

Ōritetanga

Learner

Success

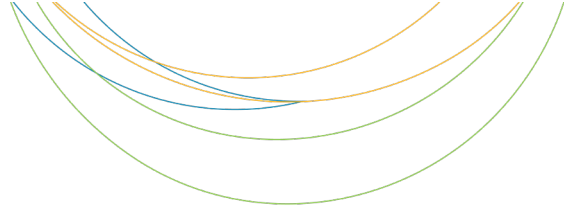
Tertiary Education  
Commission  
Te Amorangi Mātauranga Matua



# Disability Action Plans 2023

A report back to the tertiary education sector





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# Improving outcomes for disabled learners

The Tertiary Education Commission (TEC) wants to encourage and support tertiary education organisations (TEOs) to take a strong, proactive approach to improving outcomes for disabled learners/ākonga whaikaha. In September 2021, we introduced mandatory Disability Action Plans (DAPs) as a new Investment Plan requirement for organisations that receive over \$5 million in TEC funding.

We want to make sure TEOs' practices don't discriminate against disabled people, and that disabled learners experience better outcomes across their education journey. A DAP helps TEOs identify good practices and offers a blueprint for change. The DAP sits alongside other Investment Plan requirements, including Learner Success Plans, that are designed to improve outcomes for historically underserved learner groups.

Introducing DAPs in the 2022 Investment Round was part of the Government's move to ensure TEOs meet their responsibilities under the United Nations Convention on the Rights of Persons with Disabilities. Creating and implementing a DAP, and the resulting improved outcomes for disabled learners, will also help TEOs give effect to the Tertiary Education Strategy (TES), specifically Objective Two: Barrier free access.

The TEC has published [DAP Guidance](#). This outlines how we expect TEOs to develop and implement their DAPs. It supports TEOs to develop a DAP that is specific to them, and gives suggestions on how to use the Kia Ōrite toolkit<sup>1</sup>. The toolkit supports a whole-of-organisation approach to taking responsibility for implementing DAPs.

## Investment Round for 2023 – DAP assessment

After introducing DAPs, we used an expert panel to establish a strong baseline of understanding and capability within TEC for assessing them. This approach was successful, and, in the 2023 Investment Round, DAPs were assessed entirely by our own staff. We sent individual feedback letters to TEOs that submitted DAPs, and we continue to have productive meetings with providers about their progress.

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<sup>1</sup> Kia Ōrite: Achieving Equity – The New Zealand Code of Practice for an Inclusive Tertiary Education Environment for Students with Impairments.



# Our observations

We'd like to thank all TEOs who submitted a DAP as part of their Investment Plan in 2023. Most first-time submissions in 2023 were made by Private Training Establishments (PTEs) in the early stages of developing their DAPs. The assessors were pleased to see similar progress in the development and implementation of DAPs between first-time submissions in 2023 when compared with first-time submissions in 2022. This indicates the Kia Ōrite Toolkit is working as intended. As the sector matures, we'll be able to better identify key milestones as we map the path towards equity.

Each provider will need to walk the path best suited for their organisation, but it's clear that TEOs are willing to identify gaps in their current capabilities and eager to improve the experiences of disabled learners across the tertiary sector.

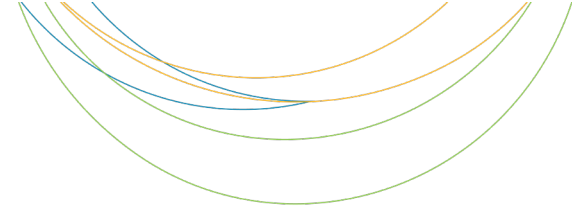
While providers are at different stages of implementing their DAPs, the common themes we identified in 2022 were highlighted again in 2023. These themes are described below, along with our advice about next steps providers can take in this important mahi.

Themes cover:

- > Data
- > Learner voice
- > Stakeholder participation
- > Governance and resourcing
- > Evaluation and monitoring
- > Staff development
- > Promotion
- > Kia Ōrite use
- > Attitude and language.

## Data on ākonga whaikaha

Current data on ākonga whaikaha continues to be a less-developed area in DAPs, but most TEOs identified data collection as high priority. Data systems do take time to be implemented properly, and then more time again to gather comparable data. It's important to engage with data experts early in the development process – and a few providers have shown they're doing this.



We'd like to see qualitative and quantitative data used together to paint an understanding of the learner journey through a TEO. Ideally, this will help identify the specific issues that impact disabled learners in tertiary learning so organisations can better target services to accommodate their needs.

Good qualitative data can be collected by engaging with all learners, understanding their needs around their studies, and comparing different cohorts' responses. For example, questions could focus on:

- > how learners get to classes
- > whether they do paid work as well as study
- > what the best way is for them to access class materials
- > whether they have difficulties with any of the above.

You may find that if all learners have some difficulty accessing your campus or online material, disabled learners will be particularly impacted.

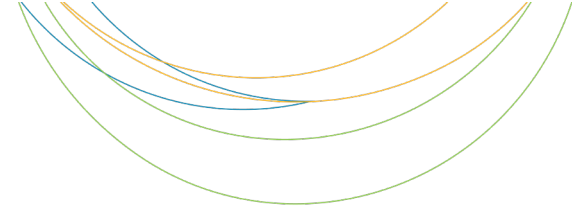
For good quantitative data, providers can consider information collected when learners enrol and/or access services. Knowing how learners identify, and what services they're accessing, will help TEOs recognise areas that may need extra resourcing to ensure learners are better supported to meet their education goals.

Stronger DAPs were able to identify disaggregated disabled cohorts. This allowed them to set equity targets for specific groups of learners. An example was increasing identification of learners with mental-health support needs, with data from several TEOs showing increased number of learners seeking help.

Some providers indicated they had no, or low numbers of disabled learners (though some also noted they were not sure as they did not collect this data). For TEOs whose data indicates this, it's important to investigate why. In some areas of education, it may be a result of the field, but it could also highlight barriers that an organisation has been unaware of and can now work to remove.

One provider identified that, in their cohort of learners, there could be an awareness barrier, or an inclination not to self-disclose impairments because they think it won't impact their learning. The provider typically saw this in older, neurodivergent learners who felt that they didn't need supports from their provider because they already had appropriate supports and coping tools in place from their lived experiences. The provider is actively taking this into consideration when thinking about how to support their learners in a mana-enhancing way.

We remind TEOs that they all have, at a minimum, their SDR/ITR data which collects disability status and use of disability support services. You can use this to get a feel for baselines, identify gaps in information, and prioritise areas for gathering qualitative information.



## Learner voice and participation in DAP development

The DAPs we received showed varying stages, or levels, of learner voice and participation in the overall DAP process. Some providers said they were unsure how to involve learners in the decision-making process. We strongly encourage you to review the [Whiria Ngā Rau framework](#) – published by the New Zealand Union of Students’ Associations.

We’re happy to help facilitate introductory meetings between DAP leads and the National Disabled Students Association (NDSA) to encourage partnership growth as development continues.

While a good number of submissions outlined learner-voice involvement through membership on DAP working and reference groups, we want to encourage practices where learner voice is used proactively and not limited to reviewing options in a ‘take-it or leave-it’ way.

Working in partnership with learners from the start of any development increases the likelihood that learner needs will be met effectively and efficiently. This approach aligns with the disabled community motto of “Nothing about us, without us”. Also, learner input in DAP development should not be taken for granted – time should be recognised and appropriately compensated.

Another aspect of the learner voice that TEOs need to protect and promote is the ability of learners to have their complaints heard, treated with care, and acted on. We’re cautiously optimistic that all providers have appropriate complaints processes in place, but we’d like to reinforce transparent decision-making practices after a complaint has been made. This demonstrates accountability and further builds trust with learners.

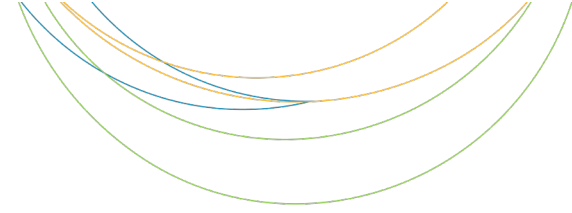
Proper management of complaints processes is also an important component of the [Code of Pastoral Care](#).

## Wider stakeholder participation

The 2023 submissions showed TEOs have a strong willingness to seek input from stakeholders in the wider community (eg, staff and support agencies). By actively seeking this community input, providers can better support their learners. Partnership approaches help raise a provider’s capability and build trust in their actions.

Good practice that we’ve seen includes creating spaces for ongoing input from experts and those directly involved with course delivery – whether through regular meetings or by inviting them to sit on advisory panels.

While not directly tied to the DAP submissions, we were pleased to see the sector engaging with disability and neurodiversity community-of-practice sessions throughout 2023, including a session on DAP development organised by NZQA and TEC.



## Governance and resourcing (personnel and budget)

Overall, the submitted DAPs indicate that TEO governance is keen for the DAP process to succeed. Most DAPs have vision statements indicating longer-term goals for disabled learners, and many successfully show how the DAPs will be embedded into their organisation.

In some DAPs, Senior Leadership Teams or Boards of Directors provided written endorsements of the proposed work plans. Some TEOs have appointed members of the governance group to oversee DAP development, in some cases supported by a new or to-be-appointed manager with a direct reporting line. Stronger DAPs identified which teams in their organisation would lead the various workstreams that were identified by their DAP Working Group.

In order to avoid mistakes of the past, we continue to strongly encourage providers to find alternatives to work plans that rely heavily on existing disability support services as part of a business-as-usual approach. This is because, historically, we've seen that disability support services are often underfunded and understaffed. So, it's unlikely that providers relying on these teams for most of their DAP implementation will be able to effectively meet their desired goals within their timeframes. Also, relying on disability support services staff to develop DAPs does not foster inclusive practices and can take staff away from their primary function of providing services to disabled learners.

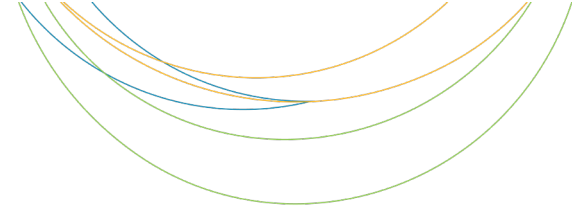
Generally, very few DAPs were at the stage of development where they could provide a cost analysis of proposed work plans and outline what they'd commit to in a formal budget.

## Evaluation and monitoring

In many DAPs, allocation of responsibilities and monitoring mechanisms were clear and defined, and new reporting pathways were being established to ensure the SLT and Board members were aware of DAP progress. Stronger DAPs gave timelines for when current capability reviews would be completed and when key decisions (eg, staff appointments, future engagements with learners and wider stakeholders) would be made. Most DAPs followed the DAP Guidance recommendation of a three-year plan cycle and aligning development with their wider Learner Success Plan.

An area for development in most DAPs is ongoing evaluation of work plans. This evaluation would enable planned monitoring processes to be effective. Many DAPs said that parity or best-practice is the ultimate target for their various work plans. However, interim targets were unclear, as was what will be viewed as successful or not.

We acknowledge that setting these targets is difficult – especially for providers still in the process of understanding their current capabilities and their disabled learner cohort outcomes. But in future DAPs, we'd like to see TEOs detail what they think is achievable.



## Staff development/training

Staff personal development plans continue to be well addressed in the DAPs. We're pleased this is an area of focus for providers, as improving all staff members' disability capability is a solid foundation on which to build trust with disabled learners and reduce barriers to their education.

From our own data, we can see that several TEC-funded resources for staff capability have been well used across all providers. In particular, the Disability Confidence e-Learning modules had a combined 1,800 registrations (and 65.3% completion rate) in 2023. All TEC-funded resources are co-created with subject matter experts and disabled and neurodivergent learners.

Related resources we've released to date include guidance on supporting learners with:

- > [autism](#)
- > [ADHD](#)
- > [foetal alcohol syndrome](#)
- > [dyslexia](#) (including [work-based supports](#))
- > [dyspraxia](#), and
- > [dyscalculia](#).

We also offer a suite of training materials for teaching with Universal Design for Learning (UDL), and for general disability confidence.

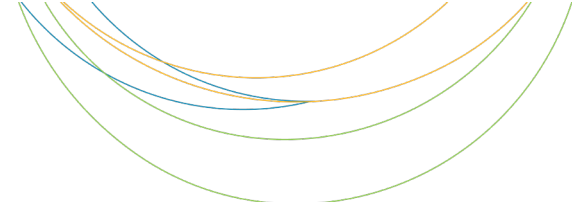
## Promoting DAPs

We acknowledge that promoting DAP material depends on its stage of development, but few plans we received gave detail about promoting the provider's DAP once the plan had been finalised. We'd like to reinforce the requirement that DAPs be available on a TEO's website in accessible formats. This helps foster trust, accountability and expectations between provider and learner.

## Kia Ōrite toolkit use

We're very encouraged to see a strong, committed approach to the principles and framework of the Kia Ōrite toolkit in most DAPs. We're heartened that some DAPs provide a detailed gap analysis, which has helped those providers start to form work plans to address gaps between their capabilities and their best-practice goals.





## Attitude/language use

Another area that continues to be represented well across all DAPs is understanding why DAP development is important. In most cases, the approach was to use mana-enhancing language with a focus on ākonga at the centre.

We'd like to reinforce the idea that the provider reflects their learners, staff and community, and has the responsibility to provide an environment where these stakeholders are supported to make their voices heard – especially when it comes to advocating for reasonable accommodations, when the provider has policies in place that cause unjustifiable barriers.

## What happens now?

We'll continue to work closely with the sector to support development of the next round of, and updates to, Disability Action Plans. We'll add to the capability-building resources we offer, with material focusing on capability for supporting Māori and Pacific disabled learners to be added to the Kia Ōrite toolkit in 2024.

We're very encouraged by the DAP development accomplished so far. While all TEOs are at different stages on their path to articulating and implementing a DAP to foster inclusive and effective learning opportunities for disabled learners, a promising start has been made. Ensuring that disabled learners are valued as participants, acknowledged for their input, and included in all stages of this process will further strengthen the DAPs.

To ensure momentum, in 2024 we'll ask providers who receive over \$5 million in TEC funding to provide evidence of actions/progress against their published DAP, whether or not they're due to submit an Investment Plan.

Moving further into 2024, we'll continue to partner with TEOs and disabled learners to facilitate further DAP development and positive outcomes for disabled learners in the tertiary system.

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