Written response to the recommendations from Universities Scotland

Universities Scotland has been invited to provide information on the progress the Higher Education Institutions (HEIs) have made on the recommendations of the report *Removing Barriers and Creating Opportunities.*

Universities Scotland represents the higher education institutions in Scotland. In our capacity as a representative body, we directly engage with the Scottish Funding Council and the Scottish Government on matters of disability equality policy on behalf of our members.

As a member of the Scottish Government’s Disabled Student Steering Group, Universities Scotland has contributed to the development of a formal Validation Process that enables the institutions to become accredited assessors of the needs of disabled students. This is designed to enable the institutions to undertake in-house needs assessment of disabled students and speed up the assessment and application process for the Disabled Student Allowance (DSA). Currently, 15 of the 20 institutions have been validated as assessors. This has greatly enhanced the efficiency of the DSA and has ensured that disabled students receive the support that they need without delay.

We would like to provide the following update on the progress the higher education institutions have made on the recommendations made by the report *Removing Barriers and Creating Opportunities.*

**Recommendation 7**

*The Committee recommends that all public sector staff, especially in light of the Disability Equality Duty, have the promotion of equalities as part of their job descriptions and performance competencies.*

The higher education institutions expect all staff to adhere to equality and diversity policies as part of their terms and conditions within their contract of employment with the university.

**Recommendation 20**

*The Committee recommends that all employers should be as flexible as possible in relation to the recruitment of disabled people and should strive to go beyond the minimum statutory requirements. In particular, the Committee recommends that the Disability Rights Commission and its successor, the Commission for Equality and Human Rights, should work with relevant personnel and recruitment professionals to develop and disseminate best practice in the conduct of interviews and the wider recruitment process as it relates to disabled people.*

The higher education institutions have developed different policies in relation to recruitment of disabled people and many example of good practice are emerging. One institution has recently reviewed the Two Tick Disability
Symbol with Job Centre Plus and has been praised for the advice and guidelines its Human Resource Recruitment Team has provided to the short listing panel on the implementation of the Guaranteed Interview Scheme. This institution has embedded this process into the IT system used by the recruitment team. This institution has also recently commissioned a social enterprise, Disabled Go which developed a website for people with disabilities which contains a Human Resource recruitment element, where all University jobs can be advertised at the target market. Currently the recruitment website receives over 1.4 million hits a month. The institution has commissioned Disabled Go on a three year contract to complete an access audit and maintain the recruitment site. It is hoped this will help disabled students, staff, and visitors to make informed decisions about where they choose to work or study.

**Recommendations 38 & 39**

*The Committee welcomes the self-evaluation work done by the Scottish Further and Higher Education Council and recommends that it builds on this monitoring and evaluation work to take forward the mainstreaming agenda and to roll out good practice in service provision to disabled students across the sector.*

*The Committee recommends that all further and higher education providers seek stakeholder feedback in relation to the services that they provide and respond where appropriate.*

The higher education institutions in Scotland are fully committed to disability equality and subscribe to the social model of disability which underpins the ethos of service delivery in the sector. The institutions have made significant progress in mainstreaming this equality strands. The principle of mainstreaming underpins the approach to disability equality and is supported by an understanding that while inclusive practice will support the majority of students there are students who require specific and specialist services.

Disability equality strategy forms one strand of the overall institutional equality strategy. Since 1998, all HEIs have developed an equality management structure that is fully integrated into the institutions’ committee structure and reports to the governing bodies. Equal Opportunities Committees (or variations thereof) are established in all institutions and are responsible for the development of disability equality policy for both students and staff. One institution has appointed a Vice Principal for Equality and Diversity. In some institutions, these committees are supported by other groups such as a Disability Advisory Group, Disability Equality Task Group, or a Student Support Forum. These Committees consider and promote best practice in relation to the admission of disabled students, and academic and administrative systems that support them.

There are many good examples of an Equality Impact Assessment Strategy developing within the sector in recognition of the duty to assess the impact of the institutions’ policies and procedures on disabled students. The institutions
systematically consult and involve disabled people in preparation for and maintenance of their Disability Equality Schemes. Some institutions have set up staff disability networks to seek views from staff. The Campus Liaison Group in one institution allows disabled staff and students to feedback and advise on matters relating to the development of the estate.

Whilst there are many examples of very good practice within the sector, we believe more work needs to be undertaken to understand the provision of services to disabled staff and students, in terms of assessing the impact of policies and identifying potential barriers. The institutions would welcome further opportunities to share and disseminate good practice.

**Recommendation 40**

*The Committee recommends that further and higher education providers should develop mechanisms which allow them to go beyond the minimum specifications in the Disability Discrimination Act with regard to informing disabled students about their legal rights.*

The Higher Education Institutions do go beyond the minimum specifications in the Disability Discrimination Act with regard to informing disabled students about their legal rights. However, we believe positive strategies for informing disabled students about their legal rights need to be developed which emphasise and encourage a constructive approach to exercise of rights and disclosure of disability.

**Recommendation 44**

*The Committee recommends that all providers, in conjunction with their disabled students, carry out a stock taking exercise of the information they provide to ensure it is appropriate and meets the needs of disabled students.*

The higher education institutions’ Student Disability Services regularly review student support provisions. The impact assessment exercise also reviews the information service available to disabled people for both the content and the format of the information provided for all applicants to ensure all students are fully aware of the challenges of study in Higher Education.

One institution has produced ‘Accessible Information Guidelines’ and encourages innovation in the delivery of information in the learning environment. A project funded by the institution’s Learning and Teaching Innovation explores delivery of documentation in audio format.

Whilst there are many examples of good practice, the higher education institutions would benefit from the opportunity to share experience and examples of good practice.
Recommendations 46 & 48

Careers Advice – The Committee recommends that the Scottish Executive should work, for example, with the Convention of Scottish Local Authorities and the funding council, to consider how best to promote close working relationships between schools and further and higher education providers in a co-ordinated fashion across Scotland.

In order to assist in raising expectations amongst young disabled people, the Committee recommends that:

- the focus of careers advice to disabled people should move from what people cannot do to what positive options are available to them; and

- research to be carried out examining the progress of disabled graduates.

- The Committee hopes that such research will identify positive examples and role models for schools and further and higher education providers to promote.

The institutions of higher education in Scotland are already active in ensuring disabled students and graduates have access to the full range of occupational opportunities and careers service activities. The service delivery is based on the principle of inclusion and integration and is specifically designed to be accessible to disabled students. Generic career services can be tailored to the individual needs of disabled students where all students are encouraged to take ownership of their career planning and to be aspirational about their career potential.

The institutions ensure that information specifically relevant to disabled students is incorporated into mainstream information provision and that careers staff undertake regular training on disability-related issues. A number of institutions have a dedicated web site providing information and careers advice for disabled students. Some institutional websites flag up employers who are members of the Employers Forum on Disability on their employer and vacancy database. At one institution, the online career management tool (CASIGMA) has the facility to allow students to sign up to targeted information postings including information specifically relevant to disabled students. Furthermore, the student files within CASIGMA are directly read from Students Records and as such contain base information on any disclosed disability to the university. The careers team staff have access to this information and can develop their guidance strategy to enhance the expectations of a disabled student whether or not the disabled student discloses their disability directly to the adviser.

The Careers services arrange work placements or internships that take account of accessibility issues. One institution works in partnership with Blind in Business to provide access to opportunities in the City via “speed recruitment” event. Careers services team staff occasionally act in an
advocacy role with identified employers and professional bodies to support disabled students in raising their career expectations and in supporting them in realisation of these expectations.

These activities are designed to encourage disabled students and graduates to pursue their personal career goals. Recent IT developments have enabled one institution to better track the destination of disabled students known to the University and better analysis of Careers Service usage by disabled students – both of which are designed to ensure development of the service appropriate to disabled students and graduates.

Recommendation 51

The Committee considers the situation where students are forced to pay for an assessment to confirm impairments that the Scottish Qualifications Authority has already accepted for the purpose of special arrangements during examinations as unacceptable and one which does not benefit any student who is making the transition from school to college to university.

The Committee recommends that the Scottish Executive should consider this situation with a view to eliminating this barrier.

The higher education institutions find that the information provided by schools to the SQA for adjustments in examinations is often inadequate in addressing the full range of disability support that a disabled student may face in higher education. Some institutions provide funding for students to be assessed by an Education Psychologist. This assessment forms the basis for support in teaching, learning, accommodation, and assessment. It also supports the students’ application for the Disabled Student Allowance.

Recommendation 52

In order to encourage more disabled learners to take advantage of early starts and familiarisation visits to acclimatise and to access and identify any additional requirements for support, the Committee recommends that-

- further and higher education providers should consider how best to provide early visits and familiarisation visits to disabled people as a matter of course, before students commence the academic year.

We recognise that the transition to university can be challenging, particularly for a disabled student and the higher education institutions operate different programmes to support transition of such students. Many institutions facilitate pre-entry visits for all prospective disabled students and particularly recommend early visits to the students with mobility and sensory impairments. These specialist visits can be in addition to general advisory visits available to general students. Disability Advisers provide information on the facilities at the university and the local area and work closely with the key staff within the institution to ensure advice and programme of support are available to the student.
At programme level, some institutions have organised dedicated teams of specialist tutors and disability advisers who assess the academic requirements of a disabled student and negotiate an Individual Learning Plan or a Leaning Agreement for each student. This is often a package of academic and personal support adapted to meet the individual needs and is subject to continuous monitoring. One institution has dedicated dyslexia and study skills tutors and a Mental Health Mentor. Learning Profiles are prepared for all disabled students which are forwarded to Coordinators of Adjustments who are responsible for cascading information about required adjustments across all Schools.

One institution has recently started an FE-HE articulation project, funded by the Scottish Funding Council, to support innovation in practice in widening access. An important strand of the project focuses specifically on disability, evaluating the current arrangements for students with disabilities with a view to developing models, applicable throughout the sector, to improve their experience when transitioning from further to higher education.

However, higher education institution are concerned about insufficient resources, caused by a lack of funding, to support disabled students attending Summer Schools, Summer Orientation visits and Freshers and Orientation Week events. Whilst the institutions provide the opportunity for students to attend, they often do not have the resources to support them. Universities Scotland urges SAAS to provide funding for these initiatives.

**Recommendation 54**

*In order to remove the potential barriers caused by professional occupational standards, the Committee recommends that-*

- the careers services, colleges, universities and the Scottish Qualifications Authority should develop clear and appropriate guidance to ensure that students in every situation are in a position to make informed and considered career choices.

The higher education institutions recognise that there is a need to provide information and guidance to enable students to make informed decisions about career choices. However, this is a complex area that requires the institutions to work in partnership with employers, professional bodies and other specialist agencies. Examples of good practice are emerging from the institutions. At one institution, fitness to practice guidance has been developed by the university's Disability Services in collaboration with the Medical School and will be reviewed in 2008 as part of the University's Disability Equality Scheme Action Plan. Academic staff are regularly advised of the implications of the Disability Discrimination (Amendment) Act 2005 for programmes accredited by external professional bodies and the need to identify the extent of any flexibility in the learning and assessment of core competencies to enable reasonable adjustments to be made to meet the needs of the disabled students. Guidance on this has been developed by Disability Services, particularly in relation to programme approval and review,
as part of the University's academic quality standards. The focus of this guidance is on identifying any unjustifiable barriers to access rather than on the impact of individual impairments in line with the social model of disability.

**Recommendation 55**

*In order to remove the barriers to disclose and to ensure disabled students receive appropriate services, the Committee recommends that –*

- all further and higher education providers should develop and foster suitable procedures and environments to encourage students to disclose a disability; and

- further and higher education providers share techniques which will support a disabled person’s choice of disclosure.

Disabled students are strongly encouraged to disclose their disability very early on at the point of application to UCAS and subsequently on arrival to the institutions at the start of the degree programme. This of course is not mandatory but the institutions do highlight the benefits of such disclosure.

Some institutions have developed formal processes to encourage students to disclose their disabilities and support needs at the point of matriculation and application for accommodation.

In some institutions, a letter and a form are sent with every conditional and unconditional offer requesting information about an individual’s disability. This is followed by an invitation for a meeting with the individual to assess their needs. However, the institutions find that many students do not disclose disability until later and through informal procedures which include staff referral, through an academic tutor, through their Advisor of Studies, or word of mouth.

Others have created an environment favourable to voluntary disclosure of disability through establishing links with external professional bodies and the promotion of the institutions’ commitment to disability equality and support facilities they offer. These institutions have experienced a rise in the number of referrals from professionals with disabled clients who may be considering higher education. A number of institutions offer access to services such as an educational psychologist or a free computerised diagnostic screening test for those with undiagnosed dyslexia.

**Recommendation 56**

*The Committee considers the issue of communication support to students to go much wider than British Sign Language interpretation and recommends that the Scottish Executive, the Funding Council and further and higher education providers should work together to investigate ways of increasing the availability of a comprehensive range of communication support to disabled students, such as Deafblind communicators, Palantypists, Makaton,*
graphic symbo charts, speech-to-text reporters and British Sign Language Interpreters.

The HEIs ensure that disabled students and students with learning difficulties have access to assistive technology. Most institutions operate a loan-pool of essential hardware and software, particularly for those students who do not qualify for the Disabled Student Allowance. Some institutions provide ‘hubs’ of specific facilities at separate teaching sites to ensure students can avail themselves of appropriate equipment.

The majority of institutions have dedicated teams of staff with a broad remit of assessing the disability related needs of students.

However, we do agree with the report’s finding that there is a need for improved provision and broader range of communication support for students with sensory impairments in higher education. Shortage of professionals with expertise in communication support prevents the higher education institutions from providing consistent support to such students.

**Recommendation 58**

*The Committee recommends that future funding to universities for service provision to disabled students should no longer be dependent on how many disabled students attend, rather it should focus on actual service provision to disabled students.*

The recent review of the Disabled Students Premium (DSP) by the Scottish Funding Council has addressed some of the anomalies associated with the calculation and allocation of this Premium to institutions of higher education. However, the Funding Council’s funding methodology that links the DSP to the Full Time Equivalent (FTE) number of students has reduced drastically the funding available to the smaller specialised institutions in the Arts and Design sector. These institutions attract disproportionately high numbers of disabled students, particularly dyslexic students, and experience high levels of disability disclosure within the sector. They also achieve high rates of student retention in the higher education sector. The significant reduction in funding has a serious impact on the facilities and support that these institutions offer to disabled students which means that the levels of individual student support undertaken since 2001 cannot be sustained.

**Recommendations 66 & 69**

*The Committee recommends that the Scottish Qualifications Authority work with further and higher education providers to provide accessibility and access modules as integral parts of courses with a clear requirement for inclusion, for example, courses on architecture, website design, and teaching. The Committee does not wish to be prescriptive in detailing which courses should have accessibility included and considers this to be a matter for the Scottish Qualifications Authority to determine.*
In order that all future students benefit from the Teachability Project, the Committee recommends that -

- the Funding Council should provide renewed and increased funding for the Teachability Project to enable it to be rolled out as a condition of funding to all higher education providers.

The higher education institutions generally support their staff in incorporating disability equality in learning and teaching practices. They promote inclusion and aim to raise awareness and understanding of when the curriculum may or may not be accessible to disabled students. Accessibility of the curriculum is a core value of the design and delivery of a course and there are many examples of good practice in the higher education sector in Scotland, such as the Centre for Academic Practice and Learning Enhancement in one institution that delivers a module entitled Creating an Accessible Curriculum for Disabled Students.

Many institutions are working towards rolling out of Teachability across the institution, for example through establishment of an overarching Teachability group chaired by the Vice Principal for Learning and Teaching and Quality Enhancement in one institution. Universities Scotland recommends that the Scottish Funding Council should consider providing funding for future development of this project in the light of the Disability Equality Duty and the requirement for impact assessment of learning and teaching for disability equality.

Accessibility and equal opportunities underpin curricular development in Computing, Teacher Training or Education degree programmes, and Architecture in many institutions. The curriculum in these subjects includes modules on the needs of the disabled people and aim to raise awareness of disability issues such as health and safety and accessibility.

**Recommendation 70**

The Committee recommends that each higher education provider review their living accommodation provision, including from private sources, with a view to assessing its accessibility and the choice that it offers disabled students. The Committee considers that any upgrade or provision of new accommodation presents an opportunity to provide a range of fully accessible accommodation that goes beyond minimum requirements and provides disabled students with a choice of accommodation.

The higher education institutions are committed to providing an accessible environment to all disabled student residents and offer a variety and choice of accommodation suitable for different disabilities. Where buildings date back to the 19th century and earlier, they are undergoing a programme of modifications in some institutions. All new buildings are designed to be fully accessible and therefore are compliant with the accessibility requirements, and in some cases exceed these requirements.
The availability of accessible accommodation is continually monitored and expanded/adapted as necessary to meet anticipated students' needs, including taking account of accessible private accommodation available in the vicinity of the institution. Some institutions have established dedicated management teams, such as a Steering Group, that meet regularly to consider the physical access issues and to plan the allocation of resources and associate works in a timely and appropriate manner.

The higher education institutions operate different programmes to enable students to discuss their accessibility requirements with the staff at the earliest opportunity. The staff meet the students with complex disabilities to try and gain an understanding of their specific needs and to enable them to view the accommodation to assess suitability. At one institution students are encouraged to contact the departmental designated access facilitator at an early stage of their application in order that adjustments can be made where necessary. It also offers an advanced visit facility, where the institution organises preferential access to accommodation for short trial periods. Another institution operates an online system where applicants can disclose information on a confidential basis that is particularly relevant to their accommodation application. The institution uses this information to make an assessment of the student's needs and the level of support required. This facility is also available in paper format for those students who don’t wish to use an online service.

Cross-cutting issues

Recommendation 94

The Committee recommends that-

- all Equality and Diversity Training programmes should contain an element of Disability Equality Training;

- the Disability Equality Training element of Equality and Diversity Training should be devised and developed by disabled people or, at the very least, in consultation with disabled people;

- all high-level Disability Equality Training programmes should be devised, developed and delivered by disabled people with appropriate training skills, experience and/or qualifications.

The higher education institutions have already adopted this approach and include disability equality training in broader equality and diversity training. Some institutions tender all their Equality and Diversity Training to an external provider. This is a competitive process and includes a full day training dedicated to Disability Equality. The trainers are highly skilled and qualified. The process is reviewed every year and the tendering process is renewed every three years, as is required by the European Law.
Challenges faced by Higher Education Institutions

We hope this submission has illustrated the progress that the sector has made to date in achieving disability equality. However, the sector also faces significant financial and structural challenges in attaining full disability equality.

1. Insufficient funding to meet the needs of an ever increasing number of disabled students accessing higher education, particularly those with complex needs, is a growing challenge.

The recent allocation of additional capital funding from Scottish Funding Council is welcome, as is the increase in the annual Non-Medical Helper Allowance available to individual disabled students through the DSA. However, an increase in recurrent core funding is necessary to enable significant improvements to be made across all areas of University activity in line with the requirements of the Disability Equality Duty to promote equality of opportunity for disabled people.

2. The inconsistencies and inequalities in support/funding available from Social Work Services to meet the needs of students with personal care requirements pose a particular problem. The higher education institutions should not have to assume the responsibilities of other statutory providers and disabled students should not have to fight for the support to which they are entitled.

3. To date, there has been limited response from the professional bodies to changes in the Disability Discrimination (Amendment) Act 2005 that require them to review the basis for the competence standards they set to ensure they do not create unnecessary barriers for disabled students. This impacts on the ability of the higher education institutions to make reasonable decisions regarding the suitability of disabled applicants/students for programmes of study leading to professional accreditation.

Universities Scotland
10 December 2007