Disability Support Fund Draft Proposal- IRU Feedback

The Innovative Research Universities welcomes the opportunity to provide feedback on the *Disability Support Fund: A sector-level approach to disability support and inclusion in higher education*. Overall, we are supportive of the recommendations, but given the limited timeframe for consultation with our members, we may later have feedback on the proposal that differs from what is provided below.

Our main recommendation is to ensure changes support a student-centred DSF, with appropriate resourcing for accountability and compliance that minimises the potential diversion of funds to administrative functions. We strongly support a phased approach to the implementation and opportunity for further consultation on its design.

We support the proposed changes and believe they will help drive cultural change and an evidence-based shift for disability inclusion by:

- Establishing governance models that support accountability, co-design, transparency and a whole-of-institution approach that makes inclusion and accessibility a priority beyond the student disability support team.
- Shifting university practices from a retroactive model of removing barriers, to a proactive duty for ensuring accessibility, for both students and staff.
- Supporting accessible pathways for PhD candidates and others into academia through the proposed disability workforce inclusion strategy.

The outcomes of the Review of the Disability Discrimination Act and the Review of the Disability Standards for Education are to be determined, but we are confident that changes to the DSF will support common objectives, such as a possible positive duty by providers to actively prevent discrimination.

Our key concerns and recommendations are that:

- Changes are implemented gradually, with transitional support to ensure continuity of services for current students.
- DSF remains student-centred, with funding directed to initiatives that directly benefit students with disability.
- Accountability does not lead to a complex, compliance-driven bureaucratic administration system that incentivises tokenistic strategic documents or duplicates other reporting requirements.

- Consequences of non-compliance do not disadvantage students by cutting funding to universities that disproportionately teach students with a disability.

We also note that the collection of student data involves ethical considerations about how data is collected, stored, and is used to track individuals. There are also intersectional factors that also complicate data collection.

The paper is intended to be exploratory, providing an early testing of ideas in advance of any formal decisions by government. We note that the proposal is to seek ministerial agreement to revised DSF eligibility requirements in November 2025. We hope that we will be provided an opportunity to be consulted throughout this process.

We provide further detail on feedback received from IRU members below.

Further feedback from IRU members

1. Funding Allocation and Thresholds

- The current **high-cost student threshold** should be reduced to enable more institutions to access funding. This adjustment would ensure that resources are directed to students with the greatest need. Notably, high-cost claims were under-utilised by **$16 million** in the 2024 allocation year, indicating a misalignment between need and access.

2. Purpose and Use of DSF

- DSF must remain **student-centred**, with funding directed to initiatives that directly benefit students with disability. Current guidelines permit use for staff inclusion initiatives, which, while valuable, do not align with the fund's core intent. There is a lack of clarity regarding the source of funding for staff-focused programs, and this should be addressed separately from DSF.

3. Implementation and Operational Pressures

- Concerns remain regarding the **rapid implementation** of funding changes, as previously experienced with SAFF and ISSP. These changes placed undue pressure on institutional operations and risked compromising service continuity.

- The Department must develop a more nuanced understanding of **operational pressures**, particularly the **lag between reporting and fund disbursement**. For example, institutions report on 2025 activities in 2026 yet receive 2025 funds at the end of 2026. Recent correspondence has misrepresented these timelines, risking confusion and potential loss of funding.

4. Equity in Governance and Reporting

- While ISSP allows greater flexibility in staffing and expenditure, disability services are subject to **stricter controls**, creating inequity across support programs.
- Disability Services Managers, often positioned at lower organisational levels, are now facing **significantly increased reporting obligations**. Clear communication to executive leadership is essential to ensure appropriate resourcing and support.
- Proposed changes to **disability governance structures** must be approached cautiously. Existing university mechanisms, including those informed by lived experience, should not be overridden by prescriptive models. Additional bureaucracy risks undermining program effectiveness.

5. Whole-of-Institution Approach

- A **whole-of-institution approach** to accessibility is critical. This includes engaging the broader university community and recognising the role of staffing and cross-functional initiatives. Reporting frameworks must reflect this complexity and not penalise institutions for integrated support models.

6. Mandatory DIAPs and Cross-Institutional Plans

- The introduction of **mandatory Disability Inclusion Action Plans (DIAPs)** raises questions regarding resourcing, compliance, and the potential diversion of student-focused funds to administrative functions.
- Cross-institutional access plans present challenges due to the **individualised nature of institutional supports**. For example, Griffith University embeds support mechanisms, so students do not need to present documentation for access. This model differs from others and must be respected in policy design.

7. Reporting Burden

- DSF reporting is already extensive, requiring detailed accounting of every dollar spent. The proposed enrolment-based allocation adds further complexity, increasing the reporting burden across the sector. Institutions already report on core staffing and additional funding sources beyond DSF.

8. Building Inclusion and Student Voice

- To foster genuine inclusion, funding must support **co-curricular activities** that build student voice and advocacy skills. These initiatives contribute to long-term outcomes, including future workforce development. However, current commentary from the Department suggests that if an activity does not directly contribute to course completion, it cannot be funded via DSF. This narrow interpretation undermines broader equity goals.

9. Recommendation for Gradual Implementation

- All changes should be **implemented gradually**, with transitional support to ensure continuity of services for current students. Abrupt shifts risk destabilising support systems and compromising student outcomes.

10. Consequences of non-compliance

- The consequences of non-compliance are unclear, but we need to remember that if a particular university does not meet the compliance requirements and the consequence is to not receive DSF, then this will only disadvantage students with disability further.

11. Independent review of the DSF

- The consultation paper mentions the requirement for an independent review every 5 years. It is unclear who will conduct the independent reviews and how these will be funded.