Appendix B – Full list of recommendations

Academic Departments

Going forward we recommend that the UCL Education Committee make a policy or policies that require each department to provide the following:

1. An externally trained departmental disability advisor who will:
    a. Be responsible for the implementation of preventative policies to avoid indirect discrimination even before knowledge of a disabled student.
    b. At the start of their course, walk the student through how their SoRA will be applied within the department. This should be done no more than 1 week after the SoRA is in place. This person should also reasonably be in charge of access for disabled staff members.
    c. Ask students about their experiences individually and through surveys in a proactive way to learn how to improve the department's handling of reasonable adjustments .
    d. Inform students about their rights and how to escalate any problems.
    e. Be responsible for arranging department-based adjustments including:
        i. Handling communications with individual staff members in the department at the start of the year and after that if any issues arise.
        ii. Being a point of contact for students & staff and handle any issues that may arise in the SoRA not being followed.
        iii. Keep up-to-date with disability law and UCL policy updates through contact with the UCL Disability Inclusion Oversight Team, which will be elaborated on in part 9.
    f. Support students & staff who have support workers with completing disability-related paperwork so that they are not disadvantaged by having to use support worker hours on paperwork.
    g. Meet with members of the Education Committee, SSW and the DSN to discuss goals and results based on a yearly disabled students' survey.
    h. Be responsible for drawing up Personal Emergency Evacuation Plans (PEEPs) in a timely manner.

"Since the medical school has its own student support team, each member should be as equally equipped to help their students as the UCL student support and wellbeing team."

2. External training for all academic and administrative staff which addresses:
    a. Practical questions such as how to access SoRAS, who the department disability advisor is, in what situations to check in with the department disability advisor, how to refer students to the department disability advisor and SSW.

b. The legal rights of disabled students to reasonable adjustments to avoid direct and indirect discrimination (Equality Act training).

c. How to avoid direct discrimination and discrimination arising from disability.

d. Examples of reasonable adjustments they may be asked to provide in their teaching (e.g. allowing a note-taker to attend a lecture).

e. How to adjust their teaching in a preventative way (e.g. Lecturecast and alerting before playing a video with flashing lights).

f. How to replace a certain reasonable adjustment with another if for some reason the first adjustment is not possible for them.

g. How to speak to disabled students in a sensitive and respectful way (e.g. not indicating that you believe a disabled person to be lazy, or a person who is mentally ill to be unreliable).

h. How to avoid harassment.

i. How to teach subjects relating to disability in a sensitive way (e.g. not approving of eugenics of disabled people).

"I do think that personal tutors etc need better training, I've experienced some lecturers being really supportive, and some very insensitive. Staff does not seem to know how to interact with students who have disabilities."

3. Preventative policies which make the education accessible in specific ways without the need for a SoRA, (universal design) such as:

a. Lecturecast being made compulsory for all modules and lecturers except where there are issues of sensitive material being discussed or confidentiality. UCL commits to using Lecturecast in line with UCU policy.

b. Warnings before playing videos with flashing lights.

c. Making sure that the 70% attendance requirement is never applied to disability-related absences (including absences because the disabled students is better able to take in information through Lecturecast than by being physically present at a lecture).

d. Rethinking what counts as lecture engagement: Lecturecast live streaming should be considered attendance of lectures for disabled students. Both students watching remotely and students sat in the lecture theatre who have issues such as anxiety or a speech impediment are unable to engage with lectures verbally. Encouraging lecturers to use digital platforms to accept student questions & replies to lecturer's questions during lectures will help remove remaining barriers to engagement for all disabled students, attending in person or remotely.

"there should be an online link that allows us to apply for sick leave, extenuating circumstances and deadline extensions without going through the departments and the supervisors"

4. A structure in place which promotes equal access long-term:
   a. Making the process of applying for sick leave, extenuating circumstances and deadline extensions simpler and independent of individual supervisors.
   b. When academic staff is evaluated one of the evaluation criteria should be the accessibility of their teaching practices.
   c. When student evaluations are sought on academic staff or modules this should also include a section for evaluating accessibility of teaching practices.

Student Support and Wellbeing

We urge the UCL Council to work with the Student Health and Wellbeing Strategy Group and independent disability rights and accessibility consultants to ensure that:

1. SSW has the internal education and structure in place to keep their policies in line with best practices under the Equality Act 2010, the new DSA structure as of 2016, and any other relevant legislation or government/SFE recommendation. This includes keeping SSW advisors up-to-date on their legal duties and the full range of support that can be offered at UCL. This would include advisors receiving:
   a. Continual education about best practises and legal duties.
   b. Continual education as new knowledge appears regarding specific disabilities or accommodations.

"Improved training for staff on Equality Act 2010"

2. SSW change their approach to SoRAs to base them on the individual student's needs. SoRAs must not be based on what other students with similar conditions need and must be adapted to the student's unique situation (for instance whether they are doing a PhD rather than an undergraduate degree). SSW must have an adequate understanding of how to provide reasonable adjustments (e.g. do not encounter technical difficulties). They must not reject reasonable adjustments on grounds other than need, including:
   a. Not having a diagnosis or the "correct" proof.
   b. Unreasonable departmental policy.
   c. Unreasonable UCL policy.

3. SSW implements policies regarding reasonable adjustments which follow best practices, including providing:

a. The full range of non-medical support services which they are obligated to provide under the government clarification of the 2016 DSA changes.[1]

b. Rent adjustments on all accessible accommodation, and updating this policy when new disabled student needs are identified. Information about rent adjustments needs to be made available to disabled students through the UCL website. This page should be emailed to prospective students and linked on all accommodation page sidebars to ensure that disabled students are aware of it, and which condition may warrant an accessible room and a rent adjustment.

c. Reimbursements for those who have been overcharged for their accessible room since 2016 due to SSW not informing them that they were entitled to this financial support.

d. Private rooms for examinations where required.

e. At the time of writing SSW have agreed to add a clause to disabled students SoRAs along the lines of "Lecturecast recording & live streaming provision where reasonable. If the lecturer refuses they must provide an equally efficient alternative". We recommend that all disabled students and all departments be clearly notified of this change.

f. Automatic card access to the SENIT suite for all disabled students, and ensuring that disabled students are aware of how they can access & use the space.

g. Support with obtaining a wide range of learning disability diagnoses including ADHD, ASD, dyslexia, dyspraxia, etc.

4. SSW takes seriously the anticipatory nature of their duty and take steps to avoid delays and avoid students having to chase after reasonable adjustments. This should include:
a. Providing the option of creating a SoRA before the start of a student's course.

b. Making sure that for students who declared a disability before starting their course their SoRA is created and sent to all relevant departments before the third week of term.

c. Ensuring that inductions to restricted workshops or facilities are done before the start of term.

d. Ensure that inductions of support workers are done before the start of term.

e. Ensuring that communication between SSW and students has no unreasonable delays.

f. Ensuring that feedback about disabled students' experiences is regularly sought, welcomed and worked on.

g. Ensuring that feedback from students reaches other UCL bodies, including any case where a student or student body feels that their needs are not being met in accordance with best practice.

h. Monitoring support worker agency performance (including cancellation rates) by regularly checking in with students who use support workers, and also recording voluntary student

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[1] https://www.disabilityrightsuk.org/government-response-dsa-funding

feedback. This should be used as the basis for decisions about whether to continue to use and/or list specific agencies on the preferred agencies list on the SSW website.

    i.   Following up with students to check that their support needs are met at their departments.

    j.   Following up with students if they have raised any issues.

    k.   Follow up with students who are struggling to maintain engagement with SSW.

    l.   Supporting students by liaising with their departments if there is any issue of bullying or SoRAs not being followed.

    m.   Maintaining a consistent SSW contact for each student.

    n.   Ensuring that communication between SSW and students is conducted through an accessible medium.

    o.   Ensuring that communication between SSW and students does not cause the students to feel unwelcome at UCL.

"Just making the process more seamless and expeditious."

5. Students are empowered and a culture of transparency is established around disability support:

    a.   Students being proactively informed of the full range of support available to them before setting up their SoRA, via the SSW website, by email, and in their meetings with SSW advisors where relevant.

    b.   This should include a list of reasonable adjustments for different needs, for which students' particular adjustments are normally available, and examples of exceptions. It should explain that the list is not exhaustive.

        i.   Example: The option of live lecture streaming in the Lecturecast software.

        ii.   Example: The right to note takers without DSA funding.

    c.   It should also include information about support which will not be included in their SoRA:

        i.   Example: The SENIT suite's availability and the support & resources available there (potentially liaising with the SENIT team to set up scheduled student inductions for the SENIT suite).

    d.   Students being proactively informed about the timeframe within which SSW will complete tasks such as setting up, sending out and reviewing SoRAs.

    e.   Students being proactively informed about what reasonable adjustments they have a right to without a SoRA:

        i.   Example: warnings before videos with flashing lights in lectures.

        ii.   Example: The right to rent adjustments on accommodation that is accessible to them.

    f.   Meeting with students at the start of their course to:

        i.   Go through their needs.

        ii.   Create their SoRA.

Disabled Students'
Network
UCL
NOTHING ABOUT US WITHOUT US

STUDENTS'
UNION UCL

    iii.   Establish contact between the student and their advisor and let them know how to get in touch and who to contact if there is an issue, including an issue with their advisor.

    iv.   Explain the practical aspects of disability support such as how to access their SoRA.

"SSW need to become a voice championing the rights of disabled students at UCL, instead of their current position as the first people to say no to any legally required adjustment we ask of them."

In those cases where SSW is not responsible for these issues UCL Council must specify which body is responsible and how they will address the issues.

Student Psychological and Counselling Services

1. Reduce counselling waiting times to no more than 3 weeks.
2. Change the system so that all emails get a response within 2 weeks.
3. Regularly ask students for anonymous feedback on the counsellor they met and take action if there is unacceptable behaviour.
4. Offer help with mental health diagnoses.
5. Follow up when students do not get back in touch.
6. Offer support to students with severe mental illnesses.
7. Better train staff to be inviting.
8. Advertise the services offered more widely.

UCL Estates

There is a clear lack of access that needs to be addressed with more thought for every user of every space within UCL. With this in mind, going forward Estates should:

1. Complete a full accessibility audit conducted by independent access consultants.
2. Ensure that no new buildings or restorations are made which are not in line with accessibility requirements.
3. Provide disability training for all staff managing UCL buildings.
4. Make a short-term plan to improve accessibility of existing buildings by 2020 in compliance with Parts M & K of the Building Regulations.
5. Make a long-term plan to ensure all existing buildings meet best practices for accessibility by 2025.
6. Accessible Toilets:

a. Ensuring all accessible toilets are either not locked to users or meet the RADAR key system and are never locked by keypads.

b. Ensure design is not dangerous, e.g. ensuring cords are not tied back.

c. Increase the number of accessible toilets on campus for better access.

d. Create easily available toilet maps and signage to alleviate stress in accessing toilets. We recommend consulting the Sign Design Guide.[2]

e. Ensure that toilets are looked after in a way that makes them accessible.

7. Building Access

a. Make buildings and rooms accessible for wheelchair users and people with limited mobility, not only to meet Parts M & K of the Building Regulations, but also any additional best practice guidelines identified by independent consultants.

b. Create flat surfaces.

c. Install variable lighting in rooms when possible, such as dimming control:

   i. We recommend consulting with Rohan Slaughter from JISC about accessible environmental design.[3]

8. Lifts

a. The maintenance of lifts so that lifts are working at all times. When lifts need maintenance ensure that there are short waiting times - the Cruciform lifts have been out of service for over a year and a half.

b. A clear commitment to providing fire lifts for all new buildings and discussion about installing them in older buildings.

c. Clearer signage to lifts.

d. Make sure all disabled students in need have a lift pass.

9. Study Spaces

a. Increase accessible study areas and/or upgrade the SENIT suite in collaboration with disabled students.

b. Ask SSW to signpost these spaces for all disabled students.

10. Accessible accommodation

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[2] https://www.signdesignsociety.co.uk/book/the-sign-design-guide/?fbclid=IwAR2SmzlChKJgS7adP5JHbYxFBoNIBUHbWHh6rQpDDXFJxpVBHmGcVBZ4dxc
[3] https://www.jisc.ac.uk/staff/rohan-slaughter

a. Provide a legally compliant set of criteria for allocating accessible housing discounts to disabled students and publicise this on all UCL Accommodation webpages.

b. Allow disabled students to visit their assigned room before the start of the tenancy to check that it is accessible for the student, and facilitate room changes for no extra charge if it is later identified that the room is not accessible for any reason, including sensory issues.

c. Accessible accommodation to be provided at the same cost as the lowest priced room within the entire Accommodation portfolio - regardless of accessibility.

d. A refund policy for all students overcharged on accommodation from 2016 onwards to ensure when applicable rent is refunded in a simple process.

e. Investigate the meaningful provision of multisensory-inclusive accommodation (vision or hearing impairment, autistic spectrum disorder etc).

f. Liaise with the accommodation codes provider or organisation (UUK or Unipol) to follow best practices.

11. Other

a. Ensure that all lectures have hearing loops

UCL East – SSW and Estates

1. SSW to set up drop-in sessions at the UCL East campus at least one day a week.
   a. All SSW sessions for UCL East students should be held on their campus, and rescheduled promptly when SSW cancels.
2. SSW to make SPCS services available at the UCL East campus at least one day a week.
3. UCL to organise a shuttle bus service between Bloomsbury and UCL East campuses (cf Imperial College shuttle bus between South Kensington and White City campuses).
4. Clear information for students studying courses in the East campus that they will need to book accommodation near the site, and include the names of halls nearby.
5. UCL Estates to work with Here East and ensure that UCL-owned buildings at UCL East meet the following requirements:
   a. Improve acoustic padding in Here East lecture theatre.
   b. Place comfortable accessible chairs on every floor.
   c. Put automatic door pushes on doors.
   d. Low-height tables in dining area for wheelchair users.
   e. Place a sign at the lecture theatre door to redirect students to the less disruptive entrance.
   f. Small screen at the front of the lecture theatre for wheelchair users to be able to comfortably look at the slides.

g. Guarantee disabled UCL East students appropriate rooms in which to take exams with the correct accessible facilities.

UCL Council

1. UCL should appoint a Disability Inclusion Oversight Team headed by a professional who is either an expert in disability studies, or is an access consultant and disabled themselves. This person should have this position as their full-time job. The team would ideally include the UCL Disability Champion as well as multiple disabled professionals.

Some of the services that this overarching body must provide are:

2. Creating an overarching plan and policies for implementing improved disability support across the many bodies currently responsible for UCL's work for the equal access of disabled students. This includes the Education Committee, Estates and SPCS. The plans & policies designed by this team should be updated yearly in collaboration with the aforementioned bodies, using feedback from both student surveys and the DSN.

3. Publishing goals and statistics regarding disabled students' experience at UCL, including program completion rates of disabled students, to hold UCLs disability services accountable.

4. Regular surveys of disabled students' experiences.

"I'd like to see more being done on a regular basis to actively elicit the views of people with disabilities, so that they can actively participate in changing the issues that impact them."

5. Ensuring that all bodies which support disabled students take appropriate steps to train their staff on the Equality Act, practical issues of disability support, university disability policy and disability awareness. This may include arranging or providing such training.

6. Ensuring that all bodies that support disabled students are appropriately structured and supported in doing so.

7. Making an effort to find students who may be disabled, including by providing diagnostic services for learning difficulties, making it clear what support they can access if they declare a disability and giving students multiple opportunities to declare disabilities.

"It is too late to tell a student in their 3rd year that they are dyslexic - to this day I don't know what support I should have or how I can learn effectively."

8. Creating a simpler & more streamlined complaints process for disabled students (who often struggle with excessive paperwork and are afraid to create formal complaints). Ensure that those who manage complaints are educated about disability rights.

"Ultimately however there is a big issue in how disabled peoples' voices are valued at UCL, this has been clear from the eugenics debacle, but also from the fact that many of these issues have been brought up again and again by disabled students without any results."

9. Providing adequate study spaces for disabled students.

"My main issue is that there is no place for me to sit and study in between lectures. I have sensory sensitivities and concentration problems that require me to sit in a quiet and ideally a little secluded area in order to focus. The purple chairs in the quiet sections of the student centre are ideal for this, but they are always occupied! If one of the rooms in the student centre could be reserved for disabled students, or if some of the testing rooms in individual departments could be reserved for disabled students this would solve the problem. As it is I am wasting hours trying to find somewhere to sit, having to settle for noisy environments and consequently being unable to concentrate."

10. Informing students of their rights.

11. Working with the DSN to empower disabled students.

"SSW need to become a voice championing the rights of disabled students at UCL, instead of their current position as the first people to say no to any legally required adjustment we ask of them."

12. Making sure that university-wide policy such as those relating to attendance and Lecturecast (see Appendix D) do not put disabled students at a disadvantage.

13. The Health and Safety Department should be required to carry out PEEPs no later than the third week of term.

14. There should to be a clear line of authority within UCL Safety Service, whereby the Head of Safety and their deputy (in the case of the Head of Safety's absence) are easily contactable and are made known to staff and students.

Interim Measures

We ask UCL to respond to the recommendations made in this report and to take the following steps by March 2nd and September 1st.

March 2nd:

» Appointing members of UCL's upper management to create an initial plan regarding:

  i. Setting up a Disability Inclusion Oversight Team
  ii. Meeting with external accessibility advisors on the following topics: the structure of UCL disability services, the functioning of SSW, Estate disability functioning, SPCS functioning and Academic departments disability functioning.

» Scheduling a meeting between the responsible member of UCL upper management, an accessibility advisor and DSN.

» Assigning a person with authority over departments and SSW as a point of contact for DSN's work in advocating for individual students with current issues (this is an interim measure until September when a more long-term solution has hopefully been found).

Department

» Assigning an employee embedded in each department as the permanent or interim departmental disability advisor to work towards fulfilling the role described in part 4 recommendation 1.

» Contacting a charity or consultancy able to offer disability consultancy and Equality Act compliance training for all heads of departments and disability contacts (such as Disability Rights UK) and discussions on how to implement this training in the departments within six months.

» Informing departmental staff of lecturers' existing responsibility that they cannot refuse Lecturecast for SoRA students without providing equally good alternatives.

Student Support and Wellbeing

» For all SSW advisors to have received or booked Equality Act training and other training regarding legal duties and best practice in regards to disabled students (part 5 recommendation 1).

» For SSW to have booked consultation with other departments such as ISD & Estates regarding the full extent of accessibility options which can be put into place at UCL now or in future.

» Sending an email to all registered disabled students which should contain an explanation that UCL has overcharged disabled students for accessible accommodations since 2016, legally accurate instructions

regarding who can receive a rent adjustment and instructions on how to be reimbursed if you have been overcharged.

» Putting on the UCL website legally accurate and comprehensive information regarding the full range of disabilities for which students can receive a rent adjustment, as well as a clear procedure for receiving this adjustment and for appealing unfavourable decisions. This should be linked in the sidebar on all UCL Accommodation pages.

» SSW to present to the overseeing member of UCL upper management a list of all cases in the last year in which they have had a difference of opinion with a student regarding which adjustments are reasonable or in keeping with the law. The Disability Inclusion Oversight Team should oversee these cases going forward.

» Presenting a clear point of contact outside of SSW and academic departments to all disabled students. This person should be presented as someone to contact if the student is unsatisfied with their department's or SSW's services for any reason. This person should not be someone who works with formal complaints.

» SSW to present to the overseeing member of UCL upper management a plan for reaching the goal of completing all SoRAs (for those students who declare their disability before the start of the academic year) before the third week of first term this year (part 5 recommendation 4).

» SSW to commit to creating a draft SoRA within 15 working days of being notified of the need for a SoRA.

September 1st:

» Selecting a team of people to address these issues long term, including a disability expert who will have this role as their full-time job. (If the person can only work part-time then employing two people part-time).

» Presenting a clear plan from each of the bodies listed in this report as to how to resolve the issues we have addressed.

» Establishing a communicative working relationship with regular meetings between DSN and the Disability Inclusion Oversight Team.

» Creating the first UCL-wide survey of disabled students in collaboration with accessibility consultants.

» For the Health and Safety team to implement a plan to avoid delays in the creation of PEEPs, including having a named individual in charge of this matter and spreading knowledge of who this is to SSW and the departmental disability advisors. A PEEP must be created no later than the third week of term if the student has declared a disability before starting their course. For the team to commit to a draft PEEP being produced within 10 working days of notification of the requirement of a PEEP.

Student Support and Wellbeing

» Sending an email to all students who have declared disabilities, asking whether they have been experiencing any issues and offering to meet with them to potentially provide further support if so.

» Creating a plan for all new disabled students to receive information about their rights and the support available for them. Creating a list with reasonable adjustments for different needs which includes information about for whom particular adjustments are normally available, and examples of exceptions. It should be explained that the list is not exhaustive. This list should be provided to all new students who have declared a disability before their SoRA meeting.

Estates

» Creating a plan for more inclusive maintenance of facilities such as toilets and lifts.

» Creating a map of accessible facilities such as toilets and lifts.

» Scheduling disability equality training for estates staff regarding accessibility-aware building management (e.g. the need to let red cords hang loose, how to make sure that the accessible entrances are usable etc.).

Student Psychological and Counselling Services

» Investigating and addressing the reason why students are not hearing back from SPCS for months.

» Having an accessible system in place (not the formal complaints procedure) for students to report issues with SSW staff, including counsellors.

Departments

» Appointing a disabled students' advisor at each department (in line with part 4 recommendation 2). This advisor should go through the Equality Act and other relevant disability support training. Having a plan to be in place for this advisor to meet with new students with disabilities individually to introduce them to the support available in their departments.

» For all heads of departments to complete training from a disability consultancy organisation.

» Converting Lecturecast from an opt-in system to an opt-out one.

» Scheduling disability training for all academic or administrative staff in the academic departments in line with part 4 recommendation 2.