Disabled Students' Network UCL

NOTHING ABOUT US WITHOUT US

Disability Discrimination Faced by UCL Students & Recommended Measures

A UCL Disabled Students' Network Report

STUDENTS' UNION UCL

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Section 1 – Context

Part 1: National context

Recent research shows that disabled students are significantly less likely to complete their university course, are lower paid as graduates and are more likely to experience loneliness.[1] A recent study from the University of Bristol stated that "*despite verbal adherence to the 'social model of disability', many institutions still saw a disabled person as a 'problem' to be solved*".[2] In other words, despite disabled students paying the same tuition fees, universities are failing to provide them with equal access to education.

2020 will be a big year for disability justice in higher education. It is the 10-year anniversary of the 2010 Equality Act, a law that solidified the right of disabled students to have equal access to education. On a national scale, disabled people's inclusion in higher education is being increasingly scrutinised by government bodies.

The regulatory body the Office for Students (OfS) monitors the access and participation plans put forward by universities. These plans determine whether the universities will be allowed to charge fees of up to £9,250. The OfS states that they are "*concerned about persistent gaps in access, success and progression for disabled students*" and are targeting the equalisation of outcomes between disabled and non-disabled students.[3] [4]

To allow higher education institutions to meet increased demands the government has increased funding to higher education. In 2015 they changed the criteria for the Disabled Students Allowance (DSA) in such a way that non-medical help such as note-takers were no longer funded by the DSA. However, according to the OfS:

"*This was on the understanding that universities and colleges would meet the shortfall by extending adjustments for individual students into more sustainable inclusive practices across the board, rather than seeing a decline in provision for disabled students. To give universities and colleges time to adjust to this new funding regime and expectations, the former Higher Education Funding Council for England (HEFCE), and more recently the OfS, have been distributing an increased level of funding, rising from £20 million in 2015 to £40 million annually from 2016 onwards. The funding has been allocated explicitly to support providers to develop inclusive teaching practices and further the adoption of the social model*".[5]

[1] https://www.policyconnect.org.uk/hec/news/he-commission-announces-inquiry-experience-disabled-students
[2] http://www.bristol.ac.uk/sps/gettingthingschanged/finalreport/
[3] https://bit.ly/2S57STJ
[4] https://bit.ly/2sAhhYB
[5] https://bit.ly/2rYMDrY

Despite this, the OfS 2019 review showed variable support offered to disabled students among higher education institutions. This caused the cross-party think-tank the Higher Education Commission (HEC) to suggest that this additional disability funding should become tied to performance, requiring universities to demonstrate *"collaboration between disability services support staff and other staff; the co-creation of services for students with students; and systematically include student opinions and feedback in reviews of said services"*.[6]

To investigate the unequal outcomes for disabled students in higher education the HEC has launched an inquiry into the experiences of disabled students. They have asked for evidence and will report on their findings and recommendations in early 2020. In an article published in December 2019 they emphasized the importance of lecture capture, compulsory staff training and the need for institutions to get "buy-in" from academics.[7]

The OfS and the HEC are not the only bodies demanding change. The Student Loans Company and the Department for Education state that they are concerned about the experiences of disabled students and are prepared to intervene more in the sector. In June 2019 the government announced the establishment of a Disabled Students' Commission to address the barriers faced by disabled students.[8]

Oversight, legislation and intervention is clearly the direction in which government bodies are heading when it comes to disability inclusion in higher education. However, structural change for disabled people is still lacking at UCL. It is notable that UCL has not yet met the Bronze level requirements (the lowest of the Disability Standard levels) since they initially considered applying in 2017.

There are many people at UCL working towards disabled people's inclusion, but their efforts are not currently supported by institutional change. UCL needs to begin to make real steps in disability inclusion in order to access widening participation funding and to meet this growing level of national scrutiny. In order to achieve this, UCL must focus not just on making adjustments for individuals but also to make the standard teaching, organization and university environment more inclusive. We want to help UCL become a leader in disability inclusion.

[6] https://bit.ly/2YZ7A29
[7] https://bit.ly/2M8hLMF
[8] https://bit.ly/34vBoUX

Part 2: This report

The Disabled Students' Network

The Disabled Students' Network is a collective which aims to represent the views of students at UCL who are disabled. This includes but is not limited to students with physical disabilities, long-term illnesses, specific learning difficulties and mental health issues.

The DSN committee, which consists of 8 disabled students who are themselves under-supported, unpaid, and fighting for their own rights, have repeatedly had to go in and advocate for other students. This process has often felt time-consuming, highly decentralised and degrading with committee members being repeatedly ignored, pressured and spoken down to. In almost every case this could have been avoided if UCL had simply compared the individual actions of the university with the 2010 Equality Act.

Last term alone our work helped ensure that several students, after months without support, finally received the reasonable adjustments that the law states should be in place when they start their education. Without our work several of them would have had to terminate their studies.

At the same time our work has no power to give these students back the first months of their studies. Nor are we able to advocate for students who do not know their rights because they do not come to us when they have issues. Furthermore, we do not have the power to ensure that the departments or SSW change the policy in question moving forward. We know of at least one incident where even when we have successfully fought for the rights of a single student, several other students in exactly the same situation have then had those same rights denied by the same body. Looking at the history of DSN activism going back to 2015 we can see a pattern of bringing up the same problems over and over again without this leading to any institutional change on the part of UCL. More information regarding this is provided in part 11.

As our committee grew in 2018/19 more and more students started coming to us with worrying reports about their treatment at UCL. In response, we decided to conduct a survey of Disabled Students' experience at UCL. The survey was conducted in November and December of 2019, and despite a lack of funding and resources we were able to collect the experiences of 33 students, providing a wealth of evidence regarding the experience of being disabled at UCL. Each student was asked about their positive and unsatisfactory experiences in four areas: their academic departments, the Student Support & Wellbeing Service (SSW), the Student Psychological & Counselling Services (SPCS) and the facilities at the Bloomsbury and UCL East campuses.

The report

Ten years after the passing of the 2010 Equality Act the testimonies from our survey reveal systematic ways in which UCL is failing to provide equal access. These are institutional failings and therefore need to be tackled with university-wide policy changes, the details of which are explored in the recommendations of this report.

The report consists of three sections: Context, Testimonies and Responding. In the first section we explain what the responsibilities of UCL are, how scrutiny of inclusion in higher education is increasing and why this report was written. In the middle section we explain, for each of four survey areas, in what ways students are not being given equal access, who is responsible for this, and how to create change. We relate each point to a quote from testimonies from the survey conducted. The vast majority of our points are backed up by multiple testimonies but in the interest of brevity we did not include them all. We conclude that the system currently in place for ensuring equal access for disabled students at UCL is not sufficient, resulting in structural inequality for disabled students at UCL. In the last section of the report we explain why these issues have not been addressed before and share a number of tools that can be used to address them. Lastly, we ask UCL to make a commitment towards their disabled students to address these issues, including taking a series of interim measures.

With the report comes a series of appendices. Appendix A contains all testimonies in full, Appendix B contains a full list of recommendations , Appendix C contains a more thorough explanation of disabled students' rights with examples and Appendix D contains an in depth explanation of a reasonable adjustment that we argue should be adapted more widely at UCL, namely the recording of lectures. Finally, Appendix E details how UCL has responded to their rent adjustment responsibilities being flagged, in order to illustrate some of the systemic obstacles that keep UCL from implementing equal access practices.

Going forward

We end the report by extending a hand to UCL and asking them to make a commitment towards their disabled students this year, on the 10-year anniversary of the Equality Act. We ask them to create a PACT, to make their disability services:

Preventative

Accountable

Collaborative

Transparent

With this PACT comes a set of interim measures at the end of this report, which we ask UCL to take to move towards providing truly equal opportunities for their disabled students.

WILL YOU MAKE THIS COMMITMENT TO YOUR DISABLED STUDENTS UCL?

Part 3: Responsibilities toward disabled students

We have dedicated this part of the document to explaining the law for the reason that most people who have a disability or work with disability are unaware of what disabled students actually have a right to. This creates a problem for individual students wanting a reasonable adjustment, but it also creates an obstacle to creating systemic change in the way that we are hoping to do with this document.

The information under the first two headings below is based on the Equality Act 2010 Technical Guidance on Further and Higher Education.[9] All quotes here are taken from that guidance document unless otherwise specified. Specific sections are referenced in brackets. The guidance document is instructive in its entirety but for ease of processing we have copied relevant sections (with many examples) into Appendix C for those who want to understand the rights of disabled students better. Finally, under the last heading we include some information about a 2016 change in the responsibilities of higher education institutions.

If the reader feels uncertain at any point about whether a recommendation in the report is reasonable, we ask that they compare the relevant testimonies with the information about the law presented both in this part and in Appendix C, which should allow them to make their own objective judgement.

The responsibility to make reasonable adjustments

According to the Equality Act 2010 a higher education institution must comply with its duty to make reasonable adjustments when a provision, criterion, practice, physical feature or the absence of an auxiliary aid or service puts a disabled student at a substantial disadvantage compared to nondisabled students. Not providing reasonable adjustments is defined as a form of discrimination (7.4, 7.84).

This duty is stated to be anticipatory. This means that in some cases the university must provide adjustments without knowing of any specific disabled people who would benefit from the adjustments (7.19, 7.21). The anticipatory nature of this duty also requires the university to anticipate the needs of students they know to have a disability, such as offering to provide an interpreter if a student has informed the university that they are deaf before such a services is requested.

"Failure to anticipate the need for an adjustment [...] may render it too late to comply with the duty to make the adjustment. Furthermore, it may not in itself provide a defence to a claim of a failure to make a reasonable adjustment." (7.20)

[9] https://www.equalityhumanrights.com/sites/default/files/equalityact2010-technicalguidance-feandhe-2015.pdf

The guidance states that:

- The university must not neglect to offer a reasonable adjustment.
- The adjustment must not be provided in a way that puts the student at a "*significant disadvantage*". This might include having significant delays in providing the adjustment or requiring a high degree of activity on the part of the student:

"Example: A person with a visual impairment regularly receives printed handouts in lectures, despite the fact that on previous occasions he has indicated his need for Braille and this has been provided. He finds this repeated need to ask for Braille frustrating and inconvenient as he does not receive the handouts at the same time as other students. This may constitute a failure to make reasonable adjustments if it is judged to have left the disabled student at a substantial disadvantage and there was a reasonable adjustment that could have been made."

- Reasonable adjustments must be based on the individual's needs and what is "reasonable". The adjustments may not be based on diagnosis (Guidance Appendix 3, part 7), whether the body responsible for disability support at the university is adequately funded, or what other students with the same condition need.
- The adjustment is not reasonable if it does not actually help the student:

"Example: A wheelchair user cannot access classes on a course that take place on the higher floor levels of the small college he attends. There isn't an accessible lift between floors in the college premises and it is unlikely to be reasonable for the education provider to install an accessible lift. Instead of relocating classes to an accessible floor, so that the student can attend the course without experiencing substantial disadvantage, the college asks the wheelchair user to change to a different course where classes are held at an accessible floor level. This step would not be effective in preventing the disadvantage experienced in relation to the course the wheelchair user has chosen to undertake."

- The adjustment must not be dangerous, humiliating or otherwise put the student at a disadvantage.
- The intention of the staff or the other adjustments that they have put in place have no effect on the unlawfulness of a specific instance of discrimination.

Sections 7.25 and 7.65 may help clarify what adjustments are reasonable to have available on short notice.

Types of discrimination

The guidance states that when the university fails to provide reasonable adjustments this results in discrimination.

Indirect discrimination "*may occur when an education provider applies an apparently neutral provision, criterion or practice which puts or would put students sharing a protected characteristic at a particular disadvantage*". (5.4). This could appear in practices such as requiring a certain level of attendance regardless of disability or not providing subtitles on all videos shown in lectures.

"Example: A college with two sites offers a science course that requires students to attend lectures on one site followed immediately afterwards by practical's at the other site. This means that individuals have to move from one site to another in a very limited amount of time. This disadvantages students who have mobility impairments and is likely to be unlawful disability discrimination unless it can be objectively justified". "[If] the college offers its courses either on one site or the other, or builds in more appropriate time allowances and other measures needed to allow students with mobility impairments to travel between sites, this could eliminate the potential discrimination described."

Direct discrimination is when "*a person treats another less favourably than they treat or would treat others because of a protected characteristic*". A protected characteristic in this case means a disability. This applies only if the education provider knew about or could be expected to know about the student's disability. This could appear in practices such as refusing a student access to a field trip or depriving them of a module choice.

Discrimination arising from disability is when a disabled person is treated less favourably not directly because of their disability but because of something arising from the disability. This applies only if the education provider knew about or could be expected to know about the student's disability. An example of how this could look is asking a student with Tourette's to leave an exam because he is making noises (the university could have provided a separate examination room for the student in question to avoid this):

"Example: A university which requires an 80 per cent attendance rate and penalises students with a lower attendance rate, disregards absences due to disability-related sickness, religious holidays, pregnancy or, in some circumstances, caring responsibilities."

Harassment is when unwanted actions of the education provider such as words or abuse violates the student's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This might manifest itself through mimicry, threats, or offensive generalizations (8.10 and 10.27).

Victimisation is when a student is overtly or covertly punished for making some kinds of complaints, such as stating that they are not being given a reasonable adjustment.

The guidance states that:

- The university is legally responsible for the actions of its employees (3.22), whether they know about and approve of them or not, unless they have taken sufficient steps to prevent discrimination, harassment and victimisation and to advance equality of opportunity (3.25-3.26).
- It is the duty of the university to take reasonable steps to find out if the student is disabled.
- You are disabled under the Equality Act 2010 if you have *"a physical or mental impairment which has a substantial and long-term adverse effect on* [your] *ability to carry out normal day-to-day activities."*
- In order for the impairment to be defined as having a long-term effect it needs to have lasted for a year or be likely to last for a year.
- A diagnosis is not required in order for the university to have a responsibility to make reasonable adjustments:

"There is no need for a person to establish a medically diagnosed cause for their impairment. What it is important to consider is the effect of the impairment not the cause." (Appendix 3, Section 7)

While we will not spend a significant amount of time here laying out specific cases of the law, we want to highlight two:

- Disability related absences must not count towards the student's attendance (from Disability Rights UK[10]):

"A disabled student takes a number of days off from their college course due to anxiety and depression. The college notes the absence and takes action to terminate his studies as he has taken off more days than allowed in a term. The college should be recording disability related absences separately. The action to exclude the student is due to disability related absence so this would be discrimination arising from disability."

- If a physical feature of a premises places a disabled student at a substantial disadvantage, the university must take reasonable steps to make the space accessible through removing, altering or offering a way of avoiding the physical feature (7.46). A building being listed is not a legal reason not to make it accessible unless the university has already requested consent to change it and been rejected (14.6).

[10] https://www.disabilityrightsuk.org/understanding-equality-act-information-disabled-students

Responsibilities after the 2016 DSA changes

In 2016, several key responsibilities were passed from Student Finance England's Disabled Students Allowance to universities. Summarised, these are:[11]

- Higher Education providers are responsible for non-medical support roles other than Sighted Guides. This includes general support worker roles, note-taking support, library support assistants, laboratory or workshop support, readers, scribes, study assistants and specialist transcription services.
- Higher education providers are required to ensure that no disabled student pays more for accommodation based on their accessibility requirements. This is not limited to any specific disabilities, or adjustments required:

"Institutions should not pass any additional costs of specialist accommodation onto the student".[12]

[11] http://www.dso.manchester.ac.uk/how-do-i-get-support/funding-for-support/dsa-changes-16-17/
[12] https://www.practitioners.slc.co.uk/media/1338/sfe_dsa_guidance-document-for-new-dsa-students_pdf_1617_d.pdf?fbclid=IwAR3GwAzCt5FZwUQtbwjnu6pJMg_FOY7Nvv6oCeAAyEIepH2URbq3yT4KOY8

Section 2 – Testimonies

Part 4: Academic departments

UCL's Education Committee must create policies in line with the 2010 Equality Act to avoid discriminatory practices

Experiences

Several students report having a single departmental contact who has gone above and beyond to help them, such as in the following testimony:

"[name redacted] is my course lead and has been an amazing ally - she has arranged live lecture streaming with me, started automated Lecturecast uploads, and been very understanding about my occasional absences from labs. I feel other course leads should follow her example."

The problem is that departmental disability support currently relies on individuals who go beyond their duty instead of an institutional structure. This leaves the student very vulnerable when their departmental contact is not such an extraordinary individual, as demonstrated in the following testimony:

"Because she is my only disability contact at my department and because no one has the job or enough knowledge about disability rights to tell her what she's doing is discrimination, I feel like I have to play along and keep her happy. It's making me feel resentful about doing this course that I was initially very excited about."

Students reported the following in their interactions within their departments:

No structured way of dealing with disabled students within departments

When there is no structure in place for implementing disability support it often leads to support being absent, delayed, having to be chased and sometimes being refused. For the student chasing after reasonable adjustments they are entitled to, the experience of having to explain yourself over and over, and often being doubted, is often time consuming and unpleasant.

1. **A lack of knowledge about Summaries of Reasonable Adjustments (SoRAS)**

"My module leads are often unaware that I have a SORA or how they can access it, so I need to send it to them. I'm not sure if this is an issue with their memory of their training on how to handle disabled students

(or if they received any), or whether no one has informed them of how to check for students with SORAs on their course."

2. **Having to repeatedly explain and prove disability**

"The amount of explaining yourself and how much you have to prove how you are being affected by things can make you feel like you are being treated as though you don't have a disability. Like having to explain that autism is permanent and affects you physically, mentally and emotionally over and over again and that all autistic students are different from each other."

3. **Having to chase after accommodation in the SoRA**

"No one is providing my lecture slides in advance and I'm having to chase on a weekly basis which makes me feel very annoying."

Note: See part 3. The reasonable adjustment must not put the student at a disadvantage.

Disability contacts lacking training

4. **A lack of understanding of disabled students' rights to reasonable adjustments**

"Throughout my whole university experience I've felt unwelcome and unheard. Whenever I would bring up my situation to my examinations officer he would advise me to either drop out or simply get on with it. I've had continuous issues with EC's and my SoRA, and was even told by a senior member of staff that ucl is an 'institution that expects a minimal level of functionality from its students."

5. **Offering "reasonable adjustments" which do not actually help the student**

"My course administrator told me I can solve my problem without needing lecturecast by coming in 4 days a week. I am a part time student due to having a health condition so I am unable to attend 4 days a week."

Note: See part 3. In order for a reasonable adjustment to count as "reasonable" it must be possible for the student to accept.

6. **Incorrectly portraying the law**

"I was told that having cancer and undergoing chemotherapy is not considered a long-term health problem and hence I cannot apply for any form of examination adjustments which I found ridiculous."

Note: See part 3. A person with cancer has the same rights under the 2010 Equality Act as any other disabled person.

7. Refusals to follow the SoRA and make individual reasonable adjustments

"My SORA also says I am supposed to get appropriate seating but that hasn't happened, leaving me in pain and discomfort during lectures. When I have approached them to get what I need, they have said no."

8. Delays

"I have had numerous instances since starting at UCL in which my needs as a person with a disability have failed to be met. Beginning with compilation of PEEP; a legally required document pertaining to fire safety within public buildings - this is something that should be drawn up prior to, or as soon as people with additional begin using public buildings. However, I started as a student in September 2018, and did not have a PEEP drawn up for me until Feb 2019 - despite mine and my programme leader/ personal tutor's best efforts and numerous attempts to arrange a meeting for this, such attempts were ignored or delayed. I therefore was not aware of accessible fire safety routes until 5/6 months into my course."

Discriminatory blanket policies

See Part 3. The university has a responsibility to make sure their blanket policies do not put their disabled students at a disadvantage. Attendance is specifically mentioned as an example.

9. Attendance

"The requirement of 70 percent attendance is ridiculous for disabled students who learn best through lecturecast or simply cannot attend because of recurrent illness. [...] I've had it used as a threat twice now, by both my department and SSW. They told me they couldn't do anything about this policy. They neglected to mention that as a disabled student my nonattendance due to disability cannot legally count towards my attendance. They probably didn't know. This made me attend lectures even when I was unwell - thus making me sicker."

10. Lecturecast

"My department does not Lecturecast the modules they host, which meant that in my first year I did very poorly on the modules from my host department and significantly better on modules taught by other Biosciences departments. This is because I was quite ill often and could not leave the house, but could follow courses from home. This difference made it clear that if I had been given recordings I could have gotten the same good grades across all my modules. This affects my confidence and my grades significantly."

Note: See Appendix D about this issue

11. No warnings about flashing lights

"No warnings when lecturers play videos with flashing lights (which is dangerous for people with photosensitive epilepsy)."

Bad practice among non-disability related staff members

12. Giving disability-ignorant advice

"When my mental and physical health worsened last year, I felt that I needed to take some sick-leave. Unfortunately, my supervisor and course organiser did not feel that this was in my best interests, and repeatedly discouraged me from applying for leave, or even seeking external advice on this matter[...]Although I believe that my supervisor and course organiser meant well, I feel as though, ultimately, they were more concerned about my PhD, and how this would reflect on them, than about my health at that time. I don't think either of them fully appreciate the negative impact that their actions or comments had on my mental or physical health, since chronic pain and fatigue rarely respond well to 'pushing through' or just 'getting on with it'."

13. Inappropriate comments

"my tutor started to recommend me to the student well-being and thought I had anxiety, ADS, and passive-aggressive which are really annoying. I do want to know myself if I do have learning disabilities and I want to be diagnosed by a medical doctor, but not a tutor."

14. Negative comparisons

"My experience with my department has been pretty negative unfortunately. My abilities and academic progress are frequently compared directly against other (full-time) PhD students and postdocs - even my own supervisor. This undermines my self-confidence and adds to my self-perception that I can never be good enough as a disabled student, working part-time."

15. Refusing sick leave

"I raise that I am in pain and cannot focus but they force me to continue which affects my academic achievement and refuse to give me sick leave even when I lost two of my family members in 2019. Even when I went to the wellbeing centre and sent them an email that I am not well, they recommended that I take a sick leave however the learning and leadership at IOE ignored this which caused me a problem and when I went to Accident and Emergency my blood pressure was over 200."

16. Punitive behaviour

"The first two problem sets of that term were never marked and most of the ones after were marked in much less detail than my peers' ones were."

Offending the dignity of disabled students

17. Ableist attitudes in the teaching itself

"Professor [name redacted] in the Year 1 Genetics module taught about eugenics in ways that called out racism, but which validated ableism. He spoke that it was 'unfortunate that Alexander Bell had deaf children',

and that deaf mutism- choosing not to speak but use BSL as their first language was a terrible condition.' He also mimicked sign language, conflating his random hand actions to an official language.

Most egregiously, he taught quantitative genetics using an example showing why killing all disabled people would not, mathematically speaking, remove the disease genes from the population, so that was not the best way to go about it. He effectively espoused the idea that disabled people should be exterminated - but not in such an inefficient way."

Note: Most deaf people see their deafness as a social identity, and many would not choose to hear if they could. Choosing to use sign language instead of speaking another language as a deaf person is a personal choice. Sign language is a language.

18. **Coercive behaviour**

"I was told by my first supervisor that I was too disabled to do my project and he then forced me to move projects. I was told it couldn't be changed at all to meet my needs, and that I had to move projects, otherwise he would make sure I never graduated and never got a job in that industry."

19. **Bullying**

"It was unfair and very stressful to see my previous supervisor convincing others that I am below the standards and using my own time for supervision to convince me that I am a loser and should leave the university and when I asked him any academic questions, he gave me more than one answer in different directions to confuse me more and in his feedback he wrote words like 'unclear', 'interesting' and 'people do not know what is inside your head' which did not help to clear the direction for developing my project. He was always scaring me that I'll be kicked out of the university at any minute. Please note that the bullying happened to me in front of other staff members and none of them helped me or raised the concerns to the university."

Next steps

It is clear from the many testimonies we received that the problem is not that individual departments have individual staff members who are ableist. The problem is that departments put insufficient resources into complying with the 2010 Equality Act. There currently exists no unified training for academic and administrative staff on their duties to disabled students. Nor is there a unified way in which departments handle disabled students' reasonable adjustments.

This lack of training results in students encountering ableist attitudes and comments. It means that they are going without the reasonable adjustments that they require in order to access their education, they are having to take the initiative themselves and they have to spend extra time chasing down the few adjustments that they can.

So far disabled students and the DSN have been addressing each issue that arises on a department-by-department basis, which is time-consuming, puts the student at a disadvantage and is an inefficient way of creating change. While each department must take responsibility for their disabled students, ultimately it is the responsibility of the UCL Education Committee to create policies in line with the Equality Act to avoid discriminatory incidents.

Recommendations

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.

Part 5: Student Support and Wellbeing

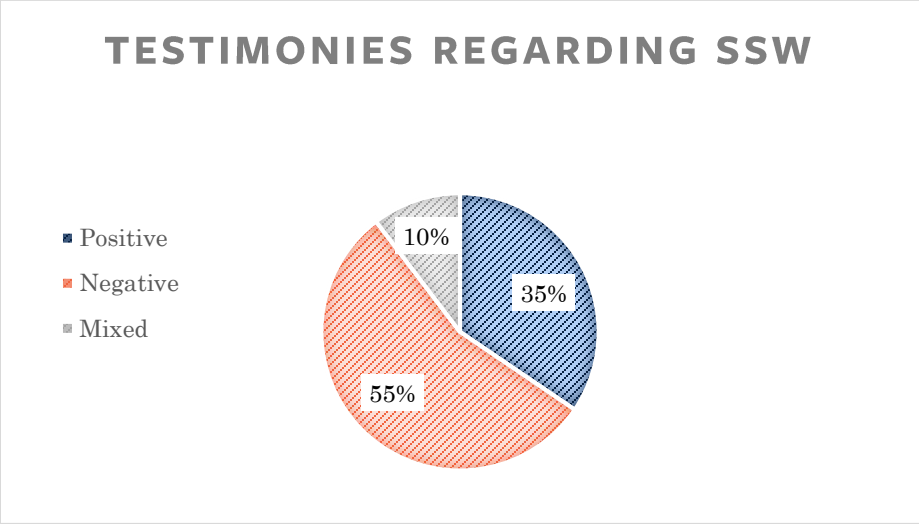
The UCL council must hold SSW accountable to its students and to the 2010 Equality Act

Experiences

Of those who commented on SSW in the survey, 10 reported mainly positive experiences with SSW:
"I really liked my SORA adviser. He was really clear and explained a lot of things and suggested several useful adjustments I did not know existed (like booking a taxi from home to IOE for 1.50 pounds)."

3 students reported mixed experiences with SSW:
"Other than delays my experience with SSW has been ok"

16 students reported mainly negative experiences with SSW:
"Numerous issues to go on about. Some very serious to the point we sought legal advice and a leading charity has agreed to represent us if necessary, in legal proceedings if they were to occur."



The fact that some students had very positive experiences of SSW should not be ignored and we will demonstrate the key learnings from these positive testimonies in Part 10 of this report. In this part (5) we will focus on the structural problems within SSW which prevent it from functioning as it should for a significant proportion of UCL disabled students. Below we address testimonies relating to SSW organization, lack of services, refusing reasonable adjustments on irrelevant grounds and a detrimental way of addressing problems.

Some of these issues may need to be addressed by other groups within Student & Registry Services. To avoid different bodies repeating that this is not their responsibility we direct ourselves to UCL Council, asking that they take responsibility for making sure that the relevant body addresses these issues.

SSW organization

The organisational problems below are not isolated incidents. 21% of our testimonies mentioned unreasonable delays in setting up their SoRAs and thus delays in receiving the adjustments they need to access education on equal terms. Several students reported the SSW never getting in touch with them about their declaration of having a disability. One student reported completely giving up on receiving a SoRA, and forgoing their much-needed support, due to the lengthy and difficult process. The most common organizational problems mentioned by our survey respondents were:

1. **A lengthy process of setting up a SoRA**

"Despite declaring [my disability] at application, my SORA was not completed until two months after starting. This was really distressing, and I was not afforded support until that time. Equally frustrating was having to chase and fight for this to be put into place, with countless emails and phone calls when I should have been focused on my actual work. This meant I had more pressure than the average student, rather than being aligned equal with them."

2. **The SoRA not being shared with all their departments (at all or in a timely fashion)**

"My SoRA has not been shared with any of my lecturers in external departments (only one of my modules is taught in my home department). "

3. **Communication with SSW being difficult due to the portal inaccessibility and slow responses**

"The online platform to communicate with SSW is completely inaccessible and off-putting. No one responds in timely fashion, and when experiencing an immediate disability barrier, there's no one to address it at the time, which can leave you in a crisis situation.
No direct way of getting in touch with anyone because there's just one email, impossible to follow up or reach the person you actually need"

4. **Not providing the required initial services**

"This is a list of things they did before I had even started my course which I had complied:

i. *Ignored my disability declaration submission*
ii. *Ignored my student support and wellbeing application*
iii. *I had to get in touch with them eventually by myself*
iv. *Cancelled my initial consultation [name of advisor redacted]*

v. *Blamed me for the cancellation and said they wouldn't allow me to book another one provisionally (because they expected me to take time out on my first day/week of uni to meet them) because I had cancelled previously, even though it was them [name of advisor redacted]*

vi. *Told me I was inflexible and making it impossible to schedule a meeting because I was hesitant about taking time out of my first week of inductions/first impressions to meet them [name of advisor redacted]"*

5. **Issues with keeping track of students**

"at times multiple people at SSW were sending me messages saying different things at the same time, unaware of each other."

6. **Giving different information about the same issue to different students.**

"SSW have also refused to help me with the cost and arrangements of an ASD diagnosis, despite saying they fund ADHD diagnoses."

"They also told me they don't help students get ADHD diagnoses"

7. **Failing to tell students about reasonable adjustments available to them**

"SSW also failed to tell me about the existence of a study room specifically for disabled students, even though I told them I was really struggling with not having a quiet place to sit between lectures, resulting in my illness flaring up due to exhaustion."

8. **Lack of complete and up-to-date information on reasonable adjustment procedures.**

"SSW were not aware of how live lecture streaming would be done when I contacted them about it, suggesting I should Skype in to lectures - I had to wait 3 weeks for ISD to reply to me to let me know they just make the regular Lecturecast system live. SSW should know about this, and moreover should be compelling all departments to offer Lecturecast recordings & live streaming where needed as part of disabled students' legal rights."

9. **Clerical error**

"I made contact with Student Support and Wellbeing, who simply said that 'they had no record of me or my disability, due to what can only be attributed to an internal /clerical error. I subsequently had a lengthy wait and a long, back -and-forth chain of communication to try and secure something as simple as a meeting to discuss compilation of a SORA. So time consuming was the entire process, that I reluctantly and eventually decided to forgo the support to which I am entitled."

Additional services

Some of our respondents reported SSW lacking an important service. In particular, many commented on SSW not supporting them in their dealings with their department. SSW should communicate with the Disability Inclusion Oversight Team (which will be considered in more detail in part 9) about who is responsible for these services:

10. Informing students about how the disability support system works

"Most SORA students I have spoken to have no idea that their SORA is on Portico and miss the unobtrusive 'View my SORA' button to click on the page which is the same colour as the rest of the page. I did not know this was where my SORA was either."

11. Collecting and taking seriously information about the quality of external services

"Get Terra an agency removed of the dsa acredited list of suppliers. The only thing I have heard about them is Horror Stories."

12. Following up on the departments and telling them to follow the SoRA

"SSW have never made my department provide any of the things my SORA says and they have not reached out to me to see how I am doing. I don't feel supported by this service in the ways I need."

13. Providing diagnostic services

"More can be done for students in terms of helping with diagnosis"

14. Responding supportively to disability related bullying issues in the departments

"The Wellbeing Centre did not respond to my complaints for the bullying that I was receiving since 2017 until I met one of the mental health managers on the 10th December 2019"

Basing reasonable adjustments on irrelevant criteria

As mentioned in part 3, the reasonable adjustments must be based on the individual's needs and what is "reasonable". UCL bodies being underfunded or not having the proper teaching does not affect the reasonableness of the adjustment. Medical evidence is not needed if the student's need is known. Adjustments should always be based on the individual's need rather than stereotypes about the condition. 21% of respondents reported an issue with SSW denying a reasonable adjustment or service. Respondents reported being left with insufficient support when instead of being based on their own needs provision of adjustment was based on:

15. Department policy rather than need (Lecturecast)

"When I asked for access to some of my lectures on Lecturecast my advisor told me this was not a good idea without asking about my situation and why I required it."

16. Unreasonable technical issues (livestreaming)

"I also faced resistance when trying to add live streaming to my SORA, as ISD said was required - SSW did not have a drop down option for live streaming, so via AskUCL they refused until I went to a drop in session with a sympathetic member of staff who changed my SORA manually."

17. University policy rather than need (attendance)

"They told me they couldn't do anything about this policy. They neglected to mention that as a disabled student my nonattendance due to disability cannot legally count towards my attendance. They probably didn't know. This made me attend lectures even when I was unwell - thus making me sicker."

18. Unreasonable practical difficulties rather than need (private room for examinations)

"Told me that even though I medically require a private room for examinations as I get rest breaks and also am hypersensitive to sound and movement, they can't guarantee me an exam appropriate room for the exam. The examples he gave were 'lighting that does not work' and 'may be put in a corridor if the room isn't available' (he also said these have happened in the past)"

19. Medical evidence rather than need (exam rest breaks)

"I was told to provide more evidence for needing time-out during exams/ assessments (even though I was struggling to find a doctor at the time, due to the post-code lottery) - fortunately the staff in the department/ faculty were aware of my situation (or were willing to accept a students declaration) - I found my department to be more accepting, understand and accommodating than centralised services. SSW also said that they were not able to be a point of contact, could not provide continuing support - when I was a student of concern."

20. Condition stereotypes rather than need

"When I finally got my SoRA it contained items that I had never even talked to an advisor about that I assume they put in just based on my diagnosis. I never got to sit down with anyone who has experience working with either of my (very common) conditions who could tell me "people with your condition are often offered x and y. Do you need any of these or is there something else you need?".

21. Other forms of study rather than need

"I believe the support for me was poor because The SORAs was not written from the beginning to suit a PHD level.(As the upgrade document and PHD thesis are different from undergraduate and Master essays.)"

Withholding support due to issues with understanding or interpretation of laws and regulations

Being unaware of laws that state that SSW have an obligation to provide a service has led to SSW failing to provide that service. Furthermore, because SSW policy is to withhold support while there is a dispute about their responsibilities there have been severe delays in those cases where the student ultimately received support.

It is important that if it is unclear what the student needs, students should in the first instance be trusted and provided with the adjustments that they request, as disabled people are the experts on their own conditions. It is always possible to revoke inappropriately supplied support but not always possible to undo the difficulties faced by students who are waiting for support. SSW is obligated to provide the most appropriate support based on the student's stated needs. There should not be delays to needed adjustments while the details of UCL's duties are confirmed.

15% of respondents explicitly mentioned SSW having issues with understanding or interpretation of a law or regulation. Considering that most students do not understand how extensive their legal rights are we find this number remarkable.

22. **Not being aware of the 2016 DSA change regarding non-medical support workers (claiming that DSA is responsible for non-medical support services, not the university)**

"Most of my support has not been put in place, as SSW refused to cover the expenses of a non-medical support worker"

23. **Claiming to be unaware of their legal obligations under the 2010 Equality Act after the 2016 change to DSA responsibilities**

"SSW claimed to be unaware of their responsibility to reduce my room rate to that of an inaccessible room type when I contacted them the first three times in 2018/19. I eventually got them to give me this discount, the first such discount I am aware of UCL granting since they gained this responsibility in 2016. This has been SSW's general attitude: say no first, allow it when I make a fuss."

Note: see part 3 and Appendix E

24. **Refusing reasonable adjustments for a continuing student whose support was supposed to roll over because of a delay in a new needs assessment**

"SSW refused to cover the expenses of a non-medical support worker during the time my DSA was being renewed from an undergraduate degree to a postgraduate degree."

25. Claiming that incorrect DSA terminology prevents them from offering a certain accommodation

"SSW wrongly interpreted the information in my DSA needs assessment as me only being entitled to hand-written notes and refused to provide a typed note taker even when my DSA advisor contacted SSW multiple times to clarify that the needs assessment means that I should have typed notes."

26. Claiming that a specific proof is legally required

"I have been unable to get a SORA in place because of problems with evidence needed. With autism, there seems to be a lot of confusion on what evidence they want. They have also told me I cannot get support without providing full Psychologist report because it is illegal under the Equalities Act. This is of course completely untrue as the law states no such thing."

Responding to problems

Most disabled students we have spoken to simply gave up on receiving support after a while if they did not get their support needs met (see part 11 to understand why). However, our testimonies also include 4 accounts from students who went further to challenge the legal position of SSW when it came to refusing them support. One of the most worrying trends that we found in our survey results was how those who fought for reasonable adjustments were treated by the SSW.

24% of the respondents in our survey reported feeling dismissed by SSW. However, the 4 students who raised a legal issue further reported having been treated in an unprofessional and unpleasant manner. We conclude that not only are SSW neglecting to make an effort to find out about any problems, their behaviour is actively discouraging reporting issues.

Rather than thanking the student for bringing to their attention a law that they had been unaware of and taking the initiative to change their functioning in accordance with their new understanding of the law, our testimonies show that the SSW employ various strategies to avoid the issue:

27. Only addressing some of the issues raised

"*The strategy employed by [*name of disability advisor retracted*] and the rest of the disability support team at UCL is to deflect, ignore 4 issues out of 5 presented to them, and wait for disabled students to get worn out trying to get justice & stop asking instead of giving them any. I feel sidelined, misinformed and mistreated when trying to get anything done with the disability team."*

28. **Taking no initiative to address the issue, forcing disabled students to spend a lot of energy chasing up reasonable adjustments**

"Also I find if they try to resolve a situation (very often unsuccessfully) they will never ask is it sorted or how it is going which contributes to a feeling of expending huge amounts of energy driving change in the provision which puts immense strain on me and my parents. (My parents have been dealing directly with them so I can try to focus on settling in etc)."

29. **Unprofessional behaviour towards students**

"SSW can speak to you as though you are pestering and annoying them if you persist to try to get your reasonable adjustments met, making you feel apprehensive about calling them anymore. They dismiss your concern and can be very unsympathetic. This is psychologically damaging when you are struggling and just want to adjust and interpret with your able peers. You are made to fuss for little concessions which is dehumanising, and you then magnetise your vulnerabilities of being disabled as a result of being forced to fight for each and every measure of support or adjustment. It is depressing and vexatious."

30. **Blaming other parties**

"SSW claimed that it was the service provider Ranstad that was misinterpreting the needs assessment. In reality, Randstad can only provide the services that are instructed by SSW"

31. **Telling the student to speak to someone else about the issue**

"told me it was my own responsibility to chase up DSA and put in place all my own support with the providers listed such as Ranstad and others"

32. **Continuing to deny students adjustments even after they have granted the adjustment to another student in the same situation**

"Although SSW ultimately gave me a rent reduction they continued to tell other disabled students that they had to pay extra for an accessible room. After several months they put up new regulations on the website stating that you could get a rent reduction, but only if you had severe mobility impairments. Not only is this contrary to the law but they must have known that this was contrary to the law because they gave me a rent reduction for an en-suite bathroom, which is necessary for my digestive disorder but which has nothing to do with mobility."

Note: Please see Appendix E for a full description of UCL's response to being informed about this law.

Next steps

The various positive testimonies about SSW show that there are many empathic and effective individuals working at SSW who want to help disabled students. However, as the majority of the testimonies show, these individuals do not have the institutional backing to do so in a consistent and timely way. This needs to be addressed with training and external support at each level of SSW.

Student Support & Wellbeing Services are responsible for resolving these issues in the first instance; however, they are not responding appropriately to problems, putting the whole burden of addressing these issues on disabled students.

It is worth mentioning that the student testimonies in this regard echo the communication difficulties that the Disabled Students Network has faced when trying to help the SSW address its shortcomings. This goes back as far as 2015 when the previous Disabled Students' Officer took on the role (see part 11)

The surprised reaction we meet when we bring up these issues to other staff members also indicates that the SSW is failing to report these issues to other bodies at UCL (see part 11).

The functioning of SSW is not transparent, it is unclear what they do, when they do it, who does it, and who they answer to. This means that it is currently very hard to make SSW accountable to UCL's disabled students or the law.

Ultimately, however, as we showed in part 3, the university is accountable for the actions of SSW. Therefore, we address the UCL Council rather than SSW in our recommendations.

Recommendations

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.[13]
    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.

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

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.
a. 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.
b. Monitoring support worker agency performance (including cancellation rates) by regularly checking in with students who use support workers, and also recording voluntary student 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.
g. Following up with students to check that their support needs are met at their departments.
h. Following up with students if they have raised any issues.
i. Follow up with students who are struggling to maintain engagement with SSW.
j. Supporting students by liaising with their departments if there is any issue of bullying or SoRAs not being followed.
k. Maintaining a consistent SSW contact for each student.
l. Ensuring that communication between SSW and students is conducted through an accessible medium.
m. 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.
    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."

6. 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.

Part 6: Student Psychological and Counselling Services

SSW must improve the SPCS to ensure that students with mental health problems are being supported.

Experiences

We asked about students' experience of the Student Psychological and Counselling Services (SPCS) separately from their experience of SSW and so we will address their responses separately. We received a few positive testimonies:

"She believed in support that can make an impact on my well-being. It had made an impact as I am learning something new. I have recently finished my sessions with her. She has respected my needs and I had struggled coping before getting into uni and the counsellor has helped me with that."

However, most were negative:

"I was told I was taking up someone else's space."

We will not cover this topic extensively as there are already bodies at UCL putting in significant efforts towards addressing mental health. We will however remark that given the university's apparent commitment towards this issue the clear lack of funding revealed by our testimonies is quite shocking. The following issues were raised by our survey respondents:

1. **Delays**

"Reducing waiting times for access to Student Psychological & Counselling Services. When I referred myself last year, I waited around 6 weeks for my first appointment."

2. **Organizational errors**

"I contacted them in 2018/19 academic year in 10/18 and 12/18, but they replied me in 07/19 which is very late because my last course finished in the end of 06/19"

3. **Unsympathetic counsellor**

"Awful experience with one of the counsellors. Horrid challenging manner when I felt fragile. I withdrew."

4. **Unsympathetic staff**

"Also some individuals in the support teams are less than helpful/sympathetic which doesnt help people who are already struggling, and it also serves to put people off from seeking help."

5. **Hard to find support**

"mental health support has been hard to come by, and the resources and support available (from both the medical school and UCL in general) is not advertised that well, and the waiting lists are very long"

6. **Does not offer help for students who are worst affected**

"When I first started at UCL, I was advised by my supervisors to get help/ aid from UCL psychological services, so they would be close in terms of care. However, after seeing the psychiatrist, I was essentially deemed too 'mad' (my chronic mental illness to severe)' to use the services, and was advised to follow the NHS track. I have kept the horrid letter I received. There was no short term effort to support me, or follow up, even though it was clear how ill I was. If I hadn't had the support of my supervisors (who are not a mental health professional) I probably would have dropped out. They continue to care for me, and speak to my NHS psychiatrists - which is above and beyond their position."

7. **Neglect to get back in touch**

"I am aware anecdotally of students who have referred themselves to SPS and never heard back, even though they were reporting suicidal thoughts. Clearly this is unacceptable, and SPS needs to be able to provide support for all students who refer themselves to their services."

8. **Failure to check up on students with mental illnesses who were scheduled to get in touch but didn't**

"When I studied here previously, they cancelled an appointment but didn't bother to contact me when I didn't re-book. I hit a really bad time and dis-engaged. That follow-up call would've been helpful."

Recommendations

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.

Part 7: UCL Estates

UCL Estates must improve access on Bloomsbury UCL Campus and Accommodation in line with Parts M & K of the Building Regulations to ensure equal access for all students

Experiences

Equal access is one of the most fundamental equal rights of all disabled students, but is consistently denied.

There was an overwhelming response to our survey about the lack of accessibility across UCL Bloomsbury. We only received a single positive comment and that was about the new student centre:

"I am an access consultant and recently was tasked with reviewing the new student centre, and I do want to say that in my professional opinion the centre has been designed with extreme care and consideration for all students with just a few problem areas, it's just a shame that they don't have the student support team to match it."

Issues were mentioned at nearly every level, including building and room access, accommodation, toilet facilities and study spaces. Some students felt that UCL Bloomsbury is simply not accessible to them, whilst others felt the wide spectrum of disabilities and necessary reasonable adjustments were not considered. By far the most common complaints were about toilets, lifts and wheelchair accessibility.

It is notable that issues of access on campus have failed to be rectified despite a commitment by the provost himself on this issue in 2015.[14] Modifications and adaptations are vital to ensure that all students can fully participate on the UCL campus.

The most important issues raised by our survey respondents were:

1. **Disabled toilets are too few**

"Not enough disabled toilets"

2. **Toilet Access**

"No UCL buildings follow the radar key scheme, which they must rectify."

[14] https://www.youtube.com/watch?v=Y8RiAEdWF4c&feature=youtu.be&fbclid=IwAR2_oHXBBGRwVqa6HNNoXlJtqYskZ-18KgdRHskY5mW35TYOVPfomDqZ9us

3. **No accessible toilet maps**

Toilet availability - toilet maps please!

4. **Toilets not being looked after in a way that makes them accessible**

"Red cords are also often tied up meaning that if someone mobility-impaired were to fall on the floor they would simply have to lie there without rescue"

5. **Poorly designed "accessible" toilets**

"The 'disabled toilets' that I use at the IOE can barely be called such, insofar as they fail to consider the needs of its disabled users - two that I have used have been built at the back of the main Ladies and Gents toilets; which means that the disabled ones are cramped, and can only be accessed via a set of double doors - double doors that are again, impossible to open as a wheelchair user. I'm now in my second year at UCL'S IOE, but I have never entered the toilet independently - to do so, could have catastrophic consequences, particularly in the event of an unexpected fire, for example."

6. **Building access**

"Access needs are not being met at all at UCL. I cannot get into and out of any classroom or lecture theatre within UCL's IOE independently - thus surely failing to meet the legal requirements outlaid within the 2010 Equality Act, entirely. Almost every door within this building is heavy and must be pulled towards oneself in order to be opened - an impossibility for a wheelchair user with limited use of their arms and upper body. This means that I have to wait until a passerby comes to by aid in order to get anywhere. [...] I was told that UCL is 'limited by what it can do, as the IOE building is grade -listed'."

Note: See part 3 above. A building being grade listed is not a sufficient reason not to make it accessible.

7. **A better disability specific study space**

"The study room for disabled students is hideous. Poorly run. Dirty - reports of mice"

8. **Lack of study spaces**

"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."

9. **Lack of lifts**

"Our office and lab space are split across two floors, with only a single steep and narrow staircase for access between them. On days when the pain is particularly bad, I have limited mobility, and frequently use a walking stick, but unfortunately the use of this staircase is unavoidable. Additionally, our office is on the sixth floor, so in the event of a fire (or indeed a practice/ false alarm) I have to get myself down six flights of stairs unaided, which I can just about do, but on a bad day this would almost certainly trigger a flare-up."

10. **Poor signage of lifts**

"clear lift signage is really important for students with fatigue."

11. **Buildings not being looked after in a way that makes them accessible**

"Lifts often not working. The cruciform is still not working after a year or more!"

12. **Staff not being trained to understand accessibility**

"I've recently had issues using accessible toilets in the main portico. The female toilets by the main library have been closed due to building works, but there is no signage to point towards the closest alternatives. I approached library staff who pointed me towards nearby toilets on the mezzanine, but these were only accessible by stairs. When I explained that these were unsuitable, they then suggested toilets by the canteen, but the lift was also out of order, meaning that these too would only be accessible by stairs. Eventually, I had to ask them to let me into the library (my card access was yet to be reinstated), so that I could get the lift to the toilets there on the second floor. By this time, I was getting really anxious, as I have chronic bladder and bowel issues, and often experience urgency when needing the toilet. I was grateful for the library staff in their assistance, but found the whole experience quite humiliating, as I had to approach the staff three times to use the toilet. UCL could easily have provided a map to point people towards the closest accessible toilets to avoid this situation."

13. **Staff refusing access**

"I have also encountered a patent example of disability discrimination at UCL'S IOE, at the hands of one of its security staff. The IOE is a public building, which welcomes hundreds of different visitors on to its premises daily. Moreover, the building as a DISABLED ACCESS door for people with disabilities to use as an alternative to the main entrance, which has stairs leading to it. I was informed in correspondence with Student Support and Wellbeing, that I can gain entry into the building via said access door without the need of my Student card, as it is a public building. On the one occasion that I didn't have my card on my person, I pressed the intercom and was expecting to be buzzed in without issue. On the contrary though, after several minutes of being kept waiting, said security guard came outside to explain (very rudely) that he was not 'letting me' into the building and that I was to WALK AROUND to another entrance. Three weeks earlier, I also witnessed the same security guard arrogantly inform a woman on CRUTCHES 'that she cannot come in this way'.

14. **No flat surfaces**

"Flat surfaces for wheelchair users. The main UCL quad surface is horrific and needs to be resurfaced before someone has an accident. My wheelchair has almost tipped a few times from hitting holes."

15. **Accessible fire exits**

"I also did not see a fire escape system for wheelchair users in FGH. Every accommodation with mobility-impaired students needs a system by which they can safely get out in case of fire."

16. **Overcharging for accessible accommodations**

"SSW attempted to overcharge me for an accessible en-suite room for my IBD in 2018/19. They only agreed to the legally mandated discount under pressure from me. I am concerned that other students have been overcharged since 2016 and SSW has not let them know that they need to be refunded."

17. **Adequate Accommodation Adjustments**

"I found the hallways in Frances Gardner House somewhat echoing and difficult to rest with loud flatmates and sensory issues - perhaps there is scope for sensory-friendly accommodation for students with sensory sensitivities?"

18. **New buildings being inaccessible**

"Astor College (a newly refurbished residence), is poorly designed for people with access requirements. Kitchens are at standing heights, certain areas are inaccessible. It's been designed for able bodied people. Pretty poor considering that it was refurbished, and they had every opportunity to get it right!"

19. **Lights that are too bright**

"Sometimes the lighting affects my concentration"

Next steps

UCL Estates is responsible for the accessibility of every building and room used by UCL. It is important that UCL Estates takes responsibility and creates accessible policies for all UCL buildings, rather than leaving the issue for each separate institute to manage.

Recommendations

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.[15]
    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.[16]

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

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
    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

Part 8: UCL East - SSW & Estates

UCL Council must ensure equal access to support for disabled students at UCL East

This year the first cohort of postgraduate students joined their programme at the Global Disability Hub at the here East campus. Within weeks of starting students approached the DSN about accessibility issues that they were facing in relation to academics, disability support and building access. As this is a separate and newly-founded campus, which appears to have been set up without sufficient awareness of disability we wanted to address these testimonies separately.

Experiences

"I was not aware that my course would be held at Here East initially, which has a great impact as ability is a main barrier for my disability, so the commute of over an hour per journey, means I am excluded from all advantages of all the activities and facts at the Bloomsberry campus. I cannot get to their library on same days I have lectures, as i get exhausted by the commute and length of time without support worker helping me physically. The UCL clubs and socials are therefore out of the question, isolating me from building a peer network and branch out into other interests to enrich my life. All the elements of university life have effectively been cut off and made inaccessible. The lecture theatre at Here East is very uncomfortable with terrible acoustics, and although I now have a bean bag to help me cope a little longer, I am still left with 4 other weekdays of lecture set in rooms with tables and hard chairs I cannot sit in for, form morning to end of business hours."

"Campus is away from my residence and I am asked to contribute £2.25 each journey it was good if I could have been told early to book hostel near classes"

"Some doors are not automatic to get in or outside you need a person assistant"

"I hope there can be more adjustment table in the dinning area which can be convenient for wheelchair users. What is more, the toilets location in the lower ground area of the main building is not clear enough and I think it is not only for disabled students, but also for all students.
In the Here East Campus, I think pressing button to open the door is always easier than letting the wheel chair users to use open the door by their hands. I haven't found a lift so far to help the wheel chair user to go to the first floor maybe I don't know, but I think the auditorium room is not suitable for wheelchair users to attend the lecture on the ground floor, because the projector screen is too high and too big for the audiences sitting in the front. What is more, even if the wheelchair users can sitting higher with a better view, there are too many noises created by other students who passing the building. There is an alternative

door which they can use to make lowest noises, but they are not being used to direct other people when there is a lecture in the auditorium area."

"Lecture theatre at UCL here east is poorly designed. Extremely distracting and loud, it's on a route to get to bathrooms/ workshops/ meeting rooms. Additionally there are tables at the top where meetings happen. There's a wall which the lecturers stand in front of which is highly visually distracted as it uses a tight linear pattern with lighting behind that moves around when I look at it so it is very distracting."

Recommendations

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.

Part 9: UCL Council

The UCL council must organize the different bodies responsible for supporting disabled people at UCL

There is an organizational problem with UCL disability support that goes beyond the bodies we have previously focused on in this report. Part of the problem is that there is no single body or person who is responsible for organizing disability support across different UCL bodies who serve disabled students at UCL.

In some institutions the Student Support and Wellbeing would fulfil this role but the SSW repeatedly emphasize their limited authority to affect UCL policy or department policy. Therefore, we dedicate this part of the report to the creation and responsibilities of an overarching authority on UCL disability support which we call the Disability Inclusion Oversight Team.

Recommendations

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.

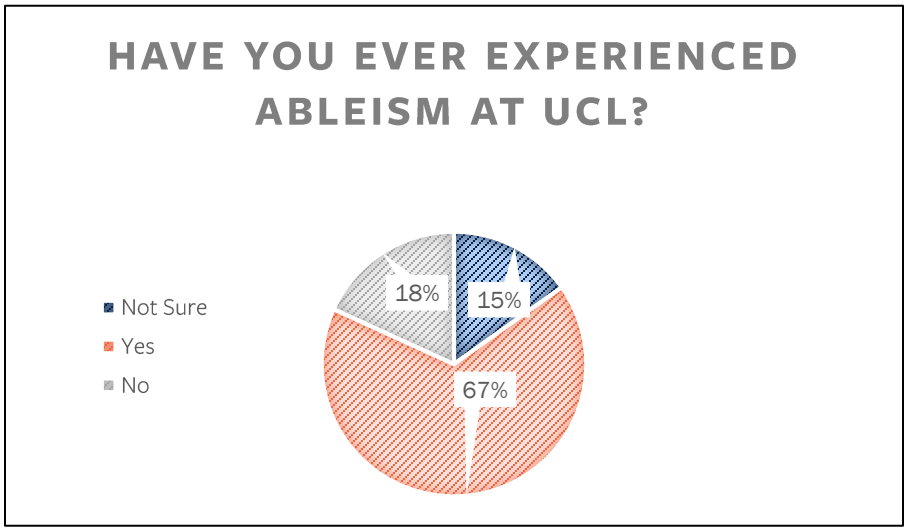
13. The Health and Safety Department should be required to carry out PEEPs no later than the third week of term.

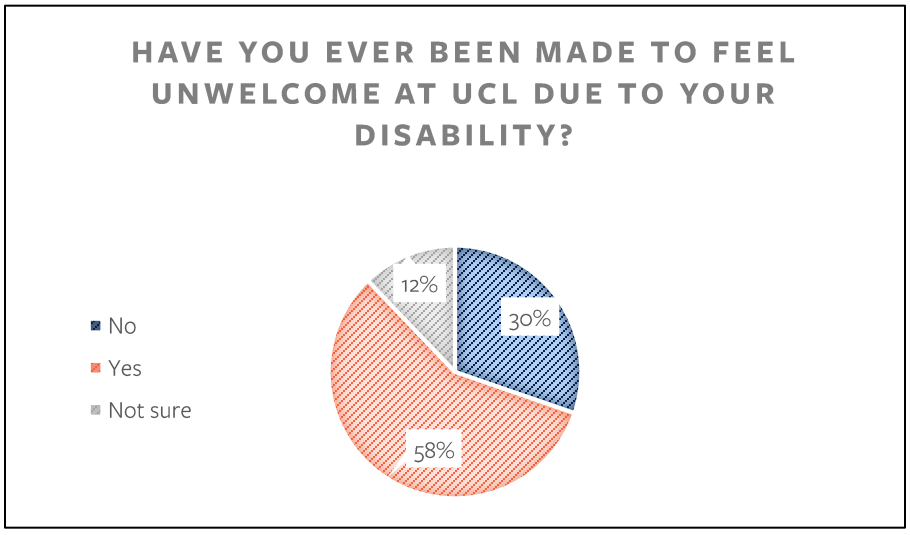
14. There should to be a clear line of authority within UCL Safety Service, whereby the Head of Safety and their deputy (in the case of the Head of Safety's absence) are easily contactable and are made known to staff and students.

Part 10: Disabled students' sense of belonging at UCL

The testimonies above paint a bleak picture of the average disabled student's experience studying at UCL. We found that 67% of students surveyed stated that they had experienced ableism at UCL. A further 15% were unsure if their experiences counted as ableism. Only 18% stated that they had not experienced ableism at UCL.

58% of students stated that they had been made to feel unwelcome at UCL due to their disability. A further 12% were unsure. Only 30% stated that they had not been made to feel unwelcome at UCL.





Many students do not use the term "ableism" to describe their experiences of inaccessibility even when this term is appropriate. For example, one student reported not having access to a whole set of buildings but stated that they had never encountered ableism at UCL. This suggests that the number of people facing ableism is actually higher than the data indicates.

Overall experiences

Unfortunately, the overall experiences of being disabled at UCL were overwhelmingly negative:

"I feel sidelined, misinformed and mistreated when trying to get anything done with the disability team."

"Throughout my whole university experience I've felt unwelcome and unheard."

"The instances that I have outlined above show, to my mind, that while UCL may well be concerned with appearing inclusive, little is done to practice and progress inclusion, which is a shame, as they are doing an almighty disservice to the people who they purport to support and welcome. Without the support of my Programme Leader / Personal Tutor, I would have been forced to withdraw from my studies."

"I realise you are looking for good and bad experiences but I unfortunately don't have any positive access related experiences with UCL yet. As I mentioned before I am part taught by Loughborough and they have been great, I also did my undergrad there and they were brilliant for all of my needs then too at the main campus"

"I can't emphasize enough how awful the student support team made me feel when joining the university and I felt very strongly about not wanting to be there in my first weeks as a result."

"I have always been an independent disabled woman, but regrettably and unacceptably, I feel that UCL is DISABLING me more."

What is it like to be disabled at UCL?

Our testimonies indicate that the average disabled student's experience at UCL is likely to include being expected to study in spaces that are not accessible to them, encountering ignorant or offensive statements about disabled people from an academic or administrative staff member and not being informed of or being misled about their rights.

The student is likely to have to spend a significant amount of time chasing after a reasonable adjustment and either having it be denied or significantly delayed. They are likely to have a single person from SSW or their department fighting their corner against the less cooperative party who is likely to treat them as

though they are pestering. Finally, the student is likely to give up on some support that they are legally entitled to because it takes too much effort to continue insisting.

The consequences of this situation are severe, with several disabled students reporting that the lack of support affects their academics, leads to a deterioration in their health and makes them consider dropping out of their course:

"Equally frustrating was having to chase and fight for this to be put into place, with countless emails and phone calls when I should have been focused on my actual work. This meant I had more pressure than the average student, rather than being aligned equal with them."

"when I went to the wellbeing centre and sent them an email that I am not well, they recommended that I take a sick leave however the learning and leadership at IOE ignored this which caused me a problem and when I went to Accident and Emergency my blood pressure was over 200."

"I am not functioning on par with my peers and am left more ill, in pain and missing more lessons in order to recover as a result. This is directly negatively impacting my ability to keep up with assignments, homework, studying, as I am deteriorating rather than thriving with the physical support I require to manage my academics."

"Because I feel so unwelcome here compared to my last institution I've thought about dropping out many times. Since the lack of support caused my illness to flare up I might not have a choice."

It is important to notice that students who did in fact drop out of their course due to insufficient support cannot respond to surveys such as ours. The DSN is aware of a number of cases where students have left their course due to insufficient support from UCL. Had they been surveyed it is likely that their testimony would have painted an even more bleak picture of disabled students' experiences at UCL. In the name of transparency, we highly recommend that UCL release statistics of the drop-out rate of disabled students.

Section 3 – Responding

Part 11: Why has this not been reported before?

When we first started discussing these testimonies with staff at UCL the most common response we received was "why did we not know about this before?" We have allowed space to address this question as it highlights the endemic nature of the problems we are facing. We have identified several reasons why UCL staff do not know about these issues.

Students lack information about rights

Disabled students are not informed of their rights at UCL, and so are often permanently discouraged from pushing for reasonable adjustments when they are first denied. Students often are not even informed about the existence of certain reasonable adjustments that would make their university experience far closer to that of their abled peers, and they stay disadvantaged through lack of information.

"*we dont know our rights well*"

When the problem appears to be a delay rather than outright refusal it becomes even harder to complain, especially as many are not aware that delays in themselves constitute a failure to provide reasonable adjustments:

"I haven't made any formal complaints because the department keep saying change will happen but it never really does. They act supportive but then the support for my physical illness never comes, and I keep believing it will eventually happen (though it's been over a year) so I don't take it higher up."

Staff lack information about rights

Lack of understanding of disabled students' rights is also a problem among staff. As this report has shown, too often disabled students are met with an inadequate and sometimes damaging response when trying to get their needs met at UCL. This is likely to demolish any sense of self-confidence or energy they had to complain. They may be inclined to accept that they really are asking for too much and the problem is with them, when this is usually not the case.

The testimonies indicate that unprofessional behaviour from staff may be a result of not receiving training on how they are required to enable disabled students, and so they see reasonable adjustment requests as a nuisance:

"Many people at UCL seem to be unaware that the university has an obligation to make adjustments to allow disabled students equal access to education. A friend of mine met a course administrator who, speaking of disabled students applying for extenuating circumstances, said outright "if they're unable to meet the course's demands then they shouldn't be able to study that course".

Lack of investigation into the conditions of disabled students

UCL does not adequately investigate in what ways disabled students have and do not have equal access to education at UCL. Although UCL bodies speak a lot about wanting to hear from disabled students they are not putting out regular surveys asking about disabled students' experience, despite this being something that all accessibility consultants recommend. Nor are they publishing drop-out rates for disabled student or seeking feedback from the DSN.

Lack of accountability built into the disabled students' support system

Because of the lack of oversight and structures of accountability students are placed in a very vulnerable position of being dependent on help from the same people that they would complain to. Thus even students who know their rights may not speak up:

"Because she is my only disability contact at my department and because no one has the job or enough knowledge about disability rights to tell her what she's doing is discrimination, I feel like I have to play along and keep her happy"

Students often fear retaliation if they bring forward complaints about repeated refusals of reasonable adjustments. Their fears are not baseless. Without oversight it is possible for tutors and advisors to delay and even deny reasonable adjustments without consequences. Such actions often damage students' time at UCL in ways that a complaint would not reverse:

"However, I did have one tutor last year who refused to mark my work at first because the department hadn't sent out my SORA to her and she said she had to check that I was telling the truth, which made me feel very uncomfortable. I sent her my draft copy but that apparently wasn't enough and she took forever to "check" with the department. The first two problem sets of that term were never marked and most of the ones after were marked in much less detail than my peers' ones were. This caused me a lot of anxiety."

The lack of support, accountability and knowledge of disabled students' rights can cause a general distrust in the system:

"I'm scared of formal complaints. I feel like it may disadvantage me."

Despite having awareness of many situations in which students have been discriminated against, and many situations in which students have dropped out due to lack of reasonable adjustments, the DSN has only heard of a single student who has made a formal complaint.

Lack of support

An additional reason why disabled students may be particularly discouraged from pursuing formal complaints after informal ones may be due to a lack of time and energy. It is often said that having a disability is a full-time job. Dealing with fatigue, pain and struggling to keep up with their full-time studies while unsupported, disabled students lack the time, energy and faith to go through with formal complaints. Some drop out from lack of support without ever formally complaining.

The UCL Complaints Procedure is needlessly difficult to access, and no support is given to disabled students in doing so, with copious paperwork and short timeframes given before complaints are considered out-of-date. In their online descriptions of the complaints' procedure UCL emphasises the importance of informal solutions before formal ones. However, when staff are not trained to understand disability issues and rights, informal complaints are unlikely to be productive. It is important to remember that any step that wastes the student's time will hit a disabled student harder than a non-disabled student.

The connection between students not being given support and students not complaining is not accidental. There is a vicious cycle. A lack of university support is keeping students from raising issues about a lack of university support, which in turn leads to a further lack of university support.

Feedback not taken seriously or acted upon

In some cases it would seem that although clear issues have been raised with specific UCL bodies such as SSW, they have neglected to appropriately resolve them internally or to discuss them with UCL management.

"we sought legal advice and a leading charity has agreed to represent us if necessary in legal proceedings if they were to occur. I won't go into specifics here but I have all the email evidence meeting minutes and exchanges in a very long document detailing the horrendous failings of SSW and thus the systemic shortfalls in support received from SSW. SSW have been made acutely aware of this."

On the rare occasion that a formal complaint is made it may not be taken seriously if staff are not educated about disability rights.

"Upon raising a formal complaint at UCL, what was most demoralising was that that instead of proffering me support, UCL have, and, continue to diminish my distress by explaining it away as my misunderstanding -

maintaining that the security attendant hadn't refused me entry, but rather, was merely delayed in coming outside to my aid, as he 'had been busy that afternoon'."

Response to DSN activism

Awareness-raising material such as this video[17] from the Disabled Students' Network in 2015 make it clear that students have been organising and raising these concerns for many years, taking them as high as the UCL Provost on several occasions, and yet change has not been forthcoming. The former Disabled Students' Officer states:

"Whenever I raised issues there was always an interest in showing that they were listening, and I do believe there was genuine intent to do some good, but when it came to actually trying to make change that was when things stalled. They often got caught up on why something couldn't happen, rather than thinking "well, why can't it?" and working with us to address those root problems. As soon as we hit any sort of challenge, it became difficult to hold interest.

Be it genuine uncertainty or deliberate complication, there doesn't seem to be a clear indication of where "the buck stops" with these issues. Raise it with SSW, they'll send you to Department Heads, who send you back to them. When you tell either of them about this loop, they'll hazard a guess at the next best person to send you to or just shrug their shoulders.

The system as it stands is not conducive to making change because it's so compartmentalised that there's more concern for keeping things as they are than actually making substantive changes
Communication between all these areas is woefully lacking, and you have to expend most of our energy just following the e-mail chain, only to be constantly passed off to someone else. When at the very least, all these people should sit together and actively decide whose responsibility it is to do what, and commit to working together for change."

Current members of the Disabled Students' Network can confirm that our feedback is often not acted upon when it is presented. We present an example of how this keeps UCL services from progressing in Appendix E.

[17] https://www.youtube.com/watch?v=Y8RiAEdWF4c&feature=youtu.be&fbclid=IwAR2_oHXBBGRwVqa6HNNoXlJtqYskZ-18KgdRHskY5mW35TYOVPfomDqZ9us

Part 12: It is possible

Is an equal access University a realistic goal? And how do we go about creating this change? In this part of the report we want to highlight some sources of information about how to improve UCL disability support.

What the positive accounts say

One great source of information about how to improve UCL comes from the positive testimonies in this report. In particular, many students singled out a single academic or administrative staff member who had done their job very well. Positive quotes often focused on a few key points which can be divided into two groups. Some positive testimonies highlight the issues already addressed:

1. **A person who stepped up and went beyond their duty to help the student when the support that was supposed to be in place was not**

"There was no short term effort to support me, or follow up, even though it was clear how ill I was[...] If I hadn't had the support of my supervisors (who are not a mental health professional) I probably would have dropped out. They continue to care for me, and speak to my NHS psychiatrists - which is above and beyond their position."

2. **A person or body that advocated for the student against another body that was not giving them the support they were entitled to.**

"Generally been supportive of me putting pressure on SSW."

Other positive testimonies highlighted practices that we hope UCL will build on and make universal:

3. **People skills - listening and being supportive**

"My experience with SSW has been really positive; I have regular contact with a specialist disability advisor, and she has been unbelievably supportive throughout my time at UCL. She has frequently helped motivate me, and given me hope when I had none. She has made me feel seen, heard and completely understood. I don't know where I would be without her valuable advice. She takes the time to listen, and always makes sure she has the 'big picture' of what else is going on with my life. I cannot thank her enough."

4. **Telling student about a service they did not know they had a right to or did not know existed**

"I really liked my SORA adviser. He [...] suggested several useful adjustments I did not know existed (like booking a taxi from home to IOE for 1.50 pounds)."

5. **Providing support in an adapted manner**

"They were great with getting my SORA sorted, Skyping me in Australia to make sure it could be done prior to me arriving."

6. **Allowing reasonable adjustments**

"Simple things like letting me make audio recordings of meetings have made a huge difference to me."

7. **Providing reasonable adjustments without hassle**

"Another lecturer, however, did an amazing job of supporting me by emailing me before every lecture with information about the lecture content and what group activities would be taking place. This really helped my anxiety and made it much easier for me to concentrate in my lectures."

Testimony comparisons

Several of our testimonies contain comparisons between UCL and other institutions. This shows that it is possible for UCL to do better by its disabled students and gives some indication as to how:

"UCL should definitely look at other universities for inspiration on adjustments and treatment of disabled students."

"Oxford's system is much more efficient and they have clear points of contact if something isn't working."

"Disability support was done much better when I was in the Chemistry department at Imperial. I had a departmental contact (one of the academics) for all disability exam arrangements, and also the department had a Student Experience Officer who I could speak to when I was struggling. All lectures were recorded and live streamed automatically through Panopto, and through this system I could even rewind lectures live. Lectures were also immediately available unlike with Lecturecast. [...] When I told my department something was inaccessible they immediately fixed it and were always kind and courteous with me."

"as an undergrad, I was assigned a Disability Advisor, who sat with me to make sure I could get all the reasonable adjustment I needed long before the first day lesson began, showing me around the facilities and access adjustments to avoid stars, getting special lift passes and organising my support workers had similar all area access and inductions to workshops in order to physically support me on campus"

Best practice examples

Another way of learning how to do better is by looking at best practice examples. Such examples can be found in the 2019 brief by OfS "Beyond the bare minimum".[18] For instance, this example from the University of Warwick:

"Accessible sensory study rooms. The library has a number of rooms with a range of software and additional facilities including different types of seating, lighting and resources. The rooms are publicised on

[18] https://www.officeforstudents.org.uk/media/1a263fd6-b20a-4ac7-b268-0bbaa0c153a2/beyond-the-bare-minimum-are-universities-and-colleges-doing-enough-for-disabled-students.pdf

the library website, and can be booked. One room contains various lighting options including a bubble tube and LED strip lighting. Seating options include a rocking chair, bean bag, soft seating and wobble cushion. Relaxation music and headphones are provided, and various sensory objects and a yoga mat are also available."

The 2017 report "Models of support"[19] by the Institute of Education also contains such best practice examples, such as this from the Open University:

"One institution has a dedicated team to support faculties in embedding accessibility in teaching and learning (which is broader than technical access or supporting disabled students). It started as a project initiated by the PVC in 2011 but has become 'business as usual' with permanent funding and staff in 2015. It drew together expertise from across the institution (course 62 production, library, media and IT) and was positioned separately from academic services and from student support as an independent entity. It advises and supports staff across the institution on disability access and quality assurance, build networks and connections, undertakes research and initiates projects. It has an advisory and facilitating role, as it is the faculties themselves that are responsible for developing and delivering accessible learning and teaching. The team regularly provides training for staff on awareness, process, governance, etc."

Best practice lists

Other reports contain tips for concrete steps to take in order to achieve equal access. Best practice to avoid discrimination is laid out in the Equality Act 2010 Technical Guidance on Further and Higher Education.[20] This includes:

- Asking disabled students for their views on reasonable adjustments.
- Consulting local and national disability groups.
- Drawing disabled students' attention to relevant reasonable adjustments.
- Planning in advance, anticipating the requirements of disabled students and reviewing the reasonable adjustments in place.
- Training employees to appreciate how to respond to requests for reasonable adjustments.
- Ensuring that employees are aware of the duty to make reasonable adjustments.
- Review regularly whether education and facilities are accessible to disabled people.
- Carry out and act on the results of an access audit carried out by a suitably qualified person.
- Provide regular training to staff which is relevant to the adjustments to be made.
- Review regularly the effectiveness of reasonable adjustments and acting on the findings of those reviews.

The 2019 Review of Support for Disabled Students in Higher Education in England[21] by the Institute for Employment Studies suggests that to better support their disabled students, universities need:

- Their senior management to commit to inclusive practice and culture.

[19] https://dera.ioe.ac.uk/30436/1/modelsofsupport.pdf
[20] https://www.equalityhumanrights.com/sites/default/files/equalityact2010-technicalguidance-feandhe-2015.pdf
[21] https://www.employment-studies.co.uk/resource/review-support-disabled-students-higher-education-england

- To involve all university staff in encouraging students to disclose an impairment.
- More comprehensive written policies detailing inclusive support.
- To take a whole institution approach to inclusive support.
- To build considerations of inclusivity/accessibility into curriculum design and programme review.
- To offer alternative formats of lectures and course materials as standard practice.
- To build considerations of inclusivity and accessibility into purchasing of services and equipment.
- Better sharing of good practice internally and across the sector.
- Better advice, guidance and training on digital accessibility for staff.

See chapter 6 of the report "Getting things changed", produced by various parties including the University of Bristol, Disability Rights UK and the National Development Team for Inclusion for more good practice suggestions.[22]

Additional resources

UCL could make use of their own resources:

- Lecturers, tutors and students at the Institute of Education who have experience in making teaching accessible.
- Lecturers, tutors and students at UCL International Disability Research Centre who have experience working on accessibility.
- Enable@UCL, a network of staff with disabilities.
- The Disabled Students' Network.
- A number of tutors and staff members in academic departments who are already working hard to help individual disabled students and understand that there is a problem in how UCL currently approaches disability support.

Finally, disability consultations and training are offered by the following:

- https://www.disabilityrightsuk.org/how-we-can-help/consultancy
- https://www.jisc.ac.uk/staff/rohan-slaughter
- http://www.axschat.com/piers-wilkinson/

[22] http://www.bristol.ac.uk/sps/gettingthingschanged/finalreport/

Part 13: PACT

There are many reasons to change the picture of disabled students' experiences that we see in this report. For one, students with disabilities have the same capacity to make academic contributions to UCL as non-disabled students. Not excluding disabled people from the pool of students thus ensures a higher quality of students at UCL and greater student performance. Ensuring equal access also improves student retention and scores on the National Student Survey. What is more, the scrutiny of disability support at different institutions is increasing on a national level, and being able to attain the first level of the Disability Standard would afford the institution a certain level of prestige. In time we would like to help UCL work toward the Gold level Disability Standard and become a leader in accessible education.

Perhaps the most convincing argument however is the moral one. Our survey results show there are many dedicated and empathic members working at UCL, who believe in equal access and want to do everything they can to provide disabled students with the best opportunities to succeed. They just do not have the institutional backing to do so right now.

UCL prides itself in being a progressive institution, the first to admit students regardless of religion, the first to make higher education accessible to a broad section of society, and the first to welcome women on equal terms with men. Using hashtags like #UCLCares, the university repeatedly makes its commitment toward student wellbeing clear.

This is the reason we believe that UCL will not stand for this unequal access but rather take significant steps to create change.

We hope that this report will be of use to UCL, to outline the problems at hand, as well as to offer concrete steps forward. Implementing the recommendations we have outlined in this report will go a long way towards building a caring community here at UCL. However we hope that the underlying message is not lost. Our aim is not simply to ask UCL to take a few concrete steps as a band-aid to the current situation but to start a conversation about what structures must be in place to ensure equal access long term. We want to emphasize the need for external accessibility consultants to assess the basis for the problems found in the testimonies, and the need for structural change. It does not matter how many excellent staff members UCL has or how loud the student voice is if UCL does not have the structure in place to support their disabled students.

To this end we want to present four principles which we wish to be the pillars of UCL disability support. We believe many of the problems with disability support at UCL can be addressed by implementing these four pillars:

Prevention

The 2010 Equality Act states that the duty to make reasonable adjustments is an anticipatory one. This reflects the adoption of the social model of disability which requires accessibility to be built into education rather than added as an afterthought. Concretely this means that before the university even has knowledge of a disabled student starting at the university, the requisite teaching policy must be inclusive and the bodies supporting disabled students must have been given the resources to provide correct support. The university must actively review current barriers to inclusion; environmental, pedagogical, administrative, attitudinal, and then take clearly specified actions to address them.

Accountability

Accountability towards disabled students and the law must be built into the university approach to inclusion. A single person, group or body must be created with the responsibility for holding UCLs inclusion work accountable. This body must ensure that UCL has clear goals, publishes results on meeting these goals, seeks regular feedback from disabled students, employs accessibility experts who know the law, and adequately addresses any problems which appear.

Collaboration

Instead of having a variety of bodies addressing each individual student in a disjointed and ad hoc manner different bodies must collaborate to supporting disabled students. Instead of rejecting feedback from disabled students, disability services must actively seek, encourage and grow from such feedback. This in keeping with an "affirmation model of disability" – the view that disabled students are a resource rather than a problem.

Transparency

By empowering their staff and students to understand the functioning of UCL disability services, disabled students' rights, what support is available, who answers to whom, and how the current issues are being addressed, the university can hold itself accountable.

We want to offer to collaborate in implementing these pillars and making UCL a leader in disability access.

Our request of UCL

We end this report by extending a hand to UCL and asking them to work with us to ensure that their disabled students have equal access to education here at UCL. This year, the 10 year anniversary of the Equality Act, we ask them to create a PACT, to make their disability services:

Preventative

Accountable

Collaborative

Transparent

To this end 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.

Will you make this commitment to your disabled students UCL?

Disability Discrimination Faced by UCL Students & Recommended Measures

A UCL Disabled Students' Network Report

Students' Union UCL
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WC1H 0AY

January 2020

STUDENTS' UNION UCL

Disabled Students' Network UCL
NOTHING ABOUT US WITHOUT US