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**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 Higher Education Standards Panel (HESP) – Consultation on amendments to the Higher Education Standards Framework 2021*.

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We thank the Higher Education Standards Panel for this opportunity to respond to the Consultation Paper and for their recognition of calls to strengthen the Threshold Standards to more effectively support students with disability. The introductory section of this submission explains the foundational principles that inform our responses to the Consultation questions.

**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, to proactively remove or reduce barriers to access and participation, as a first order response. 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 inclusion 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.

However, disability support services—on which most universities still rely—are unwieldy, and 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).

These types of adjustments are also only relevant to a relatively small number of students with, for example, sensory or fine motor impairments and can be at best ineffective or at worst overwhelming to a much larger group of 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 or ability but rather the inaccessibility of higher education curriculum, pedagogy, and assessment.**

While the implementation of systemic inclusive education reform as per GC4 (United Nations, 2016) will assist the achievement of the other elements of the Consultation Paper, including combatting racism through values and practices that contribute to a more inclusive and cohesive society, our submission focuses on Questions 6 and 7 and the themes of nomenclature and terminology, inclusion, universal design, and inherent requirements.

**Q6 To what extent would the proposed themes in the consultation paper (inclusion, universal design, and inherent requirements) drive a more inclusive and equitable higher education system and drive student outcomes?**

### **Nomenclature and terminology**

We commend the Panel's decision to address existing nomenclature and terminology, including removal of the term 'special needs'. Although this term is now ubiquitous, it is doing damage that we now have the knowledge to avert. The word 'special' marks students with disability out as needing something that other students do not. This can contribute to staff believing that 'special skills' are needed to teach 'special students', and that these students should be educated in 'special places' (De Bruin, 2024). However, 'special' is not the only problem word in this phrase. As Graham et al. (2024) note,

The word 'needs' portrays people with disability as dependent on the largesse of others to provide them with the support and adjustments they 'need'. This can contribute to a perception that people with disability are weak and a burden on others ... The language of 'needs' also obfuscates the fact that inclusive education

is a human right, and that education providers are obligated to provide adjustments under legislation. In other words, students with disability don't have needs that they are waiting on us to fulfill, they have rights that we have agreed (and, in most cases, are paid) to provide. (p. 75)

**Correspondingly, we recommend going one step further than indicated in the Consultation Paper and explicitly adopting a rights-based framing, along with strengths-based language.** This, we believe, will be an even more effective approach, as it will mitigate the effects of outdated language while alerting both students with disability and higher education workers of rights and obligations under international human rights and national anti-discrimination legislation.

**We also recommend use of the phrase 'persons with disability' in the Threshold Standards (where appropriate and relevant) in recognition of the fact that many staff within universities also experience disability.** By emphasising personhood, this phrase mirrors the language of the CRPD and recognises humanity as a primary identity; that is, people are persons whether they be students or staff.

### Inclusion

The extent to which this theme will drive a more inclusive and equitable higher education system and drive fairer student outcomes is dependent on the sector's genuine embrace of **systemic inclusive education reform**. *Effective* reform implementation will require a shift in both culture and mindset, similar to the shift that is still taking place within the school education sector. However, two complicating factors have made university culture less amenable to genuine reform: (1) competitive entry, and (2) significantly larger student/staff ratios.

The first factor, *competitive entry*, can promote the attitude among teaching staff that access to complex curriculum content is a bar that students must meet by virtue of meeting ATAR or equivalent standards for entry, inappropriately extending inherent requirements for the degree to required hurdles for access to learning. This attitude is inconsistent with the mindset necessary for understanding disablement as the result of an interaction between a person with an impairment and barriers that prevent their access in participation, as per the social model of disability (Oliver, 2013). **Too often, the resulting assumption is that student outcomes are the result of a mismatch between intelligence and intellectual demand, when it may be the result of an interaction between students with, for example, a language impairment and inaccessible curriculum, assessment, and pedagogy** (Graham, Killingly & Tancredi, 2026).

The second factor, *significantly larger student/staff ratios*, increases the distance between students and those ultimately responsible for their learning: unit coordinators. Currently, this distance means that consultation is conducted by Disability Support unit staff who have no control over curriculum and content development, and limited contact with unit coordinators and tutors. Depending on the size of the unit, the lead academics responsible for developing curriculum and assessment, administrative functions (e.g., timetabling and answering student

queries), and managing teaching teams, may never meet the students enrolled in their unit. Tutors, often employed as casuals, are also not allocated time for student consultation.

What this means in practice is that generic adjustments, like scribing, note taking, extra time in exams, extensions for assessments are provided to students, however, these types of adjustments do not address the types of barriers we noted earlier, and may therefore be ineffective as well as contribute to cognitive overload.

### Universal design

We agree wholeheartedly with the description of this theme in the Consultation Paper and commend the Panel for its inclusion.

To strengthen further, **we recommend specifying curriculum, assessment, and pedagogy as critical components of 'learning environments'**. Our experience is that the term 'learning environments' is easily misinterpreted to refer only to the physical (or built) environment which leaves curriculum, pedagogy, and assessment untouched and largely inaccessible (Tancredi et al., 2024). Further, **we recommend specifying that the 'digital environment' involves more than meeting WCAG 2.2 guidelines**, especially now as most assessment and curriculum content is accessed digitally through Learning Management Systems. Content is presented in written or verbal forms and how it is presented can either support or thwart student comprehension, impacting outcomes.

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](#) in a university-wide undergraduate unit. 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, supporting students' academic vocabulary development. Procedural barriers were removed through logical content sequencing, clear signposting, and a carefully scaffolded assessment task 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).

**As recognised in the Consultation Paper, the value of accessible curriculum, assessment, and pedagogy is that all students benefit: not just those with disabilities, but also those from socioeconomically and/or linguistically diverse backgrounds, a broad group that includes many**

**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, achieving accessibility in higher education through the implementation of universal design principles will require significant investment in professional development of staff, as has been required in the school education sector.** Academic staff, who have in most cases not been teachers, need support to learn and apply universal design principles in their development of curriculum content, formative and summative assessment, and pedagogy, particularly in relation to their use of specialist vocabulary. Without this support, students with disability will continue to encounter instructional barriers.

### Inherent requirements

In the higher education context, inherent requirements play a critical role in ensuring that graduates can meet the core competencies of their chosen profession or discipline. Providing clear and accessible information about these requirements supports **student awareness**, enabling prospective and current students to assess their suitability for a course and engage in early discussions about **reasonable adjustments** (Brett et al., 2016). This transparency can reduce uncertainty and minimise situations where students encounter barriers later in their academic journey (Brett et al., 2016).

**A common concern, especially in relation to assessment, is that adjustments compromise academic integrity.** Our Accessible Assessment research conducted with over 400 secondary school students has demonstrated that applying universal design principles to improve linguistic, visual, and procedural accessibility of assessment task sheets significantly improves the experiences and academic outcomes of all students, including those with disabilities impacting language and information processing (Graham et al., 2026). **Importantly, the process of accessible assessment redesign applies only to linguistic, visual, and procedural complexity, retaining the intellectual demand of each task.** Our results demonstrated that students with disabilities impacting language and information processing could engage with the intrinsic cognitive load of the original task at levels commensurate with students without disability, *if* barriers to their comprehension were removed. **We are now working with over 120 educators in a larger follow-up project and can confirm that professional learning is necessary but effective in assuaging concerns about academic integrity and inherent requirements.**

**Q7 To what extent would the proposed themes promote accountability, better governance, and improved provider practice to support people with disability in higher education?**

Adoption of all three themes will be beneficial for Australian higher education if conducted as key components in the implementation of systemic inclusive education reform consistent with our international obligations as a signatory to the CRPD. Yet, if greater progress in the school

education sector is any indication, much more by way of accountability will be necessary to achieve the desired outcomes.

### Inclusion

**In relation to inclusion as an overall concept, universities must accept that change to systems and practice is necessary and that students with disability have a right to be included.** This shift in attitude and thinking has been difficult to achieve across all levels of education, but especially university education, due to enduring beliefs about who education is for and how it is best delivered. The result of these beliefs is the peripheralisation of inclusive practice, rendering it as something done as needed and only for identified students by people other than the teacher/lecturer/unit coordinator. This perception is incompatible with the principles of universal design, which seeks to proactively meet the access needs of as many users as possible, whether those users are identified or not.

### Universal design

**We recommend the adoption of universal design be supported through quality professional development coupled with rigorous evaluation.** This is necessary to address a key barrier to effective reform in higher education: the ‘closed door’ of teaching. The relative invisibility of university teaching could be vastly improved by random audits led by an external authority such as TEQSA after the development of accessibility design principles (Graham, Killingly & Willis, 2026) for higher education curriculum, assessment, and pedagogy.

**This is the rationale underlying random evidence audits assessing schools’ compliance with the Nationally Consistent Collection of Data on School Students with a Disability (NCCD).** Every year, Australian schools that have claimed disability support funding based on adjustments provided to students with a disability are selected for audit at random. Given the prospect of higher education moving to needs-based funding, it is critical that this sector adopt similarly robust accountability mechanisms to assess whether necessary reforms are occurring with fidelity and whether the desired outcomes for students are being achieved. Accountability measures could also include student consultation and feedback on accessibility and inclusion supports, as well as course completion outcomes.

### Inherent requirements

The Consultation Paper’s proposed theme on inherent requirements seeks to address issues by ensuring prospective and current student awareness, highlighting flexible design informed by universal design principles, and conducting the regular review of inherent requirement statements to ensure their ongoing relevance and accuracy. **We support these proposed actions but again recommend the provision of quality professional development to provide academic staff with the knowledge and skills necessary to implement universal design with fidelity.** Improvements in knowledge and skill will also reassure academics that universal design properly implemented will not compromise academic integrity and inherent requirements of the degree.

We note that the concept of inherent requirements is explicitly recognised in the *Disability Discrimination Act 1992 (DDA)* under section 21A and is further reinforced in the *Australian Disability Standards for Education 2005 (DSE)*. The DDA (1992) makes it unlawful to discriminate on the grounds of disability across a range of criteria, including by denying access to any benefit provided by the educational authority and developing curricula that will exclude a person from participation. Building on this legislative foundation, the DSE (S 5.2) further emphasises the responsibility of education providers to consult with students regarding whether their disability may impact their ability to participate in courses or programs. It also requires educational providers to consider reasonable adjustments that enable students with disability to participate on the same basis as their peers (DSE, 2005). Despite these formal obligations, the DSE have been only partially effective in preventing discrimination and achieving inclusive education, due to vague definitions, weak enforcement, and inconsistent implementation across educational sectors (De Bruin, Poed & Jackson, 2024; Dickson, 2022). The DDA and DSE are currently under review and our submissions to these consultations can be accessed at: <https://research.qut.edu.au/c4ie/submissions/>

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Members of The QUT Centre for Inclusive Education (C4IE) at Queensland University of Technology (QUT) conduct high-quality research across three interlocking programs: (i) Engagement and Learning, (ii), Inclusion and Exclusion, (iii) Health and Wellbeing. For more information about C4IE, its members and research outputs, please contact Jiwon Carluccio, C4IE Coordinator [jiwon.carluccio@qut.edu.au](mailto:jiwon.carluccio@qut.edu.au) or visit [www.research.qut.edu.au/c4ie/](http://www.research.qut.edu.au/c4ie/)