



November 21, 2025

Submission to the 2025 Review of the Disability Standards for Education

Executive Summary

Code REaD Dyslexia Network welcomes the opportunity to contribute to the 2025 Review of the Disability Standards for Education (the Standards). Dyslexia and related specific learning disorders affect up to 15% of Australians¹, yet students with dyslexia continue to face considerable barriers to equitable access in education. Many of the concerns identified in the 2010 and 2020 reviews remain unaddressed, including inconsistent implementation, limited educator awareness, and reliance on ineffective complaints-based enforcement through the Disability Discrimination Act 1992 (DDA).

Families consistently report significant variation between schools in the provision of reasonable adjustments. Access to supports often depends on parents' capacity to advocate, rather than on consistent policy adherence. In some jurisdictions, particularly Western Australia, policies governing adjustments for high-stakes examinations directly conflict with the intent of the Standards and can limit pathways to further education.

Key issues impacting students with dyslexia include:

- **Costly and unnecessary re-diagnosis requirements** for Year 12 assessments.
- **Inconsistent application** of adjustments across schools and teachers.
- **Restrictions on adjustment types** in high-stakes exams, including arbitrary limits on extra time and assistive technology.
- **Exclusion of students with imputed disability**, whose functional needs are not recognised without a formal diagnosis.
- **Structural barriers** in Western Australia, including the OLNA assessment's uncompensated spelling component.

¹ Australian Curriculum, Assessment and Reporting Authority. (2024). School students with disability. National Report on Schooling in Australia.

Code REaD Dyslexia Network recommends removing diagnostic barriers, establishing consistent national minimum standards for adjustments, strengthening accountability mechanisms, and aligning state assessment policies with the intent of the Standards. Without these changes, students with dyslexia will continue to face disadvantage, reduced educational attainment, and negative mental health impacts.

About Code REaD Dyslexia Network

Code REaD Dyslexia Network represents young people and families affected by dyslexia and related specific learning disorders, including dysgraphia and dyscalculia. Up to 15% of Australians are estimated to have dyslexia or a related learning disorder, and prevalence is rising. Students with dyslexia are at increased risk of disengagement, early school-leaving, and underrepresentation in tertiary education². Research highlights the long-term mental health impacts associated with schooling challenges, including anxiety, depression, and low self-esteem³.

Introduction

Code REaD Dyslexia Network welcomes the opportunity to provide evidence and lived-experience insights to inform the 2025 Review of the Disability Standards for Education. The Standards aim to ensure that students with disability can access and participate in education on the same basis as their peers. They outline student rights, legal obligations for education providers, and guidance on reasonable adjustments.

Despite this framework, significant issues persist:

- Accountability for implementing the Standards remains weak.
- Complaints-based mechanisms under the DDA are inadequate for systemic change.
- Many educators lack awareness of dyslexia-inclusive practices and their obligations.

Families frequently report inconsistent access to adjustments, insufficient support, and school-level misunderstanding of dyslexia. In some cases, state-level assessment policies conflict with the principles of the Standards, making equitable access to education, and to future study, more

² Dalsgaard, S., McGrath, J., Østergaard, S. D., Wray, N. R., Pedersen, C. B., Mortensen, P. B., & Petersen, L. (2020). Association of Mental Disorder in Childhood and Adolescence with Subsequent Educational Achievement. *JAMA Psychiatry*, 77(8), 797-805. <https://doi.org/10.1001/jamapsychiatry.2020.0217>.

³ Eissa, M. (2010). Behavioral and emotional problems associated with dyslexia in adolescence. *Current psychiatry*, 17(1), 17-25.

difficult. These issues underscore the urgent need for improvements to the Standards and their implementation.

Key Concerns: Improving Implementation of the Standards for Students with Dyslexia

1. Accommodation and Adjustments

a. Burdensome Re-Diagnosis Requirements

Several jurisdictions require updated diagnostic assessments for Year 12 examination adjustments, despite dyslexia being a lifelong condition. Assessments cost between \$1,000 and \$2,000 per child; waiting lists are long; and comorbidities often require multiple assessments, significantly increasing the financial and emotional burden.

“Cost is a huge barrier. Someone told me the pretesting’s going to cost you like 8-9 hundred dollars and then the second one’s going to be around a couple of \$1000 and I was going to be paying for intervention between. But that was just terrifying because we didn’t have that much cash in one hit. And then knowing that she should need SCASA accommodation that I would need to pay that \$2000-\$3000 again at a while she was in year 11 and year 12.”

— Parent discussing the financial toll of accessing a diagnosis

b. Inconsistent Adjustment Practices Across Schools

While the Standards require fair and equitable decision-making, families report large variations in how adjustments are understood and implemented. Some teachers are unaware of obligations or options, leaving families responsible for re-explaining dyslexia and advocating for their every school year.

“Moving through the years, I have advocated for her every single year. Made sure that we’ve copied all her reports: her diagnosis report, any other reports and given them to the teacher every single year to make sure they know (she’s dyslexic and needs adjustments), because they often don’t”.

— Mother discussing the importance of advocacy

c. Restrictions on Adjustments for Year 12 Examinations

Western Australia’s *Equitable Access to Assessment Policy (2025)* sets procedures for exam adjustments, including Year 12 university entrance exams. The policy limits the available supports by disability category, with little transparency or evidence for why measures like extra time (10 minutes per hour) or assistive reading devices are considered adequate for dyslexia. It also requires students to be re-diagnosed, and applications are reviewed by a panel with no guarantee of approval. These restrictions can prevent students from receiving reasonable adjustments they need to access higher education and are their rights under the DDA and Standards.

“He was angry all the time. He was really stressed; he punched a hole in the wall. It was awful, the worst I’ve ever seen.”

— Parent of a student denied adjustments

d. Exclusion of Students with Imputed Disability

The Western Australian School Curriculum and Standards Authority (SCSA) recently (May 2025) ruled that students without a formal diagnosis, despite clear functional needs, are no longer eligible for adjustments. This contradicts the DDA and the Standards, which recognise that disability can be diagnosed by imputation.

Imputed disability is recognised under the Federal Disability Discrimination Act 1992 (Part 1, (4), 1) in the definition of “disability”, and in the Nationally Consistent Collection of Data census. Western Australia’s SCSA would appear to be contravening Federal discrimination law (a position on which Code REaD will seek clarification from the Australian Human Rights Commission, should SCSA’s position remain unaltered).

Clearer and more inclusive national guidance is needed to ensure equitable access, especially for timed assessments.

Issues Specific to Western Australia

Western Australia presents some of the most significant systemic barriers for students with dyslexia.

Equitable Access to Assessment Policy

Although the policy provides adjustments such as limited extra time and the C-Pen Exam Reader, evidence indicates significant barriers:

- Confusing and inconsistent application processes
- Inconsistent school-level implementation
- Late confirmation of adjustments for high-stakes exams
- Arbitrary restrictions on adjustment types based on disability category

These barriers prevent many students from accessing adjustments to which they have a right under the Standards.

OLNA: A Structural Barrier

WA is the only state requiring students to pass the Online Literacy and Numeracy Assessment (OLNA) to achieve the WACE.

Western Australia is the only state with this requirement, and it includes a spelling component for which no accommodations are available to students with dyslexia. Given that dyslexia involves phonological processing difficulties that directly impact spelling, this component acts as a structural barrier.

This requirement:

- Disproportionately penalises students with dyslexia
- Blocks pathways to graduation and higher education
- Contributes to student stress, disengagement, and mental health decline

Families report feeling powerless and defeated, with some abandoning university aspirations due to OLNA.

Recommendations

1. **Abolish re-diagnosis requirements** for access to exam adjustments, recognising dyslexia as a lifelong condition.
2. **Establish nationally consistent minimum standards** for adjustments across all school sectors and jurisdictions.
3. **Mandate evidence-based adjustments**, including proportional additional time, appropriate assistive technology, and removal of arbitrary caps.
4. **Ensure state assessment authorities align policies with the Standards and the DDA.**
5. **Allow adjustments based on functional need**, reinstating eligibility for students diagnosed by imputation.
6. **Strengthen monitoring and accountability**, including reporting obligations, compliance audits, and meaningful enforcement mechanisms.
7. **Provide funded training for educators** on dyslexia, reasonable adjustments, and legal obligations under the Standards.

8. **Embed meaningful consultation** with students, families, and advocacy organisations in policy development and review processes.
9. **Urgently review the Western Australian structural barriers under OLNA**

Conclusion

Students with dyslexia continue to face significant barriers to equitable access and participation in education. Without stronger oversight, clearer guidance, and alignment across jurisdictions, the Standards cannot achieve their intended purpose. Code REaD Dyslexia Network urges the Department to adopt the recommendations outlined in this submission to ensure that every student with dyslexia is supported, included, and able to reach their full potential.

Yours Sincerely,

Marshall Roberts

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Code REaD Dyslexia Network