



Toitū te Waiora Disability Action Plan

January 2025



TOITŪ TE WAIORA
Community, Health, Education
and Social Services
Workforce Development Council

toitutewaioara.nz



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Introduction

This Disability Action Plan for Toitū te Waiora (Community, Health, Education and Social Services) Workforce Development Council has been developed to support disabled learners who may undertake our qualifications, the providers that deliver the qualifications, the industries we support and our kaimahi.

The actions described in the plan (see Section 2) will make our products, services and workplace more accessible and inclusive. For a full overview of planned work and work that has already been undertaken, please refer to the Workplan for the Disability Action Plan, which complements this action plan.

The Disability Action Plan was finalised in December 2024 and will be reviewed in December 2025.

Section 1: Background

This section provides background to the Disability Action Plan, including information about Toitū te Waiora, disability and how we can effect change to benefit learners, providers, industry and our own organisation.

About Toitū te Waiora

Toitū te Waiora represents industries including:

- care services
- disability services
- education and educational support services
- funeral services
- health services
- public order safety
- regulatory services
- skin and nail therapy services
- social services
- urban pest control.

We work with industry and employers to understand the skills needed in these workforces. We lead the development of industry qualifications, set industry standards and assess training provision against these industry standards.

We work collaboratively across the vocational education sector and endorse vocational education programmes before they are approved by the New Zealand Qualifications Authority (NZQA).



We also engage with the Tertiary Education Commission, NZQA, Centres of Vocational Excellence and tertiary education organisations to support and improve outcomes for all learners in our industries.

Link with our Strategic Direction

Our Strategic Direction has an overarching goal: a skilled and qualified workforce for Aotearoa New Zealand. This goal is underpinned by three strategic goals: voice of industry, responsive qualifications and influential advice.

To achieve our goals and deliver our work, we need to build organisational capability, guided by our commitment to [Te Tiriti o Waitangi](#).

The actions in this Disability Action Plan (see Section 2) will specifically help us meet our voice of industry and responsive qualifications goals and build organisational capability.

Scope of our Disability Action Plan

Our Disability Action Plan covers all aspects of our role and work, both internal and external. The actions will help us understand the needs of and provide services and products for disabled people.

The Disability Action Plan and associated workstreams and plans (which may be part of business as usual, or standalone initiatives) also provide ways to monitor performance and track progress of initiatives.

Rationale and drivers for our Disability Action Plan

Commitment to government direction

Toitū te Waiora is required under the [Education \(Community, Health, Education, and Social Services Workforce Development Council\) Order 2021](#) to act in a manner that –

7 (1)(a) contributes to an education system that honours Te Tiriti o Waitangi and supports Māori–Crown relationships.

7 (1)(d) seeks to contribute to an education system that provides opportunities for all people to reach their full potential and capabilities in the specified industries, including those who have been traditionally underserved by the education system; and

7 (2) When performing its functions under section 366 of the Act, the Council must give effect to the relevant parts of the tertiary education strategy.



7 (3) When performing its duty under section 369(2)(b) of the Act to have regard to the needs of Māori and other population groups identified in the tertiary education strategy, the Council must consult—

7 (3)(b) the persons it considers on reasonable grounds represent those population groups.

The Objective in Council direction to give effect to the [Tertiary Education Strategy](#) requires Toitū te Waiora to act to support the objectives outlined in that strategy. The objectives most relevant to this Disability Action Plan are:

- **Objective 2: Barrier free access: Priority 3:** Reduce barriers to education for all, including for Māori and Pacific learners/ākonga, disabled learners/ākonga and those with learning support needs
- **Objective 4: Future of learning and work: Priority 7:** Collaborate with industries and employers to ensure learners/ākonga have the skills, knowledge and pathways to succeed in work.

Also, Toitū te Waiora must, under the [Employment Relations Act 2000](#) (sections 104 and 105) and the [Human Rights Act 1993](#), behave as a fair and accommodating employer of disabled people.

Commitment to the New Zealand Disability Strategy 2016–2026

Our work is closely guided by the [New Zealand Disability Strategy 2016–2026](#), a key disability-focused document designed to guide the work of government agencies.

The strategy has three sets of principles and two approaches underlying its focus. The three principles are: Te Tiriti o Waitangi, the [Convention on the Rights of Persons with Disabilities](#) and ensuring disabled people are involved in decision-making that impacts them. The two approaches are: Investing in our whole lives – a long-term approach, and Specific and mainstream services – a twin-track approach.

Outcomes under the strategy that particularly guide our work are:

- **Outcome 1:** Education (especially the need for disabled people to be involved in development of educational opportunities)
- **Outcome 2:** Employment (especially proportional representation as employees) and economic security.

Commitment to workforce development

Toitū te Waiora is committed to workforce development across all the industries it supports.



A productive, appropriately qualified and competent workforce that can work safely is essential to improving outcomes for disabled people in Aotearoa New Zealand. It also contributes to positive outcomes for wider society. The Office of the Ombudsman has documented in its report [*Making Disability Rights Real 2014 - 2019*](#) that, “There would be a fiscal benefit of \$1.45 billion per year if the participation of disabled people in the labour market was equalised.”

Pressures on the current disability and wider health workforces are not forecast to ease soon, with both personnel and funding pressures affecting providers. In this environment, the qualifications and learning pathways available to those who want to work in the disability sector or upskill in roles must be fit for purpose, targeted and meet current community needs.

Alongside improving outcomes for people who are supported by the workforce, a workforce with higher qualifications will, over time, lead to a more productive sector – yielding good return on investment in training for both individuals and organisations. This knowledge underpins our approach to the development of disability-related qualifications.

Commitment to Te Tiriti o Waitangi

Toitū te Waiora has committed to reimagining vocational education through leading and building a system that honours Te Tiriti o Waitangi. This work supports the Order in Council:

7 (1)(a) contributes to an education system that honours Te Tiriti o Waitangi and supports Māori–Crown relations.

This means Toitū te Waiora must design, conduct and manage the products, processes and spaces it has agency over in a way that facilitates the full involvement of disabled people in society. As a “good citizen” we should act to improve outcomes for disabled people where we can.

This Disability Action Plan, and the associated workplan, allows Toitū te Waiora to describe the actions we are taking to give effect to the direction of the Order in Council and Tertiary Education Strategy, comply with relevant legislation and support an equitable society.



About disability

Definitions and models

The United Nations Convention on the Rights of Persons with Disabilities defines a disability as:

“any long-term physical, mental, intellectual or sensory impairment which, in interaction with various barriers, may hinder the full and effective participation of disabled people in society on an equal basis with others.”

Many impairments can lead to people experiencing disability. An impairment can result from accidents, injuries, congenital conditions, genetics, long-term conditions and health issues. Depending on the impairment, it may not cause an individual significant issues, but when an impairment comes into play in a society built one way, for one type of being, it can be disabling.

Some disabilities can be hidden (for example, chronic health, mental health, learning and communication). Disability can be experienced for a period or over a lifetime. It may also evolve and change for individuals.

The experience of disability is influenced by a person's impairment and other demographics, such as gender, age, ethnicity and culture. This intersectionality can have a compounding effect on an individual's experience of disability.

Using a social model of disability

Aotearoa New Zealand government, services and society operate with a social model of disability. This means we understand that barriers experienced by disabled people are caused by how society is organised, rather than by a person's impairment or difference. “Disabled” refers to factors outside of a person's control that impact them by placing barriers in the way of their ability to participate.

The social model of disability approach underpins the New Zealand Disability Strategy 2016–2026 and drives its focus on ensuring all environments, across all facets of social and civil life, are inclusive and accessible to disabled people.

This approach is opposite to the outdated medical model of disability, which states that disability lies with the individual, who needs to “adapt” or be “cured” to fit society. Rather, the social model puts the responsibility for supporting inclusion and accessibility onto non-disabled people and all organisations.



Disability data

An overview of disability data follows.

Population statistics¹

- Nationally, 1 in 4 people identify as disabled (24%, ~1.1 million).
- Māori are disproportionately represented compared with the general population.
- The employment rate for disabled people was 39.8%, compared with 80.3% for non-disabled people.
- The unemployment rate for disabled people was 11% compared with 4.5% for non-disabled people.
- Twenty-six percent (26%) of disabled people were underutilised² compared with 10% of non-disabled people.
- Disabled people were less likely to report satisfaction with career development opportunities (45%) compared with non-disabled people (53%) (2021 data).
- Tāngata whaikaha Māori³ were less likely to have a paid job (40% compared with 71% of Māori non-disabled) (2021 data).
- For adults, physical limitations were the most common impairment experienced, and these were more common with age.

Younger people and learner statistics

- Eleven percent (11%) of children aged under 15 years are disabled. There is a higher rate of disability among Māori, at 14% (2021 data). This has significant implications for the future workforce.
- Disabled learners are poorly identified⁴ in education data. There is no systematic monitoring for this priority group to understand how well expectations for inclusive, quality education is being met.⁵
- Disabled learners in tertiary education report significant challenges in the 2024 Let's Get Accessible report (Ministry of Education, 2024), for example:
 - 32% of survey respondents said it was difficult or impossible to ask teaching staff for help
 - 20% said their learning environment was difficult to access

¹ Data is taken from Stats NZ's [Labour market statistics: June 2024 quarter](#) report, unless otherwise stated.

² "Underutilisation" is a Stats NZ term. Underutilisation rate reflects people who do not have a job but are available to work and are actively seeking employment.

³ Tāngata whaikaha Māori is a recent term to refer to Māori disabled people. Tāngata whaikaha refers to the determination and ability of Māori disabled people, where whaikaha means to have strength, to have ability and to be enabled. Another term for Māori disabled people is whānau hauā – which acknowledges that the experience of disability is a collective whānau experience.

⁴ They are not identified at all in data covering compulsory education. Data held at the tertiary level is not considered to be robust and does not cover the whole sector.

⁵ Education Review Office (2022).



- Disabled learners want improvement in areas relating to accessibility and support.

Outcomes for people with different impairments vary greatly. While general data on disabled people's education and employment outcomes is poor, it is known that people who experience significant cognitive impairments have very poor outcomes in both education and employment. It is important that work aiming to improve outcomes for disabled people takes disparities *between* disabled people into consideration and aims to target those most disadvantaged groups.

Disability confidence

Toitū te Waiora strives to be a “disability-confident” organisation. Employment New Zealand⁶ outlines this as an organisation that:

- has managers and staff who understand disability and know what disabled people can do
- has managers who know it is important to their organisation to employ disabled people
- has in place inclusive policies and practices
- has plans in place to ensure a diverse workplace
- addresses barriers to employment and promotion for disabled people
- thinks about the needs of disabled people when designing products and services
- thinks about the needs of disabled people when hiring staff
- can attract a wider pool of job applicants
- is more likely to retain talented disabled employees.

Disability confidence helps organisations to:

- get and keep good staff
- build better individual relationships with all stakeholders, including customers
- experience the benefits of a diverse workforce such as increased innovation
- manage costs – recruitment costs are lower and disabled people have fewer ACC incidents and accidents at work compared with non-disabled employees
- ensure the workforce reflects a diverse community.

⁶ Employment New Zealand (2023).



How Toitū te Waiora can effect change

Toitū te Waiora has limited direct engagement with learners, therefore our Disability Action Plan focuses on effecting change using other levers, particularly those in our control.

To effect change in areas outside our control, our actions could focus on working with and influencing relevant organisations and agencies in the sector who have control over other relevant levers, for example, NZQA and the Tertiary Education Commission.

External mandates

The government has responsibilities under the United Nations Convention on the Rights of Persons with Disabilities to increase equity for disabled people is across government and wider society – including the education sector.

Drivers for increasing equity include:

- New Zealand Disability Strategy 2016–2026
- [Statement of National Education and Learning Priorities](#)
- Tertiary Education Strategy
- Tertiary Education Commission requirement for some tertiary organisations to have disability action plans.

Levers and tools in our control

We have external and internal levers and tools in our control that we use to develop, monitor and assess qualifications, and provide advice to industry and the wider sector.

We are also an employer of people and an organisation the wider public engages with.

External levers and tools:

- Disabled people who undertake our qualifications
- Providers who deliver our qualifications and training
- Disabled people and communities, including whānau who employ people who have our qualifications to support disabled people
- Industry as employers of disabled people.

Internal levers and tools:

- Our qualification development, review and assessment function
- Our organisation as an employer of disabled people
- Our organisation as one with which disabled people in the wider community interact.



Influencing others

Toitū te Waiora kaimahi and Council have a role in influencing industry and educational providers by promoting our work and our commitment to equity, and by making connections between inter-related pieces of work with NZQA, the Tertiary Education Commission and any relevant industry bodies.

Those involved include:

- Senior Leadership Team and people leaders
- our Council and individual members
- our kaimahi
- providers we interact with
- industries we support.



Section 2: Disability actions

This section outlines our existing and future disability actions. They are grouped according to four areas of our work:

- supporting qualifications and providers (responsive qualifications goal)
- supporting industry (voice of industry goal)
- building organisational capability (supporting our people)
- supporting the wider community.

By monitoring actions over time, we can measure what matters and monitor change.

For actions that are already underway, most measures are within our current performance measures.

Supporting qualifications and providers

The core role of Toitū te Waiora is to develop qualifications, establish standards and evaluate training provisions in our areas of remit. We seek to ensure our qualifications and standards are current, flexible, accessible to learners and meet industry needs now and in the future. We also support providers who deliver the qualifications we manage.

Areas for improvement

Our products and services must meet the needs of disabled communities⁷ and be accessible and inclusive.

Anecdotal input from stakeholders indicates we need to broaden our approach and outreach to all customers to understand their needs, barriers and expectations when engaging with our processes and products.

⁷ The disability community includes disabled people and their whānau, partners, friends, relatives, unpaid carers and others directly involved in informal support for disabled people as determined by disabled people. This includes advocacy/consumer organisations comprising and representing disabled people.



What we want to achieve	What success looks like	How we will measure success
<ul style="list-style-type: none"> • Toitū te Waiora has a strong partnership relationship with the disability community. • Accessibility and inclusivity are part of the design of and processes for all our qualifications. • Tertiary providers and trainers who deliver our products have easy and reliable access to best-practice advice on supporting disabled learners. 	<ul style="list-style-type: none"> • Toitū te Waiora partners with the disability community on relevant qualification development and review functions and processes, and incorporates advice received • Our qualifications are accessible and inclusive. Specific disability-focused qualifications are identified and developed in response to sector needs. • We use our qualification design and review process to champion disability capability. • Tertiary providers and trainers are more confident in supporting disabled learners and employees. 	<ul style="list-style-type: none"> • Toitū te Waiora provider stakeholder survey – percentage of provider stakeholders who agree Toitū te Waiora has regard for disabled people • Disability partners survey • Number of learners enrolled in new disability qualifications • Percentage of relevant qualifications with the disability skills standards and or assessments specifications • Percentage of qualifications – kaimahi who have completed disability capability training • Usage of advice provided – number of unique visits to our website, number of downloads from website, percentage of responses to online instant survey who found our advice useful



How we will improve

Current actions

Qualification activity – Health and Wellbeing Qualifications Review A comprehensive review of a suite of health and wellbeing qualifications is underway and expected to be finalised by the end of 2024. New qualification content development will take place during 2025.

From our engagement, we have heard that there is insufficient support for disabled individuals within the health and disability sectors. Our stakeholders told us this could be improved by more targeted and specific training that better reflects the needs of disabled people and the disabled workforce.

To respond to this feedback, Toitū te Waiora consulted with the public on two proposed options:

1. A further Disability Support strand be added to the New Zealand Certificate in Health and Wellbeing (Level 3), allowing further specialisation within this sector.
2. A standalone Disability Support qualification with the potential to staircase to higher levels. This option received the most support. We are now in the early stages of development and will continue to work with our disability consultation groups and subject matter experts to build these new qualifications.

Other specific actions being taken We recently created a unit standard for First Aid: [Instruct how to provide basic life support](#). This ensures that learners who may not be able to physically perform First Aid (such as CPR) are not disadvantaged and are able to achieve a First Aid certificate.

We are developing a suite of micro-credentials that focus on long-term care skills. An increase in skill in this area will be significant for disabled people who require personal care services longer term.



Future actions

Develop new qualifications in response to disability community needs.

Develop and implement new skills standards (covering disability knowledge, confidence and capability) in relevant qualifications.

Develop and implement new skill standard assessment specifications to include provision that assessment activities should incorporate the needs of disabled people.

Provide guidance for our kaimahi to ensure the consumer voices of the disability community are better understood and considered in qualification product review and development, insights work programmes and workforce development plans.

Provide advice on indicators of good practice for disabled learners in tertiary education and work-based training.

Improve our data reporting on, and view of disabled learners' performance in, qualifications we manage.

Supporting industry

One of our key roles is supporting industries we are responsible for. This support function is broad, and we seek to understand our sectors and industries, and ensure our work addresses their workforce needs.

Areas for improvement

Industry organisations are time poor and may lack the internal capability to properly support disabled employees. If they search out advice, it can be time consuming to wade through a lot of information, which reduces the likelihood of uptake of advice. Also, data on the performance and experiences of disabled people as employees is lacking. This means it is hard for employers to understand how disabled people are experiencing employment environments, which adds to challenges in understanding how to improve their experiences.



What we want to achieve	What success looks like	How we will measure success
<p>The industries Toitū te Waiora supports have easy and reliable access to best-practice advice on supporting disabled learners and employees.⁸</p>	<ul style="list-style-type: none"> Industries Toitū te Waiora supports can quickly and easily access information on the performance and experiences of the disabled people they employ. Industries are more confident supporting disabled employees. 	<ul style="list-style-type: none"> Toitū te Waiora Industry Stakeholder Survey – percentage of industry stakeholders who agree Toitū te Waiora has regard for disabled people. Usage of advice provided: number of unique visits to the website, number of downloads from the website, percentage of responses to online instant survey who found our advice useful.

How we will improve

Future actions

Provide advice on best practices for supporting disabled employees.

Use our channels to support and share good news stories about disabled people employed in the industries we support.⁹

⁸ The *Let's level up* research report (Hanga-Aro-Rau and Waihangā Ara Rau Workforce Development Councils 2024) identifies a need for, "... a foundational understanding of disability amongst some employers" (p.25); and that "Supporting employers in understanding the importance of disability... will go some way towards addressing the knowledge gap" (p 27). Employers also reported that "more knowledge about disability" (p 29) would make a positive difference to their experiences hiring disabled people.

⁹ The *Let's level up* research report (Hanga-Aro-Rau and Waihangā Ara Rau Workforce Development Councils 2024) identifies that, "... access to and visibility of a community of role models is an enabler for disabled people..." (p 36).



Building organisational capability

The Council, Senior Leadership Team and people leaders of Toitū te Waiora have a responsibility to improve our disability confidence and competence, through building our organisational capability. In time, this improvement will change kaimahi attitudes. It will also change the way we do business as usual by ensuring we have an “equity by design” approach to our work.

Creating a diverse workplace that is welcoming to a diverse community will also support diversity of thought across our work and widen our talent pool. It will also support our external mandates to be an equitable employer in line with the New Zealand Disability Strategy 2016–2026.

Area for improvement

Toitū te Waiora needs to better understand how disabled kaimahi experience the organisation, and the overall level of disability confidence and capability among all kaimahi.

If our current position is like that of other organisations, it is likely that disabled kaimahi:

- would like more and easier access to assistive technologies and adaptive office equipment
- would like more accessible bathrooms, kitchens, quieter break spaces and a more welcoming office space (for example, the ability to adjust lighting)
- may experience ableist attitudes and be reluctant to disclose a disability.

People leaders may need more support to manage and empower disabled kaimahi and manage working terms and conditions equitably.



What we want to achieve	What success looks like	How we will measure success
<p>For Toitū te Waiora to be an organisation that is disability confident and capable, where disabled kaimahi thrive.</p>	<p>Disabled kaimahi experience Toitū te Waiora as an inclusive, comfortable, equitable and empowering place to work.</p>	<ul style="list-style-type: none">• Percentage of kaimahi who have completed disability capability training.• Training evaluation results.• Percentage of kaimahi who agree we are an inclusive employer.• Percentage of kaimahi who agree they have the right equipment to do their job.• Compliance against Web Content Accessibility Guidelines (WCAG 2) international standard.

How we will improve

Future actions

Survey all Toitū te Waiora kaimahi to find out more about the experiences and needs of disabled kaimahi.

Review our internal and external platforms and communications for accessibility and inclusivity.

Provide targeted training and development opportunities to improve the disability capability of all kaimahi.



Supporting the wider community

Toitū te Waiora is a member of the wider community with an obligation to act as a “good citizen” in promoting and enabling equity. We are also directed by legislation to improve outcomes for, and be accessible to, disabled people. We aim to be trusted and influential advisors to our stakeholders.

Areas for improvement

Toitū te Waiora has an opportunity to build stronger relationships with disabled people and better understand how they view our products and services: are they accessible and inclusive and do they meet the needs of the disability community?

What we want to achieve	What success looks like	How we will measure success
<p>For Toitū te Waiora to be experienced by the disability community as an accessible and inclusive organisation that actively partners with disabled people to improve outcomes.</p>	<ul style="list-style-type: none"> • The disability community has strong, trusted relationships with us. • The disability community experiences the organisation as inclusive and accessible. • The disability community views us as a genuine partner in improving outcomes for disabled people. 	<ul style="list-style-type: none"> • Toitū te Waiora Industry Stakeholder Survey – percentage of industry stakeholders who agree Toitū te Waiora has regard for the needs of disabled people. • Disability partners survey. • Compliance against Web Content Accessibility Guidelines (WCAG 2) international standard.

How we will improve

Future actions

Establish a Disability Advisory Group to support implementation of our Disability Action Plan and advise Toitū te Waiora on disability-related issues.

Grow our relationships with relevant government and non-government organisations with a voice and role in the disability sector.

Review our public-facing platforms and communications for accessibility and inclusivity.



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Sector guidance

A limited number of sources tell us about the current situation for disabled learners and adults and provides guidance for the sector.

Stats NZ undertook a disability census in 2013 (a 2023 disability census has yet to be released at time of publication of this document). Information includes demographics, education, employment of disabled people. www.stats.govt.nz/information-releases/disability-survey-2013

Whaikaha has a range of data and information (mainly based on Stats NZ census and research). Data is categorised across the eight New Zealand Disability Strategy outcomes, including employment, education and leadership. It has also produced data on how tāngata whaikaha Māori are doing since 2018 via the Te Kupenga survey.

- www.whaikaha.govt.nz/about-us/programmes-strategies-and-studies/programmes-and-strategies/new-zealand-disability-strategy
- www.whaikaha.govt.nz/news/news/tangata-whaikaha-maori-data

The Education Review Office in partnership with the Human Rights Commission and the Office for Disability Issues, looked at how well the education system is supporting disabled learners in schools.

<https://ero.govt.nz/our-research/thriving-at-school-education-for-disabled-learners-in-schools>

Universal Design for Learning (UDL)

<https://ncea.education.govt.nz/universal-design-learning-udl>



The Statement of National Education and Learning Priorities and Tertiary Education Strategy.

www.education.govt.nz/assets/Documents/NELP-TES-documents/FULL-NELP-2020.pdf

The National Disabled Students Association, Ministry of Education, Tertiary Education Commission and NZQA worked on the Let's Get Accessible research project (2024) to understand disabled learners' experiences navigating the tertiary education system.

www.educationcounts.govt.nz/publications/tertiary_education/education-learners/lets-get-accessible-disabled-students-experiences-navigating-the-tertiary-education-system

Te Pūkenga *Te Rito* 2021 research into the experience of disabled learners in the vocational system.

[Te-Rito-Insights-from-Disabled-learners-Part-Three1.pdf \(xn--tepkenga-szb.ac.nz\)](#)

The Kia Ōrite Toolkit provides current, New Zealand-specific guidance to help tertiary education organisations better support disabled learners.

www.achieve.org.nz/kia-orite-toolkit