

LAEIC - TAFE access inquiry  
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# Vision Australia Submission

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## **Inquiry into access to TAFE for learners with disability**

Submission to: Parliament of Victoria -  
TAFEaccessinquiry@parliament.vic.gov.au

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Submission approved by: Chris Edwards, Manager Government Relations  
and Advocacy, NDIS and Aged Care, Vision Australia.

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## Introduction

Vision Australia is making this submission to the Economy and Infrastructure Committee's inquiry into access to TAFE for learners with disability. In doing so, we wish to draw the Committee's attention to the unique and significant barriers that people who are blind or have low vision often experience when they attempt to pursue an education at TAFE. These barriers have been known anecdotally for a long time, and were further highlighted in research that Vision Australia conducted in 2017.

Given the extremely high unemployment rate in the blindness and low vision community, and the strong link between educational attainment and employment outcomes, we believe that urgent action is required by the Victorian Government to address these barriers so that learners who are blind or have low vision are able to benefit fully from the many vocational and educational pathways that TAFE has to offer.

## Background

Over the past decade Vision Australia has made a number of submissions in which we have drawn attention to the importance of the TAFE system for learners who are blind or have low vision, and the barriers then often face in studying at TAFE. In our 2014 submission to the Senate's Inquiry into the Role of the TAFE System, we noted that:

*The TAFE environment offers people who are blind or have low vision a supportive environment in which to gain a well-recognised qualification. Well established and well-resourced institutions such as TAFE are more able to provide dedicated diversity, disability and other support services to students who are blind or have low vision, including the ability to make reasonable adjustments<sup>1</sup>.*

However, we also noted that there can be barriers to full participation by learners who are blind or have low vision, including the lack of information provided in accessible formats such as braille and e-text.

In our 2015 submission to the Senate Inquiry into current levels of access and attainment for students with disability in the school system, we commented as follows:

*We are aware of many examples of students who are blind or have low vision being unable to complete their University or TAFE studies due to poor access to learning materials in accessible formats and assistive technology.<sup>2</sup>*

Despite the manifest benefits and opportunities that the TAFE system has provided to learners who are blind or have low vision, including in Victoria, there has been an increase in the barriers that students

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<sup>1</sup> Vision Australia Submission to Senate Inquiry into the Role of the TAFE System, p.1. Available at <https://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiLv4SN8LfsAhUnyzgGHVJ8CK8QFjAAegQIBRAC&url=https%3A%2F%2Fwww.visionaustralia.org%2Fsites%2Fdefault%2Ffiles%2Fdocs%2Fabout-us%2Fvision-australia-submission-to-the-inquiry-into-the-role-of-the-tafe-system-and-its-operation-24-march-2014.docx%3Fsfvrsn%3D2&usg=AOvVaw0JFAGUoEIOY4ZpfoSmUBSj>

<sup>2</sup> Vision Australia Submission to Senate Inquiry into current levels of access and attainment for students with disability in the school system, p.1. Available at [https://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjZxNCj97fsAhVVzDgGHTS6Af4QFjAAegQIBBAC&url=https%3A%2F%2Fwww.aph.gov.au%2FDocumentStore.ashx%3Fid%3D44ffcdea-9ea0-4640-9c6f-34aad7fcff66%26subld%3D401239&usg=AOvVaw1EAUFwcn\\_PxGvv3\\_ge\\_ZBx](https://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjZxNCj97fsAhVVzDgGHTS6Af4QFjAAegQIBBAC&url=https%3A%2F%2Fwww.aph.gov.au%2FDocumentStore.ashx%3Fid%3D44ffcdea-9ea0-4640-9c6f-34aad7fcff66%26subld%3D401239&usg=AOvVaw1EAUFwcn_PxGvv3_ge_ZBx)

face. In some cases, a reduction in resources has meant that specialist support staff can no longer provide the personalised support and attention to reasonable adjustments that we know make the difference between whether a student who is blind or has low vision succeeds or fails. Further, barriers have been created by a failure to require that new technologies introduced to deliver TAFE courses be developed according to the principles of inclusive design. This has resulted in many platforms and technologies utilised by TAFE institutions being inaccessible for people who are blind or have low vision. Examples include the Blackboard and Moodle online learning platforms, both of which have been identified by students who are blind or have low vision as including components that are difficult or impossible for them to use with assistive technology.

## **TAFE's Role in Improving Employment Outcomes**

Since 2007 Vision Australia has undertaken and contributed to research into the extent and impact of unemployment in the blindness and low vision community. Most recently in 2018, we collaborated with the CNIB Foundation (Canada) and the Blind Foundation of New Zealand to undertake an international survey of unemployment. The findings of this survey reinforced the findings from previous research: only 24% of Australians who are blind or have low vision are in full-time employment. Of those, the majority are employed in entry-level or non-supervisory roles, with very limited opportunities for career progression. Moreover, Australians who are blind or have low vision are twice as likely to be working part-time, and three times more likely to be in temporary employment, compared with national averages for the general community.

The survey also found, consistent with previous research, that there is a strong link between employment outcomes and attaining a post-secondary qualification. Only 10.6% of people without a post-secondary qualification are employed, compared with 28% who do have a post-secondary qualification. Previous research has shown that 75% of people who are blind or have low vision with a post-secondary qualification are employed.

We believe that the only way to open new pathways to meaningful employment for people who are blind or have low vision is to implement interconnected and coordinated strategies that are anchored in the family, developed in the school and tertiary education systems, embraced by employers, supported by governments, and embedded in society as a whole. The TAFE system has the opportunity to play a crucial role in this strategic framework, but only if barriers to participation are addressed.

People who are blind or have low vision usually enrol in TAFE courses to obtain a qualification that will increase their chances of gaining meaningful and rewarding employment. However, many students have told us over the years that they have been given little practical advice about how to choose courses of study that will maximise their employment outcomes. In some cases, students have found themselves studying one course after another in a futile quest to get a qualification that will help them get a job.

We believe that there must be a greater focus in the TAFE system on assisting students who are blind or have low vision through the provision of informed and realistic vocational advice that takes into account the highly competitive nature of the labour market. As the economy emerges from the COVID-19 pandemic it will become much more difficult for people in vulnerable groups to enter the labour market. The role of TAFE in identifying meaningful vocational pathways will become even more important.

## Barriers to Online Learning

The most significant single change that has occurred over the past decade in the delivery of post-secondary education has been the development of online learning. It is now virtually impossible for a TAFE student to avoid interacting in one way or another with an online learning platform, even for those courses that have a substantial “hands on” or practical component. Online learning has developed rapidly, and its associated technology has been adopted with little systematic assessment of its impact on students with disability in general, and students who are blind or have low vision in particular. Although there are no intrinsic limitations to the development of technologies that are fully accessible and inclusive, there does need to be a commitment by developers to follow accepted accessibility guidelines, standards and best practices at all stages of the technology life cycle. Retrofitting inaccessible technology can be a much more expensive and time-consuming process than incorporating access and inclusion from the outset.

As online learning proliferated in the university and TAFE sectors, Vision Australia staff received an increasing number of reports from clients who were finding it difficult or impossible to access course delivery and curricular content due to accessibility barriers. In some cases, these barriers forced students to discontinue their studies, but even where students found ways of minimising them, they experienced much higher levels of stress and poorer educational outcomes than other students.

In 2017 Vision Australia conducted research by means of a survey supplemented by a number of telephone interviews to gain a more detailed understanding of the impact of barriers to online learning experienced by current and recent students. We decided to narrow the scope of our research primarily to Australian universities. The TAFE system is considerably dispersed both in terms of location and administrative responsibility, and it would have been very difficult to conduct effective initial research with that system. In any case, many of the online learning platforms used by universities are also used by other providers of post-secondary education, including the TAFE system, and it is therefore very likely that any barriers identified in the university sector are also present at least to the same degree in the TAFE system.

As it happened, two participants in the research had studied at TAFE colleges, and their negative experiences did mirror those of participants studying at university. Of the 35 respondents to the survey, 34 said that they had experienced significant barriers when using online learning as part of their course.<sup>3</sup>

The three categories of barriers that were identified by our research are, firstly, accessibility barriers due to the failure of online learning system developers to comply with international accessibility standards, with resulting inaccessibility in key components such as discussion boards and collaborative tools; secondly, the lack of knowledge and support from many disability staff; and, thirdly, the unwillingness of lecturers to make changes to the design and delivery of course content so as to improve accessibility.

One of the TAFE participants in our survey commented:

*I started at TAFE in 2015 and got told to leave because of my eyesight ... The lecturer at TAFE would not give me access to any visuals on my laptop.*

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<sup>3</sup> Online, but Off-

Track: Barriers to Online Learning Experienced by University Students who are blind or have low vision. Available at <https://www.visionaustralia.org/community/news/2019-08-23/online-track>

Given the strong link between attainment of post-secondary education and positive employment outcomes, it is essential that barriers such as these are addressed, and that mechanisms are put in place to ensure that new barriers do not arise.

## **Conclusion and Recommendations**

In our 2014 Senate submission mentioned above, we commented favourably on the approach taken by the TAFE system in Victoria to providing support to learners who are blind or have low vision. However, rapid changes in technology and approaches to course delivery risk undermining the foundations of accessibility support. We therefore make the following recommendations, aimed at ensuring that the Victorian TAFE system will be able to provide acceptable levels of access and inclusion for learners who are blind or have low vision:

1. That Victorian TAFE ensure that online learning platforms and components are accessible and inclusive, by adopting Australian Standard AS/EN301:549 for the procurement of accessible ICT;
2. That resources be developed to provide disability support staff in the TAFE system with accurate, comprehensive and consistent information about the provision of reasonable adjustments for students who are blind or have low vision;
3. That ongoing training be provided for disability support staff about the functionality of assistive technology used by people who are blind or have low vision, and how it interacts with mainstream technology such as online learning platforms;
4. That all TAFE teachers be given training in how to support students who are blind or have low vision;
5. That there be a greater focus on providing informed and realistic vocation advice to assist students who are blind or have low vision choose the most appropriate courses to maximise their chances of obtaining positive employment outcomes;
6. That a robust complaints mechanism be established to provide students with a consistent and straightforward way of raising accessibility- and support-related issues and having them addressed.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include:

- Registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment;
- Assistive/Adaptive Technology training and support;
- Seeing Eye Dogs;
- National library services, early childhood and education services and Felix Library for 0-7 year olds;
- Employment services;
- Production of alternate formats;
- Vision Australia Radio network including a national partnership with Radio for the Print Handicapped;
- NSW Spectacles Program; and
- Government advocacy and engagement.

We work collaboratively with governments, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation.

Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.