible digital materials, hybrid participation options, captioning technologies, and inclusive assessment practices benefit a wide range of students including those with temporary health conditions, caring responsibilities, or language barriers—but also all staff and students when they need to adapt based on circumstances.

From an institutional perspective, universal design also enables more efficient allocation of resources. By reducing common barriers embedded in learning environments and administrative systems, institutions can direct specialist disability support resources to enable all students to take part fully.

Third, the consultation's focus on inherent requirements is welcome and timely. Clear and well-designed inherent requirements statements can support transparency for prospective students and staff, and assist institutions to identify legitimate learning outcomes associated with professional or accreditation requirements. However, it is important that inherent requirements frameworks are developed in a manner consistent with inclusive design principles. If poorly implemented, inherent requirements can inadvertently reinforce outdated assumptions about disability and capability.

For this reason, ongoing review of inherent requirements statements and meaningful engagement with students and staff with disability will be critical to ensuring these frameworks remain inclusive and evidence based.

Overall, the three proposed themes are mutually reinforcing.

Question 7

To what extent would the proposed themes promote accountability, better governance and improved provider practice to support people with disability in higher education?

The proposed themes would significantly strengthen accountability and governance across

the sector if they are embedded clearly within the Threshold Standards.

At present, many obligations relating to disability access in higher education derive from the *Disability Discrimination Act 1992* (itself which is currently under review) and the Disability Standards for Education 2005. While these instruments establish important legal rights and standards, their enforcement mechanisms are largely complaint-driven and reactive. As a result, there can be significant variability in how institutions interpret and implement their responsibilities.

By contrast, the Threshold Standards play a key role in shaping institutional governance, quality assurance, and internal accountability processes. More explicit inclusion of disability access and inclusive practice within the Threshold Standards would therefore help ensure that accessibility considerations are embedded within institutional governance structures rather than treated solely as compliance obligations.

In particular, stronger standards relating to inclusion and universal design would support institutions to:

- integrate accessibility considerations into course design, digital infrastructure, and teaching practice
- embed accessibility within institutional governance and quality assurance processes
- develop institution-wide approaches to inclusion, rather than relying on isolated disability support units (notwithstanding the importance of such standalone units).

Many barriers faced by students and staff with disability arise not from individual attitudes but from structural features of university systems, including administrative processes, digital platforms, physical infrastructure, and curriculum design.

The consultation paper also rightly identifies the need to clarify institutional responsibilities in contexts such as work-integrated learning, fieldwork, laboratory work, and education delivered through third parties. These areas can present challenges for students with disability and can sometimes fall outside clear institutional accountability frameworks. Explicit standards in this area would help ensure that inclusion responsibilities are maintained regardless of where learning activities occur.

Overall, strengthening the Threshold Standards in the ways proposed would encourage institutions to adopt a more proactive, system-level approach to disability inclusion and would help ensure more consistent practices across the sector.

Additional observations and suggestions

The DAG strongly supports the proposed direction of reform, and in addition we offer several observations that may assist in strengthening the implementation of the proposed themes.

We strongly support the point that accessibility and inclusive design are institution-wide responsibilities, rather than solely the remit of disability support services. This includes responsibilities across governance, curriculum design, infrastructure, digital systems, and professional development. However, we also wish to stress the importance of disability

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support services. As disability takes many forms there remains a risk that the call to adopt inclusive practices across systems of governance can lead to the loss of specifically-focused divisions, figures, or groups within universities that hold particular expertise and retain institutional knowledge sufficient to assist students (and staff) with disabilities. A balance is required between embedding inclusive design expectations at the institutional level to ensure accessibility is addressed proactively during planning and review processes, while also having designated focal points to which staff and students when distinct access issues arise.

We strongly support the point about the importance of ‘mechanisms for consultation with, and participation of, students and staff in institutional planning, review, and decision-making’. The Threshold Standards should indeed encourage institutions to establish such mechanisms.

Finally, on the point of resources, implementing universal design and inclusive practices requires sustained investment in staff capability, digital accessibility, and institutional systems. Clear expectations within the Threshold Standards can support institutions to allocate appropriate resources and embed accessibility within professional development, workload planning, and quality assurance processes.

Conclusion

The La Trobe University Disability Advisory Group strongly supports the Higher Education Standards Panel’s proposal to strengthen the Threshold Standards through a greater emphasis on inclusion, universal design, and clearer approaches to inherent requirements.

These themes reflect well-established evidence about the barriers faced by students and staff with disability and the structural reforms required to address them.

The DAG commends the Panel for its work in advancing these reforms.

Yours sincerely,

Zibet Szacs vay, Kylie Lee (Co-Chairs) and Piers Gooding, written collaboratively with and on behalf of the La Trobe University Disability Advisory Group