MELBOURNE POLYTECHNIC

Legislative Assembly Economy and Infrastructure Committee:

Inquiry into access to TAFE for learners with disability

SUBMISSION   **October 2020**

Melbourne Polytechnic welcomes the opportunity to provide our experiences and insights on how learners with disability can be supported to access and fully participate in TAFE programs. For the purpose of this submission we will be referring to learners as students.

Melbourne Polytechnic believes creating an enabling environment has benefits for all, such as creating an accessible and flexible teaching environment that supports the diverse learning needs of all TAFE students.

Melbourne Polytechnic supports the position that the Victorian TAFE Network has the potential to continually strive for improvements to remove structural barriers and provide supports that ensure access and equity for people with disability. The National Disability Insurance Scheme (NDIS) has transformed the way services and supports are funded, provided and accessed by people with disability. The supports have provided some improvement for students with disability to access TAFE and drive a stronger focus on disability which has benefited all students. Identifying the link between the role of the NDIS Local Area Coordination (LAC) services and building community inclusion at TAFE, the LAC provider in the Northern region has been invited to co-locate at several of Melbourne Polytechnic's campuses to provide students and staff with information, linkages and capacity building opportunities. This is an important partnership that will further support inclusion of students with disabilities at Melbourne Polytechnic and capability building in our community.

The Melbourne Polytechnic Chief Executive (CE) has also demonstrated a leadership commitment to improving access and achievement for students with disability through participation in the TAFE NDIS Working Group as well as leading several related disability projects over the last two years. Internally, Melbourne Polytechnic is driving change through an Inclusion Respect and Equality Taskforce led by the CE with representation from across the TAFE, including staff members with disabilities. The specific objective of the Taskforce is to create an inclusive, respectful and equal culture for all our students, staff and the community. To achieve this objective, the Taskforce is responsible for leading and championing a program of work across agreed priority areas, each with specific activities that contribute to a culture of inclusion, respect and equality at Melbourne Polytechnic.

Melbourne Polytechnic is committed to creating an inclusive, respectful and equal culture for all our students, staff and the community. This is underpinned by the principles that an inclusive, respectful and equal culture at MP:

- Fosters an inclusive, respectful and equal environment
- Promotes equity, ensuring fairness and accessibility for all
- Goes beyond meeting minimum standards or legislative requirements in relation to inclusion and equality
- Gives all people at MP the same opportunities

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- Promotes and upholds MP values
- Contributes to valuing difference and reducing discrimination
- Provides a safe environment free of abuse
- Provides a sense of belonging, acceptance and connectiveness
- Focusses on the abilities of all people
- Relies on cross-functional teams working together to achieve outcomes
- Promotes the safety and wellbeing of staff and students.

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

Melbourne Polytechnic acknowledges the role TAFEs play in providing the first step to employment by providing further education and skills needed to enter the workforce. If barriers are not removed or supports provided, people with disability can be substantially disrupted from attaining education and employment that can lead to lifelong social and economic disadvantage. People with disability experience added financial barriers to when accessing TAFE as well as administrative barriers such as enrolment and completing literacy and numeracy test requirements. By improving the supports and options available to potential students with disabilities, we can ensure equitable access to TAFE programs.

As such, TAFE plays a vital role in creating opportunities for disadvantaged Victorians. TAFE is regarded by many as what can be the learning environment where students from vulnerable backgrounds can feel safe, be supported and empowered to flourish not only academically but also personally and socially. Melbourne Polytechnic acknowledges and embraces the important role of TAFE in this regard with a strong sense of passion and commitment. The Free TAFE initiative has encouraged higher TAFE participation for all students which provides broader opportunities for inclusion of students with a disability. The surge in demand as a result of Free TAFE has also driven increased demand for access and equity supports and services.

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

Melbourne Polytechnic currently supports 227 students with disability who access the Student Equity and Access Service. Each student has co-developed their Disability Action Plan and these are distributed to the relevant teaching departments. These assist students to receive the appropriate levels of equitable assessment arrangements and reasonable adjustments they are entitled to under the Disability Discrimination Act. The support that students receive from the Equity and Access Service ranges from informal advice and guidance from Equity and Access staff with the student's teachers in regards to support requirements, to coordinating direct support for students from an Education Access Worker supporting the student in class with note taking or participation assistance. In addition, the Student Equity and Access team provide an advice hub for all teaching departments across Melbourne Polytechnic to support staff to provide an inclusive environment and reduce barriers to learning and participation. Importantly, the advice hub provides an equitable service for all students, whether they are registered for support or not.

Annual student surveys for students registered with the Access and Equity service have provided feedback which indicate students are overall very satisfied with the level of support they receive.

Areas of improvement suggested by students include:

- Increasing disability awareness for all teaching staff
- Streamlining the process for seeking special consideration
- Having increased access to Disability Liaison Officer (DLO) support (currently two to three DLOs per institute provide services to 300-400 students which limits the amount of time that DLOs can spend individually with students).

As a result of recent research focusing on increasing access and achievement for students with disability, recommendations were provided to all TAFES to improve access and achievements for students with a disability. In order to address these recommendations and inclusion more broadly, Melbourne Polytechnic has three dedicated working groups that report to the Inclusion Respect and Equality Taskforce. Through a targeted and prioritised approach, these working groups champion a program of work to respond to the recommendations.

The working groups have the following purposes:

1. To promote greater disability awareness and confidence including developing and implementing disability awareness training for all staff;
2. To develop teacher capability in applying an intersectional and gender lens in teaching and learning and build teacher capability and promote greater confidents in teaching students with diverse needs; and
3. To contribute to a culture of inclusion and equality at MP by ensuring all our communications are accessible to our communities.

Along with the work of the Taskforce, Melbourne Polytechnic is also engaging in projects to improve the experience of learners with disabilities, such as:

- Improving assistance with enrolment, orientation and teacher liaison

- Alternative or modified study materials and assessments

- Assistance with car parking and access

- Introductory Auslan training available for all staff

- Development of policies and procedures to improve the experience of students who bring external carers onto campus

- Analysing the support students with disabilities require to access remote learning

- Improving the relationship and communication between the Equity and Access staff and teaching departments.

A specific focus on improving the experience of students with disability has led Melbourne Polytechnic to receive funding under the Department of Education and Training Regional and Specialist Training Fund to tailor the design and delivery of the Certificate IV in Training and

Assessment (TAE40116) to students who are Deaf or Hard of Hearing. The project outcomes included increasing the pool of qualified Auslan teachers to increase staff for the growing demand for Auslan as a community language, and the training of Auslan interpreters. The project contextualised existing TAE resources to meet the specific learning needs of Deaf students. This included the translation of resources into Auslan and linking teaching to work places and peers in the Deaf community. A Deaf TAE instructor was engaged which meant that Auslan was the language of instruction in the classroom, with minimal use of Auslan interpreting. The Deaf instructor was also provided with a mentor, modelling the importance of continual improvement in teaching.

To further improve the experience of students with disability, Melbourne Polytechnic has targeted partnerships with disability employment organisations to increase the employment of staff with disability. It is important for Melbourne Polytechnic that inclusion policies and practices are reflected in the recruitment and development of staff.

Barriers to learners with disability accessing TAFE and ideas for addressing these strategies to increase the participation of learners with disability in TAFE programs, including initiatives that have proven successful in Victoria and interstate

While staff capability and capacity for providing reasonable adjustments is improving there are still areas of inconsistent knowledge and skills between TAFE institutes, campuses and courses. Universal design approaches to teaching and assessment provide more efficient access to a broader range of learning needs. Recent research into improving access and achievement for students with disability found a recurring theme that access and achievement is improved when teachers and staff take personal responsibility for inclusion. Therefore, building staff's disability confidence can create a more inclusive culture for people with disability.

There is also a significant amount of confusion over what is deemed as 'reasonable' when providing reasonable adjustments given the limited framework that guides the provision. The judgement and responsibility for what is deemed 'reasonable' is undertaken in consultation with the DLO and teaching staff. Often the amount of support provided reflects the fear of legal repercussions rather than an informed judgement. This can even at times result in over supporting students, placing the integrity of the course at risk. By providing clearer guidance through a framework for the provision of reasonable adjustment in vocational education, a more consistent student experience would be achieved.

There is also a lack of guidance and training material for accessible digital teaching and learning and the use of assistive technology. Due to the move to the sudden and enforced transition to online learning in response to COVID 19 restrictions, there has been significant investment required by TAFEs to ensure online learning environments provide equitable access for students with disability. This unplanned change to delivery has highlighted the need for further planned approaches to ensure all delivery platforms can support the needs of students with a disability.

DLOs often complete a considerable amount of research into effective and useful digital solutions for students to assist them to be as independent as possible. This is not only a lengthy process but also 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. Melbourne Polytechnic recommends the investment in an assistive technology such as Subject Matter Expert or Specialist which could be shared across the Victorian TAFE Network and provide current, reliable and cost-effective assistive technology advice and guidance to DLOs across TAFEs.

Melbourne Polytechnic, like other Victorian TAFEs provide programs across multiple campuses and often inherit existing infrastructure instead of purpose-built accessible facilities. Students with disability are often faced with outdated and poorly equipped facilities that inhibit inclusion. In lieu of significant capital investment, Melbourne Polytechnic has engaged in adaptive design to its existing infrastructure to improve access. However, there is now a commitment by the Melbourne Polytechnic Board to complete a full infrastructure audit to understand areas of improvement required and provide guidance to prioritization of investment. As it is a resource intensive program to rectify and adapt existing infrastructure to improve accessibility and inclusiveness at each campus. It is recommended a full access audit on all TAFE infrastructure be conducted across all TAFEs to develop a long-term plan to identify resources required and key investment opportunities.

The current funding model for students with disability, provided in a 'Community Support' allocation to each TAFE does inhibit student's choice and control to participate in TAFE programs. TAFEs provide DLOs and other student support services through this allocated funding. Given the individual nature of each student's support needs, different levels of funded supports are required to access their learning and training. TAFEs are required to balance support requirements for students with expenditure without a clear framework for determining reasonable adjustments and supports. This means that students often experience barriers at some institutes and a lack of consistency in the supports that they receive. There is currently a level of inequality experienced by students with disability to access the supports they need at the institute they choose, given each TAFE allocate student supports differently. Unlike universities, where students receive specific funding allocated to their student number and can take this funding with them to access any university program, TAFE students do not feel they are able to flexibly change TAFE providers. It is recommended that the student support funding model be reviewed for students with disability to reflect the policy directions of the NDIS and other agendas which support increased choice and control to the student to access the education and training they choose at their choice of institution.

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

Melbourne Polytechnic auspices deafConnectEd, a service funded by the Department of Education and Training. The service provides information and support to students who are Deaf or Hard of Hearing, as well as training providers, teaching and support staff that work with these students across Victoria. Specifically, the deafConnectEd service provides information videos in Auslan, links students to mentor opportunities, and provides transition support to secondary schools to assist students in navigating vocational education. For training providers, deafConnectEd also provides webinars and onsite deafness awareness training to raise awareness of the needs of these students. Specialist training is also provided to Auslan interpreters working in the vocational education space, as well as support staff working as notetakers for students who are Deaf or Hard of Hearing.

Melbourne Polytechnic endorses an approach to better understand the demand for services through the investment of a data capture program accurately measuring the supports and services students are accessing. This will enable the TAFE Network to more effectively and efficiently plan and invest in future service and resource provision for students with disability. A consistent approach to data collection and reporting across the TAFE Network would also allow for greater collaboration and knowledge sharing.

In Australia, rates of anxiety and depression, particularly among young people are significantly high and TAFEs provide students with care and development skills they require to study and live in our communities. From previous research, we know that a high proportion of TAFE students identify as having a psycho-social disability. Students often refrain from identifying as requiring specific supports; however, we know that supports are required to increase retention and completion for students with a psycho-social disability including access to mentoring programs, counselling and psycho-social coaching. As such, a TAFE Network program to support mental health for students is recommended. Melbourne Polytechnic recommends:

- A co-designed mental health crisis management model to be developed across TAFEs;
- Greater supports and training for TAFE staff in mental health awareness and mental health first aid training;
- Incorporation of positive mental health behaviours and skills being incorporated into vocational education curriculum that will provide the student with industry specific techniques into the workplace (for example self-care strategies and stress management); and
- Building partnerships with mental health organisations and peak bodies.

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

Melbourne Polytechnic supports the broad capability building of all staff in disability awareness and is currently developing a training module to be undertaken by all existing staff and new staff as part of their induction. There are identified opportunities to expand training annually for universal design and delivery of training products. The Australian Disability Clearing House on Education and Training (ADCET) provides a significant amount of resources and information to support students, teachers and DLOs and is actively used and supported as a repository for reliable and current information.

Currently, with the focus on online learning, Melbourne Polytechnic would like to draw the attention of the importance of improving the user experience and ensuring that online learning environments are accessible to all users. Online platforms should aim to meet Level AA success criteria of W3C Web Content Accessibility Guidelines (WCAG) 2.0. Melbourne Polytechnic has over the last year improved accessibility online by introducing the following improvements:

Moodle adaptations

The Moodle Accessibility plugin 'Blackboard Ally' is now available in all Moodle sites. This plugin is an additional service within Moodle which automatically creates alternative versions of uploaded content files including Electronic braille, BeeLine Reader, Audio and ePub. This provides support to students with range of disabilities by allowing them to choose the version

of content that best suits their needs. From a trainer's perspective, Ally automatically checks course materials against WCAG 2.0 accessibility standards and produces an accessibility score for each file upload to a Moodle unit. In addition to educating teachers about obligations and impacts for accessibility, Ally provides them with guidance and tips to rectify any problems it discovers.

ReadSpeaker is also fully integrated within Moodle as our text-to-speech solutions. It supports an inclusive learning environment and provides improved digital accessibility to our staff and students with learning and speech disabilities, visual impairments, and low literacy challenges across devices and platforms. Studies show that adding text-to-speech technology to educational content helps to improve comprehension, language skills, and autonomy of struggling or reluctant readers.

Video platform

MP has integrated a video hosting system into our learning management system to improve access for users. Video platforms allow more time and greater flexibility for training and induction. When materials are provided in video format, students can replay the video as many times as they require to support their learning needs. During playback they can control the rate of delivery by not only pausing and rewinding, but by also adjusting the video playback speed.

Automatic captioning of videos

The video system provides automatic captioning of all videos and this is presented in both transcript and closed caption formats. These captions can be further edited by the trainer and there are processes in place to audit caption accuracy. The timed presentation of audio with captioning also assists those with literacy-based learning needs.

However, 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 students 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. It is recommended that consideration 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.

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

The political and economic context for TAFE has dramatically shifted with the introduction and rollout of the NDIS and Free TAFE. These substantial policy changes have transformed expectations, as well as access to education and training for people with disability. Although these policies and programs are creating more opportunities for more students to enter TAFE, they are also placing pressure on staff resources. Melbourne Polytechnic notes the great opportunities Free TAFE creates for disadvantaged students, but also the surge in demand as more students enter the system, which drives demand for supports to meet the needs of more diverse students.