

Australian Government Department of Education
GPO Box 9880, Canberra ACT 2601
Via email: DisabilityStandardsConsultation@education.gov.au

Dear Review Team,

2025 Review of the Disability Standards for Education

Thank you for the opportunity to provide a submission to the 2025 Review of the Disability Standards for Education.

Advocacy for Inclusion (AFI), incorporating People with Disabilities ACT, is a Disabled People's Organisation providing systemic advocacy informed by our individual and self-advocacy work across the ACT. Most of our Board, staff and members are people with disability, and AFI's policy positions are grounded in lived experience and co-designed with our community. Our work is guided by the principles of the Convention on the Rights of Persons with Disabilities (CRPD).

The need for an inclusive education system

AFI's [*White Paper on Inclusive Education*](#) outlines our community's priorities for building an inclusive education system for people with disability. Inclusive education is fundamental to enabling people with disability to participate socially and economically, live independently, and remain safe from violence, abuse, neglect and exploitation. Evidence consistently shows that inclusive settings produce stronger academic, social and emotional outcomes for students with disability, and create benefits for all learners through reduced bullying, improved acceptance and other social and academic gains. Inclusive education also supports better long-term outcomes, including employment, independent living and community participation.

Inclusive education is central to meeting Australia's human rights obligations. The CRPD establishes a clear right to inclusive education. Article 24 requires equal access to learning and full participation; Article 9 requires accessible physical, digital and communication environments; and Article 19 affirms the right to inclusion in community life. These obligations require education systems to remove barriers, provide reasonable adjustments, and ensure that students with disability can belong, participate and succeed on an equal basis with others.

AFI continues to call for a range of reforms to support greater inclusion across the education system, including adequate resourcing to ensure curriculum adjustments can be supported, teacher training and specialist expertise, and more support delivered in mainstream settings.

Barriers and enablers

There remain significant barriers to inclusive education, including:

- lack of adequate resourcing for inclusive education (physical and digital infrastructure, staffing, training).
- the risk of “inclusion in name only”, where children are physically educated in mainstream classrooms but not genuinely supported or participating.
- attitudinal barriers, discrimination and structural segregation.

As the Discussion Paper notes, discrimination matters are being examined in the separate Disability Discrimination Act Review, to which AFI has provided a submission. Discrimination nevertheless remains a significant problem which the Standards can help to address.

Key enablers include:

- adequate resourcing for specialist supports, training for teachers and staff, and accessible infrastructure.
- universal design of both physical and digital learning environments.
- system-wide planning rather than ad hoc fixes.
- monitoring, accountability and transparent data on inclusion progress.

Disability Standards for Education - consultation topics

As the Discussion Paper acknowledges, there is potential to enhance the role the Standards play in addressing these barriers and enabling students with disability to access high-quality education from pre-school and early childhood learning, primary and secondary school, through to vocational and higher education, including undergraduate and postgraduate study.

1. Effective implementation of the Standards

Consistent with AFI’s experience, the Discussion Paper shows that the Standards are not being implemented consistently across the education system. Students with disability continue to be denied access to their preferred school or course, do not receive timely or adequate adjustments, and encounter inconsistent and opaque decision-making. Strengthening implementation requires clearer accountability, regular public reporting, support for educators, and national mechanisms for monitoring compliance. Without these measures, students will continue to rely on self-advocacy and individual goodwill rather than a rights-based system.

In ACT schools, the situation is reaching crisis point with increasing numbers of students not attending, withdrawing or being encouraged not to attend. More generally across the education system, students are being denied preferred placements, experiencing delays or refusals of reasonable adjustments. Providers frequently report gaps in awareness, capability and resourcing. In secondary school, action is needed to ensure full access to the curriculum, fair access to subject choices, assessment adjustments, and to build the independence and peer belonging that become critical during adolescence. Schools must ensure students with disability can participate equitably in increasingly complex academic and social settings, with strong anti-bullying frameworks and better transition planning for post-school pathways.

In tertiary education, the Standards emphasise the need for accessible settings and student services. In practice, more needs to be done to ensure flexible, adult-appropriate supports, accessible digital platforms and physically accessible environments. At the Australian National University, for example, there are well-known infrastructure challenges on the ageing campus, including inconsistent information about wheelchair-accessible routes and multi-level buildings without reliable lift access. These barriers highlight the importance of universal design and proactive accessibility planning in new developments such as the Woden TAFE campus.

2. Inclusive decision-making

Inclusive decision-making and co-design are critical issues for the disability community. Students with disability and their families are too often viewed as passive recipients of decisions rather than genuine partners. Decisions about adjustments, behaviour support, subject selection or assessment are made “for” them rather than “with” them. Consultation processes in schools are inconsistent, opaque and sometimes adversarial, and issues resolution processes are often slow, unclear or inaccessible. In tertiary education, students frequently need to self-advocate repeatedly because learning-access plans are not embedded across faculties and complaints pathways are difficult to navigate.

Inclusive decision-making requires co-design, not just consultation. Students and families must have a central role in decisions that affect their learning, course access and wellbeing. This includes transparent processes for determining reasonable adjustments, accessible and timely complaints handling, independent advocacy support, and culturally safe and trauma-informed engagement approaches—particularly for First Nations students, autistic students, students with intellectual disability, and those with co-occurring mental health conditions.

3. Clear responsibilities for assessment authorities and course developers

Assessment bodies, curriculum developers, training organisations and universities hold significant power in shaping whether students with disability can access the curriculum “on the same basis”. Yet the Standards do not clearly allocate responsibilities across these actors—a gap highlighted both in the Discussion Paper and in the Final Report of the 2023 Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. Schools and providers are often forced to “negotiate” adjustments around assessments that were never designed inclusively, and students may lose access to subjects or pathways because assessment frameworks remain inflexible.

AFI hopes that the Review will strengthen obligations for assessment authorities and course developers to embed universal design and ensure reasonable adjustment options across all assessment forms. Responsibilities for accessible formats, digital accessibility, alternative assessments, inherent requirements, and work-integrated learning adjustments must be explicit and enforceable. Without clarity at the system and design stages, education providers are left carrying the burden of retrofitting accessibility—leaving students with disability to face the consequences of curricula and assessments that were never designed with them in mind.

Thank you again for the opportunity to contribute to this Review. AFI would welcome further discussion on how to strengthen the Standards and support their implementation. Please contact me, at Craig@advocacyforinclusion.org, or our Senior Policy Officer, Harry Lomas, at Harry@advocacyforinclusion.org, if you wish to discuss this submission further.

Regards,



Craig Wallace
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Advocacy for inclusion
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