

WESTERN SYDNEY UNIVERSITY



Western Sydney University's Accessibility Action Plan 2018-2020

1. ACKNOWLEDGEMENTS

With respect for Aboriginal cultural protocols and out of recognition that its campuses occupy their traditional lands, Western Sydney University acknowledges the Bundjalung, Darug, Gundungurra, Tharawal (also historically referred to as D'harawal) and Wiradjuri Peoples and thanks them for their support of its work in their lands (Greater Western Sydney and beyond).

The Office of Equity and Diversity would also like to acknowledge the contributions of students and staff with disability in providing feedback on their experiences at the University and suggesting improvements.

The Western Sydney University Accessibility Action Plan would not be possible without the valuable guidance of the Disability Action Plan Advisory Committee, including:

- Angelo Kourtis, Vice-President (People and Advancement) Chairperson
- Ellen Brackenreg, Executive Director Student Participation and Success, acting Chairperson
- Sev Ozdowski, Director Equity and Diversity,
- Michelle Falconer , Senior Coordinator, Equity and Diversity, Secretariat and Principal Plan Author
- Susan Hudson, Executive Director Human Resources
- Alex Grochowski, Senior Manager, Capital Works and Facilities
- Kym Morris, Associate Director, Digital Security and Risk, ITSD
- Kevin Bell , Pro Vice-Chancellor (Digital Futures)
- Kevin Dunn, Dean, School of Social Sciences and Psychology
- Laynie Hall Pullin, Lecturer and School Disability Coordinator, Nursing and Midwifery
- Rebecca Ladd, Head, Student Disability Services

2. INTRODUCTION

The Western Sydney University 2018-2020 Accessibility Action Plan (the Action Plan) articulates a cohesive whole-of-University strategy to prevent and address disability discrimination for students and staff with disability. The Action Plan helps the University meet legal obligations under the Disability Discrimination Act 1992 (Cth) and Education Standards. It will act as a cross-unit roadmap of the organisation's disability-related support and inclusion programs, and will help to advance the University's Securing Success Strategic Plan 2015-2020 (link: [strategic objectives](#)).

The Action Plan is endorsed by the University's Executive Committee and is the third consecutive plan registered with the Australian Human Rights Commission. It serves as a public declaration of the University's intentions and directions for providing disability-related accessibility and inclusion to students and staff with disability over the next five years.

The Action Plan is based on the direct input of students and staff with disability, evidence of previous organisational outcomes and strategies, sectorial trends, and a review of disability-related performance and practice across the institution. For a detailed overview of these considerations see attachment 1: '*Western Sydney University's 2017-2022 Disability Action Plan Discussion Paper*'.

3. DISABILITY DISCRIMINATION ACT & EDUCATION STANDARDS

The University's responsibilities to its students and staff with disability are outlined in a range of legislative instruments and standards, however the obligations are outlined primarily under the Commonwealth Disability Discrimination Act 1992 (DDA). The DDA prohibits discrimination in a number of specifically defined "areas of life", including employment and education.

The DDA encourages organisations to develop Action Plans to eliminate discriminatory practices and to provide a copy of these plans to the Australian Human Rights Commission. The DDA sets out that an Action Plan is a strategy for changing business practices which might result in discrimination against people with disability, including anti-discrimination policy development and program delivery.

As Western Sydney University is principally an institution of learning it is appropriate that the Action Plan look closely at the area of education. The Action Plan will outline the ways in which people with disability will be assisted, wherever possible, to gain access to and participate in the same quality of education available to students without disability. However, as the University is also an employer and provider of accommodation and other services, it is equally appropriate that these areas are also included in the University's Action Plan.

Even though the DDA is complaints-based (as opposed to compliance-based) legislation, it obliges the University to actively eliminate discrimination against people with disability and their associates in employment, the provision of education services, in access to university premises and information, and in a range of other areas.

The DDA requires the University to promote acceptance of the principle that people with disability have the same fundamental rights as all other members of the University community. Under the DDA,

Western Sydney University is also required to put in place policies and programs to prevent harassment and victimisation of people with disability.

Finally, under Section 123 of the DDA, the University is liable for unlawful conduct by the provider's employees or agents unless the provider can establish that it took reasonable precautions and exercised due diligence to avoid the unlawful conduct. In such cases, the University bears the onus of demonstrating that reasonable precautions have been taken and due diligence has been exercised.

The following, adapted from [Western Sydney University's National Disability Coordination Officer \(NDCO\) program website](#), summarises the key points of the DDA's Disability Standards for Education (known as the Education Standards which came into effect in Australia in 2005).

The Education Standards provide guidance on the legislative obligations, under the DDA, to ensure that students with disability have the right to study *on the same basis* as students without disability. *On the same basis* means that students with disability must have comparable opportunities and choices as students without disability. The Education Standards cover all areas of education, including admission, enrolment, participation in courses and access to facilities and services.

The Education Standards explain that the University has a responsibility to provide adjustments to help people with disability participate in education. Adjustments that are needed will depend on the impact of an individual's disability and will be identified through a process of consultation between the person with disability and education provider. Some examples of education adjustments include, but are not limited to:

- access to alternative formats
- access to inclusive technologies
- extra time in exams
- readers
- note takers
- practical assistants
- alternative assessments
- improvements to physical access
- early access to learning materials
- access to a hearing loop or sign interpreter

The Education Standards demonstrate that the University is responsible for providing adjustments that are "reasonable", but does not have to provide adjustments where it would lead to "unjustifiable hardship" for the University. Where this occurs, the University must be able to demonstrate unjustifiable hardship on an individual basis. Factors that the University may take into account to determine unjustifiable hardship include risks to the person with disability or others, or the financial situation of the University.

The Education Standards do not require the University to relax the standards of a course or progress a student who does meet academic requirements. All students, regardless of disability, must be able to meet the essential requirements of their course, referred to as the Inherent Requirements.

Similarly, as an employer the University is responsible for making reasonable adjustments to accommodate disability-related needs in the workplace for our staff with disability and those with disability-related carer responsibilities. The University is also required to ensure equal access and opportunity for staff with disability and those with carer responsibilities through recruitment, development and promotion mechanisms, staff entitlement and benefits, information provision, and physical environment. Ensuring fair opportunity to all staff, regardless of disability, is also an excellent way of harnessing top performance and innovation from the institution as a whole.

4. DEFINITION & PREVALENCE OF DISABILITY

The concept of 'disability' is defined broadly under the DDA. The University adopts this same broad definition for the purpose of the Disability Policy and this Action Plan. 'Disability' incorporates any physical, sensory, neurological, intellectual, psychiatric, or learning disability, and covers physical disfigurement, the presence in the body of disease-causing organisms, chronic health conditions, and total or partial loss of part of the body or a bodily function. It also includes a temporary, permanent, current, past, future and/or assumed disability.

The current estimate of the rate of disability in 15 -64 year old Australians is 18.3% (Australian Bureau of Statistics 2015). The same estimates indicate that 20% of Australian adults had experienced a mental health condition in the past 12 months; 25% of young Australians currently has a mental health condition, and 75% of mental health conditions emerge before the age of 21 years.

Importantly, there is higher disability prevalence in our Aboriginal and Torres Strait Islander population. The [2012 Survey of Disability, Ageing and Carers](#) showed that Aboriginal and Torres Strait Islander people are 1.7 times more likely to have disability than non-Indigenous people. The same survey also highlighted that Aboriginal and Torres Strait Islander people are 1.5 times more likely to live with a more severe disability than non-Indigenous people. This makes it crucial that the University ensure our Aboriginal and Torres Strait Islander students and staff have ready access to disability-related specialist supports within the institution, as a key means of retaining our Indigenous students and staff and supporting their success.

5. STRATEGIC CONTEXT

Western Sydney University, along with the wider higher education sector, is facing a uniquely contemporary tension. That is, universities are striving to be highly flexible, responsive and accessible to students and staff with disability, *whilst* grappling with rapidly growing numbers of students and staff disclosing disability, and disclosing increasingly complex disability-related needs. Concurrently fast-paced structural shifts are occurring throughout the sector with growing sectorial volatility and competitiveness. This requires nimble innovation and very high performance from the University.

During the term of the new Action Plan, universities across Australia will need to innovate new ways to support students and staff with disability and maximise the effectiveness of current provisions. The measures within this Action Plan are designed to help position the University to meet these challenges.

There are also plenty of unprecedented opportunities, as society continues to explore unimagined ways for technology to better support people with disability, develop more sophisticated flexible working arrangements, open up new and more universally designed higher education pedagogy, and educate a generation of young learners with disability who have not experienced anything but fully integrated learning environments. This presents tremendous potential for the University to secure the success of our students and staff with disability more than ever before.

5.1 Students with disability

The number of Australians with disability participating in higher education is rapidly climbing. In 2010 Australian universities included 9100 (approx.) students with disability, rising to 15300 in 2015, approximately 40% growth (REF i.). This increase creates a higher demand for disability-related education adjustments within universities and accessible facilities, services and pedagogy. The National Centre for Student Equity in Higher Education (NCSEHE) recently highlighted this issue, reporting that *'Educators, policy makers and equity practitioners may be inadequately prepared to provide support to the growing numbers of students with disability.....Greater cooperation and coordination collecting information and exchanging knowledge of best practice would assist all universities to more effectively support (the growing numbers) of students with disability.'* (p.8).

The national increase in students with disability broadly reflects the contemporaneous expansion in overall university cohorts. Importantly however, it also represents an increase in the proportion of students with disability compared to the overall national cohort. That is, the percentage of Australian students reporting having disability rose from (approx.) 4% in 2010 to (approx.) 5.5% in 2015 (REF ii).

Whilst the participation rate increased across the sector there remains a sizeable gap between participation of students with disability and wider disability prevalence in the community. That is, [2012 ABS data](#) shows that people with disability make up 15% of 18-64 year olds. Reasons for this gap will be multifarious, many of which likely beyond the influence of universities. However, it's also likely that there is a group of prospective higher education students with disability not yet engaged who could feasibly succeed at University, especially given the recent improvements in disability retention and success rates nationally (see below).

A higher disability participation rate in Australian universities delivers valuable individual and broader societal benefits given the economic and social advantages of higher education attainment. For people with disability the benefits of higher education are particularly impactful as a means of helping to overcome the inherent disadvantages of living with disability.

In 2016 the National Centre for Student Equity in Higher Education reported that the success rate for students with disability during recent years is slightly lower but generally converging with the overall cohort. Therefore, on the whole, students with disability are now successfully completing their studies at approximately the same, but slightly lower, rate as the overall body of students. This is a significant achievement by the sector in recent years.

The retention rate has also marginally decreased, as shown by Department of Education and Training's [Selected Higher Education Statistics – 2015 Student data on Equity Performance](#) where the total national cohort has an average retention rate of 78% compared to 77% of students with disability. These figures indicate students identifying as having disability are staying on at university at almost the equivalent rate as their peers without disability. The figures show Western Sydney University achieving a 76.6% retention rate for students with disability.

Notably, the same data shows a wide variation in the disability retention rate between institutions, ranging from 50% to 85%, indicating that not all universities have the same outcomes for students with disability.

Recent research by [University of Tasmania 'Exploring the Retention and Success of Students with Disability' \(2016\)](#) suggests that disability retention and success is likely to be improved where a university has:

- a whole of university inclusive strategic framework with a focus on universal design;
- a current, flexible and relevant policy framework;
- adequate financial and human resources provided to fit student need;
- disability support services integrated with student support services;
- specialist disability support staff;
- regular disability-specific training and awareness strategy for all staff;
- well performing relationships between disability practitioners, academic staff, and students; mechanism for helping to identifying students with mental illness, and autism spectrum disorders;
- regular monitoring of retention and success rates for students with disability;
- student wellbeing and resilience programs;
- academic adjustment plans developed collaboratively with students and effectively disseminated to key staff;
- partnerships with external organisations; and
- consideration of students with disability in the development and use of online learning resources.

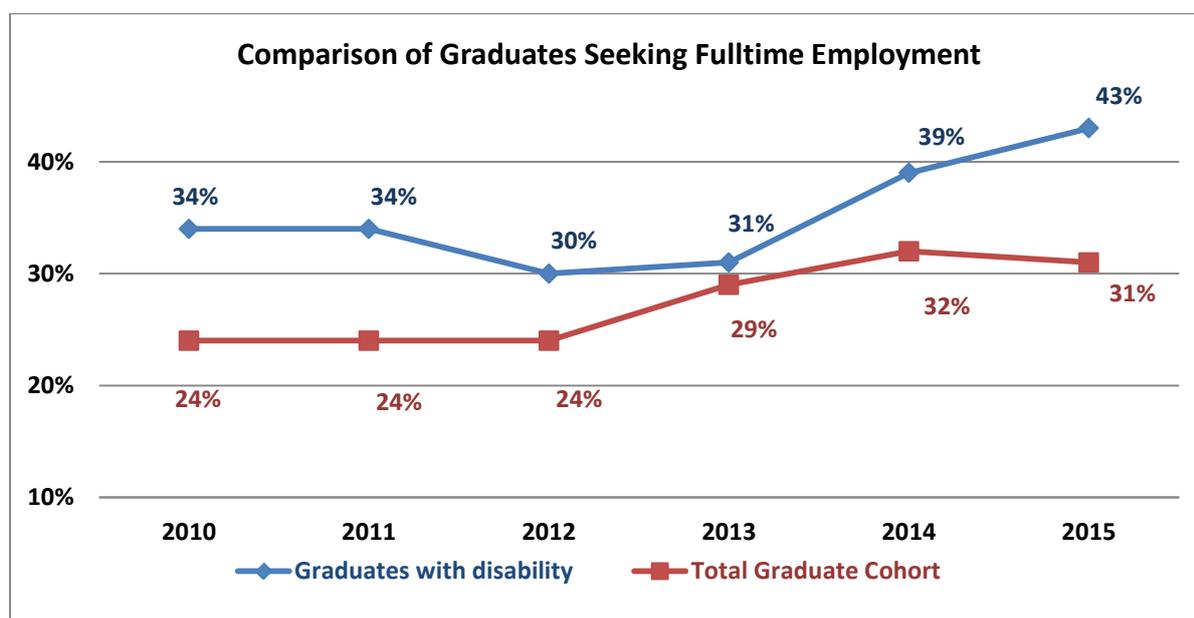
A recent review of the University's practices and programs showed that Western already has most, but not all, of the above features. Where gaps have been identified, they are, wherever possible, addressed in the following Action Plan. The ongoing challenge during the term of this next Action Plan will be to retain our good practices and outcomes *while* finding ways to stretch the favourable impact in the face of the climbing level and complexity of students with disability need.

Sectorial trends suggest that the following key issues are also likely to affect Western Sydney University over the next five years:

- academic and administrative staff not applying disability-related reasonable adjustments, potentially a violation of DDA statutory obligations;
- a 'continually arising' lack of disability knowledge and understanding by university staff across the sector (Kilpatrick, S. 2016);
- the fast-paced technological changes in blended and fully online higher education, and the major influence digital accessibility will have on attraction, retention and success of students with disability; and
- continuing growth in students presenting with mental illness diagnosis and the likely impact on overall student wellbeing, retention and completion rates.

5.2 Graduates with disability

Overall, Australian graduates with disability are less likely to obtain full-time employment than their counterparts without disability. Between 2010 and 2015 national graduate destination data (REF iii) shows full time employment was *obtained* by 65% of graduates with disability compared to 72% of the total graduate cohort, on average. The same data also shows that the portion of graduates with disability *seeking* full-time employment was also higher at 35% compared to 27% for the total graduate cohort, on average. The graph below depicts the year to year gap trend in graduates looking for full-time employment across 2010-2015 comparing graduates with disability and total graduate cohort.



In 2017 the National Centre for Student Equity in Higher Education (NCSEHE) highlighted this gap, reporting that '*Graduates with disability are less likely to be in work than students without disability and that (this) disadvantage follows through into employment and careers and is represented in their earning potential.*'

There is little research in this particular area, however in 2016, Richardson, S., Bennett, D. & Roberts, L.^{iv} investigated graduate outcomes for equity groups including those with disability. This research noted that some groups of Australian graduates with disability achieved better employment outcomes than others. Those who had worked in their final year of studies achieved more favourable labour outcomes, therefore highlighting the particular importance of Work Integrated Learning and career services to students with disability. Also, in 2016 NCSEHE reported better labour outcomes for graduates with disability from particular types of universities, such as institutions within the Group of Eight, Australian Technology Network of Universities (ATN), or an Innovative Research University (IRU). The underlying reasons for the correlation are still unclear. Importantly, in August 2017, Western joined the Innovative Research University group, therefore presenting potential opportunity to share in these better outcomes.

5.3 Employees with disability

In 2016 the Australian Human Rights Commission (AHRC) highlighted the ongoing lack of progress in the employment participation rate of people with disability. The Commission described Australians with disability as '*significantly underemployed compared to people without a disability*' in its ['Willing To Work Report: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability'](#). It also emphasised that this situation has stubbornly persisted despite comprehensive efforts over two decades to address the gap. This is contrary to the many broad sweeping improvements in social inclusion of people with disability, importantly including in higher educational attainment.

The Australian Bureau of Statistics' *'Survey of Disability, Ageing and Carers'* (2012) showed the employment participation rate of people with disability in 1993 at 55% and in 2015 at 53%. This compares with the 2015 participation rate for people without disability of 83%. This continuing underrepresentation of people with disability in the workforce has significant economic and social effect with predictable health and wellbeing detriments.

It is now widely accepted that this situation limits the available talent pool and robs Australian employers of performance and business benefits. In 2015 the Business Council of Australia argued that workforce diversity is a key driver for better organisational performance, including employing people with disability. In 2013 the Harvard Business Review featured research^v showing that employees working for organisations with measurable and genuine diversity were 45% likelier to report market share growth and 70% likelier to report having captured a new market. This highlights the potential business advantages of ensuring that employment practices are genuinely inclusive of prospective and current employees with disability. The [Australian Chamber of Commerce and Industry's 'Employ Outside the Box: The Business Case for Employing People with Disability'](#) encourages businesses to employ people with disability because of the following business benefits '*...increased productivity, reduced absenteeism, reduced turnover, increased morale, more positive organisational culture and reduced workers compensation...*' (p. 7).

As an employer, Western Sydney University significantly outperforms Australia's low disability employment rate. At our institution, about 10% of our workforce report having disability and request formal workplace adjustments (see below for further details). As a major regional employer, this achievement not only benefits our individual staff and organisation generally, it also represents a significant return to the broader Greater Western Sydney region.

Given Australia faces a perennial problem of being unable to improve its disability employment rate so far, the University's leadership in this area could be especially valuable. As a thought leader in the wider community, there may be scope for the University to help translate our good practices into better outcomes for all Australians with disability seeking employment.

The AHRC report (as above) recommends that all employers:

- remove any systemic obstacles to people with disability within the recruitment processes;
- support managers and supervisors to create and manage diverse teams and flexible working arrangements;

- include diversity, inclusion and flexibility into leadership KPIs; and
- invest in employee health and wellbeing programs.

The University already undertakes some of these recommended measures, and where there is a gap, this has been included in the Action Plan.

The AHRC also recommends that all universities incorporate disability-related content into business and leadership courses, to help better educate and prepare future employers for greater inclusion of Australians with disability in the workplace. This recommendation has also been captured in the Action Plan.

Technological advances have brought unparalleled capacity for workplace flexibility. Therefore, increasingly enabling the University's workforce to complete work tasks via modified working hours, alternative locations, multiple communication channels and mobile production tools. Also, there are new opportunities arising for the University as an inclusive employer where innovations are currently being made in better workplace management of mental health. These, and other strategic developments, will progressively open up fresh prospects for the inclusion of our staff with disability.

6. ACCESSIBILITY & DISABILITY AT WESTERN SYDNEY UNIVERSITY

6.1 Disability Policy

The University's Disability Policy states our commitment to provide reasonable adjustments wherever possible to students and staff to accommodate disability-related needs. It also outlines the University's intention to prevent discrimination on the basis of disability and to actively remove barriers wherever possible to ensure accessibility, flexibility, and equal opportunity to all students and staff regardless. In 2017 the University updated its Disability Policy to ensure the language and procedures were current, early in the term of this Action Plan the University will conduct a broader review of the Policy to ensure its provisions are as contemporaneous as possible and reflective of best practice.

6.2 Provisions and supports available for students and staff with disability

The University provides a suite of supports and facilities for students and staff with disability to help accommodate disability-related needs. Including the following specific provisions:

Student Support Services, Disability Service

The Disability Service is part of the Student Support Services unit and is made up of a team of professional Disability Advisors and trained educational support staff. The Disability Service supports and assists future and current students with disabilities, including those with chronic health conditions, mental health illness, and learning difficulties, to reach their full academic potential. Students with a temporary injury such as a broken limb may also be eligible for assistance.

The Disability Service helps students with the following:

- Pre-admission advice;
- Educational Support Service staff (academic note takers, readers, practical assistants and sign interpreters);
- Training in and access to assistive technology;
- Advocacy on disability related issues;
- Referral to other relevant services;
- Transcription of videos/podcasts ;
- Textbooks and educational material in alternative formats.

Academic Integration Plans

One of the key ways the Disability Service assists students with disability is to develop an Academic Integration Plan (AIP) on their behalf. An AIP stipulates the specific educational adjustments and provisions the University will make to accommodate a student's disability and help to ensure they receive equal access and opportunity throughout their studies. The AIP's are based on expert disability documentation of the student's individual condition and needs, and on discussions with the student and School. The University is legally obliged to develop *and* implement these plans under the DDA and Education Standards.

'Nuts and Bolts' Professional Development Module

The University offers all staff an online professional development module AIPs called 'Nuts and Bolts'. This online module familiarises staff with the Commonwealth disability legislation and provides the knowledge and skills to understand and effectively implement AIPs.

Assistive Technology Rooms

Access rooms are available on all Western Sydney University campuses and provide students registered with the Disability Service with access to specialist assistive technology and adaptive equipment. Access rooms are located in the library and open during regular library hours, except during formal exam periods. The Access rooms have been designed to enable several students to work independently using designated work stations in a shared space, including for example the following equipment:

- Height adjustable tables;
- Printer (students to supply own paper);
- Scanner;
- PEARL Scanner (for use with Openbook software);
- Personal computers with standard keyboards, monitors and mice;
- Clearview (CCTV enlarger); and
- Sloping desk.

The rooms also provide the following types of assistive software:

- Voice-recognition;
- Text to speech;
- Document conversion;
- Literacy support; and
- Text and video magnifying.

Reasonable Adjustment Plans & Staff Workplace Adjustment Fund

The University provides a Reasonable Adjustment Plan (RAP) where a staff member with disability requires formal workplace adjustments to accommodate their disability-related needs, in accordance with its legal responsibilities under the DDA. A RAP outlines the specific workplace adjustments the University commits to install to help enable a staff to make their fullest workplace contribution and maintain health, safety and wellbeing. This arrangement is similar to AIPs used for our students with disability. Workplace adjustments may include for example:

- Specialised office or other equipment;
- Assistive Technology;
- Modified working hours;
- Alternative working location/s;
- Task rotation and/or breaks;
- Shared work tasks;
- Additional and/or differently structured workplace supervisor support and/or instructions; and
- Mentoring and/or peer support.

The University also has a centralised Staff Workplace Adjustment Fund (SWAF) which is dedicated to funding services and equipment needed for staff with disability with a RAP in place. The RAP process and SWAF is administered by the Office of Equity and Diversity.

Flexible Working Provisions

Providing flexible working options at the University plays an integral role in developing opportunities for increased staff satisfaction, retention, engagement, and sustained organisational knowledge. Recently the University's Vice-Chancellor and President, Professor Barney Glover, advised all staff that the University has '*...many options available to staff who require flexible working arrangements and I encourage staff to discuss these options with their Manager, Senior HR Partner or HR Advisor. When properly managed, flexible working arrangements serve to benefit the overall productivity of our University.*'

Within this flexible approach to working arrangements the University provides many short and long-term provisions and practices that accommodate flexible work options for staff in a variety of circumstances including staff with disability with or without a RAP in place, and/or staff with carer responsibilities. This flexibility may relate to when, where and how work is done.

Mental Health and Wellbeing Program and Student Ambassadors

One of the principal ways the University invests in student and staff health and wellbeing is through the University's Mental Health and Wellbeing Framework. This program provides health promotion information and activities to students and staff on maintaining good mental health whilst studying and/or working at the University, and generally helping to better inform the University community on mental health, and importantly challenging the stigma associated with mental illness.

The Western Sydney National Disability Coordination Officer Program

The Western Sydney National Disability Coordination Officer Program (NDCO) works strategically across the Greater Western Sydney region to assist people with disability access, and participate in tertiary education and subsequent employment. NDCOs undertake a wide range of activities across the local community with the aim of achieving the following outcomes for people with disability:

- services that facilitate transitions and participation in tertiary education and subsequent employment are coordinated;
- local networks collaborating to identify and overcome barriers in transitions and participation in tertiary education and subsequent employment; and
- making decisions about their education and employment based on an improved knowledge of their rights and entitlements, supports available, educational options and pathways to employment.

6.3 Overall Key Issues at Western Sydney

A recent review of the University's former Action Plan and consultations showed that many teams across the University had advanced disability-related work (see below for key highlights), often to a particularly high standard to improve accessibility at the University.

Here are just some of the implementation highlights from the previous Action Plan:

- Western Sydney University is one of the top performers nationally in students with disability retention, and the pre-existing gap in completion rates of students with and without disability has been steadily closed during the term of this Action Plan;
- New development and online publication of best practice guidance on Universal Design and Inclusive Teaching in blended learning contexts;
- Introduction of a Biennial Student Survey of students using the Student Support Services, including the Disability Service to strengthen student voice and evidence of student experience;
- Continued investment in a whole-of-university and award winning 'Mental Health Strategy' dealing with increasing issues of mental health and mental illness affecting students and staff;
- Completion of a cross-unit student-led project to evaluate on-campus physical accessibility across all campuses, delivered via Capital Works and Facilities, Student Support Services, the School of Science and Health, and the Office of Equity and Diversity;
- Conducted an audit of Access Rooms and Adaptive Technology bank leading to an equipment update and refresh of support provided to students with disability across all major campuses;
- Explicit incorporation of Disability Discrimination Act requirements into the '*Architectural Design Standards at Western Sydney University*' and the Governance 'sign-off' processes for all new build and upgrade capital works project; and
- Development and publication of Inherent Requirements for approx. 100 courses across all Schools.

The University is an especially complex organisation and these advances while noteworthy, can at times be piecemeal rather than cohesive. This review demonstrated that indeed substantial effort and investment is contributed across the University toward better equity, accessibility and inclusion for students and staff with disability. However, we could achieve better impact for students and staff by adopting a more coordinated 'whole-of-organisation' approach.

Students and staff with disability told the University via a recent online survey (see Attachment 1 for details) that the institution is generally supporting them effectively. Students and staff with disability reported that the disability-related measures by the University they valued most highly included:

- specialised equipment to help accommodate their disability needs;
- flexible arrangements, particularly flexible working arrangements for staff and alternative assessments arrangements for students;
- expert assistance through specialist support teams within the University;
- development *and* implementation of an agreed disability-related adjustment plan (that is, an AIP for students, or a RAP for staff); and
- when staff demonstrate a supportive and inclusive attitude towards a student/staff's disability-related needs, students particularly noted the attitude shown by school-based staff, and staff with disability were likelier to comment on the attitude demonstrated by their workplace supervisor.

However students and staff with disability also highlighted some gaps, the areas they suggested needed improvement included:

- a paucity in disability awareness and inclusive practice by individual University staff, outside our specialist support services;
- inconsistent implementation of their agreed adjustment plans;
- a need for longer-term follow up support from our specialist staff;
- problems with physical access on campus, particularly parking; and
- students particularly highlighted their need for more tailored peer support.

At Western Sydney University there is a number of key issues relating to accessibility and disability that the Action Plan needs to address over the next five years.

6.4 Learning, Teaching, Participation and Success

As explored earlier, the number of students with disability attending university nationally is rapidly increasing. At Western Sydney University we've experienced the same trend, approximately a 40% increase in the number of students with disabilities during the same period. The number of students with disability registered with the Disability Service grew from 980 in 2011 to 1688 in 2016. According to students identifying as having disability, the disability participation rate here was 4.1% in 2017.

The Disability Service recently conducted the *Needs Gap Analysis Study 2016* to investigate ways to manage this trend and still provide a high quality service to our students with disability. The subsequent report showed that between 2014 and 2015 there was a 21% increase in year on year demand. Disability Service clients were also generally contacting the service more frequently over the period examined. Between 2014 and 2015 the 'occasions of service' count increased by almost 30%, from about 3690 to 4760.

During this same time the Disability Service team expanded to some extent, but not at the same pace as the large increase in student numbers and/or occasions of service. Within the past 3 years the service has grown from 6.4 FTE to 8.4FTE.

During consultations, staff from across the University indicated that overall student need is also becoming increasingly complex and intense. Staff reported that there seems to have been a steady rise in students presenting with mental illness, Autistic Spectrum Disorders and/or other complicated disability-related needs as their primary diagnosis. This same trend was also identified by recent research funded and reported on by National Centre for Student Equity in Higher Education. In 2016 their report on *'Issues and Trends for Students with Disability Review of NCSEHE Funded Research'*, noted an empirical shift in disability types such as mental illness and Autism Spectrum Disorder, and a reduction in other disability types.

These issues will be significant considerations throughout the next five years. The *Needs Gap Analysis Report 2016* makes a number of recommendations of ways the University could provide an even more effective service and better stretch to meet rising student need. The issues highlighted by this study and many of its recommendations have been incorporated into the Action Plan.

Information from staff consultations indicated that this same pressure is also affecting the School's Disability Coordinators. Senior staff and Disability Coordinators identified that this role is becoming less manageable in its current form and workload allocation. A view was expressed by several key stakeholders that 'pockets' of excellence by Disability Coordinators exist in some Schools, but in other areas the full capacity of the role is not yet being met.

Conversely, as discussed above, there is an existing gap in participation rate by students with disability at the University. The University currently has 4.1% of students with disability, compared to 15% disability prevalence amongst 18-64-year-old Australians. As an institution, this presents an opportunity to capture a cohort of prospective students that we are not yet reaching. This could be addressed through marketing, student recruitment, and school's engagement efforts targeted to students with disability who may consider higher education options.

One measure which could help to tackle the disability gap is the 21st Century Curriculum Renewal Project. As of March 2017 the University is embarking on a major curriculum reform project, led by the Deputy Vice-Chancellor (Academic) and the Pro Vice Chancellor (Learning Transformations), to transform and refresh the whole-of-university curriculum. It seeks to create a more targeted, attractive, relevant and accessible curriculum architecture. The new structure will be more effective, agile and simpler. Importantly for students with disability, this reform also strives to encourage wider access and participation, through the inclusion of flexible modes of study and flexible pathways into study.

The Digital Futures team, under the leadership of the Pro-Vice Chancellor (Digital Futures), is leading work in the digital environment, benchmarking work by peer schools and applying rubrics, such as Quality Matters with criteria for universal design and accessibility. With the recent Shared Services projects bringing Blended Learning Advisors and Designers central in the University, the opportunity now exists to propagate consistency across the institution and to confirm best practice for students with disability.

As technologies continue to evolve, the Digital Futures Team and the Learning and Teaching Technologies Advisory Group (also under the PVC Digital Futures), are committed to monitoring the accessibility of all digital learning materials, platforms, and channels; incorporating universal design into all new systems and upgrades; and staying abreast of fast moving advances in Assistive Technology and accessibility features of new products and practices.

Another fundamental pedagogical shift in higher education has been the increasing move towards Work Integrated Learning (WIL) and a focus on developing graduate employability. The University is taking advantage of this development by increasingly introducing WIL elements into course offerings. For students with disability this has the tremendous benefit of helping to overcome some of the inherent barriers for graduates with disability, as discussed above.

Learning in a workplace setting can present additional issues to be managed for a student with disability. For the University this can also involve new challenges, such as navigating intricate legal obligations, developing new types of adjustments, and forging complex arrangements between the University, our student, and/or an industry partner hosting our student.

Western Sydney University has started to address this through the introduction of a new Placement Integration Plan. However, stakeholders identified that this 'booming' new type of educational adjustment presents issues often beyond staff's previous experience and can be particularly convoluted to solve. This suggests that staff may need more support than offered via Placement Integration Plans, to help build their capacity to manage these situations well when supporting students with disability.

During consultations our students with disability highlighted these other key issues:

- Academic Integration Plans are not always implemented consistently, and sometimes not at all, by university staff, and that this is an issue of highest importance in their view;
- Flexible assessment which accommodates disability-related needs is one of the most valuable ways the University can support a student with disability, such as re-scheduling an exam to a different time of day, providing assessment information as early as possible in each semester, and/or extended assessment periods;
- Specialised assistance via the Disability Service is considered by students as one of the most impactful ways the University supports their success at University; and
- A flexible and/or understanding attitude shown by a staff member about a student's disability-related needs, particularly in the Schools, can make a large difference to how engaged and supported a student feels at University.

6.5 Employment

As discussed above, the Western Sydney University is an exemplar employer of people with disability. We have a higher participation rate of staff with disability than most Australian employers, including the Australian Public Sector. Our provision of Reasonable Adjustment Plans (RAP) and specialist assistance is done to a very high standard. However, consultations and a review of the University's employment practices identified several areas for improvement and these are incorporated into this Action Plan.

Firstly, the Office of Equity and Diversity data shows that at end of 2016 the University had approximately 380 staff members with a registered RAP in place. In 2015 we had approximately 350 RAPs in place. Over the past several years there has been a consistent trend of a continual increase in staff requesting a RAP. It is anticipated that 2017 will report an even higher rise. Between January and

April 2017 Equity and Diversity had already received 50 new requests for a RAP. However, the resources allocated to this service have not increased during this same period.

Putting a RAP in place for staff with disability brings multifarious benefits to the University, as discussed above, and is an essential way to meet the University’s anti-discrimination legal obligations. However, given an apparent sharp rise in demand, how the provision of RAPs is structured and resourced will need consideration. This Action Plan includes measures to ensure the RAP process is delivered in the most efficient way to meet contemporary needs and identify any other gaps to be addressed.

As mentioned above, in 2016 the University conducted its first-ever survey of staff with disability about their views on the impact and value of the disability-related supports the University has in place. The number of responses was limited (60 received) and therefore can only be considered broadly descriptive, and not at all definitive. However the responses did give insights into the experiences of those staff who responded to the survey. Importantly the responses indicate which disability-related supports by the University the staff with disability most valued, including (in order of most frequently reported):

- specialised equipment provided via the SWAF and the Office of Equity and Diversity;
- flexible working arrangements;
- supportive and inclusive attitude from other staff, particularly a Supervisor; and
- good quality support from the Senior Staff Disability Advisor at the Office of Equity and Diversity.

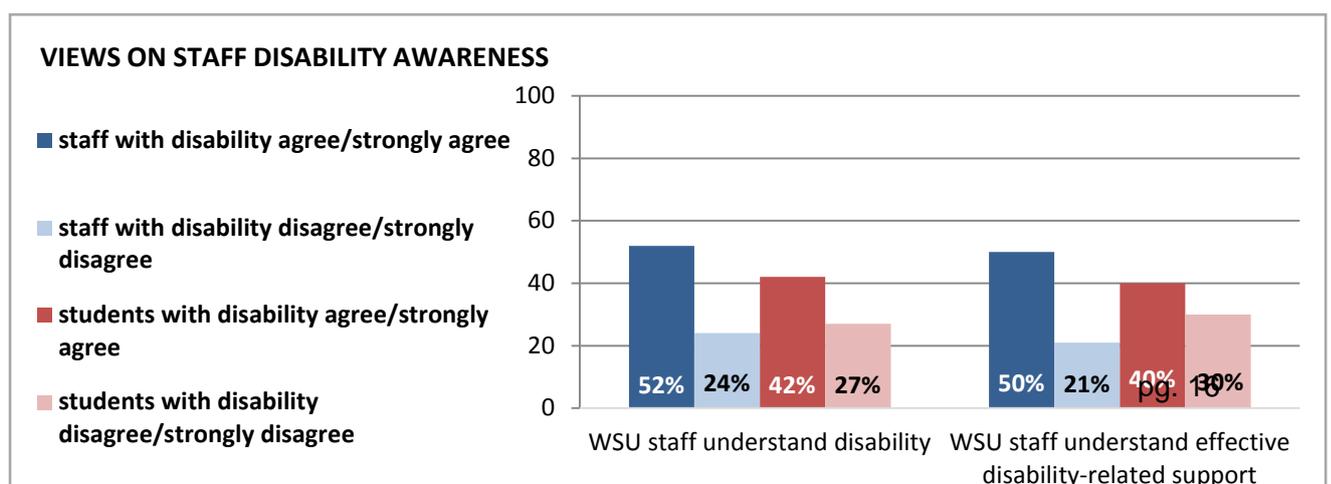
Survey respondents also identified the following areas where they suggested the University improve its practices (in order of most frequently identified):

- unhelpful and uninformed disability-related attitudes of managers and co-workers;
- supervisors actively discouraging flexible working arrangements; and
- better ongoing monitoring and reviewing of existing RAPs via Office of Equity and Diversity.

Currently the University is refreshing its ‘Our People Strategy’. It will be important to embed the above issues into this strategy.

6.6 Staff Disability Awareness

Consultations, practice review across the University, and sector scoping all point strongly to the issue of low disability awareness and competence by staff and the critical impact this has on effectiveness and outcomes. The following graph shows the views of students and staff on disability awareness by staff across the University, as measured by the recent survey (as above).



The University's previous Disability Action Plan included measures on disability awareness and competence, however this does not appear to have addressed the situation to the extent required. Therefore, this Action Plan will incorporate a wider sweeping review of the existing programs and activities in this area plus draw on best practice across the sector.

6.7 Digital, Information and Communications Accessibility

Digital transformation at the University will be a strong theme across the term of this Action Plan. The Pro Vice-Chancellor (Digital Futures) is currently developing a Digital Futures Strategy for the University that strives to develop best-in-class practices with a focus on emerging pedagogies and technologies. This will be a key opportunity to embed Universal Design principles into the institution's digital learning and teaching so as to ensure maximum accessibility for students with disability.

The Web Accessibility Working Party has been working towards improved accessibility of web based learning and teaching content. This cross-unit group has developed a set of well researched and designed guidelines ready to be implemented across the University.

The DAP Review and stakeholders identified that the recent University-wide rebranding may have affected overall accessibility of the University's digital and other information and communication. Several of the inaccessible elements already identified could potentially amount to a breach of our anti-discrimination legal obligations and warrant further review. Measures to help address this issue of concern have been incorporated into this Action Plan.

6.8 On-Campus Accessibility

Over recent years the University's Estate and Commercial team has undertaken widespread major capital works in upgrades and new builds across our campuses. These are some of the biggest capital work developments in the history of the University. However, it appears that amidst these large-scale programs and extensive maintenance over the University's seven campuses, disability-related access can be often out-prioritised when faced with competing demands.

Notably, physical accessibility was one of the biggest concerns for students and staff with disability in recent consultations, particularly the daily struggle to find accessible parking. Limited parking is a universal problem across the University affecting many staff and students with and without disability. However, for our students and staff with disability parking can be an absolutely critical determinant of whether the individual can physically access the campus or not, with no available alternative. For some students and staff with disability, it can directly impact on health and wellbeing, as indicated by several examples given by students in the *Disability Services Gap Analysis Report 2016*.

The *Disability Services' Needs Gap Analysis Report 2016* also identified that introducing online Accessibility Maps would significantly improve physical accessibility across campuses, this feature is already provided by nine other universities across the sector.

A joint student-led project between Capital Works and Facilities (CWF), the Disability Service, School of Science and Health, and Office of Equity and Diversity recently evaluated on-campus physical

accessibility across all campuses to identify current accessibility needs. The reports provided by these final year Occupational Therapy students, with guidance from our own CWF, Disability Services staff, and academic experts include an in-depth analysis and measurement of our physical accessibility against specific statutory obligations. This project was an important example of the University providing our students with Work Integrated Learning (WIL), and doing so in a way with the real potential to improve lived experiences on campus. It provided highly valuable information and a description of the University's current status regarding on-campus physical accessibility. However, it remains unclear how the University will use this important information to guide priority setting and future capital works.

The above project demonstrated the value of cross-unit collaboration on physical accessibility at the University and highlighted a need for more ongoing regular, structured cross-unit communication, partnership and problem solving. Other universities, including for example Macquarie University and the University of Technology Sydney, have in place a standing joint committee of key stakeholders to help prioritise and solve ongoing and arising physical access issues.

6.9 Implementation, Monitoring, Reporting & Communication

The Office of Equity and Diversity will act as lead agency in coordinating the implementation of this strategy and Action Plan, and will do so under the direction of the Vice President (People and Advancement). This will include reporting annually on the implementation to the Executive Committee. The Office of Equity and Diversity will also be available to support stakeholders with implementation responsibilities, including:

- providing advice on legal responsibilities and emerging practice;
- helping to facilitate cross-unit collaboration;
- providing expert LGBTIQ-related information, training and/or professional development to teams; and
- linkages with external experts, community, sector and industry partners.

The Action Plan has been carefully designed to closely align with the University's Securing Success 2015-2020 Strategic Plan. Therefore, progress on any of the items listed below will also help University portfolios to advance the Securing Success objectives and report against them.

Exemplar teams and individuals across the University making outstanding contributions to the overall Action Plan aims (as above) will be highlighted in the annual reporting to the Executive Committee to help identify strong performance and impact within the University.

7. 2018-2020 ACCESSIBILITY ACTION PLAN

7.1 Our Vision

Through this Action Plan, Western Sydney University will achieve excellent accessibility in learning, teaching, research, service and as an employer. The University will build on its already good practice to become a best-in-class place of work and study through innovation, responsiveness, creative flexibility, and technology enriched environments. The University will become an organisation

knowledgeable about the needs of our future and present students and staff with disability and highly skilled in achieving best education and employment outcomes.

7.2 Strategic Aims

This Action Plan drives the University's overall aims to:

- a) build demonstrably equitable, inclusive and accessible organisational structures and culture for students and staff with disability;
- b) signal to our stakeholders that the University is disability-friendly and always striving to build equal opportunity and accessibility for students and staff with disability; and
- c) harness whole-of-organisational benefits of disability inclusion and accessibility.

7.3 Planned Actions, Responsibilities and Timeframes

Securing Success Objective 1: A distinctly student-centred University where academic and personal support is well integrated at all student lifecycle stages.

Action	Stakeholder Responsible	Timeframe	Priority
1.1 Continue to implement the recommendations of the Disability Service Gap Analysis (July 2016).	Chief Student Experience Officer, via Head, Disability Service	End 2018	A
1.2 Monitor the extent of implementation of Academic Integration Plans (AIP) across the Schools, and scope feasible options for systematically tracking AIP implementation.	Chief Student Experience Officer, via Head, Disability Service Executive Deans	End 2018	A
1.3 Update the Western Sydney University Mental Health and Wellbeing Strategy and extend to 2020, including mental health and wellbeing being embedded into curriculum to help educate students' about better mental health.	Chief Student Experience Officer, via Head, Disability Service	By end of 2018	A
1.4 Develop an improved process for students with disability transitioning from undergraduate course-based study to higher degree research programs to ensure disability-related adjustments are appropriately continued and/or effectively adjusted.	Chief Student Experience Officer, via Head, Disability Service Deputy Vice Chancellor (Research & Innovation)	End 2018	A
1.5 Increase promotion to International Students of the availability of the Disability Student Service, particularly highlighting free and strictly confidential access to the service. These promotions may include printed materials in other languages, presenting information at International Student orientation, adding new web content or links specifically targeting International Students.	Chief Student Experience Officer, via Head, Disability Service Pro-Vice Chancellor (International)	End 2018 and ongoing	A

Action	Stakeholder Responsible	Timeframe	Priority
<p>1.6 Consider ways staff could be better supported when helping to make arrangements for students with disability on work-related placements.</p>	<p>Chief Student Experience Officer, via Head, Disability Service</p>	<p>End 2019</p>	<p>B</p>
<p>1.7 Conduct a basic review of the Disability Coordinator Role across the Schools to identify any changes needed to meet the growing demand, better support staff within those roles, and help ensure that practices between Schools are to a consistent standard.</p>	<p>Executive Deans</p>	<p>End 2019</p>	<p>C</p>
<p>1.8 Staff of the Disability Service and Badanami Centre for Indigenous Education to actively exchange practice information and advice on a regular basis to continue to build an effective partnership.</p>	<p>Pro-Vice Chancellor (Engagement & Aboriginal & Torres Strait Islander Leadership) Chief Student Experience Officer, via Head, Disability Service</p>	<p>End 2018 and ongoing</p>	<p>B</p>
<p>1.9 The University will liaise with the First People’s Disability Network Australia to seek their advice on further actions which could be undertaken to improve inclusion, wellbeing, and success of our Aboriginal and Torres Strait Islander students with disability.</p>	<p>Pro-Vice Chancellor (Engagement & Aboriginal & Torres Strait Islander Leadership) Chief Student Experience Officer, via Head, Disability Service</p>	<p>End 2018 and ongoing</p>	<p>B</p>
<p>1.10 The University’s National Disability Coordination Officer Program, Disability Services, and Careers team to jointly explore viable options for making more internships available via the University for students with disability, and deliver a recommendation/s to the Vice President, People and Advancement.</p>	<p>Vice President, People & Advancement, via Director, Equity & Diversity</p>	<p>End 2019</p>	<p>C</p>

Securing Success Objective 2: To be a research-led University with regional, national and global impact.

Action	Executive Responsible	Timeframe	Priority
<p>2.1 The University to consider applying for a Research Grant through the National Centre for Student Equity in Higher Education targeted at how to effectively provide support to students with disability in the face of growing demand and increasing complexity of need. These grants require a blended team of academic researchers and equity practitioners to focus on translating research into practice innovation by sharing findings with the national higher education sector to help better inform policy and institutional practice.</p>	<p>Chief Student Experience Officer, via Disability Service, in partnership with Office of Equity & Diversity</p>	<p>End 2018</p>	<p>B</p>

Securing Success Objective 3: Provide a unique learning (and working) experience (and environment) that is innovative flexible and responsive.

Action	Executive Responsible	Timeframe	Priority
<p>3.1 Ensure digital quality assurance monitoring occurring across the University (eg Quality Matters evaluation) includes specific consideration of the disability-related needs of students, contemporary best practice in digital accessibility, and compliance with anti-disability discrimination statutory obligations.</p>	<p>Pro-Vice Chancellor (Digital Futures)</p>	<p>By end of 2018</p>	<p>A</p>
<p>3.2 Adopt the Web Accessibility Checklist and Guidelines developed in 2017 by the Web Accessibility Reference Group. Promote use of these tools by all teaching staff when designing and collating teaching materials.</p>	<p>Pro-Vice Chancellor (Digital Futures)</p>	<p>By end of 2018</p>	<p>A</p>
<p>3.3 Ensure University web content complies with Web Content Accessibility Guidelines (WCAG) 2.0 AA level, as per Western Sydney's Disability Policy.</p>	<p>Executive Director, Marketing</p>	<p>By end of 2018</p>	<p>A</p>

Action	Executive Responsible	Timeframe	Priority
<p>3.4 Conduct a review of accessible emergency evacuation facilities and on-campus parking, taking into account current need, legislative requirements, and views of student and staff with disability to identify existing gaps and current practice across the sector. The review is to scope potential options for improved emergency evacuation, and on-campus parking for students and staff with disability.</p>	Director, Estate & Commercial	By end of 2018	A
<p>3.5 Ensure the University's student and staff disability-related needs are specifically addressed within the design of future vertical campus development, covering issues such as emergency evacuation facilities, (including the Bankstown development). Disability-related needs of students and staff to be accommodated throughout new vertical campus developments. This is to be done in consultation with students with disability, Student Services, and Office of Equity & Diversity.</p>	Director, Estate & Commercial	Throughout the Bankstown Vertical Campus Development Project and any future development projects.	A
<p>3.6 Establish a joint committee on physical accessibility to consider current and future needs, priorities, and physical access solutions across the University, including representatives of students and staff with disability, and other key stakeholders such as Student Support Services, Office of Equity and Diversity, and Office of Pro Vice Chancellor (Aboriginal and Torres Strait Islander Leadership)</p>	Director, Estate & Commercial and Director, Equity & Diversity	By end of 2018	A
<p>3.7 Revise promotional materials to prospective students and associates to include information highlighting the availability of high quality disability-related student support services, Academic Integration Plans, and other flexible options at Western.</p>	Executive Director, Marketing	By end of 2018	A
<p>3.8 Develop and publish online accessibility maps to help students and staff with disability better navigate the University's campuses.</p>	Director, Estate & Commercial	By end of 2019	A
<p>3.9 Develop guidelines and other capacity building tools on disability awareness and best practice for staff creating Work Integrated Learning opportunities.</p>	Executive Deans	By end of 2019	B

Action	Executive Responsible	Timeframe	Priority
<p>3.10 Development of Project Lumbar and the Digital Spine, currently in development, to explicitly incorporate the disability-related needs of students, contemporary best practice in digital and information accessibility, and compliance with anti-disability discrimination statutory obligations.</p>	<p>Chief Information & Digital Officer And VP (People & Advancement)</p>	<p>By end of 2019</p>	<p>A</p>
<p>3.11 Check the accessibility and disability-friendliness of activities and materials used for Schools Engagement and Widening Participation programs to ensure inclusion of students with disability likely to consider University as an option.</p>	<p>Executive Director, Marketing</p>	<p>By end of 2019</p>	<p>B</p>
<p>3.12 Structurally embed the responsibility for the provision and maintenance of the Assistive Technology Rooms into the Information Technology and Design Service unit, including for example, formally allocating the task to one or more team members, incorporating into existing Position Description/s, and ensuring team members stay abreast of latest technological developments and student need.</p>	<p>Chief Information & Digital Officer</p>	<p>By end of 2019</p>	<p>B</p>
<p>3.13 Determine an updated schedule of high priority accessibility-related capital works, taking into account the latest and future planned capital works development. Prioritisation to be established based on accessibility audit reports recently produced by student-led projects, key stakeholder consultation, current and best industry practice, and direct advice from units providing disability specialist support services within the University (eg: Disability Service and Equity & Diversity).</p>	<p>Director, Estate & Commercial</p>	<p>By end of 2019</p>	<p>B</p>
<p>3.14 Review and upgrade existing process/es for scheduling and monitoring needed physical access improvements on campus to ensure currency and best practice.</p>	<p>Director, Estate & Commercial</p>	<p>By end of 2020</p>	<p>B</p>
<p>3.15 Incorporate disability awareness content into business-related courses with a focus on the business advantages of employing people with disability in the future world of work and society.</p>	<p>Dean, School of Business</p>	<p>By end of 2020</p>	<p>C</p>

Securing Success Objective 4: An expanding international reach and reputation

Action	Executive Responsible	Timeframe	Priority
4.1 To ensure staff within the portfolio of Pro-Vice Chancellor (International) portfolio undertake disability awareness training to help identify ways to best support domestic students with disability travelling overseas and International Students entering the University.	PVC (International)	End of 2020	C
4.2 To measure the participation rate of students with disability in the University's international mobility programs to determine any existing gap, and develop an action plan to address any lack of participation by students with disability.	Pro Vice Chancellor (International)	End of 2020	C

Securing Success Objective 5: Act as a leading advocate and champion for the Greater Western Sydney region and its people

Action	Executive Responsible	Timeframe	Priority
5.1 The University to continue to administer the local National Disability Coordination Officer Program and ensure it meets its objectives to improve: local linkages between schools, post-secondary education and training providers and disability service providers; transitions for people with disability into tertiary education and subsequent employment; and education and employment participation by people with disability.	Director, Equity & Diversity	Ongoing, subject to cnt'd federal funding.	C
5.2 NDCO to collaborate with internal stakeholders to address the higher education participation gap in the local region, improve outcomes for graduates with disability in Greater Western Sydney, and lift the local regional employment participation rate.	Director, Equity & Diversity	Ongoing, subject to cnt'd federal funding.	C

Securing Success Objective 6: A dynamic and innovative culture that secures success.

Action	Executive Responsible	Timeframe	Priority
<p>6.1 Conduct a future-needs forecast to measure the likely trend in demand for disability-related adjustments for staff over the next five years, potential gaps, and possible ways to meet the upcoming demand.</p>	Director, Equity & Diversity	By end of 2018	A
<p>6.2 Incorporate the relevant above actions into the new 'Our People' Strategy and any other disability-related considerations.</p>	Associate Director, Talent & Leadership Development	By end of 2018	A
<p>6.3 Review the University's suite of Workplace, Health & Safety policies, guidelines, training, and consultation processes. The review to including checking the extent of disability-related provisions and any gaps, inclusion of students and staff with disability in consultation bodies, coverage of anti-disability discrimination obligations, and adequacy of emergency protocols and arrangements for people with disability.</p>	Executive Director Human Resources	By end of 2018	A
<p>6.4 Review current Reasonable Adjustment Plan processes and implement any changes which will help to provide the service as effectively as possible, including maximizing capacity to meet the growing demand within the organisation, improved longer-term follow-up, and effective monitoring and/or review of plans already in place.</p>	Director, Equity & Diversity	By end of 2019	A
<p>6.5 Design and implement a cross-unit staff development framework to build disability awareness and knowledge across the organisation, particularly targeting those with most direct contact with students and staff with disability from orientation through to exit, including casual staff. This initiative to cover Casual employees and incorporate an element of mandatory disability awareness training for all staff.</p>	Director, Equity & Diversity Associate Director, Talent & Leadership Development	By end of 2019	A

Action	Executive Responsible	Timeframe	Priority
<p>6.6 Build all managers and supervisors' understanding of flexible working arrangements, ways to effectively use such strategies, and relevant anti-discrimination legal rights and obligations regarding flexible working arrangements to accommodate staff's disability-related needs</p>	<p>Director, Equity & Diversity Executive Director Human Resources</p>	<p>By end of 2019</p>	<p>A</p>
<p>6.7 Audit relevant University policy instruments to ensure accessibility and other disability-related issues and legislative requirements are adequately covered, including a comprehensive review and update the current Disability Policy</p>	<p>Director, Equity & Diversity</p>	<p>By end of 2019</p>	<p>A</p>
<p>6.8 Institute a biennial survey open to all staff with disability, with comparative links to data already collected by MyVoice survey to determine staff engagement and wellbeing.</p>	<p>Director, Equity & Diversity</p>	<p>By end of 2019</p>	<p>B</p>
<p>6.9 Develop a reward and recognition program for staff contributing to equity, inclusion and/or accessibility, including for students and/or staff with disability, e.g.: Vice Chancellor's Award for Inclusive Practice.</p>	<p>Director, Equity & Diversity Executive Director Human Resources</p>	<p>By end of 2019</p>	<p>B</p>

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WESTERN SYDNEY UNIVERSITY'S 2017-2022 DISABILITY ACTION PLAN DISCUSSION PAPER

ACKNOWLEDGEMENT

With respect for Aboriginal cultural protocols and out of recognition that its campuses occupy their traditional lands, Western Sydney University acknowledges the Bundjalung, Darug, Gundungurra, Tharawal (also historically referred to as D'harawal) and Wiradjuri Peoples and thanks them for their support of its work in their lands (Greater Western Sydney and beyond).

The Office of Equity and Diversity would also like to acknowledge the contribution and guidance of the Disability Action Plan Advisory Committee, including:

- Angelo Kourtis, Vice President People and Advancement, Committee, Chairperson
- Ellen Brackenreg, Exec Director Student Participation & Success, Student Participation & Success, acting Chairperson
- Sev Ozdowski, Director Equity and Diversity,
- Michelle Falconer , Senior Coordinator, Equity and Diversity, Committee Secretariat
- Susan Hudson, Executive Director HR & Org Development, Office of People and Culture
- Alex Grochowski, Senior Manager, Capital Works & Facilities
- Kym Morris, Associate Director, Digital Security & Risk, ITSD
- Kevin Bell , Pro Vice Chancellor (Digital Futures)
- Kevin Dunn, Dean, Social Sciences and Psychology
- Laynie Pullin Hall, Lecturer and School Disability Coordinator, Nursing and Midwifery
- Rebecca Ladd, Head, Student Disability Services
- Student with disability representative

STRATEGIC CONTEXT

Current estimates of the rate of disability in 15 -64 year old Australians is 18.3% for (ABS 2015). It was also estimated that 20% of Australian adults had experienced a mental health condition in the past 12 months; 1 in 4 young Australians currently has a mental health condition, and 3 out of 4 mental health conditions emerge before the age of 21 years.

In 2017, Western Sydney University, along with the wider sector, is facing a distinctly contemporary tension when responding to student and staff disability-related needs. That is, we're striving towards a strategic mission and legal requirement to create a highly flexible and responsive institution accessible to our students and staff with disability. Whilst concurrently grappling with rapidly climbing numbers of individuals disclosing disability, with increasingly complex disability-related needs, within a volatile sector with diminishing resources. This demands new approaches, different practices and structural change.

Meanwhile, the opportunities are endless as society continues to explore unimagined ways for technology to better support people with disability, develop more sophisticated flexible working arrangements, open up new and more universally designed higher education pedagogy, and educate a generation of young learners with disability who have not experienced anything but fully integrated learning environments.

The 2017-2022 Disability Action Plan (DAP) will be the University's third consecutive plan. Its purpose is to articulate a cohesive whole-of-University strategy to prevent and address disability discrimination for students and staff with disability. The DAP helps the University to comply with legal obligations under the Disability Discrimination Act 1992 (Cth) (DDA) and DDA Education Standards. It will act as a cross-unit roadmap of the organisation's disability-related support and inclusion, and help to advance the University's [strategic objectives](#).

The endorsed plan will be registered with the Australian Human Rights Commission as a public declaration of the University's intentions and directions for the next five years for providing disability-related accessibility and inclusion.

OVERALL SITUATION AT WESTERN SYDNEY UNIVERSITY

Overall the DAP Review and other information show that many units across the University have advanced DAP-related work, and much of it to a very high standard. However, these actions are often piecemeal rather than progressing particular and/or shared strategic direction/s. Substantial effort and investment is being contributed throughout the University for better equity, accessibility and inclusion for students and staff with disability. However, this is happening inconsistently over the organisation without necessarily working collaboratively to maximise results.

Here are just some of the implementation highlights from the previous DAP term:

- According to Australian Government Department of Education and Training's data, Western is one of the top performers nationally in student with disability retention, and the pre-existing gap in completion rates of students with and without disability has been steadily closing,
- The University's development and online publication of excellent guidance on Universal Design and Inclusive Teaching in blended learning contexts

- Introduction of a Biennial Student Survey of students using the Student Support Services, including the Disability Service
- A whole-of-university and award winning 'Mental Health Strategy' dealing with increasing issues of mental health and mental illness affecting students and staff.
- Joint student-led project between Capital Works and Facilities, Student Support Services, School of Science & Health, and Equity and Diversity to evaluate on-campus physical accessibility across all campuses.
- Audit conducted of Access Rooms and Adaptive Technology bank leading to an equipment update and refresh of support provided to students with disability across all major campuses.
- Explicit incorporation of Disability Discrimination Act requirements into the 'Architectural Design Standards at Western Sydney University' and the Governance 'sign-off' processes for all new build and upgrade capital works project.
- Development and publication of Inherent Requirements for approx. 100 courses across all Schools.

In our recent online survey, students and staff respondents told us that, on the whole, the University is supporting them effectively, and that they most consistently and highly value when the University:

- provides specialised equipment to help accommodate their disability needs
- allows flexible arrangements, particularly flexible working (staff) or alternative assessments (students),
- staff demonstrate a supportive and inclusive attitude towards a student/staff's disability-related needs, particularly when this is shown by school-based staff (students) and/or workplace supervisors (staff)
- provides expert assistance through specialist support services within the organisation and implements an agreed disability-related adjustment plan (Reasonable Adjustment Plan or Academic Integration Plan).

Students and staff with disability also suggested areas for improvement. Most predominantly, they pointed to:

- a gap in the disability awareness, and practices of individual staff outside our specialist support services;
- inconsistent implementation of their agreed adjustment plans;
- a need for longer-term follow up support from our specialist staff
- problems with physical access on campus, particularly parking, and
- students in particular highlighted their need for more tailored peer support.

In summary, the University has made solid progress during the term of the previous DAP, and appears to be performing well overall. Western needs to extend our current good practices, be more strategic and better coordinated, and pursue more innovative solutions to meet the arising challenges over the next five years.

REVIEW AND CONSULTATION

This Discussion Paper encapsulates the key points of information obtained through:

- a recent review of the previous Disability Action Plan
- an inaugural online survey for students and staff with disability
- interviews of staff in key operational areas with high strategic impact
- examination of other existing data indicating quality of service and outcomes for students and staff with disability including Disability Services Gap Analysis (2016) and MyVoice 2015,
- review of DAPs from other Australian universities and large corporates,
- scoping of sector trend data and recent literature; and
- guidance from the Disability Action Plan Advisory Committee.

These sources have helped to identify the University's progress against the previous DAP; our existing and forecasted gaps in practice; current need and issues across the organisation.

This Discussion Paper provides a quick scan of overall disability-related practice across the University as a place of work and study. It also lists critical issues for consideration and poses broad future directions for discussion. Stakeholders are asked to respond to the discussion points at end of the paper, and of course any other arising issues. Readers may like to comment only on specific elements of the Discussion Paper, within their own area of experience and or responsibility. The below list outlines the areas covered by each segment of the Discussion Paper.

Contributions will be used to inform the objectives, actions and success indicators of the next DAP.

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1. LEARNING, TEACHING, PARTICIPATION & SUCCESS

KEY ISSUE/S:

Growth in Demand

- During the period of the previous DAP 2010-2015, the participation rate of commencing students with disability in higher education has grown from approximately 4% to 5.5% of the entire student cohort nationally^{vi}.
- Whilst this is a relatively modest increase in the percentage of students with disability compared to the overall national cohort, in real numbers there has been a rise from approx. 9, 100 students with disability in 2010 to approx. 15, 300 in 2015. This is approx. 40% growth in the number of individual students with disability attending Australian universities.
- At Western Sydney University we've experienced the same trend. That is about a 40% increase in the number of students with disabilities. In 2011 there were 980 students with disability registered with the Disability Service, and by 2016 this had grown to 1688. During this same period the Disability Service has not received a commensurate staffing increase, within the past 3 years the service has grown from 6.4 FTE to 8.4FTE.
- The Disability Services' recent *Needs Gap Analysis Report 2016* indicates the unit is grappling to meet this larger demand, noting that between 2014 and 2015 there was a 21% increase in YoY demand. This same report also shows that Disability Service clients are generally contacting the service more frequently. Between 2014 and 2015 the 'occasions of service' count rose by almost 30%, from about 3690 to 4760.
- The above report's analysis, and stakeholder consultation during the DAP Review, indicate that overall student need is becoming more complex and intense, particularly with the steady rise of students with mental illness and/or other complicated disability-related needs, such as Autistic Spectrum Disorders. This trend was also identified by recent National Centre for Student Equity in Higher Education funded research, which noted a shift in the distribution of disability types to the category which includes mental illness and autism spectrum disorder and a reduction in other disability types^{vii}.
- As across the sector, our Disability Services are currently considering new ways it can keep up with the exponential incline in demand for service and adjustments. This issue will be a significant consideration throughout the next five years.
- *The Needs Gap Analysis Report 2016* makes a number of recommendations of ways the University could provide an even more effective service and better stretch to meet student need. This study and its recommendations need to be considered as a critical component of the next DAP.
- This growth in demand is also affecting the School's Disability Coordinators. During the DAP Review senior staff and Disability Coordinators identified that the role is becoming less sustainable in its current form and workload allocation, as the numbers of students with disability rise and the disability-related needs become more complicated.
- Stakeholders also identified that 'pockets' of excellent performance by Disability Coordinators exist in some Schools, but in other Schools the full capacity of the role is not being met.

Innovations in Pedagogy

- Since drafting the previous DAP, Western has increasingly adopted digital and blended learning. As across the sector, this tendency has opened up many new opportunities for the participation of students with disability. It has also brought new challenges, to ensure all learning materials are accessible to the growing number of students with disability. Digital accessibility will continue to be a crucial issue for our students with disability into the next DAP.
- During the 2010-2015 DAP the University made significant efforts in relation to improving the accessibility of blended learning. For examples in January 2016, the Central Blended Learning Team introduced '*Basic Standards for Blended and Fully Online Learning 2016*'. Issues of accessibility and Universal Design are addressed throughout the requirements, including guidance on use of colour, font, ease of navigation, WCAG requirements, specific reference to ensure students with disability are informed about where to get support for learning accessibility issues, and other information.
- In September 2016, the University re-established the Web Accessibility Working Party to generate whole-of-University solutions for ensuring Western Sydney University addresses its obligations under the Web Content Accessibility Guidelines (WCAG), the National Transition Strategy and Disability Discrimination Act to produce accessible digital learning resources. This Working Party is currently developing a suite of resources to help produce accessible materials, introducing an accessibility statement to be added to video and lecture pods, and embedding WCAG Guidelines in Central Blended Learning Team's staff development workshops.
- During the former DAP, the University increasingly moved towards more Work Integrated Learning. For students with disability this has the tremendous benefit of gaining valuable work-based experience, the lack of which has long been acknowledged as a main barrier for graduates with disability obtaining equitable graduate outcomes. However, of course, learning in a workplace setting can also present other additional issues to be managed for a student with disability. For the University this can require navigation of intricate legal obligations, development of new types of adjustments, and complex arrangements between the University, our student, and/or the industry partner providing the work-integrated learning experience.
- Western Sydney University has started to address this through the introduction of a new Placement Integration Plan. This document articulates the adjustments specific to the workplace setting placement, negotiated with the assistance of the Disability Service. However, during the DAP Review consultations, stakeholders identified that this 'booming' new type of reasonable adjustment brings issues often beyond staff's previous experience and can be particularly convoluted to solve. This suggests that staff may need more support than offered via Placement Integration Plans to help build their capacity to navigate these situations well.

Student Experience

- Within the DAP Review we conducted a basic online survey to measure views of students and staff with disability on disability-related support at the University. We received only a small number of responses, including 38 from students with disability and 60 from staff with disability. Therefore the results are only broadly indicative of actual overall experience. Other data would need to be considered in order to verify these results.
- The key findings in relation to learning, teaching, participation and success were overall favourable showing that:

- 77% of students with disability agree that the University takes all reasonable steps to enable their participation at the University, and discourages disability discrimination; and
 - Just over 60% agreed that the steps taken by the University to support them were effective, and that they felt supported well at the University.
- When asked to identify the most valuable ways the University supports their disability-related needs the students identified the following:
 - Alternative assessment arrangements to accommodate disability-related needs, such as scheduling an exam in the morning instead of afternoon, extended assessment periods, etc.
 - Specialised assistance via the Disability Service, many students named their Disability Advisor and/or their Academic Integration Plan as the most impactful assistance, and
 - A staff member, particularly in the School, who showed a flexible and/or understanding attitude towards the student's disability-related needs.
- When asked to identify areas the University could improve its support to students with disability, students most commonly recommended that we address inconsistent implementation of their Academic Integration Plans, or in some cases not implemented at all. This issue was featured in the previous DAP and addressed via a recommendation for more staff training and development. It appears that additional measures may be needed in order to ensure the University addresses its obligations under Disability Discrimination Act to have the agreed adjustments actually in place for the student.

Staff Disability Awareness

- Only 40% of students agreed that staff have a good understanding of disability or understand effective ways to support a person with disability, particularly school-based staff, such as teaching and administrative staff. Importantly, respondents expressed this lower level of confidence in staff's disability awareness even when they had indicated higher satisfaction in other areas.
- Also, in the cases where students *had* experienced staff with good disability awareness and/or a helpful approach to their disability-related needs, they also consistently identified this experience as one of the most valuable and impactful ways the University supported them.
- This highlights the value and benefits of building staff's capacity to better understand disability, ways to support people with disability, and ways to show this understanding to our students with disability.
- The findings from this small survey sample raises the question of whether we need to establish a better way to understand the specific experiences of students with disability, and those supports and experiences that students with disability find the most valuable.

SUGGESTED DIRECTIONS FORWARD:

1. Conduct a future-needs forecast to measure the likely trend in demand for disability-related supports and adjustments for students over the next five years, potential gaps, and possible ways to meet the upcoming demand. It may be helpful to do this as a joint venture with other similar universities to benefit from cross-institutional exchange and resource sharing.
2. Undertake a study of contemporary and effective practices across the sector being used to help meet the growing demand for disability-related supports and adjustments. Consider ways the University could facilitate practice-sharing between specialists in other Universities.
3. Conduct a short review of the Disability Coordinator Role across the Schools to identify any changes needed to meet the growing demand, better support staff within those roles, and help ensure that practices between Schools are to a consistent standard.

4. Consider ways staff could be better supported when helping to make arrangements for students with disability on work-related placements.
5. Map existing data available to help determine the quality of student with disability experiences and impact of supports provided, and determine whether further data is required.
6. Audit a random sample of Academic Integration Plans to measure extent of implementation across the Schools, and scope options for systematically monitoring AIP implementation.
7. Implement mandatory disability awareness training for all staff.

2. EMPLOYMENT

KEY ISSUE/S:

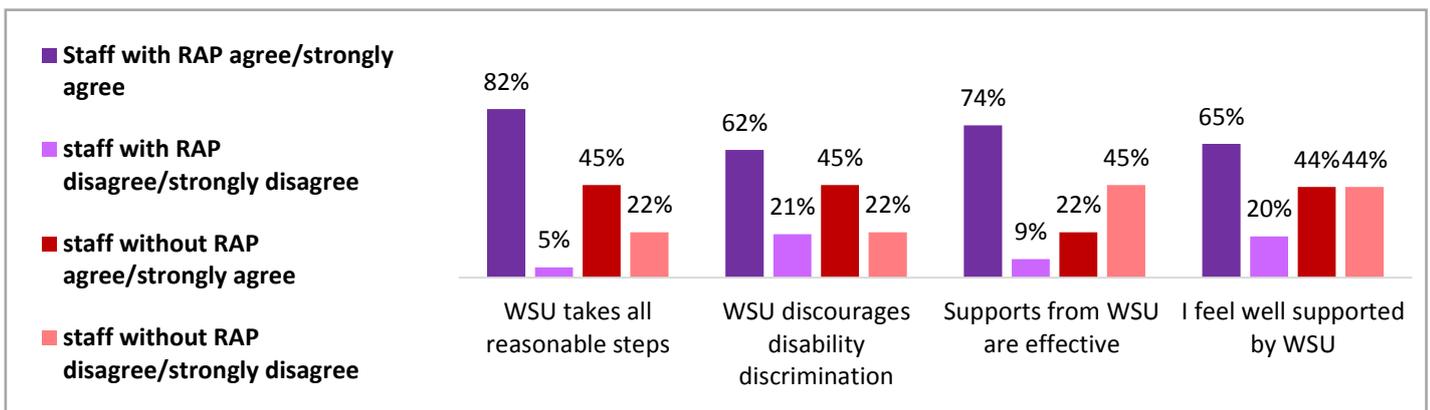
Growth in Demand

- Equity and Diversity data shows at end of 2016 we had approximately 380 staff members with a registered Reasonable Adjustment Plan (RAP) in place. In 2015 we had approximately 350 RAPs in place. There has been a consistent trend of continual increase across the past several years. It is anticipated that 2017 will see an even higher rise. Between January and April 2017 Equity and Diversity has already received 50 new requests for a RAP. During this same period there has been no increase in the number of staff resources dedicated to providing this service.

Staff Engagement and Well-being

- As part of the DAP Review the University administered its first ever survey specifically targeting our staff with disability. As noted earlier, the response was small, only about 60 staff respondents. Therefore the information from the survey can only be considered descriptive in very general terms, and not all diagnostic. However it does give insights into the experiences of those staff who responded to the survey.
- Overall the survey suggested that the majority of staff with disability:
 - 68% agreed that the University takes all reasonable steps to accommodate their disability,
 - 54% agreed that the University that the supports provided are effective and
 - 52% agreed that the University supports them in a way that allows them to feel well supported at work.
- Importantly however, staff with a RAP in place were much more likely to give a favourable response than staff without a RAP in place, showing for staff with a RAP in place:
 - 82% believed the University took all reasonable steps to enable their participation in the workplace,
 - 74% of staff with a Reasonable Adjustment Plan in place believed the supports they received were effective, and
 - 65% felt well supported by the University.

See graph below for comparison of staff with and without a RAP in place.



Staff Experience & Impact of Support Provided

- The data collected by the DAP Review Survey reveals key issues affecting the respondents, their views on the impact and effect of supports provided by the University, and their suggested improvements.
- The supports which staff with disability most valued included:
 - Equity & Diversity providing specialised equipment, as identified by 46% of respondents;
 - flexible working arrangements, as identified by 25%;
 - supportive and inclusive attitude from other staff, as identified by 20%; and
 - good quality support from the Senior Staff Disability Advisor, at the Equity and Diversity team, as identified by 18%.

Staff Workplace Adjustment Fund

- This data suggests that the University's centralised Staff Workplace Adjustment Fund (SWAF) for provision of specialised workplace equipment is working effectively to help staff manage their disability at work and is considered a major factor in their engagement and wellbeing.

Flexible Working

- The survey results also indicate that respondents viewed flexible working arrangements to have a vital impact on the effectiveness of workplace accommodations by the University, and staff with disability's sense of being supported well and effectively.
- Significantly, stakeholders informed the DAP Review that flexible working arrangements are sometimes actively discouraged by supervisors of staff with a RAP in place. This suggests a need to better educate senior staff and other supervisors about the business benefits of flexible working and relevant legal obligations.

Staff Disability Awareness

- The survey data also points to the attitude demonstrated by other staff, especially their supervisor, as a significant factor on whether staff with disability feel they're being reasonably and well accommodated by the University. It indicates that there are staff within the University who demonstrate an inclusive approach to staff with disability, and that this makes a measurable difference.
- However, 30% of staff respondents recommended that the University improve the disability-related attitudes of managers and co-workers. This was the single most frequent suggestion made by respondents. Highlighting a need to build staff disability awareness and competence (as discussed above re students with disability).

Specialist Support & RAP Process

- Through the RAP process the Office of Equity and Diversity puts in place a formal agreed plan. This process articulates the adjustments the University agrees to use to accommodate a staff's disability-related needs, including specialist equipment, flexible working arrangements, modified working methods, and more.
- The data shows that 18% of respondents identified the Equity and Diversity specialist staff support and RAP process itself as the most valuable assistance provided. This result added to the other related data, shows that the RAP process, specialist staff, and the arrangements made by the specialist staff through the RAP process are considered high impact by our staff with disability.
- However respondents indicated that more is needed on an ongoing basis to help monitor and regularly review existing RAPs. Where a respondent reported this doesn't happen currently they were also more likely to express dissatisfaction with the University's efforts to reasonably accommodate their disability. These staff described problems with RAPs not being properly

implemented, being less effective on a longer-term basis, and/or becoming out-dated due to arising changes in the situation.

- Notably, the DAP Review also considered the 2015 MyVoice survey findings. These results were inconsistent with the above and instead showed staff with a RAP in place scoring lower in key wellbeing and engagement markers, compared to overall staff and those with disability without a RAP in place. Such contradictory results highlight the importance of collecting regular data about our support to staff with disability, a practice we don't have established at the University, to help us track trends and capture significant issues in real time and better understand the underlying causes of such results.

SUGGESTED DIRECTIONS FORWARD:

1. Conduct a future-needs forecast to measure the likely trend in demand for disability-related adjustments for staff over the next five years, potential gaps, and possible ways to meet the upcoming demand.
2. Increase all managers and supervisors' understanding of flexible working arrangements, ways to effectively use such strategies, and relevant anti-discrimination legal obligations to consider flexible working arrangements to accommodate staff's disability-related needs.
3. Build staff's general disability awareness, and increase understanding of inclusive workplace practice, particularly managers, and as a matter of urgency the supervisors of staff with a RAP in place. Recognise, and where appropriate reward, staff using an inclusive approach to staff with disability.
4. Review current RAP processes and implement any changes which will help to more effectively provide longer-term follow-up, monitoring and/or review of RAP already in place, and better meet growing demand.
5. Institute a biennial survey open to all staff with disability, with comparative links to data already collected by Student Support Services and MyVoice survey – to help cross reference and examine trends in more detail.

3. ORGANISATIONAL PLANNING, CAPABILITY, POLICY & PROCEDURES

KEY ISSUE/S:

Organisational Planning

- A desktop review of the University's strategic plans and policies shows that the underlying principles of equity, diversity, responsiveness, and flexibility are often featured, however measurable disability-related objectives, actions, success indicators and policy elements are not as prevalent.

Resources and Staff Capability

- As highlighted above, demand for disability-related adjustments for students and staff is forecasted to continually increase, and possibly grow beyond current resources during the 5 year term of the next DAP. Without forward planning, resourcing and changes this will likely affect our capacity to make legally required reasonable adjustments for staff and students with disability.
- As discussed above, there appears to be a gap in staff's overall understanding of disability and ways to effectively accommodate a person's disability-related needs in learning and/or workplace settings, see graph below.

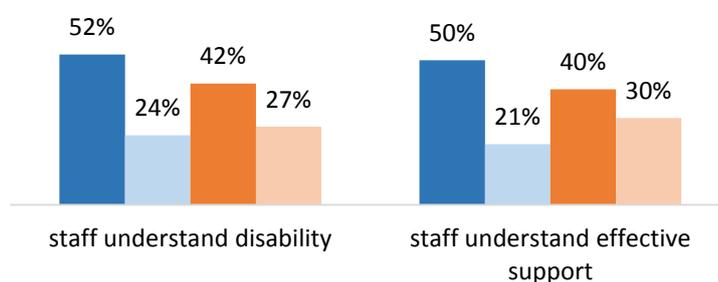
VIEWS ON STAFF DISABILITY AWARENESS

■ staff with disability agree/strongly agree

■ staff with disability disagree/strongly disagree

■ students with disability agree/strongly agree

■ students with disability disagree/strongly disagree



- A lack of staff disability awareness and competence may be contributing to unreliable implementation of agreed adjustment plans for students and staff. This is likely to be compromising the effectiveness of the supports the University invests in across the whole organisation.
- This has been an ongoing need identified in the University's previous two DAPs. Key stakeholders informed the DAP Review that historically the University has attempted to build staff's disability competence through the introduction of the comprehensive 'AIP Nuts and Bolts' staff development unit and other efforts. However this measure alone seems to have had a limited affect.

Policies & Procedures

- During 2016 the Disability Policy was updated to reflect administrative changes in processes used to generate adjustment plans for students and staff. This policy update highlighted that the Disability Policy could be improved by an overall review of its substantive content to ensure that it still meets the University's needs and contemporary best practice.
- The current Disability Policy is not accompanied by Guidelines, whereas other similar University policies are. It may be useful to generate such a document, given that the organisation is facing a rising and increasingly complex demand for disability-related adjustments, and our relevant legal obligations.

SUGGESTED DIRECTIONS FORWARD:

1. Audit the presence of disability, and other equity and diversity, related content in the University's existing strategic plans and critical policy documents to identify strengths, gaps and recommended improvements.
2. Create a tool to assist staff to embed equity and diversity (including disability) related objectives, actions and performance measures within routine strategic planning processes.
3. Develop a reward and recognition program for staff contributing to equity, inclusion and/or accessibility, including for students and/or staff with disability, eg: Vice Chancellor's Award for Inclusive Practice.
4. Design and implement a cross-unit staff development framework to build disability awareness and knowledge across the organisation, particularly targeting those staff with most direct contact with students and staff with disability, outside our specialist support services.

5. Conduct a comprehensive review and update the current Disability Policy, and consider whether new Guidelines would be useful.

4. DIGITAL, INFORMATION AND COMMUNICATIONS ACCESSIBILITY

KEY ISSUE/S:

- Within the term of the previous DAP there has been rapid and unprecedented progress in the area of digital, information and communications across the University (the sector, and society broadly). These developments were beyond the set objectives and actions of the previous DAP and largely did not steer these developments. The next DAP will need to consider a mechanism for keeping abreast of fast-paced change within the organisation and adjusting the whole-of-University strategy accordingly.

Digital Accessibility

- The ITDS has incorporated accessibility requirements into its routine procurement and project planning processes and structures, for example the Service Activation Checklist, ITDS' version of the University's standard Procurement Plan, and the Risk and Compliance Workbook. These are important safeguards for ensuring we meet our accessibility obligations.

Assistive Technology

- Responsibility for the University's Assistive Technology (AT) rooms (providing students with access to specially modified IT equipment) has recently transferred from Disability Services to ITSD. This has been the result of close cross-unit collaboration, and reflects the student preferences as identified by the *Disability Services' Needs Gap Analysis Report 2016*, and is anticipated to result in much improved access for students with disability.
- However, to date there is no specific plan for how ITSD staff will keep informed of disability specific AT developments and student need, as a newly added function to their previous operations.

Web Accessibility

- As discussed above the Web Accessibility Working Party has been progressing improvements to accessibility of digital learning materials, the outcomes and recommendations for future actions generated from this project need to be incorporated into the next DAP.
- Responsibility for the University's web content now sits with the Marketing and Communications team and not the Information Technology and Design Service (ITSD). This is a change not reflected in the previous DAP and needs to be taken into account in development of new DAP actions and responsibilities.

Branding Accessibility

- The DAP Review and stakeholders identified that the recent University-wide rebranding has affected overall accessibility of the University's digital and other information and communication. Several of the inaccessible elements already identified could potentially amount to a breach of our anti-discrimination legal obligations and warrant further review.

SUGGESTED DIRECTIONS FORWARD:

1. Conduct a desktop audit of the ITDS accessibility-related procurement, contractor and project planning structures and processes to ensure that they reflect current and planned accessibility across the organisation and anti-discrimination obligations.

2. ITDS to ensure that the new responsibility for the AT Rooms is structurally embedded into the ITDS unit, including formally allocating the new responsibility to one or more team members, incorporating the responsibility into existing Position Description/s, and planning how team members will stay abreast of latest AT developments and student need.
3. Ensure that the outcomes and recommendations of the Web Accessibility Reference Group directly inform and relate to new DAP objectives, actions and responsibilities.
4. An external expert to conduct an accessibility audit of the rebranding guidelines and templates to identify any inaccessible features and implement changes to redress identified problems as a matter of priority.

5. PHYSICAL ACCESSIBILITY

KEY ISSUE/S:

Accessibility Governance

- Within the term of the previous DAP, Capital Works and Facilities (CWF) embedded disability-related requirements into their routine procurement, design, and contracting processes and structures. For example the team includes the Disability Discrimination Act requirements into the *'Architectural Design Standards at Western Sydney University'*, plus accessibility is included in CWF's governance 'sign-off' processes for all new build and upgrade capital works projects. CWF advise that they anticipate reviewing their current process for identifying and scheduling physical accessibility-related projects to help ensure the schedule can be more readily kept current in real time.

On-Campus Accessibility

- Within the term of the previous DAP the Capital Works and Facilities (CWF) team has undertaken widespread major capital works in upgrades and new builds. These are some of the biggest capital work developments in the recent history of the University. However it appears that disability-related access is often out-prioritised when faced with competing demands.
- Physical accessibility problems were one of their biggest concerns of students and staff with disability, in particular the daily struggle to find accessible parking. This was identified by both the online DAP Review survey and *Disability Services' Needs Gap Analysis Report 2016*.
- Limited parking is a universal problem across the University affecting many staff and students with and without disability. However for our students and staff with disability parking can be an absolutely critical determinant of whether the individual can physically access the campus or not, with no available alternative. For some students and staff with disability, it can directly impact on health and wellbeing, as indicated by a number of examples given by students in the *Disability Services Gap Analysis Report 2016*.
- *Disability Services' Needs Gap Analysis Report 2016* also identified that introducing online Accessibility Maps would significantly improve physical accessibility across campuses and is already provided by nine other universities. This was an action within the previous DAP that has not yet been implemented.
- A joint student-led project between CWF, Disability Service, School of Science & Health, and EQD has evaluated the on-campus physical accessibility across all campuses to help identify current accessibility needs. The reports provided by these final year Occupational Therapy students, with the guidance of our own CWF, Disability Services staff, and academic experts include in-depth analysis and measurement of our physical accessibility against specific statutory obligations. This

information is highly valuable and provides a description of the University's current status regarding on-campus physical accessibility.

- However, it remains unclear how the University will use this important information to inform priority setting and future capital works.

Cross-Unit Collaboration

- The above project is an example of the potential for useful cross-unit collaboration on physical accessibility at Western. It also highlights a need for more ongoing regular, structured cross-unit communication, partnership and problem solving. Other universities, including for example Macquarie University and University of Technology Sydney, have in place a standing joint committee of key stakeholders to help prioritise and solve ongoing and arising physical access issues.

SUGGESTED DIRECTIONS FORWARD:

1. Conduct a review of on-campus accessible parking, current needs, gaps and scope potential solutions to mitigate the problem of lack of parking for students and staff with disability.
2. As a matter of priority, develop and publish online accessibility maps to help students and staff with disability better navigate our campuses.
3. Determine an updated schedule of priority accessibility-related capital works, taking into account the latest and future capital works development, accessibility audit reports provided by recent student-led project, any other updated information, and views from key stakeholders across the University. CWF to act as the lead agent in creating this schedule, with direct advice from the Disability Service and Equity and Diversity.
4. CWF to review and upgrade current process for scheduling and monitoring needed physical access improvements on campus.
5. Progress on implementing priority accessibility-related works to be reported on as part of regular monitoring of DAP implementation.
6. Establish a joint committee on physical accessibility to consider current and future needs, priorities, and physical access solutions across the University, including representatives of students and staff with disability.

6. DISCUSSION POINTS

The Equity and Diversity team would very much appreciate contributions from stakeholders about the points raised throughout this Discussion Paper. Stakeholders may like to respond to the entire Discussion Paper, or alternatively to those segments most relevant to their role at the University. We would particularly like stakeholders to consider and advise on the following questions:

1. Are there other critical issues that the DAP needs to take into account? If so, what is the issue and do you have a suggested way to address it?
2. Do the suggested future directions seem feasible and likely to address the needs as identified by the Discussion Paper? Do you have other suggested future directions or recommendations?
3. What would be a sustainable way for stakeholders to provide regular data to the Equity and Diversity team on DAP implementation progress?
4. Where significant change occurs, what process would best allow the new DAP to adjust during its five year term to amend the plan's actions to continue to be relevant and current?

ATTACHMENT 2: 2018-2020 ACCESSIBILITY ACTION PLAN SCHEDULE OF IMPLEMENTATION & RESPONSIBILITY

Timeframe	*Ongoing	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
2018																		
		1.1	Continue to implement the recommendations of the Disability Service Gap Analysis (July 2016)	A														
		1.2	Monitor the extent of implementation of Academic Integration Plans (AIPs) across the Schools, and scope feasible options for systematically tracking AIP implementation.	A														
		1.3	Update the Western Sydney University Mental Health and Wellbeing Strategy and extend to 2020, including embedding mental health and wellbeing into curriculum to help educate students' about mental health.	A														
*		1.4	Develop an improved process for students with disability transitioning from undergraduate course-based study to higher degree research programs, to ensure disability-related adjustments are appropriately continued and/or effectively adjusted.	A														
*		1.5	Increase promotion to the International Students of the availability of the Disability Service, particularly highlighting free and strictly confidential access to the service.	A														

Timeframe	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
*	3.1	Ensure digital quality assurance monitoring occurring across the University includes specific consideration of the disability-related needs of students, contemporary best practice in digital accessibility, and anti-disability discrimination obligations.	A														
*	3.2	Adopt the WSU Web Accessibility Checklist and Guidelines. Promote the use of these tools by all teaching staff.	A														
*	3.3	Ensure University web content complies with WCAG 2.0 AA compliance level.	A														
	3.4	Conduct a review of accessible emergency evacuation facilities, and on-campus parking, taking into account current need, legislative requirements, and views of student and staff with disability to identify existing gaps and current practice across the sector. The review is to scope potential options for improved emergency evacuation, and on-campus parking for students and staff with disability.	A														

Timeframe	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
*	3.5	Ensure student and staff disability-related needs are specifically addressed, covering issues such as emergency evacuation facilities, within the design and development of the future Bankstown vertical campus, and accommodated throughout the new site, in consultation with students with disability, Student Services, and Office of Equity & Diversity.	A														
*	3.6	Establish a joint committee on physical accessibility to consider current and future needs, priorities, and physical access solutions across the University, including representatives of students and staff with disability.	A														
	3.7	Revise promotional materials to prospective students and associates to include information highlighting the availability of high quality disability-related student support at Western.	A														
	6.1	Conduct a future-needs forecast to measure the likely trend in demand for disability-related adjustments for staff over the next five years, potential gaps, and possible ways to meet the demand.	A														
	6.2	Incorporate the relevant above actions into the 'Our People' Strategy and any other disability-related considerations.	A														
	6.3	Review the University's WHS policies, guidelines, training, and consultation processes in relation to disability-related inclusions, consultation, and obligations.	A														

Timeframe	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
*	1.8	Staff of the Disability Service and Badanami Centre for Indigenous Education to actively exchange practice information and advice on a regular basis to continue to build an effective partnership.	B														
	2.1	The University to consider applying for a Research Grant via the National Centre for Student Equity in Higher Education targeted at how to effectively provide support to students with disability in the face of growing demand and increasing complexity of need.	B														
*	1.9	The University will liaise with the First People's Disability Network Australia to seek their advice on further actions which could be undertaken to improve, wellbeing, and success of our Aboriginal and Torres Strait Islander students with disability.	B														
*	5.1	The University to continue to administer the local National Disability Coordination Officer (NDCO) program and ensure it meets its funding obligations and objectives.	C														
*	5.2	NDCO to collaborate with internal stakeholders to address the higher education disability participation gap, improve outcomes for graduates with disability, and lift the employment disability participation rate in Greater Western Sydney Region.	C														
2019																	
	3.8	Develop & publish online accessibility maps to help students with disability better navigate the University campuses.	A														

Timeframe	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
	3. 10	Development of Project Lumbar and the Digital Spine to explicitly incorporate the disability-related needs of students, contemporary best practice, and anti-disability discrimination obligations.	A														
	6.4	Review current Reasonable Adjustment Plan processes and implement any changes which will help to provide the service as effectively as possible.	A														
	6.5	Design and implement a cross-unit staff development framework to build disability awareness and knowledge across the organisation, including an element of mandatory disability awareness training for all staff, including casual staff.	A														
	6.6	Build all managers and supervisors' understanding of flexible working arrangements, use, and anti-discrimination obligations regarding flexible working arrangements to accommodate staff's disability-related needs.	A														
	6.7	Audit relevant University policy instruments to ensure accessibility and other disability-related issues and legislative requirements are adequately covered, including a comprehensive review of the Disability Policy.	A														
	3.9	Develop guidelines and other capacity building tools on disability awareness and best practice for staff creating Work Intergrated Learning Opportunities.	B														

Timeframe	*Ongoing	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
		1.6	Consider ways staff could be better supported when helping to make arrangements for students with disability on work-related placements	B														
		3. 11	Check accessibility & disability-friendliness of activities & materials used for Schools Engagement & Widening Participation programs to ensure inclusions of prospective students with disability.	B														
		3. 12	Structurally embed the responsibility for the provision & maintenance of the Assistive Technology Rooms into the Information Technology and Design Service unit.	B														
		3. 13	Determine an updated schedule of high priority accessibility-related capital works. Prioritisation to be based on accessibility audit reports, stakeholder consultation, current and best practice, and direct advice from units providing disability specialist services.	B														
		6.8	Institute a biennial survey open to all staff with disability, with comparative links to data already collected by MyVoice survey to determine staff engagement and wellbeing.	B														
		6.9	Develop a reward and recognition program for staff contributing to equity, inclusion, and/or accessibility, including for students with disability, eg: VC's Award for Inclusive Practice	B														

Timeframe	*Ongoing	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
		1.7	Conduct a basic review of the Disability Coordinator role across the Schools to identify any changes needed to better meet growing demand, better support staff, ensure consistent practice and standards across Schools.	C														
		1.10	The University's NDCO Program, Disability Services, and Careers teams to jointly explore viable options for making more internships available via the University for students with disability and deliver a recommendation to the VP.	C														
2020																		
		3.14	Review and upgrade existing process/es for scheduling and monitoring needed physical access improvements on campus to ensure currency and best practice.	B														
		3.15	Incorporate disability awareness content into business-related courses with a focus on the business advantages of employing people with disability.	C														
		4.1	To ensure staff within the portfolio of PVC (Int'l) undertake disability awareness training to help identify ways to best support domestic students with disability travelling overseas and International students entering the University.	C														

Timeframe	*Ongoing	#	Action	Priority	Assoc. Director, Talent & Leadership Dev.	Chief Info & Digital Officer	Chief Student Experience Officer, via Head, Disability Service	Dean, School of Business	DVC (R&I)	Director, Equity & Diversity	Director, Estate & Commercial	Executive Deans	Exec. Director, Human Resources	Exec. Director Marketing	PVC (Engagement & ATSI Leadership)	PVC (Digital Futures)	PVC (Int'l)	VP, P&A
		4.2	To measure the participation rate of students with disability in the University's international mobility programs to determine any existing gaps, and develop an action plan to address any identified lack of participation by students with disability.	C														

ⁱ Department of Education and Training Equity Performance Data

ⁱⁱ Department of Education and Training Equity Performance Data

ⁱⁱⁱ Graduate Careers Australia Graduate Destination Survey Reports, 2010, 2011, 2012, 2013, 2014, 2015

^{iv} Richardson, S., Bennett, D. & Roberts, L. Investigating the Relationship Between Equity and Graduate Outcomes in Australia

^v by Hewlett, S., Marshall M., & Sherbin, L.,

^{vi} Department of Education and Training Equity Performance Data

^{vii} National Centre for Student Equity in Higher Education (2016) *Issues and Trends for Students with Disability: Review of NCSEHE Funded Research*