

HIGHER EDUCATION DISABILITY SUPPORT PROGRAM
CAPACITY BUILDING FUND

ACSES Insights Report on Disability in Higher Education— Stage 1

Stocktake of public information on
disability in Australian universities

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Universities For All

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ACSES Insights Report on Disability in Higher Education— Stage 1: Stocktake of public information on disability in Australian universities

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Acknowledgement of Country

The Australian Centre for Student Equity and Success acknowledges Indigenous peoples across Australia as the Traditional Owners of the lands on which the nation's campuses are situated. With a history spanning more than 60,000 years as the original educators, Indigenous peoples hold a unique place in our nation. We recognise the importance of their knowledge and culture, and reflect the principles of participation, equity, and cultural respect in our work. We pay our respects to Elders past, present, and future, and consider it an honour to learn from our Indigenous colleagues, partners, and friends.

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1. Introduction

The Australian Centre for Student Equity and Success (ACSES) received funding through the Higher Education Disability Support Program Capacity Building Fund to develop *Insights Reports on Disability in Higher Education*. This Stage 1 report on the stocktake of public information on disability is the first of multiple planned *Insights Reports*. Subsequent components will identify: service provision not readily identifiable in public information; data collection practices on disability; public information on provider categories of University College and Institutes of Higher Education; and longitudinal analysis of progress against stocktake indicators. The *ACSES Insights Reports on Disability in Higher Education* aim to identify and report sector-level issues, gaps, and opportunities.

Performance monitoring of disability has traditionally been grounded in the Martin equity and general performance indicators for higher education (Martin 1994). Disability data is based upon self-declared disability through enrolment processes. Enrolment declarations include self-reported categories for disability. Routine reporting for disability groups component categories together under the umbrella of disability, with some reports including analysis of performance of disability sub-groups (for example, Kilpatrick et al., 2016; ACSES, 2025). This focus on student categories of disability is grounded in individual characteristics rather than the environmental factors that are central to social and ecological models of disability.

This stocktake aims to go beyond counting students by individual category of disability by documenting facets of the learning environments with which students interact. This is achieved by review of publicly accessible websites of 43 higher education providers operating under the provider category of “Australian University” in 2025 (Tertiary Education Quality and Standards Agency [TEQSA], 2026). The stocktake reviews the accessibility information that is published, and the extent to which disability is referenced in webpages relating to admissions, student support, disability services, enabling policies, teaching policies, strategy, and planning. Stocktake criteria are aligned to regulatory requirements relevant to the participation of students with disability. Whilst focused on disability, the stocktake also reviewed references to autism and neurodivergence given the recent rise in related disclosures.

1.1 The context

1.1.1 Growth in numbers of university students with disabilities

The stocktake of public information on disability in Australian universities emerges from a dynamic policy context. The commitment to the rights of persons with disabilities to participate in higher education is now deeply embedded in the higher education sector’s legislation and policy instruments across international treaties, Commonwealth legislation, State and Territory legislation, and financing and regulatory mechanisms. There is much to celebrate in terms of the resulting increase in participation in higher education, but there is also evidence that university students with disability experience lower rates of satisfaction and higher rates of perceived discrimination (Brett et al., 2024; ACSES, 2025).

While this would be troubling at any time, it is of greater significance in the context of the significantly increased number of students now disclosing disability. From 2014 to 2024, numbers of domestic students with disability increased by 142% compared to a 5% increase for all domestic students (Department of Education, 2025a). Currently one in eight university students are students with disability, a number that can be expected to grow given one in four school students are students with disability. Mapping of data on patterns of disability between schools (derived from the National Consistent Collection of Data [NCCD] for students with disability) and universities (derived from the Tertiary Collection of Student Information [TCSI]) (see Table 1) demonstrates significant differences in how disability is identified and reported with potential implications for how disability is prioritised as a construct and how students are then included and supported.

Table 1: Students with disability by category in schools and universities

Category of disability and data source	Schools Disability Data (NCCD) 2024	Table A University Disability Data (TCSI) 2024
1. Proportion students with disability (NCCD and TCSI)	25.7%	12.7%
2. Sum of all categories of disability (NCCD and TCSI)	100%	140.7%
3. Cognitive (NCCD)	54%	38.3% (comprising rows 4, 5, 6, and 7)
4. Acquired Brain Injury (TCSI mapped to NCCD Cognitive)	n/a	1.1%
5. Intellectual (TCSI mapped to NCCD Cognitive)	n/a	2.4%
6. Neurological (TCSI mapped to NCCD Cognitive)		21.0%
7. Specific Learning Disability (TCSI mapped to NCCD Cognitive)	n/a	13.8%
8. Socioemotional (NCCD)	35%	49.8% (comprising row 9)
9. Mental Health Condition (TCSI mapped to NCCD Socio-emotional)	n/a	49.8%
10. Physical (NCCD)	9%	30.7% (comprising rows 11 and 12)
11. Physical (TCSI mapped to NCCD Physical)	n/a	5.9%
12. Medical Condition (TCSI mapped to NCCD Physical)	n/a	24.8%
13. Sensory (NCCD)	2%	6.5% (comprising rows 14 and 15)
14. Low Vision/Blind (TCSI mapped to NCCD Sensory)	n/a	3.3%
15. Hard of Hearing/deaf/Deaf (TCSI mapped to NCCD Sensory)	n/a	3.2%
16. Other disability (TCSI not mapped to NCCD)	n/a	12.9%
17. Not specified (TCSI not mapped to NCCD)	n/a	2.5%

Source: Australian Curriculum, Assessment and Reporting Authority, 2025; ACSES; 2025

1.1.2 Funding support for students with disabilities

Universities have received funding through the Australian Government's Disability Support Program for over 20 years. Until 2018, universities were eligible for partial reimbursement for additional costs incurred in supporting students with high-cost support needs and in 2019 the Disability Support Program was amended to include funds based on enrolments by students with disability. Today, the financing, regulation, and stewardship of higher education is experiencing transformational change. The Australian Universities Accord's vision for a better and fairer higher education sector, represents a generational shift in policy, and in 2025 funding for the Disability Support Fund quadrupled from \$13 million in 2024 to \$53 million. The fund guidelines also expanded the list of fundable activities including universal design for learning, an approach that promotes inclusive education through learning design, development, delivery, and assessment. A key aim of the *ACSES Insights Reports on Disability in Higher Education* is to assess whether the increase in the Disability Support Fund and other policy changes have had a demonstrable impact on the participation and experience of students with disability in higher education.

1.1.3 A shifting cohort of university students with disability

An additional factor to consider is that disability in the school and higher education systems appears to be evolving from traditional stereotypes of physical and sensory disability, with a sharp increase in numbers of students disclosing a hidden disability. There is particularly strong growth in disclosures of autism, neurological conditions, and mental health conditions. This shift is reflected in the most recent higher education data collection—47% of students with disability disclosed a mental health disability (Department of Education, 2025b), rising to 49.8% at Table A universities (ACSES Data Program, 2025). The growth in autism diagnoses associated with poor educational outcomes has sharpened policy attention on autism and neurodivergence (Anderson et al., 2018) and seen the publication of a National Autism Strategy (Department of Social Services, 2024a).

2. Report methodology

A university's website functions as the primary "front door" to institutional information and services, making it central to equitable access to higher education. As the key gateway to enrolment, learning resources, and student support for prospective and current students, the university's website should be accessible, inclusive, and readily navigable. This stocktake reviewed the publicly accessible websites of 43 higher education providers operating under the provider category of "Australian University" in 2025 (TEQSA, 2026). Data collection from in-scope institutions took place in November and December 2025.

2.1 Student-focused and regulation-grounded

University websites routinely manage large volumes of complex information, publications, policies, and higher education services in ways appropriate for their individual mission, profile, and history of the institution. This stocktake identified and reviewed relevant, publicly available website information using the following student-facing questions:

1. Is the digital front door accessible to me?
2. Can I study my course of choice?
3. Will my learning environment be accessible?
4. What disability services are provided?
5. Will my voice be heard?
6. Do enabling policies commit to disability inclusion?
7. Do teaching policies commit to disability inclusion?
8. Do university strategies commit to disability inclusion?

The stocktake response to these questions is grounded in policy and regulation that impose disability inclusion requirements on Australian universities. Relevant policy and regulation include but is not limited to:

- Disability (Access to Premises — Buildings) Standards 2010
- Disability Discrimination Act 1992
- Disability Standards for Education 2005
- Higher Education Provider Guidelines 2023
- Higher Education Support (Other Grants) Guidelines 2022
- Higher Education Standards Framework (Threshold Standards) 2021
- Higher Education Support Act 2003
- Ombudsman Act 1976
- TEQSA Statements of Regulatory Expectations.

These policy instruments contribute to the participation of a growing number of students with disability in higher education. The experiences of students with disability necessitates attention because they are less likely to report that they are free from discrimination. They are also the least satisfied of all equity groups on scales relating to freedom of expression, learning resources, teaching quality, student support services, and overall satisfaction with their educational experience (Brett et al., 2024; ACSES, 2025).

2.2 Methods

To gauge how accessible Australian university homepages are for people with disability, three levels of review were undertaken. Firstly, university accessibility statements were reviewed for their ability and extent to which they aligned with guidance from the Australian Human Rights Commission that websites should align with Web Content Accessibility Guidelines (WCAG) 2.2 AA.

Next, university websites were audited against two widely adopted auditing tools recognised by the World Wide Web Consortium (W3C, 2025b) Web Accessibility Initiative: axe DevTools (Deque Systems, 2025) and WAVE (WebAIM, 2025). To ensure a fair comparison across all institutions, variables that could alter the presentation of each website were strictly controlled and held constant throughout testing.

Once a student has entered the university's digital front door, they rely on the institution to provide accessible digital resources. Thirdly, the research team evaluated the accessibility of key university documents (typically downloadable files) using the Portable Document Format/Universal Accessibility (PDF/UA) Foundation's own industry-standard tool, PAC 2026 (axes4, 2026), to evaluate their accessibility.

The research team also undertook a targeted review of Australian university course information, randomly selected from those aligned with the largest field of study taught by each university (based on 2024 student load data; Department of Education, 2025c). The course page was reviewed for information about students with disability, autism, and neurodivergence. References to inherent requirements were also reviewed.

Researchers also reviewed student support webpages. Given universities may organise and present information differently, we acknowledge that this approach may not capture information about student support and learning environments spread across multiple webpages. The identified student support page was reviewed for information about students with disability, autism, and neurodivergence as well as universal design for learning and the accessibility of learning environments. Multiple categories of website information were also reviewed for the extent to which they adopted a positive framing of disability consistent with methods used by Gray et al. (2025).

A recurrent feature of disability advocacy is the notion of "nothing about us without us", making student voice an important feature of disability inclusion. The research team searched websites for information about the presence of a disability advisory committee (consistent with Australian Human Rights Commission [2021] recommendations for embedding consultation processes within disability action plans). We experienced challenges in identifying information on student voice and feedback mechanisms, which suggests students would also struggle to identify opportunities for their voice to be heard.

Information published on university websites is regulated by universities policies and strategies. The research team searched policy libraries to identify the presence of disability and related terminology in university policies. There was evidence for every university of a service and policy environment that considered disability. The team observed different

approaches to signalling how students may access services. The use of euphemistic language that does not directly use the term disability was common.

The research team also reviewed key strategic documents including strategic plans, annual reports, and mission based compacts for references to students with disabilities, autism, and neurodivergence. The presence of targeted planning documents in the form of disability action plans and mental health strategies was also assessed. Most, but not all, Australian universities were found to refer to students with disabilities within these planning documents, although the depth of engagement with disability varied considerably.

3. Key findings

The stocktake represents a point-in-time snapshot of disability-relevant information published on the websites of 43 Australian universities.

3.1 Is the digital front door accessible?

3.1.1 Web accessibility statements

The W3C sees publication of a web accessibility statement as an important means of supporting user access (W3C, 2025). This stocktake reviewed discoverability, transparency, and actionable feedback mechanisms of accessibility statements on Australian university websites and found that:

- 72% of Australian universities (31 of 43) provide an easily discoverable web accessibility statement.
- 16% of Australian universities (7 of 43) maintain a transparent commitment to WCAG 2.2 AA as their technical accessibility standard, consistent with Australian Human Rights Commission (2025) guidance for Australian organisations.
- 56% of Australian universities (24 of 43) provide an actionable feedback mechanism for users.

3.1.2 Is the homepage accessible?

A university's homepage is the front door for access to its broader website and serves as a proxy for the accessibility of the institution's commitment and capacity to render information accessible to users. The stocktake found that:

- 93% of Australian universities (40 of 43) have homepage errors at a rate that is lower than the global education average using an automated assessment tool (WAVE).
- 76% of Australian universities (32 of 43) have homepage errors at a rate that is lower than the USA education average (.edu domain) using an automated assessment tool (WAVE). This is significant given the USA operates with stringent disability accessibility requirements.
- 21% of Australian universities (9 of 43) homepages have no "critical" or "serious" accessibility issues detected in an automated assessment (DevTools).

3.1.3 Are key documents accessible?

University websites host a large volume of public-facing documents. As a proxy for institutional practice in information accessibility, this review assessed key "cornerstone" publications ($n = 118$ sourced from 43 Australian universities)—strategic plans, annual reports, and disability action plans—published as PDFs (Portable Document Format), against recognised accessibility standards. The review found that:

- 7% of the key documents (8 of 118) reviewed meet the PDF/UA requirements set out in AS ISO 14289.1:2017, which Australian Human Rights Commission (2025) guidance identifies as the relevant standard for organisations.
- 3% of the key documents (3 of 118) meet WCAG 2.2 AA standards for accessibility.
- 2% of Australian universities (1 of 43) satisfy PDF/UA requirements across each of the three key documents.
- 0% of Australian universities (0 of 43) satisfy WCAG 2.2 AA requirements across each of the key documents scrutinised.

3.2 Can I study my course of choice?

A review of admissions webpages provides an opportunity to assess the extent to which Australian universities are welcoming of students with disability. The research team undertook keyword searches of admission landing webpages and an undergraduate course webpage for reference to students with disability and autism and neurodivergence and found that:

- 7% of Australian universities (3 of 43) reference disability on their admissions webpage.
- 14% of Australian universities (6 of 43) reference disability on course webpages.
- 40% of Australian universities (17 of 43) reference inherent requirements on course webpages.
- 0% of Australian universities (0 of 43) reference autism and/or neurodivergence on their main admissions webpage or selected course webpages.

3.3 Will my learning environment be inclusive?

A review of the landing webpage for student support and the disability services webpage provides an opportunity to assess the extent to which universities provide information to students with disability about the accessibility of the learning environment and the availability of support services. The review found that:

- 84% of Australian universities (36 of 43) reference disability on their student support webpages.
- 36% of Australian universities that reference disability on their student support webpages (13 of 36) frame disability in positive terms.
- 91% of Australian universities (39 of 43) publish service eligibility criteria on their disability support services webpages.
- 84% of Australian universities (36 of 43) publish information about the process of obtaining a reasonable adjustment on their disability support services webpages.
- 60% of Australian universities (26 of 43) publish information explaining privacy matters associated with disability services on their disability support services webpages.
- 14% of Australian universities (6 of 43) clearly date information on their disability services webpages.

- 47% of Australian universities (20 of 43) utilise a positive framing of disability on their disability services webpages.
- 12% of Australian universities (5 of 43) reference universal design for learning on their disability services webpages.

The research team noted a pattern of euphemistic and jargonistic reference to disability that may erode transparency. This was evident across a variety of webpages and policy and planning documents. To illustrate the diverse ways in which disability is represented, the research team identified 15 variants for describing the plans used to manage documenting and provision of reasonable adjustments. None of these plans used the term disability:

- Academic Adjustment Plan
- Access Plan
- Academic Reasonable Adjustment Plan
- Accessibility Learning Access Plan
- Assessment Adjustment Plan
- Education Access Plan
- Equitable Learning Plan
- Learning Access Plan
- Learning Statement of Access
- Learning Support Plan
- Reasonable Adjustment Plan
- Student Access Plan
- Student Support Plan
- Study Access Plan
- University Accessibility Plan.

3.4 Will my voice be heard?

To assess the extent to which students may be able to consult on matters relating to disability or assess the extent to which matters of disability related complaints were prominent, university websites were searched for information about disability advisory committees and complaint reports. The search found that:

- 42% of Australian universities (18 of 43) feature readily available information regarding disability advisory committees.
- 7% of Australian universities (3 of 43) publish information on complaint data broadly consistent with TEQSA Statements of Regulatory Expectations on grievances and complaints that come into effect in 2026.

3.5 Do enabling policies plan for inclusion?

Key policies, including a university's policy on policies, were reviewed to examine whether disability featured as an intentional policy choice. The review found that:

- 0% of Australian universities have a policy framework that referenced disability (0 of 40 policy frameworks identified in 43 universities).
- 23% of Australian universities have a procurement policy that referenced disability (10 of 37 procurement policies identified in 43 universities)
- 23% of Australian universities have a physical infrastructure policy that referenced disability (10 of 22 physical infrastructure policies identified in 43 universities).

3.6 Do teaching policies commit to inclusion?

To assess institutional commitments to an accessible teaching and learning environment, university policy libraries were searched to find policies akin to an overarching curriculum framework, assessment policy, and policy guidance mediating reasonable adjustments. The search found that:

- 21% of Australian universities have a curriculum framework that reference disability (9 of 39 curriculum policies identified in 43 universities).
- 60% of Australian universities have assessment policies that reference disability (26 of 42 assessment policies identified in 43 universities).
- 100% of Australian universities have policy guidance mediating reasonable adjustments (43 policies providing guidance on reasonable adjustment across 43 universities).

Findings relating to enabling policies and teaching policies reveal universities use a diversity of approaches to managing their policies, including standalone omnibus policies, and fragmented policies and procedures. There are also differences in the extent to which policies are published publicly or are available only to staff or students via intranet access. This review of policies published on public websites does not exclude the possibility that all universities have policies governing all matters under review that are not publicly accessible.

3.7 Do university strategies commit to inclusion?

To assess institutional commitments to inclusion of students with disability, key strategy and planning documents were reviewed for references to students with disability. The review found that:

- 26% of Australian universities (11 of 43) included reference to students with disability in their strategic plan.
- 74% of Australian universities (32 of 43) included reference to students with disability in their annual report.
- 83% of Australian universities with a mission based compact (35 of 42) included reference to students with disability in their mission based compact.
- 77% of Australian universities (33 of 43) have an identifiable disability action plan.
- 70% of Australian universities (30 of 43) have an identifiable mental health strategy.

3.8 The overall picture

The overall picture emerging from the stocktake of publicly available information on disability in Australian university websites is mixed. Universities clearly meet their regulatory obligations in some domains—but not all. In many areas of analysis, disability does not feature prominently in key university webpages or policies. As a fast-growing subcategory of disability, references to autism and neurodivergence were even less visible. The terms disability, autism, and neurodivergence were almost entirely absent from universities' core governance documents, including university acts and council charters.

A university's website indicates its approach to inclusion, equity, and diversity, and shows that it takes its responsibilities for accessibility and digital quality seriously. This stocktake suggests there are opportunities in the current policy environment to encourage a more mainstream positioning of disability. The report's data is summarised in Table 2 below, providing a statistical stocktake that can inform opportunities for capacity-building, institutional prioritisation, and policy reforms that may narrow gaps observed in this report.

Table 2: Proportion of Australian universities meeting stocktake criteria

Stocktake criteria	Proportion
Accessibility statements	
Discoverable accessibility statement	72%
Transparent commitment to web accessibility standard (WCAG 2.2 AA)	16%
Actionable feedback mechanism	56%
Homepage accessibility	
Homepage errors (WAVE) lower than global education average	93%
Homepage errors (WAVE) lower than USA (.edu) average	76%
Homepages that are free of “critical” and “serious” issues (DevTools)	21%
Key document accessibility (strategic plan, annual report, and disability action plan)	
All three key documents compatible with screen readers (AS ISO 14289.1)	2%
All three key documents meet digital accessibility standards (WCAG 2.2 AA)	0%
Inclusive admission	
Disability referenced on main admission page	7%
Disability referenced on select course page	14%
Inherent requirements published on select course page	40%
Learning environment accessibility and support	
Disability mentioned on student support webpage	84%
Positive framing of disability on student supports webpage	36%
Disability support services	
Service eligibility criteria published on service webpage	91%
Process for obtaining adjustment published on service webpage	84%
Privacy matters explained on service webpage	60%
Currency of information detailed on service webpage	14%
Positive framing of disability (where relevant) on service webpage	47%
Reference to Universal Design for Learning on service webpage	12%
Student feedback mechanisms	
Information about advisory committee available	42%
Complaint data reports available	7%
Enabling policies	
Policy framework is published and references disability	0%
Procurement policy is published and references disability	23%
Physical Infrastructure policy is published and references disability	23%
Curriculum policies	
Curriculum framework is published and references disability	21%
Assessment policy is published and references disability	60%
Policy mediating reasonable adjustment is published	100%
Strategic prioritisation	
Strategic plan mentions students with disability	26%
Presence of disability action plan	77%
Presence of mental health strategy	70%
Mission based compact mentions students with disability	83%
Annual report mentions students with disability	74%

4. Opportunities for advancing disability inclusion

4.1 University actions

Accessible, readily navigable websites benefit all users and reflect a university's values and commitment to inclusion, ensuring it meets its legal and ethical responsibilities. When information is easy to find, all students can focus on learning rather than navigating barriers. Stocktake findings suggest a number of opportunities for innovation and improvement broadly aligned to the student-facing questions embedded in report's structure.

Students with disabilities should be made to feel welcome

Universities should encourage more positive communications about disability and the supports available in their admissions statements and requirements. There is also the opportunity to ensure there is clarity around inherent requirements, enabling students to make informed decisions early. This can occur on general and disability-specific websites.

The digital front door should be made accessible

Universities should commit to regular audits of their digital systems. Universities should also support training for web developers and academic staff to raise staff awareness of accessibility needs and techniques. The stocktake identified exemplars of good practice and there is an opportunity for universities to learn from others in adopting more accessible information provision and ensuring training on accessibility is in place for staff.

The learning environment should be made accessible

The stocktake has focused on student support webpages as an indicator of the attention given to disability-related concerns across different aspects of the learning environment. Whilst disability is referenced by the most universities on these pages, only a third of these references are framed in terms of a positive commitment to inclusion.

The dominant paradigm observed across the stocktake is one of accommodating students with disabilities through provision of legally compliant reasonable adjustment rather than active concern for dismantling barriers within learning environments that may exclude students with disability. Universities are encouraged to consider mechanisms by which learning environments can be accessible by design.

Students should have transparency about the disability services available

Almost all Australian universities made information about disability services readily identifiable to students, and a high proportion of key webpages included information about the eligibility criteria of these services. Every university has a policy mediating reasonable adjustments. There is, however, a gap between the full range of services and reasonable adjustments that students may be eligible for and those that are published. There is also a gap in terms of communicating the extent to which university learning environments are designed for accessibility, with few universities including information about universal design for learning on their disability services webpages.

The voice of students with disabilities should be heard

Consultation processes and complaints and grievances serve as important feedback loops for institutional decision-making processes. It helps universities to design learning environments that are genuinely accessible, inclusive, and supportive. Universities should consider how mechanisms for routine consultation with students with disability can be incentivised and made transparent. It is also critical that these opportunities for being heard are visible to students. The review found that information on disability advisory committees and complaints processes was not publicly available, and potentially not visible to students.

Enabling policies should embed a commitment to disability inclusion

While disability did not feature in top-level policies on policies, there was evidence of a growing recognition that university decisions around the procurement of goods and services can influence the accessibility of learning environments. It is notable that notwithstanding the presence of the Access to Premises Standards, only a quarter of Australian universities were identified as having a transparent policy on physical infrastructure that mentioned disability. There are opportunities for universities to share and promote good practice in procurement policy and incentivise more prominent policy commitments to physical access.

Teaching and learning policies should embed a commitment to disability inclusion

The stocktake findings suggest that the provision of reasonable adjustment is now embedded in universities' teaching and learning policies (disability policy has mandated the provision of reasonable adjustment for many years). There is, however, comparatively less focus on disability inclusive curriculum, which presents opportunities for sharing good practice on embedding disability inclusion within the curriculum through universal design for learning and related strategies. Universal design for learning can address barriers to learning by creating flexible, inclusive environments and reducing the need for individual adjustments.

Strategy, planning, and public accountability documents should embed a commitment to disability inclusion

Despite representing one in eight current students, and one in four potential students, disability is yet to feature as a key consideration in three quarters of Australian university strategic plans. Conversely, over 80% of Australian universities reference students with disability in their mission based compact or have one or both of a mental health strategy or disability action plan. There are opportunities for universities to better acknowledge the importance of students with disability as a key student cohort through clearer alignment across university strategy, planning, and public accountability documents.

Inclusion of autism and neurodivergence

Universities should explicitly recognise autism and neurodivergence within student-facing information and institutional policy frameworks. The stocktake found no university referenced autism or neurodivergence on their admissions webpages, only one of 42 referenced autism on a course webpage, and no institution explicitly referenced autism or neurodivergence within teaching and learning or assessment policies. This absence risks signalling that neurodivergent students are an afterthought within institutional design rather than an expected part of the student cohort. Universities can address this by embedding clear references to autism and neurodivergence in admissions materials, curriculum policy guidance, and disability services information. Doing so strengthens transparency, supports

informed student decision-making, and reframes autism and neurodivergence inclusion as part of mainstream academic governance rather than a specialist accommodation function.

4.2 Policy actions

The stocktake found sub-optimal alignment between existing policy requirements relating to disability inclusion and public information published by Australian universities. There are opportunities for further advancing disability inclusion in higher education policy.

Web accessibility

The stocktake found shortcomings in the accessibility of university websites that are likely to impact on the successful access and participation of students with disability in higher education. There is a need to strengthen regulatory accountability for web accessibility, which is best achieved through the regulatory functions of TEQSA.

TEQSA already provides guidance to the sector through good practice guides and Statements of Regulatory Expectations. This extends to transparency on regulatory decisions. TEQSA is encouraged to strengthen consideration of disability—including web accessibility—within its guidance and regulatory functions.

Disability inclusive admissions

The stocktake found a relative absence of disability as a feature of university admissions information, which is likely to impact on application and admissions experiences of students with disability. There is a need to better understand the impact that current approaches may have on students with disability, which is best achieved through a continuation of the admissions transparency policy.

Until now, the admissions transparency policy has been led by the Higher Education Standards Panel. Following the passage of legislation on 30 March 2026, the Australian Tertiary Education Commission (ATEC) has become responsible for providing advice on the Higher Education Standards Framework, and the Higher Education Standards Panel will be disbanded. Any future work on admissions transparency should include disability more prominently within its scope. This might include evaluation of the role of inherent requirements statements on students with disability.

Disability inclusive student voice

The stocktake found a minority of universities make information available about how students with disabilities can be involved in formal consultation mechanisms, and even fewer universities publish complaint information. This is likely to undermine the efficacy of feedback mechanisms that contribute to inclusive learning environments. TEQSA has published clearer regulatory expectations on complaint reporting, but there are opportunities to further strengthen system-level feedback mechanisms for students with disability. This includes:

- National Students Ombudsman reports should include deidentified complaints data by demographic indicators, including but not limited to disability.
- Annual reports prepared by the National Students Ombudsman for the Federal Minister for Education and Secretary of the Australian Government Department of

Education should aim to include analysis of patterns of complaints relating to disability and recommend actions for systemic improvements.

- The Minister for Education and Secretary of the Department of Education should consider mechanisms by which the National Student Ombudsman's annual reports are formally considered by TEQSA and ATEC and how relevant recommendations regarding systemic improvements contained within are responded to.

Disability support services

The stocktake found that information on disability services is routinely provided but may not meet the information needs of students with disability. A minority of universities address matters such as a privacy, and there is a wide variety of jargon-laden terms used to describe key services. The support services reasonably expected to be available for students with disability should be more clearly articulated in higher education policy, which could be achieved through:

- the Australian Government Department of Education facilitating the cyclical collection and publication of information about support services made available by Australian universities
- the Australian Government Department of Education clarifying expectations around support service availability for students with disability in explanatory information published for providers associated with relevant regulatory requirements
- using future updates to relevant legislation to strengthen requirements about publication of information about disability support services.

Disability inclusive policy

The stocktake found pervasive reference to policies mediating reasonable adjustments for students with disability, but reduced and, in some cases, no reference to disability in enabling policies and curriculum policy frameworks. An aspiration to reduce demand on reasonable adjustment and promote more inclusive learning environments may be undermined by the absence of disability in policies on matters that include policy, infrastructure, procurement, web accessibility, curriculum, and student support.

There is a need to promote and embed disability inclusive policy, which is best achieved through the regulatory functions of TEQSA.

TEQSA is encouraged to strengthen the consideration of disability within its guidance and regulatory functions, and is encouraged to consider developing a specific Statement of Regulatory Expectations on disability.

Strategic prioritisation

The stocktake found that students with disability were mentioned in a quarter of university strategic plans. Whilst this may suggest that disability is positioned as a niche strategic consideration, the broader ecology of planning and public accountability documents positions disability as a near ubiquitous concern. The majority of Australian universities have one or both of a disability action plan and mental health strategy (84%, 36 of 43). Over four in five Australian universities (83%) also make reference to students with disability in their mission based compact.

This approach to strategic prioritisation coincides with indicators that highlight shortcomings in university approaches to inclusion of students with disability, including but not limited to low levels of key document accessibility, and high levels of self-reported experiences of discrimination, harm, and hatred. A different approach to strategic prioritisation of disability may lead to better outcomes for students with disability, which could be achieved through:

- ATEC establishing a disability committee and commissioning disability focused reports with regard to how the sector, and individual universities can advance disability inclusion
- the Australian Government Department of Education developing specific guidance to support universities in developing strategic responses to policy changes (if any) that may arise from reviews of the Disability Discrimination Act 1992 and Disability Standards for Education 2005
- aligning the work of the Australian Disability Clearinghouse on Education and Training (ADCET) with strategic priorities that may be identified at a sector level.

Inclusion of autism and neurodivergence

Sector-wide policy and regulatory guidance could provide clearer expectations that autism and neurodivergence be treated as an explicit dimension of disability inclusion rather than an implicit subcategory. The stocktake identified no standalone autism or neurodivergence strategies across Australian universities, with references dispersed across disability or mental health frameworks and rarely positioned as a strategic priority. National guidance could support consistent sector practice by encouraging explicit recognition of neurodivergent cohorts in admissions transparency frameworks, curriculum governance, and institutional reporting. Aligning autism and neurodivergence inclusion with regulatory and quality assurance mechanisms would signal that neurodivergent participation is a matter of institutional excellence and accountability, not solely a matter of access or accommodation.

4.3 Opportunities for improved monitoring of disability

This stocktake report provides a nascent framework for monitoring facets of disability in higher education that compliment and contextualise data that is routinely collected on disability. The Martin Indicators of access, participation, success and retention (Martin, 1992) and Quality Indicators of Learning and Teaching (QILT) provide quantitative (and some qualitative) evidence of the experiences of students with disability. This stocktake provides insights into the learning environment that students with disability experience and may form the basis of cyclical monitoring of institutional environments that contribute to the disadvantages experienced by students with disability.

There are opportunities to refine this method that include refinement of components of the stocktake, extending the stocktake to University Colleges and Institutes of Higher Education that were not within scope for this report, and repeating the stocktake to assess whether Australian universities and the broader higher education sector have improved their performance on stocktake indicators.

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Appendix 1: Australian universities reviewed

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- University of Technology Sydney
- University of Wollongong
- University of the Sunshine Coast
- Victoria University
- Western Sydney University

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Dr Matt Brett is Director of Academic Governance and Standards at Deakin University. He is also an Adjunct Professor with ACSES at Curtin University and Project Director for the ACSES Disability Support Program Capacity Building Fund Project. Matt is a CODA (Child of Deaf Adults), and his lifelong experience of disability has informed a longstanding commitment to student equity spanning roles in research, policy, and practice. Matt convened the 2011 National Summit on the Mental Health of Tertiary Students, and co-edited *Student Equity in Australian Higher Education: 25 Years of A Fair Chance For All*. He is also a non-executive director of Expression Australia.

Dr Bret Stephenson

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Dr Bret Stephenson is an independent consultant specialising in student equity, student success, and data and digital governance in Australian higher education. With more than 20 years' experience across teaching, institutional research, and strategic leadership roles, he supports universities to align policy and practice with the needs of diverse student communities. A 2024 ACSES Equity Fellow, he recently completed a sector-wide research project, *Centring Equity in Data and Digital Governance: Informing Policy to Empower Practice*. His contributions to the sector have been recognised with an Australian Government (OLT) Citation for Outstanding Contributions to Student Learning (2014) and two Vice-Chancellor's Awards for innovation and equity impact.

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Dr Patricia McLean has extensive experience in higher education. Previous roles include Advisor and Executive Officer to the Vice-Chancellor Deakin University, Manager of the Vice-Chancellor's Strategy Office (University of Melbourne), and Executive Director Academic Enrichment Programs (University of Melbourne). Recent research experience includes as lead researcher for two Australian Government projects: the *Supply Chain Talent Pipeline Project* (2022-2024) and *Barriers to women entering and progressing in transport roles* (iMOVE 2023).

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Andrew Hone is a Project Manager at the Australian Centre for Student Equity and Success (ACSES) at Curtin University. Andrew previously worked in education and data analytics in Ireland, including leading an internal equity-focused analytics project at a third-level institution examining factors affecting student retention & success. He has also contributed

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