

Parliamentary Inquiry into access to TAFE for learners with disability

Victorian TAFE Association Submission

November 2020



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Executive Summary

The Victorian TAFE Association (VTA) welcomes the opportunity to respond to the Victorian Legislative Assembly Economy and Infrastructure Committee's Inquiry into access to TAFE for learners with disability.

This submission is made by the Victorian TAFE Association (VTA), on behalf of its members.

The VTA is well placed to respond to this Inquiry in its role as the peak employer body for Victoria's TAFE sector. VTA members comprise all of the public Vocational Education and Training (VET) providers being the twelve stand-alone public TAFE providers, four dual sector universities, and an Associate member AMES (Adult Migrant Education Service).

Victorian TAFE providers are actively engaged in vocational education and training (VET) at the state level as well as nationally and internationally. We understand the Committee is interested in views, insights and experiences on how learners with disability can be supported to access and fully participate in TAFE programs in Victoria. Through this submission, we endeavour to cover many of the areas of interest to the Committee, with a particular focus on the key areas of:

- the support learners with disability need to maximise their learning experience at TAFE;
- the training and practical, policy and curriculum support TAFE teachers need to maximise the learning experiences of learners with disability; and
- the effectiveness of current government and TAFE policies and programs in supporting learners with disability and suggestions for improvement.

The VTA response draws on information directly from VTA members for this Inquiry and on the views of practitioners from the TAFE Disability Network, those most closely involved with and attuned to the needs and learning experiences of learners with a disability.

We are aware that our members have contributed to the development of a whole of government submission to the Inquiry prepared by the Department of Education and Training. In doing, so they will likely have provided case studies and examples of on-the-ground activities which will be featured in that submission. In addition, the recent report by the Nous Group "Improving access and achievement for students with disability – Final Report" (9 October 2019) commissioned by the Box Hill Institute (on behalf of the TAFE Network) undertook research, consulted across the Network, and provided recommendations on access and achievement for students with disability features examples and case studies.¹

Therefore, this submission does not feature case studies and examples but we are happy to provide extra information where it would be helpful to illustrate issues for the Committee.

¹ Nous Group was engaged by Melbourne Polytechnic and Box Hill Institute (on behalf of the TAFE Network) to undertake research, consult across the Network, and provide recommendations on access and achievement for students with disability and disability inclusive workplaces. Both pieces of work were overseen by a Project Control Group (PCG), with representatives from Melbourne Polytechnic, The Gordon, Box Hill Institute, and the Department of Education and Training (DET). This report referenced here focuses on access and achievement for students with disability.

The VTA would welcome the opportunity to meet with the Committee to discuss the views and ideas explored in this submission.

Background and context

Victoria's TAFE network is highly cognisant of disadvantaged cohorts including but not limited to people with disability. TAFE plays a major role in providing opportunities for those who may encounter difficulty with engaging, staying and succeeding in education and training. Research by KPMG, undertaken for the VTA, showed that in Victoria alone, people with disability are generally better represented in VET than in university, the TAFE network delivered training to three times as many students from low socio-economic backgrounds as higher education providers, and about four times as many Indigenous students.²

Research supports that without the opportunities provided by TAFEs, many learners from disadvantaged cohorts would likely be excluded from tertiary education and training and from full engagement with society.

The breadth of the Victorian TAFE sector

The breadth, or diversity, of the Victorian TAFE network operates on a number of levels, from a diverse educational and training profile, to its location provision over large geographical areas, the highly mixed student cohort, and the large range of industry sectors that are serviced.

A consideration of Victoria's TAFE institutes enables some understanding of the wider sector.

Victoria's 12 TAFE institutes and four dual sector universities:

- operate over 90 campuses covering every corner of the state;
- provide education and training to over 200,000 Victorian students;
- deliver in excess of 2 million units of training;
- employ around 10,000 staff;
- manage over \$2 billion of state-owned assets;
- offer training across the Australian Qualification Framework, with many TAFEs registered as higher education providers, and others holding partnerships/agreements with universities and other higher education providers that create pathways between institutions or that included the delivery of higher education courses (at least in part) by TAFE institutes; and
- all Victorian TAFEs and dual sector universities are registered with the Victorian Registration and Qualifications Authority (VRQA) as approved senior secondary providers and deliver senior secondary qualifications. All offer VCAL as a course of study at foundation, intermediate and senior levels, and they make up the majority of non-school senior secondary providers in Victoria.

² KPMG (June 2018), *The Importance of TAFE to Victoria's Prosperity: Final Report*, <https://vta.vic.edu.au/document-manager/research-applied/848-the-importance-of-tafe-to-victoria-s-prosperity-final-29-06-18>, accessed 29 July 2019

Responses to the Inquiry's questions

The social and economic benefits of improving access to TAFE for learners with disability

The size and scale of the Victorian TAFE network underpins its capacity to be accessible to a wide range of learner cohorts and to improve/increase the educational opportunities for people with disability. This manifestly contributes to the social and economic benefits gained by people with disability who can take their place in the credentialed workforce and achieve their potential.

The social and economic benefits of improving access to TAFE for learners with disability can be demonstrated across the sector. There are multiple examples from all TAFE providers that support this claim and point to the opportunities provided by TAFE for learners with disability, to gain the education and training that enables them to enhance their lifelong social and economic advantages.

Research indicates that economic participation and financial independence are key issues for people with disability who are underrepresented in the workforce and often have lower median incomes. TAFE provides the education and training that are critical to assisting to build their career readiness and strengthen employability; the benefits of this are far reaching.

Enabling participation in education and training builds diversity in educational settings and subsequently in workplaces. This can lead to greater understanding of population diversity and increases the understanding and awareness of the valuable contributions people with disability can make to their community and economy.

By accessing a TAFE qualification, people with disability can also gain social benefits through connection opportunities with peers, improved self-esteem and self-confidence through learning, and join programs and activities which may improve mental health, and support a sense of belonging in a community setting, reducing the sense of isolation that people with disability often experience.

A safe and inclusive TAFE environment, with strong equitable practices encourages people with disability to engage positively with further education and training. Learners with disability who access a TAFE qualification can also act as champions and mentors for others aspiring to participate in vocational education and training.

The support learners with disability need to maximise their learning experience at TAFE

People with disability make decisions about their education on the same basis as other learners, for example on interest, employment prospects, financial means, access to education providers, and the expectation of support for their choice. As such, they should be in a position to choose a course or be able to participate in learning on the same basis as others. They should not be put at a disadvantage because a system cannot deal with their needs or provide the support that they may require.

The types of support learners with disability need to maximise their learning experience at TAFE include:

- Supported transition into TAFE
- Access to disability informed teachers that can support reasonable adjustments whilst setting realistic expectations
- Access to flexible teaching and assessment delivery
- The use of universal design of curriculum/assessment
- Bridging / foundation courses to assist students moving from one level of education to the next.
- Reasonable EFT of Disability Officers to meet the needs of all students with a disability
- Reliable, ongoing funding for disability supports (tutors, note takers, participation assistants, software and hardware purchases, interpreters, etc.).

Some of these matters are explored in more detail below.

Transition from senior secondary education to TAFE: The process for sharing knowledge of disability and support needs during a student’s transition from senior secondary education to TAFE, and/or when a student with disability is undertaking part of their vocational learning at a TAFE is an important transition point. Often students with disability come to TAFE from schools without a learning capability plan or with an assessment plan that has not been updated to reflect a student’s capability and support needs. Members of the TAFE disability network indicate that better preparation and documentation at the school level and working closely with the TAFE Disability Liaison Officer (DLO) could improve this situation and lead to more effective transitions for students.

The idea of Transition Officers who assist learners with the move from secondary school to TAFE has also been raised in the context of advising secondary schools on how to best assist a learner transition to TAFE.

Enrolment processes and front-line inclusive practices: In the main, enrolment processes for TAFE are completed online. While this suits many prospective students, this is not always the best option for people with disability as often web-based platforms (e.g. enrolment process) are not built with universal design principles. This may inadvertently potentially restrict a person’s capacity to navigate enrolment processes independently. Literacy and numeracy testing (often undertaken online) as part of the enrolment process for vocational education and training have necessitated TAFEs creating more flexible approaches for learners with disability. Such as providing prospective students with disability with a more face-to-face approach with well-trained enrolment and administration staff, who are disability aware and can assist to make the process more inclusive.

The enrolment process is a key transition point for gathering information about student characteristics and any disclosed disability, assisting students to understand what supports may be available to them, and assisting the institution to accurately identify a student’s disability and additional learning and support needs.

For learners with disability, a case management approach to enrolment may be more appropriate and more effective in the long-term. Such a process has the potential to recognise student characteristics that may negatively impact on a student’s progress but would not necessarily be identified as a traditional barrier or equity indicator through the online enrolment form.

Transition from TAFE to employment: TAFEs use a strength-based approach for transitioning students to employment, one that looks towards skills development and better employment

prospects for people with disability. Many TAFE's have their own job or employment services to assist students with their transition from TAFE to employment and/or they have strong relationships and partnerships with industry, employers, employment services organisations and NDIS Local Area Co-ordinators to assist with the transition to employment.

In assisting students with disability in the transition to employment or in undertaking work placement as a part of their qualification, there is often a real and/or perceived lack of awareness and capacity to accommodate the needs of people with disability by employers.

A lack of disability confidence and knowledge about disability among employers can contribute to bias and discrimination. Employers can also experience difficulties in supporting employees with disability regarding recruitment practices, providing workplace adjustments and meeting legal and regulatory requirements.

The National Disability Coordination Officer Program builds links and coordinates services to smooth the transition from school to tertiary education and subsequent employment of people with disability. It has an important role to play in building employer disability awareness and confidence.

Curriculum Design

Addressing the issue of reasonable adjustments

Under regulatory arrangements and policies, TAFE's are obligated to support learners with disability through the provision of Reasonable Adjustment.³ This can involve assisting a student with their application, enrolment, learning and assessment, and the use of facilities or services.

For teachers and trainers there is often a tension around the balance of providing reasonable adjustments for students with a disability and the need to meet the compliance/inherent requirements of the course a student is undertaking. This tension can create difficulties around access and participation. To strengthen the opportunity for success for students with a disability, course design is best when it is flexible in its delivery and caters to the needs of a diverse student cohort. Best practice guidelines applied across the sector could help embed a consistent approach to determining reasonable adjustments to deliver the best outcomes for the students and increase participation in mainstream courses, whilst maintain compliance and industry expectations.

A systemic approach to addressing the issue of reasonable adjustments for learners with a disability could be to embed the principles of universal design into curriculum development.

Universal Learning Design

Universal design, that is, designing learning to meet the needs of the variety of learners, is widely accepted as a set of principles for curriculum development that give all individuals equal opportunities to learn. Courses designed in this context offer flexibility so that students can customise and adjust their learning experience to meet individual needs. Universal design guides the creation of learning outcomes, resources and assessments that work for everyone and is designed to improve the learning experience and outcomes for all students, including students with

³ *The Standards for RTOs, the Disability Discrimination Act 1992, and the Disability Standards for Education 2005.*

disabilities, who often require reasonable adjustments to learning and assessment to enable them to be successful.

Currently Disability Liaison Officers (DLOs) assist teachers to understand and apply reasonable adjustments for individual students and do so on an individual teacher basis. This is a time consuming and repetitious process and one that is likely to increase as more learners with disability choose to study in TAFE. Resourcing increased numbers of DLOs funded by Government for TAFEs could be part of a solution.

A longer-term solution could be to assist teachers/trainers to embed and/or apply universal design principles into curriculum and assessment through a program of professional learning for existing staff and as a part of initial teacher training for new entrants. This could have a range of benefits for teachers and students alike. For teachers there could be a reduced need to apply individual educational adjustments and to develop individual alternative assessments. Students may experience increased ability to engage, through variability and choice; reduced need for support services; reduced need to request individual educational adjustments; and it may reduce the stigma of singling out those who receive support service by giving a variety of options to all students.

In summary, some possible solutions to address barriers are:

- Well supported transition approaches and processes
- Increased teacher training around disability awareness
- Increased universal design of curriculum / assessment
- Greater funding for Disability Officers to be employed to cater for the needs of the growing learners with disability cohort
- Assisting employers to become disability confident.

The training and practical, policy and curriculum support TAFE teachers need to maximise the learning experiences of learners with disability

It is well recognised that the achievement of high-level educational outcomes relies heavily on the quality of teaching that is delivered to students. This is as true in the delivery of VET as it is to any other educational sector, and it is as true for students with disability as it is for the outcomes of participation in TAFE for all students.

In saying this, while teachers are vital to the learner's journey they are not alone. Teachers, DLOs and support staff who understand and assist people with disability are key catalysts for successful learning experiences. A strong TAFE response to maximising the learning experiences of learners with disability is driven by the workforce that delivers it and the professional development strategies in place to support them.

The capacity for TAFEs to provide successful training experiences is not built in isolation, particularly for learners with disability. It is enhanced by TAFE institutes engaging in strong and broadly based community partnerships to support networks and partnership arrangements for training delivery, promote education pathways from schools into TAFE, and foster employment outcomes.

Feedback from the TAFE Disability Network (TDN) indicates that there is a need for more specialist support in the classroom and access to more high-quality professional development (PD) for teachers. All TAFEs conduct some degree of professional development relating to inclusiveness or

cultural awareness and the majority place great emphasis on regular PD as necessary for a successful inclusiveness approach.

Previously-cited research by the VTA⁴ noted that TAFE teachers have in the past indicated that they would like additional training in understanding the impact different disability types have on learning, and how they can better accommodate the needs of learners with disability.

The VET Development Centre (VDC) delivers an annual program of targeted events designed to support teachers working with learners with disability including the challenging behaviours that can result from mental health. A list of events for 2020 is included at Appendix A.

The Australian Disability Clearinghouse on Education and Training (ADCET) also provides a range of material describing how to adapt pedagogy for learners with disability.

Melbourne Polytechnic also hosts the deafConnectEd website. This website provides information for people who are deaf or hard of hearing, who are studying or just thinking about study. They also offer information and support to teachers and trainers, interpreters and notetakers who work with deaf or hard of hearing students.⁵

More research could be done to investigate the challenges facing teachers involved in working with learners with disability including exploring and understanding teacher practices, teacher preparation, support, and professional development in this area.

The key issues raised by the TDN around the training and support TAFE teachers could better assist students with disability focussed on included:

- Training in disability awareness
- Specialist teacher training
- The understanding of and resourcing of assistive technologies.

Training in disability awareness. Students will come into contact with a range of staff including student support staff at enrolment, teaching staff, educational support staff, student counsellors, and administration staff during their learning lifecycle. With the opening up of pathways to TAFE through inclusive policies, outreach activities and initiatives such as Free TAFE, there is every likelihood that teaching and support staff will increasingly interact with learners with disability. The knowledge and skills to design and deliver training and assessment to learners with disability will more and more become fundamental elements of teaching practice.

The Certificate IV in Training and Assessment (TAE) is the national qualification for TAFE teachers. The TAE training package includes advice on equity issues, including reasonable adjustment considerations for learners with disability.

The TAE includes two electives with a focus on delivering education and training to learners with disability. TAEXDB401 Plan and implement individual support plans for learners with disability; and TAEXDB501 Develop and implement accessible training and assessment plans for learners with disability.

There is a strong argument for the inclusion of these currently elective elements of the TAE to become a part of the core for teaching staff, and for a more comprehensive approach to building the disability confidence and awareness in the professional learning for support staff.

⁴ Jonas, Pam, Schultz, Nita and van Son, Jo (2017), Disadvantaged young people: senior secondary completion in Victorian TAFEs and dual sector universities, Victorian TAFE Association.

⁵ <http://www.deafconnected.com.au/>

Understanding and resourcing of assistive technologies.

DLOs often complete a considerable amount of research into effective and useful digital solutions for students to assist the student to be as independent as possible. This is not only a lengthy process but can also be unreliable as the rapid pace of change in technologies mean that DLOs may recommend the purchase of an item which may end up proving ineffective for the student. Working collaboratively across the TAFE sector, it may be more effective to provide an assistive technology Subject Matter Expert or Specialist who could be shared across the Victorian TAFE Network and provide current, reliable and cost-effective assistive technology advice to DLOs across TAFEs.

Similarly, in the area of assistive technologies for deaf students, teaching staff who create video content and resources must be trained in how to use and audit them effectively. Staff must be committed to review and edit auto captions for errors if they are to be accurate and beneficial for students. The pace of captions also needs to be adjusted if they are to be read easily, especially by learners who do not have English as a first language. This is a resource intensive requirement and could be a cost that is shared across the TAFE network, for example. Recent examples within the TAFE sector of collaborative approaches to resource development and sharing resources across and between TAFEs have had demonstrable benefits.⁶

Consideration could be given to the sharing of resources that would support the captioning review and editing across the TAFE network in order to ensure consistent access to content for students with disability.

Specialist teacher training

By offering a range of courses across the TAFE sector in training specialists to work with people with disabilities, TAFE increases the potential pool of specialist teachers that are available to add to the TAFE workforce. Recruitment into the sector of highly qualified teachers is acknowledged as being critical to the successful learning experiences and outcomes for all students.

Many people find their way into a teacher/trainer role towards the middle or end of another substantive career and bring their specialist skills into a teaching role. There could be merit in developing a TAFE graduate program (similar to other professional groups) with the aim of 'growing our own' specialist workforce. Whereby students with and without disability who are undertaking qualifications related to community services, personal care, allied health, disability etc. be encouraged to add a teacher/trainer qualification (TAE) and be recruited directly into the TAFE system on/or after graduation.

Learners with disability often undertake courses in areas related to the 'care' professions themselves. Courses such as the Diploma of Community Services, Diploma of Nursing, Certificate III in Individual Support, Certificate IV in Education, Support and Certificate III and Diploma of Early Childhood Education and Care, are among the most popular courses for learners with disability.

This is a potential peer workforce in the making and it would be a valuable exercise to develop strategies to maximise the pathways to employment in TAFE to graduates from this group.

Similarly, the demand for Auslan interpreters in TAFE is growing and the availability and cost of Auslan interpreters to provide support for deaf and hard of hearing students to participate equitably can be prohibitive. For example, Melbourne Polytechnic has a long history within the disability

⁶ The Regional TFE Alliance Project is one such example.

sector and is Victoria's sole provider of the Certificate IV in Auslan PSP40818, an advanced sign language course. This accredited pathway to learning Auslan, provides students with opportunities to participate in deaf community-based activities and events with their industry partners. Melbourne Polytechnic is currently involved in a pilot to ensure a pipeline of interpreting staff for Victorian TAFEs.

The experiences of learners with disability accessing and participating in TAFE programs

The TAFE sector has a disability inclusive culture. While all TAFEs have policies and practices to support this and comply with government policies that encourage inclusiveness, the experiences of learners with disability may vary between TAFE institutes, locations, and courses.

The complexity of disability may have an impact on the level of study of learners with disability, with some likely to be in the lower-level qualifications (e.g. Certificate I, Certificate II). For this reason, TAFE strategies for inclusiveness and facilitating access to skill development, if relevant, could also place increased focus on supporting pathways to higher levels of study and employment.

The creation of a safe, accessible and inclusive environment is key to ensuring students feel comfortable to identify the adjustments they need. Students with a disability often have concerns around flagging their requirement for adjustments or additional support and worry about stigma, discrimination, or lack of understanding. There is no obligation for students to disclose a disability however feedback from the sector indicates that providing early support can deliver higher completion rates, so the impact of students feeling empowered to flag their support needs has a far-reaching impact on their experience and academic outcomes.

TAFEs employ Disability Liaison Officers (DLOs) through their Community Service Funding, who provide advice and support for learners with disability to ensure equal access to learning opportunities. DLOs work with teachers and learners to develop a disability access plan that supports the learner through articulating the learner's specific needs such as reasonable adjustments, assistive technologies and classroom support. Their work in support of teachers also provides an opportunity to assist teachers, where relevant, to broaden their perception and understanding of the challenges that learners with disability face.

In large part, the success of learners with disability in TAFE can be attributed to the effort and commitment of institute leaders and the dedication and efforts of DLOs, teachers and other support staff.

Barriers to learners with disability accessing TAFE and ideas for addressing these

While TAFEs have achieved great gains in creating an inclusive environment, there is inevitably always more that could be done. Consultation with the DLOs, for example, raised additional matters including:

- Not all learners with disability are young. Mature aged TAFE students with disabilities have significant barriers with returning to study after many years outside of education settings. Years outside of education (which may well have been difficult and a negative experience to begin with) is made harder due to impacts of a disability. Many mature aged students do not have a formal diagnosis of a disability as these were not done during their school years. They have lives to juggle, including children and sometimes caring responsibilities.
- Availability of foundation and entry level courses as beginning points for students with disabilities and increased 'taster type' courses for school leavers with disabilities.
- There is a lack of understanding of what undertaking a TAFE course is all about from prospective students / parents, etc. For example, many parents and students think their child will be supported by a full time 'integration aid' as they may have had at school. Greater work in this transition space is needed.
- Regional barriers including, for instance, the availability of courses in regions, geographical and travel issues, and socio-economic issues around course and associated fees.

Possible solutions identified in our consultation with members to address barriers included considering increasing the number of foundation / entry level courses, and the development of a bridging / preparatory course for entering TAFE.

Strategies to increase the participation of learners with disability in TAFE programs, including initiatives that have proven successful in Victoria and interstate

Continuing to increase the extent to which TAFEs are engaging learners with disability is a State Government priority. Research indicates that improved linkages between education and employment stakeholders and service providers and improved transitions for people with disability between school/community, tertiary education and subsequent employment are proven to increase the participation of learners with disability.

Strategies such as TAFE Taster activities and outreach programs and partnerships are being implemented in individual TAFEs. For example, school outreach programs to both mainstream and specialist schools have been developed by TAFEs as a way of engaging school students in training pathways.

TAFEs take an active community capacity building role. They use a variety of community-oriented approaches to identify and support learners with disability to undertake vocational education and training. This approach utilises partnerships between the TAFE and a broad range of community agencies, other training providers and industry/enterprises.

Their focus is on the access, participation and outcomes phases of the TAFE experience, including identifying groups not yet accessing TAFE training, engaging and supporting them, not only in successfully participating but also in linking their training to employment opportunities.

Implications for policymakers include finding ways to promote and resource collaborative and community-oriented approaches within TAFEs and tap into the valuable strategies generated by the TAFEs about increasing participation of learners with disability and to share these more broadly.

Showcasing of the types of innovative practices by different institutes such as (but not limited to) Box Hill, Wodonga, Swinburne, Bendigo Kangan, Chisholm, and Holmesglen would assist others in understanding successful local strategies, the transferability of such models and the potential to adopt and adapt these and similar ideas to their own practice.

The effectiveness of current government and TAFE policies and programs in supporting learners with disability and suggestions for improvement

TAFE supports State Government policies to encourage and increase access and vocational pathways for learners with disability. TAFE leadership encourages and promotes inclusive approaches to address disadvantage and inequity for all learners and this is supported through internal policies and practices.

TAFEs and the VTA were closely involved in consultations with the Macklin Review. During the consultations, TAFEs engaged in robust discussions which included a specific focus on equity and the need for increased supports for learners with a disability including funding inequities. We anticipate that the report from the Macklin Review may provide recommendations in this area and TAFE will be ready to respond to any potential outcomes.

TAFEs have a broad range of disability-inclusive policies and practices in place. These include access and equity policies, equal opportunity policies, student welfare and accessibility policies, partnerships with Disability Service Providers, community support policies to foster engagement with the community, scholarships for students experiencing disadvantage, including disability; disability access plans, and reasonable adjustment policies.

We also acknowledge the importance of the National Disability Insurance Scheme (NDIS) in providing a policy response to the extra assistance needed for learners with disability and its role in helping to fill some of the gaps in the fragmented array of services available to them. Generally, the NDIS provides personalised supports related to people's disability support needs where they are not provided under other policies or mechanisms.

Notwithstanding the supportive policy environment there exists a fundamental equity issue at stake for learners with disability who choose to go to TAFE for their tertiary education. Their choice and control over their education setting can be constrained because they do not have the sorts of extra targeted support enjoyed by their peers in senior secondary school settings or higher education.

In addition to Skills First course funding, TAFEs are in receipt of a range of funding sources generally provided for the delivery of a broad range of support services and programs for disadvantaged learners, *including* those learners with disability.

Free TAFE has been successful in increasing enrolments among learners with disability and that is to be applauded. But, with increasing enrolments has come the need for extra specialist staff and extra

resources for learners. Community Service Funding (CSF) also provides additional resources for TAFEs to provide a broad range of support services and programs to disadvantaged cohorts *including* learners with disability. Disability Liaison Officers who are available to help learners are also funded under the CSF allocation. While this funding, in part, may subsidise a student's participation it is not targeted to learners with a disability, and in fact serves a much broader purpose.

CSF is discretionary in that each TAFE determines what supports are required for their local community and its learners. Inclusion and engagement support services including the funding of disability support workers for eligible learners and their teachers to meet their needs are *included* in the CSF. The support can encompass assistance with organisational skills for study, course work review, assistance to navigate language, literacy and numeracy support, and access to assistive technologies.

Skills and Jobs Centres at TAFEs are also funded through Community Service Funding. TAFEs work with disability employment services, through their Skills and Jobs Centres, to provide job readiness and employment services. Services includes tailored employer liaison and advocacy to secure employment or work placements; specialist employment services programs; work-ready training programs, career coaching, and motivational sessions.

All Skills and Jobs Centres' services *are available* to learners with disability, as are support services offered under the Reconnect program.

The key words mentioned above are '*including*' and '*available to*' there is no mention of *targeted*. In essence learners with disability compete for resources under the CSF along with all other disadvantaged student cohorts.

This stands in contrast to these learners' peers in school education and higher education, as unlike schools and universities where there is targeted funding for learners with disability, there is **no** targeted funding for learners with disability in TAFE.

It is a question of equity that learners, wherever they choose to learn, should have the same access to the resources that enable them to undertake their learning in the most effective way for them, and in a way that is most likely to result in the best outcome from their education and training.

A question of equity and policy

If a learner with disability is enrolled for their VCE, VCAL or VETiS in a senior secondary setting, they, like all students, will receive core learning funding under the State Government's Student Resource Package (SRP), and in addition they are eligible to apply for equity funding under the Program for Students with Disabilities (PSD). The PSD is a targeted supplementary funding program for Victorian government schools that provides resources to schools for students with disabilities. Schools receive funding for eligible students at one of six levels, ranging from Level 1 of \$7,773 to Level 6 of \$59,334.⁷ Students also have access to a range of extra services such as transport assistance and home-based educational support.

⁷ These figures are drawn from the 2021 Student Resource Package Guide <https://www2.education.vic.gov.au/pal/student-resource-package/policy>

However, this support stops at the school gate. A student with disability is no longer eligible to receive the SRP or apply for PSD if they choose to undertake their VCAL fulltime in a TAFE or part-time as part of a VETiS, VCAL or VCE course, even though the TAFEs and dual sector universities are approved senior secondary providers offering the same courses.

Where a student is undertaking their vocational education and training at a TAFE in partnership with a school, the school has the discretion to direct a proportion of the student's funding to the TAFE in recognition of the shared costs involved but this practice is not mandated and not widespread.

Victoria's TAFE institutes are considerable providers of senior secondary education. The Victorian TAFE Association's research highlights that Victoria's TAFE institutes provide secondary education to around 6,000 students, with increasing numbers of early school leavers completing their senior school certificates in TAFEs and dual sector universities year on year.⁸

All Victorian TAFEs and dual sector universities are registered with the Victorian Registration and Qualifications Authority (VRQA) as approved senior secondary providers and deliver senior secondary qualifications. All offer VCAL as a course of study at foundation, intermediate and senior levels, and these providers make up the majority of non-school senior secondary providers in Victoria.

A question that should be asked and addressed is why there is no targeted funding for students with disability if they choose to study at a TAFE for their senior secondary education.

At the tertiary education level there is also a disparity in funding between TAFE and higher education. If a learner with a disability is undertaking a course at a university, they will be eligible for targeted assistance for their learning needs through the Australian Government's Higher Education Disability Support Program and Disability Support Fund (DSF) which provides funding to eligible higher education providers to undertake activities that assist in removing barriers to access for students with disability.⁹ Under the DSF, providers are able to provide staff training to support students with disability, and modifications to course content, teaching materials and delivery methods. The DSF ensures that students with disability with high costs needs are adequately supported.

The objectives of the ASSD component of the program are to provide funding to eligible higher education providers to assist with the high costs incurred in providing educational support and/or equipment to students with disability to enable them to participate in higher education; and encourage efficient and effective use of equipment and education resources to support students with disability.

⁸ Jonas, Pam, Schultz, Nita and van Son, Jo (2017), *Disadvantaged young people: senior secondary completion in Victorian TAFEs and dual dual sector universities*, Victorian TAFE Association.

⁹ Additional Support for Students with Disabilities (ASSD) and Performance-based Disability Support funding were merged to create the Disability Support Fund (DSF), which allocates funding through both claims-based and formula-based models. Higher Education Disability Support Program <https://www.education.gov.au/higher-education-disability-support-programme> accessed September 2020.

Eligible higher education providers can apply for reimbursement of their ASD expenses incurred in the previous calendar year. The program allows up to sixty percent of the costs of additional support.

The objective of the Performance-based Disability Support Funding component of the Disability Support Program is to encourage higher education providers to implement strategies to attract and support students with disability.¹⁰

No such targeted programs exist for learners with disability who choose to study at TAFE; by contrast to the higher education sector, all of the student learning costs must be met from within the Skills First funding and other additional general funding such as the Community Service Funding.

Again, the question deserves to be asked as to why is there is no targeted funding for students with disability if they choose to study in a TAFE rather than in higher education, particularly given that more learners with disability on average are likely to be studying at TAFE.

In supporting learners with disability, TAFEs and dual sector universities have developed courses, structures and support systems that are as much as possible centred on the needs of learners with disability.

TAFE institutes each serve a diverse community with different educational and support needs. It appears that in other sectors of education, governments (federal and state) are alert to the distinctive needs of learners with disability, and the additional costs that are incurred in meeting these needs, which are met through targeted support programs

There exists a policy imperative for a concerted and coordinated approach to seamless and targeted support to learners with disability across the school and tertiary education sectors.

The VTA recommends that the Inquiry investigates this issue fully to address the inequity in targeted support programs for learners with disability in TAFE.

Suggestions for improvement

- Provision of targeted, appropriate, and predictable funding arrangements for learners with disability in TAFE which would remove the apparent funding inconsistencies that can limit the choice and control of students with disability to undertake a course in TAFE.
- The circumstances of young people within the disability categorisation can be quite different and some are more high needs than others. An alternative approach to viewing the heterogeneity of the group could be achieved by examining the different types of learners with a disability and formulating targeted policy responses.
- There are also opportunities to improve the outcomes of existing policies and initiatives by expanding their scope and amending eligibility criteria. For example, better utilising the Disabled Australian Apprenticeship Wages Scheme (DAWWS) as a pathway option for learners with disability. The scheme could also be extended to include trainee qualifications.

¹⁰ Ibid p.15

Conclusion

Across the TAFE network there has been much collective effort and leadership focussed on improving access and achievement for learners with disability.

This Inquiry signals a willingness to talk about the great work being done in TAFE to provide access to TAFE for learners with disability and ideas for improvement; we trust it also signals a willingness for action to be taken where issues have been raised and innovative suggestions have been made.

In closing, we further trust that the Inquiry and its findings will provide future direction to government, TAFEs and stakeholders on how access to TAFE for learners with disability can be further strengthened in Victoria.

Key Contact

The VTA welcomes the opportunity to speak further to the issues outlined in this submission. Please contact:

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Nous Group, "Improving access and achievement for students with disability – Final Report", October 2019.

National Disability Coordination Officer Program Evaluation 2016
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DeafConnectEd <http://www.deafconnected.com.au/>

APPENDIX A

VET Development Centre (VDC) suite of professional learning activities in 2020

Supporting Students Online & Digital Literacy

Online Engagement for Effective Learning

Addressing Dyslexia and Other SLDs in the Classroom

Info Supporting People with Psychosocial Disability

Info Session on Course in Culturally Considerate Disability Support for Aboriginal and Torres Strait Islander People

Deaf ConnectEd Webinar - Practical Strategies

Applying Reasonable Adjustment

Learn Local Access, Choice and Equity Series | 3hr Session: Building Learner Support and Wellbeing

Working with vulnerable young adults in VET

Teaching strategies for challenging behaviours

Managing my mental wellbeing in 2021!

Strength based approaches in supporting students with mental illnesses

Assisting students at risk of panic attacks/suicidal thoughts. Risks and signs.