**Luke Sheehy**
Chief Executive Officer

21 November 2025

**Mr Tony Cook PSM**
**Secretary**
**Australian Government Department of Education**

By email: DisabilityStandardsConsultation@education.gov.au

Dear Mr Cook

**Response to the Review of the Disability Standards for Education**

Universities Australia (UA) members educate over one million domestic students, 13 per cent of whom identify as having disability. In 2011, this number was 5 per cent. This growth speaks to improved institutional processes and a greater societal understanding and acceptance of disability. But it also reflects that society has seen a considerable rise in the prevalence of mental health issues in the wake of COVID-19. Students with disability are now the fastest-growing cohort in higher education, making equitable access, participation, and outcomes all the more critical to the success of our universities.

This 2025 Review of the Disability Standards for Education (the Standards) comes at an important time, alongside the Review of the Disability Discrimination Act (DDA) and changes to the Disability Support Fund eligibility requirements. Alignment between these frameworks is key to bridging the gap between the ambition of the Standards and the lived experiences of students with disability.

Our key response to the Discussion Paper is that sector-specific guidance is urgently needed. The Standards are written with schools and early childhood in mind, but universities operate in a very different environment, encompassing complex undergraduate, postgraduate and research contexts, each with unique obligations and risks. However, the same Standards apply to all levels of education. Without clearer articulation of sector-specific obligations, universities will continue to face real challenges in interpreting and implementing the Standards effectively.

We recommend that the Department consult closely with the higher education sector to co-design university-specific guidance for the Standards, with intentional reference to research degrees and work-integrated learning. This increased specificity will help universities understand and meet their obligations, especially if the Review of the DDA introduces a proactive and positive duty to prevent discrimination – a duty that would necessarily be operationalised differently in universities than in schools or other educational settings. In the absence of sector-specific Standards, UA supports including the draft principles as supplementary guidance materials to assist providers to comply with the Standards. However, these materials should remain separate to the Standards to allow flexibility for sector-specific advice without requiring changes to each Part of the Standards.

UA supports the intent to strengthen inclusive decision-making and welcomes the emphasis on student voice in the draft principles. The current approach in the Standards and the draft principles for consultation is reactive. In the university context, this model is less effective and less fair. Our sector prioritises inclusive design from the outset, with consultation and adjustments to address areas of

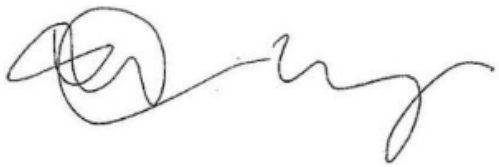
additional need. The Standards and principles should reflect this different consultation dynamic and acknowledge that university students are often independent learners.

I would also highlight the unique challenges around work-integrated learning and professional accreditation. Universities rarely have control over external environments such as placements yet may be held accountable when host organisations refuse to accept students with disability or to make adjustments. Similarly, professional accreditation bodies can impose requirements that conflict with anti-discrimination obligations, creating barriers for students with disability in accredited pathways. Greater clarity is needed on the nature of shared responsibilities in these contexts, drawing on the overlapping duty of care model in workplace health and safety. We encourage the Department to engage with professional bodies to ensure alignment between accreditation and the Standards.

The DDA makes it unlawful to approve curriculum that may exclude students with disability but UA notes that 'curriculum' is not defined in the DDA, the Standards, or the Threshold Standards. UA urges the adoption of a clear, co-designed definition to clarify its relationship to course design, assessment and, by extension, the responsibilities for universities. This would further help universities to interpret and meet their obligations and ensure a cohesive approach to course design across the sector.

UA and its member universities remain committed to working with the Department to ensure the Standards support inclusive, high-quality education for all students. I welcome further engagement on this important work and the opportunity to provide a strong voice for Australia's universities.

Yours sincerely



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