



# Accessibility Action Plan 2019 - 2021



UNIVERSITY  
OF WOLLONGONG  
AUSTRALIA



# Vice-Chancellor's Foreword



The University of Wollongong (UOW) has a strong and proud history of nurturing and demonstrating an inclusive culture, where people from diverse backgrounds, ethnicities and abilities are proactively encouraged to choose UOW for work and study.

This is reflected by the diversity of people across all of our UOW locations, including our metropolitan and regional campuses and our online community.

Our commitment to implementing strategies and policies that make everyone's experience here at UOW a positive one means that everything we do and provide should be accessible and inclusive.

The UOW ethos is to not only meet our regulatory obligations but to go further than that, to set the benchmark for inclusivity and demonstrate through our actions that diversity is our strength.

The principles of equity, diversity and inclusion are at the forefront for UOW as we strive to excel in our core purpose; however, we realise that without an organising framework to achieve inclusive teaching practices, curriculum, and accessible environmental design, our efforts become piecemeal and isolated.

## Our Vision

UOW – inspiring a better future through education, research and partnership

## UOW Values

- **Intellectual openness**

We are driven and determined yet collegial and ethical in all that we do. We are always looking to serve our communities and share our knowledge and expertise with them for mutual betterment.

- **Excellence and dedication**

We work tirelessly to excel in our research and education, and to address complex, real-world problems in partnership with our communities.

- **Empowerment and academic freedom**

We celebrate the freedom to have different opinions and different ideas. We encourage the asking of difficult questions and discovery of innovative solutions.

- **Mutual respect and diversity**

We aspire to set the standard for inclusiveness, diversity and equity. We welcome – and benefit from – the diversity of our communities within Australia and internationally. We will continue to champion Aboriginal and Torres Strait Islander Reconciliation.

- **Recognition and performance**

We celebrate the hard work and dedication of our staff, and recognise and reward their achievements. We expect all our staff to meet the challenges of our changing world by seizing opportunities that deliver continuous improvement.

The UOW Accessibility Action Plan 2019 – 2021 (AAP) reinforces our commitment and sets out our key priorities to create an inclusive learning and working community for students, staff and community stakeholders living with a disability. The AAP is guided by the principles of Universal Design and embeds this thinking and practice into related goals and objectives.

To continue to provide equal access, rights and opportunities for all students, staff and our community engaging with UOW, I encourage all members of the UOW ‘family’ to work together to implement the actions of this plan.

Professor Paul Wellings CBE  
Vice-Chancellor and Principal  
University of Wollongong



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# Background

## WHY HAVE AN ACCESSIBILITY ACTION PLAN?

As an institution we need to ensure that we promote and establish an equitable, accessible and inclusive environment across all that we do encompassing teaching, learning, research, engagement, operations and our culture.

Implementing this Accessibility Action Plan helps us to address key areas of need, and confirms our commitment to Universal Design as the essential component to achieving success.

Universal Design, according to The Center for Universal Design, is the “design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design,” ([https://projects.ncsu.edu/design/cud/about\\_ud/about\\_ud.htm](https://projects.ncsu.edu/design/cud/about_ud/about_ud.htm)). At UOW, we are working to adopt the principles of Universal Design in our teaching, learning, research and operational activities so that universal access by all individuals of all backgrounds and abilities is the minimum standard (refer to page 16 for more information on Universal Design principles.)

The Accessibility Action Plan provides a coordinated and accountable approach to achieving our vision of an inclusive university for all students, staff and visitors.

## UOW VALUES AND STRATEGIC GOALS (2016 – 2020)

### UOW Strategic Goals

- Addressing regional, national and international needs: Setting priorities and focus
- Providing exceptional learning and student experience: Maximising Success
- Transforming the workplace: Investing in our staff and physical environment
- Celebrating partnerships: Enhancing reputation
- Sustaining a world-class university: Embracing change and opportunity
- Making a difference: Valuing the role of higher education in society

UOW has outlined its commitment to inclusive practices in its 2016-2020 Strategic Plan, which underpins the major goals and direction of the Accessibility Action Plan 2019 – 2021.

UOW's values recognise the importance of investing in both students and staff to ensure individuals are able to reach their potential and make meaningful contributions to the university and greater community. The UOW Strategic Plan encourages inclusive practices by promoting equality and equity across all aspects of the university from study, to work, to events run by the university and other forms of community engagement.

UOW is committed to providing an environment that facilitates the success of all students and staff living with a disability, and to the provision of an inclusive culture where all individuals can actively participate and excel in their studies or work.

## **LEGAL FRAMEWORK**

The following legislation and standards are important to UOW's Accessibility Action Plan and are applicable to students, staff and visitors:

- The Disability Discrimination Act 1992
- NSW Disability Anti-Discrimination Act 1977
- The Disability Standards for Education 2005 and the Review of the Education Standards 2012
- The National Disability Strategy 2010 - 2020
- The Anti-Discrimination Act 1977 (NSW)
- The Convention on the Rights of Persons with Disabilities 2006
- Fair Work Act 2009
- Disability (Access to Premises – Buildings) Standards 2010



# Guiding Principles

The University of Wollongong is comprised of a network of campuses located at Wollongong (including the Innovation Campus), Batemans Bay, Bega, Shoalhaven, South Western Sydney, Southern Highlands, Southern Sydney, and Sydney CBD. As well, UOW provides learning and research experiences through our online presence. Our students and staff represent many communities from across Australia and many nations internationally.

In our 2030 vision, the University of Wollongong aspires to *“set the standard for inclusiveness, diversity and equity. We welcome – and benefit from – the diversity of our communities within Australia and internationally. We will continue to champion Aboriginal and Torres Strait Islander Reconciliation.”*

Implementation of the UOW Accessibility Action Plan is guided by three principles.

## PRINCIPLES:

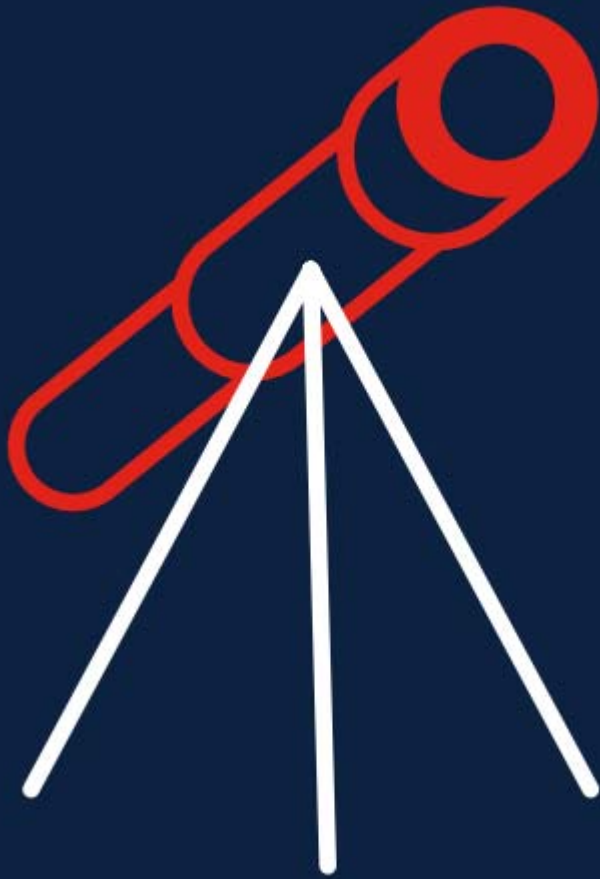
At UOW, our community:

- respects and celebrates our uniqueness as individuals, and we use our differences, as much as our commonality, as assets that promote growth, creativity, inspiration and well-being;
- has the skills and confidence to promote equity and inclusion in teaching, learning, research, community engagement, and all of the activities that underpin and support these core functions; and
- has the skills and confidence to implement, advocate and model inclusive practices, and to have shared responsibility for creating environments that welcome diversity; repel and report intolerance, harassment and discrimination; and, treat all people with respect and fairness.

## HOW WILL WE MEASURE OUR SUCCESS IN IMPLEMENTING THE ACCESSIBILITY ACTION PLAN?

Designated business owners will report against achievement of the AAP actions to the governance committee, which will report up to the Vice-Chancellor.

Achievement of the AAP objectives will be measured using a variety of data sources including, but not limited to, staff and student satisfaction rates, feedback reports, attrition rates, completion rates and diversity metrics.



**Accessibility  
Action Plan  
2019 - 2021**



Action Item	Role Responsible	Key Stakeholders	Target Timeframe
<b>ENABLING STRATEGIES TO PROVIDE AN INCLUSIVE ENVIRONMENT FOR PEOPLE LIVING WITH A DISABILITY (STUDENTS, STAFF AND VISITORS)</b>			
<i>Governance and our culture</i>			
1. Adopt a governance structure with associated targets and reporting practices to support strategy related to Equity, Diversity and Inclusion (EDI) for all educational, research and employment experiences irrespective of their location or their mode of delivery.	Vice-Chancellor	VCAG, SPU, all Faculties and Units	End of 2019
2. Develop and implement strategy to address the increasing prevalence of mental health issues (students and staff).	PVCS, CAO		By end 2021
3. Ensure student and staff input in developing strategic objectives associated with accessibility.	Chair of governance committee	Staff and students	By end 2021
4. Establish effective monitoring processes and feedback loops that enable an agile response to the needs of people with a disability.	Chair of governance committee		By end 2020
5. Review key policies for inclusion of accessibility principles and ensure that procedures meet identified needs.	All policy owners	Director GLD	By end 2021
6. Explore collaborative opportunities afforded by the UOW Accessibility Action Plan for associated UOW entities (onshore, such as Pulse, UOW College, and also offshore).	DVCGS, CAO	Directors of UOW entities	By end 2020
<i>Services and support</i>			
7. Units and Faculties to set operational objectives to create an awareness of and commitment to the principles of Universal Design thinking and instruction.	PVCS, HR, FMD, SSD, LTC	All staff SPU	By end 2021

Action Item	Role Responsible	Key Stakeholders	Target Timeframe
8. Implement accessibility service standards and training for all in a customer-facing environment that includes a knowledge bank of facilities and services for people living with a disability (staff, students and visitors.)	SSD, Director HR	PODS, PVCS	By end 2020
9. Create opportunities at various staff and student touchpoints (enquiry centres, reception areas etc) for people living with a disability to access support as required.	Disability Services, HR	SSD	By end 2020
<b><i>Marketing and communications</i></b>			
10. Establish and implement a guideline and governance process to ensure that student and staff communications are produced in accessible formats adopting principles of Universal Design.	SMCU	All staff	By end 2021
11. Ensure key UOW communications are provided in accessible formats adopting principles of Universal Design.	SMCU	Faculties, SSD	By end 2021
<b><i>Providing an enabling university environment</i></b>			
12. Develop a design standard for key reception areas/touchpoints, e.g. Student Central, HR reception, IMTS reception, Early Start, UOWActive and FMD.	FMD	PVCS, SSD, Director HR	By end 2020
13. Student residences to be audited for accessibility and inclusion, e.g. visual fire alarms.	Accommodation Services	FMD	By end 2020
14. Develop a Universal Design Guideline for all works undertaken by FMD, (including awareness of mental health). Ensure that all new, major and minor building works and public realm works embody Universal Design principles.	FMD	Manager Disability Services	By end 2020

Action Item	Role Responsible	Key Stakeholders	Target Timeframe
15. Design and implement a campus physical wayfinding strategy to ensure safe, accessible paths of travel and provide simple and intuitive communication (including public transport, pedestrian & cycle access.)  (Note: FMD planning for 2020 includes a Biometrix accessibility map relating to physical exertions.)	FMD	SSD	By end 2021
16. Design and implement a campus digital wayfinding package that provides for simple and intuitive use. (Note: FMD has completed a prototype.)	FMD, IMTS	SSD	By end 2021
17. Continue ongoing physical access audits of buildings and facilities to develop a Physical Access Plan that identifies strategies and budget to improve access. (Note: examples include University Hall, accessibility projects, integration of the residential precinct, bathroom upgrades, and provision of accessible bathrooms that are gender neutral.)	FMD	Manager Disability Services	Ongoing
18. Review parking and transport strategies to incorporate Universal Design.	FMD	Manager Disability Services	By end 2020
19. Audit accessibility to research facilities and research activities for staff and students with diverse abilities.	RSO, FMD		By end 2020
20. Develop tailored resources to facilitate access by future students living with a disability who are considering UOW.	SMCU, SSD	Manager Disability Services	By end 2020
21. Develop a purchasing guideline that promotes the inclusion of Universal Design principles in the procurement of all products and services, and, encourages the participation of suppliers that adhere to principles of Universal Design.	Procurement Manager, Finance	FMD, Manager Disability Services, Director HR	By end 2020
22. Review and revise the Campus Access and Order Rules to be inclusive of people requiring emotional support animals for access.	FMD, WHS	Manager Disability Services, Director HR	By end 2020

Action Item	Role Responsible	Key Stakeholders	Target Timeframe
<b>STRATEGIES FOR AN (EN)ABLING EDUCATIONAL EXPERIENCE</b>			
23. Complete a 360° review of Student Disability Services at UOW, including the process for assessment and implementation of reasonable adjustments.	PVCS	Faculties, SSD, HR	By end 2019
24. Establish online, accessible enrolment processes that are inclusive.	SSD, IMTS		By end 2020
25. Develop a timetabling process that prioritises and accommodates identified needs of people living with a disability, e.g. accessible lecture spaces for staff/students with a disability.	SSD	FMD, PVCS units, IMTS	By end 2021
<b><i>Orientation and induction</i></b>			
26. Audit accessibility on and around campus for students living with a disability who are attending orientation.	FMD	SSD	By end 2020
27. Review orientation for students living with a disability in ways that enhance their capacity to successfully transition to study at UOW irrespective of their location or mode of study.	SSD	IMTS/ LTC/Library/PVCS units	By end 2020
28. Appoint transition mentors/induction buddies for students who identify with complex disabilities.	Disability Services, HR	SSD	By end 2020
<b><i>Teaching and learning</i></b>			
29. Develop and implement policy, guidance and protocols that facilitate the adoption of Universal Design principles in all aspects of the learning experience, and consider implications for mandatory practice.	LTC	Academic staff	By end 2019
30. Ensure all staff engaged in teaching are aware of their legal and ethical obligations and establish professional development for academic staff to embed principles of equity, inclusion and Universal Design.	LTC	PODS, Faculties	By end 2021

Action Item	Role Responsible	Key Stakeholders	Target Timeframe
31. Investigate flexibility in assessment processes and design alternative assessment methods to suit diverse student needs. (Note: requires reference to TAPS)	Director, AQS, LTC, Faculty ADEs	Faculties, SSD	By end 2021
32. Implement Blackboard Ally into the UOW learning platform and ensure that appropriate resources and professional development is in place to support staff to use it.	LTC, IMTS	Faculties	By end 2020
33. Evaluate, and remodel where necessary, Library services, resources and support for students and staff living with a disability so that all web-based resources, and as many other resources as possible, are accessible to all staff and students irrespective of their location or mode of study.	Director, Library Services	Disability Services	By end 2020
34. Explore the capacity to implement a process for providing/converting print texts into accessible formats for all students at all locations.	Director, Library Services		By end 2020
<b><i>Employability and co-curricular participation</i></b>			
35. Ensure that the principles of Universal Design are incorporated into the planning, design and delivery of all co-curricular activities, e.g. by clubs, societies, faculties, etc.	SSD, PVCS,	Faculties UniLife, ASD	By end 2020
36. Ensure UOWx programmes and recognition are equitable, accessible and inclusive.	Senior Manager, Student Diversity, Outreach and UOWx		By end 2021
37. Faculties and professional units collaboratively develop and implement work integrated learning experiences that are accessible to students living with a disability.	Careers Service	Faculties	By end 2021
38. Design and implement resources and professional development for Higher Degree by Research (HDR) supervisors so that they are equipped to work effectively with students living with a disability.	RSO, PODS		By end 2020

# Definition of key terms

## Disability

The University of Wollongong recognises the legal definition of disability, as defined in the Commonwealth Disability Discrimination Act 1992 (DDA). This encompasses temporary or permanent physical, intellectual, psychiatric, sensory, and neurological and learning disabilities and the presence in the body of organisms causing, or capable of causing, disease. It also includes a disability that presently exists, existed in the past, or may exist in the future, as well as a disability that is imputed or presumed to a person.

The definition of 'disability' according the DDA stipulates that a person with a disability has:

- Total or partial loss of a person's bodily or mental functions; or
- Total or partial loss of a part of the body; or
- The presence of a body of organisms causing disease or illness; or
- The presence of a body of organisms capable of causing disease or illness; or
- The malfunction, malformation, or disfigurement of a part of a person's body; or
- A disorder of malfunction that results in the person learning differently from a person without the disorder or malfunction, or; or
- A disorder or illness that affects a person's thought processes, perception of reality, emotions, or judgement or that results in disturbed behaviour;

And one which:

- Presently exists; or
- Previously existed but no longer exists; or
- May exist in the future; or
- Is imputed to a person.

## Discrimination

Disability discrimination refers to the less favourable treatment of one person over another because they have a disability (or impairment) - this is direct discrimination, e.g. not permitting a staff member with a disability to participate in a staff development program. Indirect discrimination may also occur in situations where a condition is imposed that people with a disability are unlikely to be able to comply with, and that condition is not reasonable in the circumstances (for example, holding an interview or an exam in a room that is not accessible for people with a mobility impairment). The DDA specifies that discrimination can occur regardless of intention. Harassment on the basis of disability is also unlawful. Examples of this could be derogatory comments made in the course of a lecture, tutorial or interview; written derogatory comments by students or staff; or restrictive personnel practices.

Some exceptions to the Standards do exist. It is not unlawful to treat a person differently where it is reasonably intended to ensure they have equal opportunity, or if their condition may pose a risk to the health and welfare of themselves or others. A person must also be able to fulfil the "inherent requirements" as described to undertake a job or course of study, unless their inability can be overcome by making a "reasonable adjustment".



## Reasonable Adjustments

Alternative arrangements or modifications are important for ensuring equal access to employment or education for people with disabilities. The University is required by law to make reasonable adjustments for staff or prospective staff with disabilities to ensure equity in areas such as job applications, interview processes and the capacity to meet the inherent requirements of a position. The University is also obliged to make reasonable adjustments for students with a disability to enable them to participate on an equitable basis in courses or programs wherever necessary and reasonable to do so without affecting the essential academic requirements of a course and to use the University facilities and services on the same basis as other students.

Adjustments might, for example, include provision of adaptive equipment or software, changing course delivery or assessment procedures, or modification of premises.

## Unjustifiable Hardship

An organisation is not legally bound to make an adjustment if by doing so it would impose unjustifiable hardship on it.

A number of factors are considered in determining unjustifiable hardship, including:

- the nature of the benefit or detriment (disadvantage) likely to be experienced by any persons concerned;
- the effect of the disability on the person concerned;
- the financial circumstances and the estimated expenditure required to be made by the organisation claiming unjustifiable hardship, and
- in the case of services or facilities provision, an action plan given to the Australian Human Rights Commission.

Unjustifiable hardship is assessed on a case-by-case basis by the Australian Human Rights Commission, following the principles established by the DDA.

## Universal Design

Resource material from the Australian Disability Clearinghouse on Education and Training - Creating Accessible Teaching and Support website explains that the concept of Universal Design, which was first developed in the field of architecture, is when "all products, environments and communications ... [are] designed to consider the needs of the widest possible array of users" [ADCET: Inclusive Teaching](#).

The concept of Universal Design is equally applicable to the design and delivery of services such as education. In these terms, Universal Design means the development of curriculum, instructional materials and instruction to be accessible to and useable by students with different backgrounds and abilities. The key aspect of a universally designed curriculum is its in-built flexibility.

Implementing this Accessibility Action Plan helps us to address key areas of priority and demonstrates UOW's commitment to Universal Design as an essential approach to achieving inclusion. Historical means of meeting the access needs of students and staff involved retrofitting changes to the environment and accommodations to classroom instruction. Extending the application of Universal Design to the built environment, to UOW's approach to education and instruction, offers a new paradigm to achieve equal educational access and enhance the learning experience for people with disabilities and other diverse populations.

## Principles of Universal Design

*Source: Universal Design in Higher Education: Promising Practices, Sheryl E. Burgstahler, 2013*

At The Center for Universal Design (CUD) at North Carolina State University, a group of architects, product designers, engineers, and environmental design researchers established seven principles of UD to provide guidance in the design of products and environments.

Following are the CUD principles of UD, each are paired with an example of its application:

1. **Equitable use.** The design is useful and marketable to people with diverse abilities. A website that is designed so that it is accessible to everyone, including people who are blind, employs this principle.
2. **Flexibility in use.** The design accommodates a wide range of individual preferences and abilities. A museum that allows a visitor to choose to read or listen to a description of the contents of a display case employs this principle.
3. **Simple and intuitive.** Use of the design is easy to understand, regardless of the user's experience, knowledge, language skills, or current concentration level. Science lab equipment with control buttons that are clear and intuitive employs this principle.
4. **Perceptible information.** The design communicates necessary information effectively to the user, regardless of ambient conditions or the user's sensory abilities. Video captioning employs this principle.
5. **Tolerance for error.** The design minimizes hazards and the adverse consequences of accidental or unintended actions. An educational software program that provides guidance when the user makes an inappropriate selection employs this principle.
6. **Low physical effort.** The design can be used efficiently and comfortably, and with a minimum of fatigue. Doors that open automatically employ this principle.
7. **Size and space for approach and use.** The design provides appropriate size and space for approach, reach, manipulation, and use, regardless of the user's body size, posture, or mobility. A science lab with adjustable tables employs this principle.



## Examples of Universal Design in Practice (source: The Centre for Universal Design)

### In Instruction

- A statement on a syllabus that invites students to meet with the instructor to discuss learning needs
- Multiple delivery methods that motivate and engage all learners
- Flexible curriculum that is accessible to all learners
- Examples that appeal to students with a variety of characteristics with respect to race, ethnicity, gender age, ability and interest
- Regular, accessible and effective interactions between students and the instructor
- Allowing students to turn in parts of a large project for feedback before the final project is due
- Class outline and notes that are on an accessible website
- Assessing student learning using multiple methods
- Faculty awareness of processes and resources for disability-related accommodations

### In Services

- Service counters that are at heights accessible from both a seated and standing position
- Staff who are aware of resources and procedures for providing disability-related accommodations
- Pictures in publications and on websites that include people with diverse characteristics with respect to race, ethnicity, gender age, ability and interest
- A statement in publications about how to request special assistance, such as disability-related accommodation
- A student service website that adhere to accessibility standards (e.g., Section 508 Standards for those of the U.S. federal government)
- Printed materials that are easy to reach from a variety of heights and without furniture blocking access
- Printed publications that are available alternate formats (e.g., electronic, large print, Braille)

### In Information Technology

- Captioned videos
- Alternative text for graphic images on web pages so that individuals who are blind and using text-to-text speech technology can access the content
- Procurement policies and procedures that promote the purchase of accessible products
- Adherence to standards for the accessible and usable design of websites
- Comfortable access to computers for both left- and right-handed students
- Software that is compatible with assistive technology
- Computers that are on adjustable-height tables
- In Physical Spaces
- Clear directional signs that have large, high-contrast print
- Restrooms, classrooms, and other facilities that are physically accessible to individuals who use wheelchairs or walkers





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- Furniture and fixtures in classrooms that are adjustable in height and allow arrangements for different learning activities and student groupings
- Emergency instructions that are clear and visible and address the needs of individuals with sensory and mobility impairments
- Non-slip walking surfaces

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The Disability Management Strategy Steering Committee was a group of key stakeholders that were particularly influential in driving the AAP 2019 – 2021. The committee included:

- Ms Melva Crouch CSM, Chief Administrative Officer (Chair)
- Prof Julia Coyle, Pro Vice-Chancellor Students
- Ms Sue Thomas, Director Human Resources Division
- Ms Theresa Hoynes, Director Student Services Division
- Dr Lisa Thomas, Deputy Director Learning, Teaching and Curriculum
- Ms Tracey Todd, Manager Student Support and Transition
- Ms Maree Neary, Senior Manager Facilities Management Division
- Dr Kimberley McMahon-Coleman, Academic Director Regional Campuses
- A/Prof Karen Walton, Acting Associate Dean Education SMAH

To provide feedback regarding the Accessibility Action Plan 2019 – 2021  
please go to <https://feedback.uow.edu.au/index.html>

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