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# Submission on Issues Paper: Promoting Inclusion - Education

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## Introduction

Despite its national reputation as an egalitarian society, for many years Australia has excluded many people from full enjoyment of the privileges of living here. Changing community attitudes and awareness of human rights have led to many attempts to change this aspect of Australian life over the past fifty years. The Disability Discrimination Act and the sequential National Disability Strategies, with their State and Territory counterparts, have demonstrated the nation's commitment to offering equal opportunities to people with disabilities. The National Disability Insurance Scheme provides one of the first mechanisms for collecting national data about people with disabilities and for learning about our needs, our goals and our progress towards achieving them. No matter what efforts are made by individuals or what policies and programs are implemented by governments, Australia will not become an inclusive society until all aspects of the community consider and value equally the needs of all Australians, including those with disability.

Statistics cannot capture exclusion. They do consistently reflect the lower proportion of people with disability who participate in various aspects of society, including employment, higher education and home ownership. While many individuals who are blind or vision impaired first experience exclusion as a personal issue, their repeated exposure to it and their discovery, through meeting or discussing with their peers, that these experiences have been shared by so many others, eventually lead them to realise that the barriers we confront are systemic. Versions of these exclusions have been experienced by all members of the BCA Board, its volunteers and the majority of the staff, who are blind or vision impaired. These concerns are demonstrated in the numerous case studies of people BCA has supported with individual advocacy. Our quotes use our members' own words to describe their experiences.

This Disability Royal Commission is a unique opportunity to tell Australia what life is like for people with disability and to explain how this makes us vulnerable to violence, abuse, neglect and exploitation. We need to be included fully in society by having full access to public transport, education, employment, healthcare, citizenship and all activities of daily life. Blind Citizens Australia is pleased to respond to the Promoting Inclusion Issues Paper.

Blind Citizens Australia (BCA) is the national representative organisation of Australians 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. We provide peer support and individual advocacy to people who are blind or vision impaired across Australia. Through our campaign work, we address systemic barriers limiting the full and equal participation of people who are blind or vision impaired. Through our policy work, we provide advice to government and the community on issues of importance to people who are blind or vision impaired. As a consumer-based organisation, our work is directly informed by lived experience of blindness and vision impairment. Our members, our directors and a majority of our staff are blind or vision impaired.

This submission will focus on two of the key questions from the Issues Paper on Promoting Inclusion.

* Question 3: Do you think Australia is an inclusive society? If not, why not?
* Question 4. How can an inclusive society support the independence and choice and control of people with disability?

## Education in Australia

BCA will be lodging other submissions in relation to some of the barriers which exclude people who are blind or vision impaired. This submission will focus on Education in Australia in the context of educating people who are blind or vision impaired.

In many respects, it seems that the challenges faced by students who are blind or vision impaired never change: braille textbooks arriving too late, teachers mistaking large print preferences for enlarging a photocopy that is already inaccessible due to the copy quality, lessons like sport leaving children sitting on the sidelines with nothing to do, and bullying or harassment by other students being ignored by teachers. Digital learning resources and disability inclusion plans should have made things better, but inaccessible materials and negative attitudes persist.

Disability education in Australia is regulated by the Disability Discrimination Act 1992 (DDA) and the associated Disability Standards for Education 2005, which are currently under review. Our consultation with 61 members for the Education Standards review submission revealed multiple instances of contravention of the Standards, and DDA. In addition to calling for data collection which adequately verifies that institutions are complying with the Standards and the DDA, BCA called for ramifications for non-compliance e.g., no longer being registered to be an education provider.

Echoing our research findings for the submission to the review of the Disability Standards for Education, the current submission will address the issues that have been reported by BCA members which directly contravene the DDA, and these associated standards.

### Why is education important?

Higher education is generally associated with better employment outcomes and higher income, yet people with disability are more likely than people without disability to leave school early. 21% of people with disability aged 15-64 left school before age 16, compared with 8.9% for people without disability. This trend continues into higher education where 17% of people with disability aged 20 and over have a bachelor's degree or higher, compared with 35% for people without disability.

It is generally recognized that most people will need to update or replace their qualifications many times throughout their working lives. Inaccessible resources, lack of access to technology and training and lack of confidence engendered by years of frustration limit the ability of people who are blind or vision impaired to participate in post-school learning options. This can compromise their employability and reduce their chances of career progression.

### Specialist versus integrated education settings

Opinions differ in the blindness community about the best place to educate children who are blind or vision impaired. A person's opinion is most likely to be influenced by their own experience. Most of those who attended schools designed for sighted children feel that they were introduced to a world which better reflects society, where they mixed with a broad range of peers. Many people who were educated in the middle of the last century believe that the segregated blind school they attended set them up with a core group of peers with the same disability and with a set of blindness-specific skills that have helped them live their lives. It was significant to them that some of their teachers were blind. Those who were educated in special units within sighted schools had the benefits of developing relationships with peers who were blind or vision impaired, but were less likely to feel included in the school's activities or by other students. Many attended camps with other blind students, where they were able to experience activities and risks specially adapted for them, rather than always having to adapt to the activities at their own school camps.

BCA believes that each child should be educated in the setting that is most likely to lead to them having independence and choice and control as an adult. Wherever students are educated, they must have the opportunity to meet with other students of their own age who are blind or vision impaired, to learn appropriate blindness-related skills, sometimes called the Expanded Core Curriculum, and that they should learn about or meet adult role models. Wherever they learn and whoever teaches them their blindness skills, their teachers should be appropriately trained and qualified and should have an understanding of the social model of disability, and of the potential of people with disabilities.

#### Historic segregation

Many BCA members were educated in the last century in institutions or even asylums run by blindness charities. They were frequently required to board, even if their families lived quite close to the school. Parents were told that they lacked the expertise to bring up their children who were blind or vision impaired. In the earlier part of the century, children were taken from their families as young as two and returned home only in term holidays i.e., three times a year. In such segregated surroundings, there is little doubt and much anecdotal evidence that children were subject to neglect and violence and abuse, including from other students. These children were undoubtedly exploited, as they were regularly paraded or publicised for fundraising events in a manner which invited pity and conveyed helplessness. The children who endured these conditions have been denied the opportunity to bring them before this Commission, whose terms of reference require it to have a future focus. However, many of the organisations providing blindness services currently are the same as those which formerly ran the blind schools. Australians who are blind or vision impaired deserve an opportunity to tell their stories about what happened to them at school, need to know attitudes and policies have changed and deserve apologies.

### Enrolment in education

Information about courses and the units available within them is voluminous. Email and online versions can be bewildering to prospective students who are blind or vision impaired. Intake officers often lack detailed knowledge of courses and their content. It is acknowledged that these change with extreme regularity.

Enrolment procedures are often inaccessible to people relying on screen-readers or voice navigation software. This usually include online forms, which can be difficult to locate and complete. Where physical attendance is required, buildings are often physically inaccessible. They will most likely be unfamiliar to the prospective student and rarely have wayfinding features. Many educational facilities still require completion of printed forms. These barriers make it difficult for people who are blind or vision impaired to enrol in education without assistance, which compromises their independence and does little to inspire confidence in a successful outcome in the learner or the provider.

### Accommodations after enrolment

Once enrolled in a course, many students who are blind or vision impaired report difficulties locating and accessing course material. Physical materials are not always provided in a student's preferred format, such as braille, audio, electronic or large print, to an appropriate standard or in a timely manner. One BCA member told of being forced to have his answers transcribed by hand from the Word file he had written into a specific workbook. Where material is provided electronically, this is not always compatible with screen-readers or voice navigation software. It is well known, except to some educators, that pdf documents can be difficult to work with. Electronic textbooks do not always follow publishing guidelines which would enable them to be read seamlessly by students who are blind or vision impaired.

The requirements for referencing sources and formatting assignments can be cumbersome and confusing. Even where what is required is clearly stated, a student who is blind or vision impaired is likely to spend a disproportionate amount of time endeavouring to ensure that these have been met. Failure to meet these standards can lead to loss of marks, irrespective of the quality of the assignment's contents.

Discussion boards and collaborative platforms have often been acquired without reference to the Web Content Accessibility Guidelines (WCAG 2.1). Attempts to retrofit them so that they can be used by students relying on voice output or magnification are time-consuming and frustrating. BCA members report friends or lecturers posting questions and comments on their behalf. Without access to such innovative platforms, students who are blind or vision impaired miss out on working with their sighted peers and on many opportunities to learn through shared insights. Some courses of study consider contributions to such platforms an element of course requirements.

Students undertaking several units of study may be expected to learn and apply a broad range of programs and platforms. Whereas their use may be intuitive for computer users with sight, a student who is blind or vision impaired will often require training to be able to use the technology effectively. a series of keystrokes is often required to achieve a desired result, rather than simply clicking a mouse. Assistive technology training can be expensive and involves long wait-times. The learning required detracts from the time and energy available for the student's intended course of study.

"Too much time is spent learning to do it, not just doing it."

Students with disability expect to be supported by Disability Liaison Officers in tertiary institutions or by itinerant special education teachers ′vision′ in schools.

"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.”

Time allocated is determined by the number of educators available divided by the number of students who require assistance. The extent to which a student's needs are met will often depend upon judgments about their self-sufficiency, the effectiveness of themselves or their parents in advocating for their needs and the extent to which other students require the educator's time. Many school students resent being withdrawn from their classrooms for their allocated support sessions, as they may miss classes they enjoy. It also draws their classmates' attention to their difference.

Accommodations and adjustments organized by disability specialists are not always provided or adhered to by educators, either because they do not understand their importance, or they do not support the inclusion of the student in their program.

"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."

Many educators and other students perceive those accommodations and reasonable adjustments, such as separate rooms and additional time for exams, give the student with a disability an unfair advantage. They misunderstand that these allowances are intended to enable the student to have the same chance of success or failure as anyone else. When reasonable adjustments are not agreed to or are not provided despite being approved, the student is reminded that they are not the same as everyone else.

### Participation in student life

Most people acknowledge that the value of educational in preparing people from adulthood goes far beyond instruction in academic studies. Students who are blind or vision impaired need to feel that their place of learning does not just make space for them --they belong. This could be assisted by meetings held between the student, with an advocate or parent if desired, and educators and blindness service providers before they start, where their needs and wishes could be explored and discussed. Orientation week events designed for students who are blind or vision impaired could explain equipment available at their campus and offer tips and tricks for navigating the resources they will need to use in their particular subjects. Educators, mentors, and peers who are blind or vision impaired could be introduced at these events. General student social events should be held in places accessible to students who are blind or vision impaired and publicised so that they find out about them. BCA members mentioned promotional vouchers for free drinks and food only being issued in graphic form, so that they could not use them and felt forgotten. One member wrote about two contrasting graduation experiences.

"I also experienced a wonderful time at my graduation, where a support member from the special needs unit helped me practice where to stand on stage so when the time came to be presented with my certificate, I was able to go up on stage with my guide dog independently and receive the award. It made my graduation so much more memorable!

"I graduated from my second degree [and] I did not attend my graduation ceremony, as I felt I would not get the needed support to do so. I picked up my certificate at a later date."

### Bullying and harrassment

Many students who are blind or vision impaired report experiencing bullying and harassment, including violence, due to their disability. Many believed that their teachers did nothing about it. Programs teaching children about bullying should identify that teasing, asking questions about or even talking about a person's disability can constitute bullying and harassment. People educating students with disability should be vigilant for such behaviour and should respond appropriately when it occurs.

### Use of technology and accessibility

Students who are blind or vision impaired will be expected to have access to and be familiar with an ever-increasing range of generic and specialist assistive technology. They will need to learn to use the software and apps that all students use, sometimes in a different way, plus specialist software and devices that make it possible for them to read or magnify the screen or navigate by voice. BCA members report that most teachers have little idea how their technology works or how they use it. at the most basic level, this can make it difficult for students to manage unobtrusively in the classroom. One BCA member, who is vision impaired, was required to juggle a laptop, iPad, iPhone, scanner and dog guide, because of the number of programs she needed to use in class. If troubles arise, there are very few its experts who can help. it would be helpful if all people studying information and communications technology could gain a rudimentary understanding of accessibility and the main programs used by people who are blind or vision impaired. the significant skills developed and gained by students who are blind or vision impaired as they progress through their schooling should also be formally certified as units of study, conferring recognized and transferrable qualifications.

Acquiring the appropriate technology and training in its use is not straightforward. Some university campuses provide computers with screen-readers installed for use by students who need them. Others do not. In a school environment, a student who is blind or vision impaired may convince their education department to buy them a laptop with appropriate software. This laptop will only be able to be used at school and will be the property of the education department. It will not be available for the student's use at home. Should they choose to go on to university or TAFE, they will then be required to seek new funding, most likely from the National Disability Insurance Scheme (NDIS), which will be provided if it fits within their specified goals and is considered reasonable and necessary. While these limitations may be justified, such assessments take time, and the student will have started university before they receive their new device. They may still need to learn how to use it. It should be noted that similar demarcation disputes can arise between education providers and the NDIS over the provision of orientation and mobility instruction.

### Education in times of change

#### Transition between stages of education

Transitioning between educational stages is difficult for many students. For students who are blind or vision impaired, they may require orientation and mobility training to learn new premises or a new transport route, sourcing funding and training for new assistive technology and interacting and negotiating with a new team of educators. The transition may involve the student learning to move around a much bigger area or to interact with a larger student population. For young adults, it may involve moving to live in a new location. For some tertiary students, these adjustments must be made every time they begin a new unit of study. There needs to be smooth handover when a child moves from one grade or school to the next, with preparation commencing well before the change takes place. Students transitioning to higher education should be encouraged to seek out disability support services in their new institution before they commence their studies. There will be more incentive to do this if measures that are set in place are carried out and if students benefit from having educators who are better prepared and more knowledgeable about how to teach in a way that works for the whole class.

#### Emergency preparedness and response

Recent emergencies, such as the COVID-19 pandemic, have seen many educational settings migrate to online learning. This has challenged the claims of education systems to be inclusive. It should never be assumed that every student has access to reliable internet, especially in an emergency. During lockdowns, it was not always possible to locate all students who are blind or vision impaired. In some places, students with disability were encouraged to continue attending school. This made it difficult to organize the distribution of materials. Since it was originally believed that COVID-19 could easily be transmitted through contact with contaminated surfaces, strict rules were put in place for braille materials, meaning there was a delay between them being produced and reaching students. Decisions were made in haste, so that systems which purported to be accessible were chosen without testing. Trying to lessen their onerous load, teachers shared resources and not everything that went into the pool was accessible for all students. Exacerbating these issues was the lack of access to information and communications technology experts with knowledge of the needs of users who are blind or vision impaired. Specialist vision teachers spent more time trying to sort out technical difficulties than teaching or instructing in blindness-specific skills.

Students, parents, and classroom teachers felt abandoned. It is undeniable that at times of change students who are blind or vision impaired will have an increased need for support from their specialist vision and other teachers. Funding models do not currently allow for this. They will also need to exercise their self-advocacy skills to an even higher degree than normal. It must be recognized that this is places additional strain on students.

### Negative attitudes and assumptions about disability

Children who are blind or vision impaired are most often educated in integrated settings, where they may be the only blind person. The only blind people they may know about may be certain prominent high achievers who occasionally appear in the media or athletes who have achieved amazing physical feats. The only blind woman they are likely to remember is Helen Keller. Worthy examples as these may be, it is imperative that students who are blind or vision impaired learn about the capacities and achievements of people like themselves. Not every sighted person is expected to become a High Court Judge or an Olympic athlete. Conversely, there will be teachers who will blame any lack of effort or understanding in a subject on a student's vision loss and be amazed by any aspect of a class they are able to do well "in spite" of it. Teachers and fellow students also need to know about different types of vision impairment, especially that total blindness is not most people's experience.

Students who are blind or vision impaired should be taught about their rights as people with disabilities and about avenues for enforcing them. They should be shown reasons to be proud of their history of activism and of their identity. Sharing these knowledge sets with fellow students could only enhance everyone's education.

A student or parent's ability to negotiate equal access to any aspect of the educational system will depend on many factors, but perhaps the chief of these is their ability to advocate for themselves. Whether it is reminding a teacher who is enforcing a seating plan that they need to sit near the front, asking not to be handed a print-out that needs to be scanned before the student can get on with their work, finding an alternative writing stimulus to a photo or calculating how much additional exam time is reasonable, students who are blind or vision impaired are constantly required to state their needs and ask that they be met. While some educators are able to take account of these needs without prompting, for many students there is the apprehension of having these needs dismissed as unnecessary or unreasonable or of derision from fellow students. This is an additional mental load, which students without disability are not required to bare.

Students with disability should be consciously taught self-advocacy skills from a young age. Students and their parents should be taught about and supported to utilise anti-discrimination legislation to bring about change.

As in other areas of society, negative attitudes and assumptions would have less chance to thrive if they were challenged by real and positive experiences. If education systems are to become truly inclusive, they must employ, promote, and be managed by people with disability. Procurement of technology which gives more consideration to accessibility and more flexible approaches to teaching should make it possible for a more representative proportion of educators to be people who are blind or vision impaired.

### Parents and the education system

All state and territory education systems acknowledge their responsibility for including students with disabilities and have policies and processes for doing so. As a result of many common assumptions made about people with disability, it seems often not to be envisaged that students, with or without disabilities, may have parents or carers who have disabilities themselves. Many schools now communicate through online platforms, rather than sending home printed notes. This has improved life for those parents who can use the online platforms, although not all systems have dispensed with the requirements for printed permission slips to be completed, signed and returned. Likewise, children's homework is often distributed through learning platforms, some of which are not accessible. Many classroom teachers seem reluctant to use resources or time making their teaching materials accessible to parents. These issues were exacerbated in 2020, when most parents were suddenly required to become responsible for their children's learning. Many parents who are blind or vision impaired lacked the technology or software or skills to take on this role. Classroom and support teachers were already overwhelmed and did not have much capacity to assist parents. Many sought assistance from peers having similar issues or were forced to ask for assistance from sighted siblings or family members.

Many parents report teachers being hostile to or dismissive of their attempts to participate in the classroom with group-work or reading support. They feel inadequate in being unable to measure up with craft creation, science projects or costume parades. While many parents who are blind or vision impaired believe their children develop early and superior skills of self-reliance and autonomy in their schoolwork, they should not have to, and their parents should be supported to fulfil their roles as parents.

### Braille

Braille is the key to literacy for people who are blind or vision impaired. It enables us to independently write, read, label, sort, revise and record. For many years, many have considered that braille would become obsolete, first through the proliferation of audio material and latterly due to digitization. This is akin to prophesying that sighted people will no longer use pens and paper. There are all sorts of situations in which people need to be able to access information without electricity, batteries or the internet. Children who are blind and their parents need to understand the value of braille, so that they can advocate for it whenever possible and so that they can see the value in persisting with learning it. Braille should also be offered to people losing their sight later in life or whose vision deteriorates. Teachers of braille, whether their students be children or adults, should be appropriately qualified. Braille should be a component of study at university for education students and short training courses in it should be available. Students should not have to learn braille from classroom teachers who are gaining their knowledge from unofficial, non-professional or unqualified sources.

### Career pathways

There is little data about the involvement or enrolment of people who are blind or vision impaired in traineeships or apprenticeships.

In TAFE, the majority will undertake lower-level certificate courses that do not directly lead to vocational qualifications. Some students study many of these courses, without significantly improving their employment prospects.

Work experience is generally a part of secondary education in upper grade levels, or post-secondary internship programs. Historically, work experience opportunities were less readily available to people who are blind or vision impaired, although it would have the same benefits as for anyone else.

"Work experience isn't always readily available and is not even offered throughout school. It… can be confusing because young people don't often know what they want to do at school age and should have access to work experience and casual work."

"Work experience is an absolute must. People who are blind don't get access to work experience that is valuable to build social skills, understand workplaces and practices. Often, we don't get the chance to do paid work through school like our peers (think retail or fast food) which means we miss out on developing some very important life and work skills."

An alternative to work experience would be peer mentoring programs, where people who are blind or vision impaired in employment act in the role of mentor to students who are blind or vision impaired. Through these, the student could gain the support of a peer mentor of whom they can ask questions and learn a lot about employment. With a work experience program, the student might feel more on their own.

It is important that work experience opportunities are available to people who are blind or vision impaired to prepare for future employment, in addition to having appropriate mentors in a peer mentoring program, who can provide expert advice about how to cope with accessibility and other issues that may arise in the workplace.

Additionally, at secondary and post-secondary education levels, there is a need for career counselling which considers the student's interests and strengths, rather than assumptions about what is or is not possible for people who are blind or vision impaired, including no comparisons with previous students.

### Lifelong learning

Adult education, outside of school, university and TAFE, can involve short courses and workshops offered by private providers in specific areas such as particular computer programmes or job-readiness (often directed at particular population groups such as women returning to the workforce or newly arrived immigrants). These are often offered by groups not within the formal education sector. Adults often undertake these more informal studies in order to enhance possibilities of obtaining employment, retaining employment, or obtaining promotion. An even more voluntary area of adult learning is motivated by general curiosity or a liking for organized study, or by a perception that continuous adaptation to change is necessary to remain employable or cognitively healthy. This can cover a broad range of contexts from U3A to hobby courses in upholstery and boat building.

In relation to all of these types of lifelong learning, because they mostly fall outside the larger and better resourced education sectors, the access barriers are often almost insurmountable. Knowing the circumstances of these study centres, people who are blind or vision impaired are less likely to feel they can assert their entitlements to accommodations, such as materials in alternative formats or note-takers. This recreational learning is a significant aspect of community participation from which most Australians who are blind or vision impaired are excluded.

### Lack of choice and control

Many BCA members report feeling powerless to do anything about their exclusion in an education setting. Where the problem is lack of access to materials, there are clearer paths to redress. Due to restrictions on resources, many places of study can only transcribe inaccessible documents which are required reading. There is no capacity to acquire materials that are only recommended. For some students, this will render it impossible to gain top marks. Similarly, universities have little to offer postgraduate research students, who have moved beyond requiring materials in alternative formats. Some appoint research assistants, to overcome data analytics and storage requirements that are otherwise completely inaccessible.

Some students who are blind or vision impaired find that, although they have individualised inclusion plans, teachers do not follow them. One TAFE student was told that giving the student printed materials in advance so that she could scan them before class would "spoil the surprise". Educators who do not support a person who is blind or vision impaired being in their class are unlikely to say so in writing. A BCA member who was near completion of his psychology degree pointed out that the statistics software program he was required to use was incompatible with his screen-reader. He was told not to bother, because no-one would tell anything to a psychologist if they could not look into their eyes. Any complaint of discrimination or harassment will be a case of the student's word against the educator's word.

Complaint mechanisms do exist, and students need to be encouraged to make use of these as soon as they start experiencing difficulties. Regular progress reviews are recommended. Many students inevitably choose to withdraw from the subject or course.

## Recommendations: An inclusive society

An inclusive society would increase the likelihood of Australians who are blind or vision impaired completing a high-quality education to a standard that maximizes their choices and autonomy in their lives. Such educational opportunities would apply not only to children and young adults but would enable people to re-evaluate their educational requirements throughout their lives and give them the chance to participate in lifelong learning. With reasonable adjustments and accommodations, students who are blind or vision impaired can be expected to attain the same standards as other learners.

An inclusive society could be achieved by adopting the following recommendations:

1. Braille should be revered as the key to literacy for students who are blind or for some who are vision impaired. Teachers should be rewarded for gaining qualifications in braille teaching. Braille format production should be well-resourced, so that it is not seen as a slower option than electronic formats. Hard-copy braille and Perkins braille writing machines should still be valued, but students should also be provided with refreshable braille displays to complement their assistive technology.
2. It is recommended that there are programs specifically for children who are blind or vision impaired where they can participate in age-appropriate learning and social, creative and risk-taking activities with other students who are blind or vision impaired. The people running these activities should include people who are blind or vision impaired. These activities should take place outside termtime, so that they do not interfere with the students' participation in school activities. They should be widely publicised.
3. Any online enrolment process and online learning environment needs to be hosted on websites that meet the current version of WCAG.
4. All enrolment or learning materials associated with course content need to be provided in preferred alternative formats e.g., electronic, large print hardcopy, braille or audio.
5. Any video content by an educational institution or used as course content should be audio described. Images should have alternative text descriptions. These expectations should apply whether or not a student who is blind or vision impaired is enrolled in a course, so that future students are not precluded.
6. Guidelines for accessibility should be regularly reviewed and updated. The Guidelines on Information Access for Students with Print Disabilities, published by Australian Vice-Chancellors’ Committee, were created in 2004 and do not accord with current best practice. Resources by the Round Table on Information Access for People with Print Disabilities should be used by educators to help improve these guidelines.
7. Conversion of materials into preferred format by education providers needs to be completed in a timely manner, so that the student can keep up with their studies. Students should receive material at a time which enables them to prepare and contribute to the class.
8. The Disability Discrimination Act 1992 (DDA) prohibits refusal to access in education. Discussions around enrolments with administrators of programs should focus on how the inherent requirements of study can be met through reasonable adjustments.
9. Social support could be facilitated by the creation of groups for socialisation of specific groups. Students who are blind or vision impaired could gather to share ideas about their assistive technology and about how to access and use the resources relevant to their degree. e.g., at the University of Queensland, the Abilities Collective provides support for people with disabilities, chronic illness and mental health conditions.
10. Access to assistive technology and training is critical for students who are blind or vision impaired, especially considering online learning. Educational institutions should assist students to get the technology that meets their needs. Funding should be allocated to procure specific technology.
11. Physical access to buildings and facilities both on- and off-campus, including at placements, is critically important. Under the DDA, people who are blind or vision impaired must be able to efficiently access physical sites. Educational institutions should make use of modern wayfinding features.
12. Students who are blind or vision impaired need to be equipped with skills in the use of mainstream and assistive technology, braille, orientation and mobility and self-advocacy. These skills can be provided by educational institutions and blindness service providers. Training courses in these skills could be certified, so that these qualifications are recognized and transferrable.
13. Mentoring programs at all levels of education, where a student is blind or vision impaired is paired with another who is more senior, can help to equip students with important skills and confidence. Blindness service providers and educational institutions should be encouraged to establish or expand such programs.
14. To assist with transition, 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 a handover process.
15. Mandatory audits must be conducted by the Nationally Consistent Collection of Data on School Students with Disability (NCCD) whereby institutions, especially at primary and secondary levels, have their accommodations practices verified.
16. Institutions must be accountable for adhering to the Education Standards under the DDA. A potential ramification of non-compliance should be deregistration as an education provider.
17. 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 it for disability education.
18. Educators who fail to comply with their obligations who are found to be engaging in harassment or victimisation must be held accountable through temporary suspension or by revoking their teaching certification. Additionally, these educators must undergo mandatory training in disability education requirements.
19. Programs teaching educators and students about bullying and harassment should recognize that students with disability are at higher risk. Training should focus on how to identify and stop such behaviour. Students who are blind or vision impaired should be shown effective strategies for responding to bullying and harassment, in a way that empowers them and does not make them responsible for it.
20. Segregation must not occur in educational institutions, with reasonable adjustments being made to ensure that a student can be accommodated and included in all learning and social activities.
21. Blindness service providers need to develop training to target students transitioning between sectors. This would include key skills in independence, orientation and mobility training, procurement of assistive technology and training in its use.
22. Blindness organizations need to work with education providers to develop resources specifically targeting transition between education sectors for students who are blind or vision impaired, and for their parents and educators.
23. Governments should lead in producing and distributing information for education and ICT leaders and decision-makers on how to create accessible learning platforms, emergency information bulletins, 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”. State, territory, and Federal governments should 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.
24. Governments should organize 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 and assistive technology software and hardware.
25. Government should 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.
26. Fact sheets conveying basic information about the programs most commonly used by people who are blind or vision impaired should be made available and publicised to it professionals and educators.
27. Governments should facilitate the immediate upskilling of students who are blind or vision impaired in the use of new accessible, assistive technologies to empower the students to independently access their education in future emergencies.
28. The government and education sector need to recognize that, in an emergency, students’ need for support will change. Specialist and class teachers must be able to assess and respond quickly and effectively to student needs so that learning is not disrupted.
29. The education sector must be aware of and understand the personal stress and self-advocacy challenges that may be experienced by students who are blind or vision impaired during emergency situations.
30. Anti-discrimination cases need to result in significant consequences for education providers which clearly breach the DDA. It is critical that appropriate penalties are issued, to dissuade providers from breaching the DDA.
31. BCA supports the strengthening of the DDA to ensure that people with disabilities are protected by a legislative requirement to remove systemic discrimination, in addition to specific cases that are brought before disability anti-discrimination commissions. Systemic discrimination should lead to significant penalties.
32. Cases proceeding to post-conciliation levels at state Equal Opportunity commissions, or the Australian Human Rights Commission should be low or no-cost. The cost of pursuing an action at Federal Court level, if conciliation fails, is prohibitive to most people who are blind or vision impaired. There is also the risk of bearing the defendant's costs if the case fails. These costs and risks often outweigh any potential benefit to be gained from pursuing Federal Court action.
33. Federal, state and territory governments should fund, support, recognize and consult member-based organisations that represent and advocate for people with disability, including groups which represent people with specific disabilities.

## Resources

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/

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