THE UNIVERSITY of EDINBURGH

Review of Support for Disabled Students

Final Report

Executive Summary

The following represents the key findings and recommendations of the review.

Implementation of Adjustments

Key Findings:

- **Complexity** – multifaceted system of support which students experience as opaque, fragmented, and inconsistent.

- **Implementation** – adjustments recommended by the Student Disability Service (SDS) are not always implemented.

- **Communication** - there is a lack of communication between SDS and schools* about deciding adjustments and a lack of clarity regarding responsibilities. Communication of recommended adjustments is hampered by poor systems and over-reliance on email.

- **Governance** - schools and SDS both have specific roles in supporting disabled students but there is no one individual or organization with overall authority or responsibility to ensure a student's adjustments (or any other needs) are implemented.

- **Accessible and Inclusive Learning Policy** – awareness of and engagement with the Policy across the University remains limited and inconsistent.

- **IT infrastructure** - the IT infrastructure in current use is inadequate for effective recording and communication of agreed adjustments.

Recommendations:

- **Status of Adjustments** - The panel **recommends** that the University change the status of agreed adjustments from a recommendation to a *mandatory* requirement to implement.

- **Roles and Responsibility:**
    - The panel **recommends** that SDS, as the professional service with specific expertise in relation to disability, must be the ultimate authority in regard to *identifying* what is a 'reasonable' adjustment.
    - The panel **recommends** that responsibility for the *implementation* of agreed adjustments must rest with the schools, and therefore ultimately with each Head of School.

- **Communication:**
    - The panel **recommends** that SDS build closer relationships with schools so that SDS Disability Advisers understand the discipline-specific issues that may impact on certain adjustments.

- The panel also **recommends** that SDS and schools engage in a programme of two way communication to ensure that schools are aware of and kept up to date with changes to the full list of adjustments and that SDS are appraised of significant changes in courses or programmes. As a minimum, the panel **recommends** that a formal meeting between SDS and each School occurs once each semester.
- The panel **recommends** that schools involve SDS and disabled students and staff during the course and assessment design process.

- **Governance**:
  - The panel **recommends** that schools undertake an annual review of adjustments and submit a report to the Disability Committee/Central Management Group in regard to the number of adjustments proposed, and the number implemented and not implemented.
  - The panel **recommends** that schools introduce a senior designated single point of contact for each disabled student, with whom students can raise issues or concerns about implementation of adjustments, and other disability related issues such as accessibility, and who is empowered to act with the authority of the Head of School to resolve problems with adjustments. This does not need to be a new role but might be given to an existing senior lead (e.g. Director of Learning and Teaching). The details of this role should be widely publicised within the school and the role should include oversight of the Co-ordinator of Adjustment system to ensure that it is working efficiently and effectively.

- **Accessible and Inclusive Learning Policy:**
  - The panel **recommends** that the Policy receives a high profile relaunch with the specific support and endorsement of senior leaders in the institution.
  - The panel **recommends** that after the initial launch and communication phase, SDS conduct a focused, small-scale audit of the AILP to investigate how successful implementation of the policy has been, as well as to identify any obstacles to full implementation.

- **IT infrastructure** - the panel **recommends** that the project to enhance the SDS data systems is delivered (as planned) by the end of the current academic year, 2016-17. This should include a single portal which lists all the adjustments for any individual student and/or all the adjustments for any individual class is required. The portal should be able to assemble relevant information throughout the student lifecycle starting at confirmation of admission.

Accessibility of the Estate

Key Findings:

- **Inaccessibility** - students and staff face difficulties in accessing some of the estate due to layout and design of both old and new buildings.

- **Baseline Data** - there is no current, accurate baseline figure in regard to the exact number of buildings which are accessible, either teaching or residential.

- **Accountability** - there is a lack of clarity on who is responsible for ensuring access once a building is in use.

- **Personal Emergency Evacuation Plans (PEEPs)** – there is no effective system or infrastructure to generate and execute PEEPs, many of the estate buildings do not have

an up to date fire action plan, and existing fire plans do not include strategies for those with sensory or mobility impairments. Although Heads of School are responsible for PEEPs for individual students, SDS could do more to provide expertise and advice for Heads of School (or individual students) around all matters related to disability, including PEEPs.

- **Maintenance** - access is often limited because of breakdown of equipment which is essential for access (such as lifts, accessible doors) and there is no systematic method for reporting accessibility or related maintenance issues directly to Estates. Repairs can take a long time to be made.

- **Lack of Engagement with Students** – the University does not systematically consult or involve disabled students during the design stages of new build or refurbishment projects. This has led to instances of poor design across the estate, not simply confined to access/egress issues. For example:
    - teaching space with inappropriate size, acoustics or lighting for students with disability;
    - a lack of clear, simple, eye level signage across the University;
    - toilets designed with insufficient space for guide dogs, wheelchair or hoist users and a lack of gender neutral toilets;
    - relatively small size parking spaces (i.e. meeting statutory requirements but practically inaccessible to many users), and inappropriate surfaces of some of the allocated bays (e.g. on cobbled areas).

- **Parking** - disabled parking spaces and building access are often blocked by external contractors and or staff.

- **Scale of ambition** – students and staff encounter additional challenges when building works are undertaken and accessibility is not considered properly (for example, the ramp into Allison House being removed for repair for 12 weeks but no alternative arrangements being made in the meantime). In new developments, the standard is compliance with building standards however these represent a minimum rather than a "best practice" standard of accessibility.

Recommendations:

- **Review of Accessibility of the Estate** - the panel welcomes the current review of the accessibility of the estate. The panel **recommends** that the University devise, and allocate appropriate funding for, an action plan to address areas of inaccessibility which emerge from the review.

- **New Policy and Guidance** - the panel welcomes the current development of a new Accessibility Policy, and accompanying guidance. The panel **recommends** that Estates ensures that the documents set out a set of appropriately aspirational standards for accessibility (given the scale and standing of the institution) and that disabled students are involved in the development of the documents in order to draw on their expertise and ensure effective communication with student body.

- **Governance:**
    - The panel **recommends** that Estates and the Estates Committee give (greater) priority to accessibility in future plans for new buildings or refurbishment of buildings.

- – The panel **recommends** that Estates and the Estates committee perform a regular (perhaps annual) review of activities and performance around inclusive access as part of the Equality Duty.
  - – The panel **recommends** that consideration be given to performance indicators (for the new strategic plan) which monitor and report on accessibility of the estate.

- **Personal Emergency Evacuation Plans (PEEPs)**
  - – The panel **recommends** that the group convened by the Vice-Principal People and Culture develops an effective system to generate and execute PEEPs, and that this is developed as a matter of urgency.
  - – The panel **recommends** that the Fire Safety Unit (within Health and Safety) address as a matter of urgency, the development and publication of a fire action plan for each building in the estate, collate a list of fire coordinators for each building, liaise with estates to identify where additional refuge areas and evacuation lifts need to be commissioned (June 2017).

- **Maintenance** - The panel **recommends** that Estates develop an effective strategy to identify and address urgent repair and maintenance issues (such as those which facilitate access of disabled individuals). Estates should also develop an online feedback mechanism for users to highlight accessibility and related maintenance issues to estates, and for Estates to respond with estimated timelines. This mechanism should be proactively marketed to students.

- **Engagement with Students** - The panel **recommends** that Estates involves disabled students in the review of accessibility, policy and guidance implementation, and during the design stages of refurbishment or new build projects in order to draw on their expertise to ensure due consideration of accessibility from a user perspective and ensure effective communication with student body.

- **Training and awareness** - The panel **recommends** that Estates staff participate in enhanced disability awareness training, ideally involving disabled users themselves, in order raise awareness and understanding of the impact of accessibility issues.

- **Parking** - The panel **recommends** that the Director of Estates implement clearer and more regular communication to its own staff and to contractors regarding the requirement that disabled parking space is kept accessible at all times.

- **Expertise and advice on all matters related to student disability** - the panel **recommends** that SDS take a lead role in championing the cause of disabled students and acts as a source of expert advice for students and staff (including Heads of School) seeking to address disability-related problems.

*Please note: the term 'school' is employed throughout this document to refer to the local organisational body to which students matriculate. This is usually a School but in some instances this may be a Deanery or a College.

Report

1   Context

1.1   Students raised concerns about the University's current arrangements for supporting disabled students at a meeting of the Edinburgh University Student Association (EUSA) Student Council held in March 2016. In response, the Principal instigated this review in April 2016 and tasked a review panel to scrutinise priority areas (accessibility and the implementation of adjustments) and recommend options for enhancement. The focus of the review was on support for disabled students, however it was determined that any issues identified which (also) related to support for disabled staff would be remitted to People Committee (or another relevant staff committee) for further action.

1.2   The Equality Act (2010) states that it is illegal to discriminate against someone on the grounds of their disability. The duty to make reasonable adjustments requires education providers to take positive and proactive steps to ensure that disabled students can fully participate in the education and enjoy the other benefits, facilities and services provided for students.

      The duty of the University, as a public sector body, is also "anticipatory": *"In relation to higher education the duty is anticipatory in the sense that it requires consideration of, and action in relation to, barriers that impede all disabled people prior to an individual disabled student seeking to access education or the benefits, facilities and services offered to students by the education provider."* (Equality Act 2010 Technical Guidance on Further and Higher Education, section 7.19).

      Therefore the University has a legal obligation to make reasonable adjustments to accommodate the needs of disabled students. This obligation is anticipatory and there is a risk that we are not currently fully meeting this obligation.

1.3   The review was overseen by a panel convened **Professor Jane Norman** (Vice-Principal, People and Culture), with membership as follows: **Mr Gavin Douglas** (Deputy Secretary, Student Experience); **Professor Sandy Tudhope** (Head of the School of Geosciences and Court representative); **Ms Jess Husbands** (EUSA Vice-President, Societies and Activities); **Ms Leah Morgan** (Convenor elect of the Disability and Mental Wellbeing Liberation Group); **Mr Chris Brill** and Ms **Stephanie Millar** (Senior Policy Advisers Equality Challenge Unit - external members).

1.4   Methodology

1.4.1   The panel met for the first time in May 2016 to agree the scope and terms of reference for the review. It was agreed that the University's traditional review methodology would be utilised, whereby reviewed areas would be invited to produce a "reflective analysis" setting out their approach to support for disabled students. These documents would then inform preparations for two formal review days addressing issues relating to the accessibility of the estate (to be held in September 2016) and the implementation of adjustments (to be held in October 2016). It was agreed that the Student Disability Service, in relation to the implementation of adjustments, and Estates, in relation to the accessibility of the estate, were the key service providers and therefore would be the foci of the review.

1.4.2   The panel met in August 2016 to consider the reflective analysis documents (and other statistical data, reports and policy documentation relevant to the review remit), identify initial findings and where further information may be required. The panel agreed the schedules for the formal review days and discussed how to approach the meetings.

Also in August 2016, Professor Jane Norman and Mr Gavin Douglas held a consultation session with a group of Co-ordinators of Adjustments to discuss issues relating to the implementation of adjustments.

1.4.3   The panel held a full day of meetings on 28 September 2016 with key stakeholders from across the institution to consider issues regarding the accessibility of the estate.

In the course of the day the Review Team had discussions with: Mr Gary Jebb, Director of Estates; Professor Jonathan Seckl, Convenor of the Estates Committee and Vice Principal, Planning, Resources and Research Policy; Mr Hugh Edmiston, Director of Corporate Services; a selection of Estates staff; a selection of Health and Safety staff (including Mr Alastair Reid, Director of Health and Safety); a selection of staff with responsibility for timetabling and space management (including Mr Scott Rosie, Head of Timetabling Services); and a selection of staff with responsibility for Personal Emergency Evacuation Plans (including Dr Lisa Kendall, Director of Professional Services, School of Law); and a selection of student and staff users.

1.4.4   The panel held a full day of meetings 30 October 2016 with key stakeholders from across the institution to consider issues regarding the implementation of adjustments.

In the course of the day the Review Team had discussions with: students with disabilities; Ms Sheila Williams, Director, Student Disability Service; Ms Tracey Slaven, Deputy Secretary, Strategic Planning; University and College Recruitment staff; school academic and administrative staff, including Coordinators of Adjustments; Student Systems staff; and Student Disability Service staff including Disability Advisors.

1.4.5   The panel met for the final time in January 2017 to discuss the legal obligations of the University with the Director of Legal Services and to agree on the key findings and recommendations of the review.

1.4.6   The key findings and recommendations were discussed at Senate (1 February 2017), People Committee (15 February 2017), and the Principal's Strategy Group (20 February 2017). A consultation event for students was held on 22 February 2017 and consultation events for School staff were held in each College as follows: College of Medicine and Veterinary Medicine (23 March 2017); College of Science and Engineering (27 March 2017); College of Arts, Humanities and Social Science (28 March 2017). Comments from all of these meetings have been incorporated into this report.

1.5   The findings and the recommendations of the review panel are broadly in line with the January 2017 publication from the Department of Education entitled "Inclusive Teaching and Learning in Higher Education as a route to Excellence". Please see web link below:

https://www.gov.uk/government/publications/inclusive-teaching-and-learning-in-higher-education

2. Implementation of Adjustments

2.1 Student Perspective

2.1.1 From discussions with students it was clear to the panel that there is a general perception within the student body that the University's approach to disability support is too often opaque, fragmented, and inconsistent. Support is multifaceted and spread over numerous areas and services across the University. At any one of these points contact may dissipate or be lost entirely, leaving students frustrated and angry with the process and in need of further help. In many cases students reported that they often simply revert to managing their situation by themselves. During the review students regularly mentioned that their University made them feel like a 'burden' due to the impersonal and uncaring culture all too often faced by disabled students.

2.1.2 In the light of these concerns the panel recognises that it is vital that the University make explicit the roles and responsibilities for disability support across the institution. It is also essential that the University engenders stronger working partnerships between Schools and support services for this complex system of support to function smoothly to the benefit of students. Finally, and of paramount importance, there must be a definitive statement on the status of adjustments if the University is to meet its legal obligations to disabled students.

2.2 Status of Adjustments

2.2.1 The Student Disability Service (SDS) recommends adjustments for disabled students in the expectation that these will be put in place. Some Schools have raised questions as to what is deemed to be a "reasonable" adjustment, challenging the recommendations of SDS Disability Advisors, which in turn has led to the non-implementation of the adjustment(s). The SDS has an expectation that Schools will instigate a dialogue with the service to seek resolution, or a workable alternative solution, if there are valid pedagogical reasons why recommended support cannot be implemented. However, once this point has been reached, expectations are such that the non-implementation of the adjustment(s) causes great stress and consternation to the students concerned. This state of affairs is unstainable.

2.2.2 As noted, the University has a duty under the Equality Act (2010) to make reasonable adjustments by taking positive and proactive steps to ensure that disabled students can fully participate in the education and enjoy the other benefits, facilities and services provided for students.

2.2.3 The panel **recommends** that the Student Disability Service (SDS), as the professional service with specific expertise in relation to disability, must be the ultimate authority in regard to *identifying* what is a 'reasonable' adjustment.

2.2.4 The panel **recommends** that responsibility for the *implementation* of agreed adjustments rests with the schools, and therefore ultimately with each Head of School.

2.2.5 In order to ensure that this distinction works to the benefit of students, the panel is in agreement that it is necessary to move away from the concept of 'recommended' to '*mandatory*' adjustment. This change will help to provide sufficient authority and weight to SDS adjustments in order to ensure that there is no option to ignore or amend them once they have been agreed and communicated to the student.

2.2.6   The panel **recommends** that the University change the status of agreed adjustments from a recommendation to a *mandatory* requirement to implement.

2.2.7   The panel **recommends** that Senate Curriculum and Student Progression Committee (CSPC) ensure that the University academic regulatory framework is amended to reflect this change in time for the start of the 2017-18 academic session.

2.2.8   Some schools have raised questions as to what is deemed to be a "reasonable" adjustment, often in the context of discipline-specific matters. The panel recognises that it is vital for schools to have confidence that adjustments take into account any discipline or course-specific issues that may be relevant.

2.2.9   The panel **recommends** that SDS build closer relationships with schools so that SDS Disability Advisers understand the discipline-specific issues that may impact on certain adjustments. The panel also **recommends** that SDS and schools engage in a programme of two way communication to ensure that schools are aware of and kept up to date with changes to the full list of adjustments and that SDS are appraised of significant changes in courses or programmes. As a minimum, the panel **recommends** that a formal meeting between SDS and each school occurs once each semester.

2.2.10   The panel acknowledges that there will be a period of transition and that student expectations will be raised at the same time as the process of adjustment decision making and agreement between SDS and schools undergoes a significant change. However, the panel was in agreement that student expectations should be high at an institution of the stature of the University of Edinburgh and that this risk was outweighed by the reputational risk for the institution of not complying with its legal duty. To assist with mitigating this risk, the panel **recommends** that SDS undertake a historic analysis of problematic adjustments. This analysis could then be used by SDS Disability Advisors as guidance in regard to the type of issues that may require a conversation with the school concerned before an adjustment decision is agreed.

2.2.11   The panel **recommends** that schools involve SDS and disabled students and staff during the programme, course and assessment design process.

2.3   **Governance**

2.3.1   The panel was in agreement that schools must monitor their own compliance with implementation.

2.3.2   The panel **recommends** that schools undertake an annual review of adjustments and submit a report to Disability Committee/Central Management Group (CMG) in regard to the number of adjustments made and the number implemented and not implemented.

2.3.3   The panel **recommends** that SDS take a lead role in championing the cause of disabled students and acts as a source of expert advice for students and staff (including Heads of School) seeking to address disability-related problems.

2.4   **Accessible and Inclusive Learning Policy**

2.4.1   Awareness of and engagement with the Accessible and Inclusive Learning Policy (AILP) across the University remains limited and inconsistent.

2.4.2   The AILP was introduced in 2013 to increase the accessibility and inclusivity of learning and teaching for all students by mainstreaming a small number of adjustments as follows:

1. Course outlines and reading lists shall be made available at least 4 weeks before the start of the course.
2. Reading lists shall indicate priority and/or relevance.
3. Lecture outlines or PowerPoint presentation slides for lectures/seminars shall be made available to students at least 24 hours in advance of the class.
4. Key technical words and/or formulae shall be provided to students at least 24 hours in advance of the class.
5. Students shall be notified by email of changes to arrangements/ announcements such as changes to courses/room changes/cancellations.
6. Students shall be permitted to audio record lectures, tutorials and supervision sessions using their own equipment for their own personal learning.
7. All teaching staff shall ensure that microphones are worn and used in all lectures regardless of the perceived need to wear them.

2.4.3   The panel noted that disabled students regard the policy as a positive development promoting an inclusive environment while also making them feel less conspicuous. However the policy has been met with a degree of resistance from some academic staff, with some regarding it as overly officious. This may have contributed to the non-implementation of the mainstreamed adjustments covered by the policy, with students reporting the main issues as follows: lecturers not using microphones in lectures; lecture outlines not available at least 24 hours in advance; recording not being permitted in class. The panel was in agreement that the AILP must be more consistently implemented, and that schools must periodically audit compliance with implementation.

2.4.4   The panel **recommends** that the AILP receives a high profile relaunch with the specific support and endorsement of senior leaders in the institution.

2.4.5   The panel was in agreement that the policy relaunch must be accompanied by further SDS training and communication sessions with Schools, focusing on the reasons why the policy is valued by disabled students and the legal implications of non-engagement. These sessions should be led/co-led by an academic member of staff, and involve disabled students explaining directly why implementation of the policy is crucial to their studies and experience at the University.

2.4.6   The panel **recommends** that SDS conduct a focused, small-scale audit of the AILP, after the initial launch and communication phase, to investigate how successful implementation of the policy has been, as well as to identify any obstacles to full implementation.

2.5   **The Role of the Student Disability Service**

2.5.1   The role of SDS within the adjustment process seems at times to be a source of confusion and frustration for students.

2.5.2   Essentially, SDS perceives its role within the process as that of identifying reasonable adjustments and communicating its recommendations to schools via the student Learning Profile (LP). However, as SDS is responsible for the initial assessment and

recommendation of adjustment, the expectation of students seems to be that SDS will take a proactive role co-ordinating and monitoring the process to successful implementation. The panel noted that, as responsibility for implementation of adjustments sits with schools, it is not realistic for SDS to have this role. The panel noted that, as SDS cannot fulfil this role, students may become frustrated with the service, perceiving it as simply reactive, or worse as an additional layer of bureaucracy forming a barrier between the students' needs and their fulfilment by frontline academic staff.

2.5.3   The panel **recommends** that SDS consider ways of clarifying the role of the service within the adjustment process, particularly as a way of manging student expectations of the service.

2.5.4   The panel noted that disabled students want the adjustment process to be more transparent particularly in regard to the roles and responsibilities within system. The current process involves a number of different areas and points of contact across the University before an adjustment can be made. At any one of these points the adjustment may fail to be implemented correctly, leaving students frustrated with the process as a whole and in need of further help.

2.5.5   The panel **recommends** that SDS, with input from schools as needed, produce a concise 1-2 page student user guide to the adjustments process, encompassing the main roles and responsibilities of SDS and of the School that the student is affiliated to. This guide must be proactively promoted to students.

2.6   **The Role of Coordinator of Adjustments**

2.6.1   The role of Coordinator of Adjustments (CoA) is key to the adjustment process in each school but appears at times to lack the clarity and authority needed to ensure the implementation of adjustments.

2.6.2   The CoA has responsibility for distributing LPs to relevant academic and other staff members involved in each particular student's course of study. The panel noted that academic and support staff were generally in agreement that the role of CoA benefitted from an academic lead in order to provide it with sufficient authority when requesting adjustments be implemented by academic peers. However, much of the work of the CoA is administrative, and so the CoA role has morphed from its origins as an academic post, to the current arrangements whereby each School has several CoAs with (usually) one academic and several Student Support Officers (SSOs). The panel noted that in such cases, the lack of a single identified point of contact for disabled students could add to student difficulties and frustration. Conversely, the panel heard that where students had had access to a single point of contact with regard to adjustments in their school, they had found this to be very positive.

2.6.3   The panel **recommends** that schools should also ensure that there is clarity in the way the CoA role / system is communicated and promoted to students to facilitate their navigation of the adjustment process within their school.

2.6.4   Overall the panel did not think it was helpful to recommend that CoA's must be academic staff, nor was it helpful or practical to make any recommendations on the number or grade of CoA's in any one area. It was more important that each school should have a designated and sufficiently senior, single point of contact that students

could approach if they experienced problems with adjustments. This member of staff should be able to act with the delegated authority of the Head of School to ensure that adjustments are implemented as required. The panel noted that a network of empowered staff members with an interest and expertise in supporting disabled students would be a potentially powerful source of expertise across the institution. The panel noted that ultimately students could raise a complaint with the University if their adjustments were not implemented, but that it was preferable to ensure that issues were resolved speedily and at frontline if at all possible.

2.6.5   The panel **recommends** that schools introduce a senior designated single point of contact for each disabled student, with whom students can raise issues or concerns about implementation of adjustments, and other disability related issues such as accessibility, and who is empowered to act with the authority of the Head of School to resolve problems with adjustments. This does not need to be a new role but might be given to an existing senior lead (e.g. Director of Learning and Teaching). The details of this role should be widely publicised within the school and the role should include oversight of the CoA system to ensure that it is working efficiently and effectively.

2.6.6   The panel **recommends** that **Professional Service Departments** with significant student-facing responsibilities (e.g. Library; Estates; Accommodation; Catering and Events; Centre for Sport and Exercise) should also identify and publicise a named point of contact for disabled students facing challenges in their respective areas.

2.6.7   The panel **recommends** that SDS put in place training and support for the aforementioned role of designated single point of contact for disabled students, including but not limited to creating a network of these staff to share best practice.

2.7   Communication and Engagement between Staff

2.7.1   There is a need for greater engagement between the SDS and schools in order to promote a more proactive approach to the management of the adjustment process across the University.

2.7.2   The panel recognises that strong working partnerships between the SDS and schools are essential for this multifaceted system to function smoothly to the benefit of students. SDS staff meet with CoAs three times a year, to provide information on procedural and process changes, deliver training and updates on system development and to discuss areas of concern, challenges and improvements to the system.

2.7.3   The panel **recommends** that SDS establish a formal network of CoAs (akin to the Senior Tutor Network for PT system) with regular meetings and events for staff to share and disseminate good practice and support peers across the University.

2.7.4   The panel **recommends** that SDS hold an Open Day to raise awareness of and promote the Service to school staff (possibly held in conjunction with other services).

2.8   Learning Profiles

2.8.1   A fundamental challenge to the effective implementation of adjustments is the sheer volume of LPs sent to the schools, especially at the start of the first semester, and the

lack of clarity in some aspects of the current system used for the dissemination of LPs. School staff reported that they were often unclear as to who had responsibility for which action in the process which could lead to the adjustment 'falling through the cracks' in the system.

2.8.2   The panel **recommends** that SDS produce clearer guidance for schools on who has responsibility for disseminating LPs and how they should be used.

2.8.3   The panel noted that current systems developments to bring the adjustments process onto the EUCLID system should reduce if not eliminate the over-reliance on emails as the primary means of communication.

2.8.4   In the interim, the Panel **recommends** that SDS review the LP email template sent to schools to ensure that specific information is directed to specific points of contact in the adjustment process, highlighting specific updates and actions required.

2.8.5   School staff also reported that a lack of detailed information to set the context for any given adjustment tended to inhibit staff engagement. The panel was in agreement that whilst there may be confidentiality considerations, it was important that staff with responsibility for implementation had as much information regarding the context of the adjustment as was permissible.

2.8.6   The panel **recommends** that Student Systems ensure that the new EUCLID reports provide more information about the nature of individual student disability in order to help frontline staff understand and assist students when they make contact with schools.

2.9   **IT Infrastructure**

2.9.1   The IT infrastructure in current use is inadequate for effective communication of agreed adjustments.

2.9.2   SDS has initiated a project, with Information Services and Student Systems, to improve data systems and processes based on students' needs and of the needs of the various related roles (CoAs, Disability Advisors etc.). In addition to this project, further enhancement work is being undertaken to make more effective use of the MyEd portal (with more personalised communications) and to the applicant portal.

2.9.3   The panel **commends** the services involved for setting up the project which would appear to address a number of the systemic and process issues identified by staff and students. The panel was in agreement that a single portal which lists all the adjustments for any individual student and/or all the adjustments for any individual class is required.

2.9.4   The panel **recommends** that the project to enhance SDS data systems is delivered (as planned) by the end of the current academic year, 2016-17. This should include a single portal which lists all the adjustments for any individual student and/or all the adjustments for any individual class is required. The portal should be able to assemble relevant information throughout the student lifecycle starting at confirmation of admission.

2.10   Staff Training

2.10.1   There is no mandatory training for staff involved with the adjustment process and encouraging staff to attend training sessions is a problem common to many areas across the University.

2.10.2   The panel **recommends** that Vice-Principal People and Culture bring a proposal to Central Management Group (CMG) that all staff are required to take part in a programme of equality and diversity training. This training may be best delivered electronically to meet staff needs and to ensure that staff completion of training was easily logged. Oversight of school compliance should be provided by central Human Resources in order to provide sufficient monitoring authority to the process.

2.10.3   Staff identified a particular need for more training and support for frontline academic staff in recognising and supporting unseen disability (such as mental health issues). The panel noted that earlier support for unseen disability may alleviate the pressure points which develop during examination periods, particularly in regard to late Special Circumstances applications.

2.10.4   The panel **recommends** that SDS collaborate with the Institute for Academic Development (IAD) to produce an online resource for staff encompassing training requirements, good practice case studies, and guidance on competence standards for academics and staff involved in teaching and assessment administration. There should also be greater visibility of CoAs on the SDS website with contact details/links for all school CoAs.

2.11   Waiting Times

2.11.1   Disabled students are frustrated by delays to their assessment by SDS.

2.11.2   A key driver of the recent SDS restructuring was the need to reduce waiting lists. The enhancements are aimed at providing a more integrated and therefore effective support to disabled students. To alleviate pressure at peak times SDS recruited a sessional Needs Assessor during 2015-16 to assess students for financial support under the UK Disabled Students Allowance (DSA) support provision (additional sessional needs assessors will now be appointed). An additional cohort of sessional Mental Health Mentors (MHM) were also appointed for academic year 2015-16 and worked at four sites throughout the University estate.

2.11.3   The panel **recommends** that SDS encourage 2/3/4 year students to seek adjustment assessments during the summer period and investigates options (including additional space on other areas of the campus if needed) to make greater use of sessional staff at peak times.

2.11.4   The panel **recommends** that school/college admissions teams collaborate with SDS to encourage new students to seek adjustment assessments outwith start of the academic year/busy semester times.

2.12   Communication and Engagement with Students

2.12.1 Disabled students are confused and frustrated by the volume of communications from across the University related to the adjustment process.

2.12.2 The panel noted that the University was addressing the issue of student communications via a working group and the development of a thematic based website for student experience services which would enhance the wider promotion and visibility of student services as a whole. SDS hopes that the restructuring of the service would also improve communications by facilitating consistency of approach to disabled student support. This more proactive approach would involve the provision of drop-in sessions for students, highlighting of services to students at key points in the academic year (such as the approach to examination periods) and possibly the use of VLE and social media. SDS also takes a proactive approach to gathering and responding to student opinion through a variety of surveys, in line with University practice. However, there is a general feeling that students are being over-surveyed.

2.12.3 The panel **recommends** that SDS make wider use of student focus groups to enhance student engagement with the service.

2.12.4 The panel **recommends** that SDS consider the viability of coordinating and supporting a disabled students' network as a forum for student with disabilities to air their views.

2.13 Positive Image of Disability

2.13.1 The panel recognises that disabled students want the University to work harder to foster and promote an inclusive and positive image of disability across the institution.

2.13.2 The panel **recommends** that University marketing materials (e.g. the prospectus) include positive images of disabled students to reflect the student cohort and encourage inclusivity.

2.13.3 The panel **recommends** that SDS and the Student Association collaborate to recognise and award schools for good practice in support for disabled students.

3. Interruptions of Studies

3.1 The panel noted student concerns that Authorised Interruption of Studies (AIS) was being inappropriately applied instead of putting appropriate adjustments in place.

3.2 The panel found no evidence that AIS was being inappropriately applied instead of putting appropriate adjustments in place. However, at present the University only has a policy in place regarding AIS at postgraduate research level. The Support for Study Policy applies where a student's behaviour gives staff cause for concern and reason to suggest am interruption of studies. However there is no formal mechanism for taught students to instigate or request an interruption of studies. In order to ensure clarity and transparency it was suggested that a formal University policy may be needed encompassing both taught and research students.

3.3 The panel **recommends** that the University develops a policy for Authorised Interruption of Studies (AIS) encompassing both taught and research students.

4. Accessibility of the Estate

4.1 Student Perspective

4.1.1 In the course of the review the panel heard from a diverse range of disabled students from across the University. Students reported numerous difficulties accessing teaching space across the University.

4.1.2 The panel noted a general perception amongst the student body that the University was not listening to disabled students. Of particular concern was the lack of consultation or involvement of disabled students during the design stages of new build or refurbishment projects. This in turn seems to have led to instances of poor design across the estate, not simply confined to access/egress issues. For example, students reported teaching space with inappropriate size, acoustics or lighting for students with disability; toilets designed with insufficient space for guide dogs, wheelchair or hoist users and a lack of gender neutral toilets; Students were also frustrated by a lack of clear, simple, eye level signage across the University. Engaging with disabled students to gain an understanding of accessibility needs from a user's perspective would avoid many of these issues and problems arising in the first place.

4.1.3 Personal Emergency Evacuation Plans (PEEPs) were also cited as a major cause for concern for students. The panel heard from a student who had had a particularly unsatisfactory experience arranging a PEEP, due to the inaccessibility of the school building, which in turn had led to a formal complaint.

4.1.4 During the review disabled students shared their experiences of being timetabled to teaching and examination venues which were inappropriate and therefore inaccessible. In several instances students reported that their school had not been alerted to the problem until the student had had to deal with the consequences of misallocation. This was particularly distressing when it occurred immediately before an examination. Furthermore, students noted that even when the allocated venue was ostensibly accessible consideration was not given to the accessibility of the surrounding area or their needs when traveling between sequentially timetabled venues. For example, students noted that persistent problems with lifts can render otherwise accessible teaching spaces inaccessible.

4.1.5 Students reported that accessibility was often restricted by maintenance failures, particularly in relation to equipment essential for access such as lifts and doors. For example, lift maintenance and reliability was cited as a major area of concern, with the Crystal MacMillan building cited as particularly poor. Students reported that lifts were often out of action for many weeks and the panel noted distressing incidents of users being trapped as the lift malfunctioned. Toilet maintenance was also regarded as problematic as was the lack of gender neutral toilets.

4.1.6 The provision of and access to disabled parking across the University has become a particularly troubling issue for many students. Students reported numerous examples of inconsiderate obstruction of disabled parking spaces by either University staff or external contractors, particularly during the Festivals. The panel also noted more general concerns in regard to the number of disabled parking spaces across the estate and the relatively small size (i.e. meeting statutory requirements but practically inaccessible to many users) and inappropriate surfaces of some of the allocated bays (e.g. on cobbled areas).

4.1.7 At a more fundamental/cultural level, students reported feeling that the issues mentioned above were indicative of a general lack of awareness amongst staff as to the personal impact and significance of seemingly minor accessibility problems. Numerous individual examples of this were cited in relation to both poor design practice (such as toilets designed with insufficient space for guide dogs, wheelchair or hoist users) and poor maintenance practice (such as the ramp into Allison House being removed for repair for 12 weeks but no alternative arrangements being made in the meantime).

4.1.8 The panel **recommends** that Estates involves disabled students in the reviews of accessibility, policy and guidance implementation, and during the design stages of refurbishment or new build projects in order to ensure due consideration of accessibility from a user perspective.

4.2 Institutional Context

4.2.1 The panel heard that University has made significant investments in the estate in recent years and the ongoing scale of the Capital Plan would have a positive impact on the accessibility of a large portion of the estate. All new-build projects comply with statutory building standards and regulations which enshrine the principle of universal accessibility. Refurbishment projects are addressed on a project by project basis, based on the principle that (if at all possible) full access through the front door would be guaranteed. Furthermore, approximately £90,000 per annum has been available to address specific accessibility needs.

4.2.2 The Director of Estates advised the panel that the unique topography and historic nature of much of the University estate meant that providing universal access was complex and expensive to deliver. He indicated that the historic nature of the estate may preclude full access to all upper floors (for example, parts of George Square and Buccleuch Place) although in certain areas partial access may be achievable. Safe and appropriate alternatives may be available although some buildings may not prove accessible. Due to these factors comparisons to other institutions were difficult but the University appeared to be significantly behind other institutions in relation to the assessment of physical compliance, estate adaptations, and the development of managed plans for the delivery of services. For example, a large number of institutions have employed external consultants to evaluate access and disability provision and there are examples of universities making adaptions to historic buildings (e.g. Oxford University).

4.2.3 The panel noted that historically the accessibility of the University estate had been managed on an ad-hoc basis with the focus largely on delivery of specific access tasks (for example, a specific request regarding the provision of access to a particular building or location for a particular individual). Records of accessibility issues had been inconsistent and incomplete. The Director of Estates acknowledged that there was an urgent need to develop a more strategic and systematic approach to accessibility across the University. There was no current, accurate baseline figure but approximately 24% of the total number of teaching buildings were inaccessible, amounting to approximately a third of the estate area/space. This amounted to a significant reputational and possibly legal risk factor.

4.3 Accessibility Review and Plan

4.3.1 The Director of Estates reported that 'Disabled Go' had been appointed to undertake a comprehensive review of accessibility across the University estate. The survey would provide a current and accurate baseline figure which would enable Estates to

seek the required level of resource to address accessibility issues and develop a prioritised matrix for future investment.

The panel noted concerns from some students who reported poor experiences with Disabled Go and noted that the company was not NRAC accredited. However, the Director noted that Disabled Go, while not a perfect solution, is a 'not for profit' organisation specifically set up to support students and is widely respected and employed by comparator institutions across the sector. The panel noted that the survey was due for completion in September 2017.

4.3.2   The Director of Estates reported that in order to accelerate work on priority areas in the interim, Faithful & Gould (accredited by the National Register of Access Consultants, NRAC), had been appointed to provide cost estimates and a high level action plan for 20 key buildings.

4.3.3   The Director of Estates reported that access reviews had also been commissioned for a selection of the major development projects either under construction or about to go on site. The results of these independent reviews would be shared with each of the design teams and, where practicable, all reasonable steps would be taken to overcome any potential accessibility issues. It was noted that review would be undertaken by NRAC registered, independent consultants for the following building projects:
- Law, Old College (onsite);
- McEwan Hall (onsite);
- Institute of Regeneration & Repair (at detailed design stage);
- Building a New Biology (at detailed design stage);
- Charles Stewart House (at early design stage);
- Hill Square Learning and Teaching Centre (Lister/Pfizer), (at early design stage).

4.3.4   The Director of Estates reported that an Equality Support Officer would be appointed to project manage the implementation of recommendations from the surveys and to advise on the accessibility of new buildings and refurbishments.

4.3.5   The Director of Estates reported that a provisional budget of £1 million had been made available for works to address the immediate recommendations from the surveys. Further budget provision would be a priority for future Planning Rounds. The Director of Estates and the Head of Corporate Services suggested that approximately £12 million in total (£3-4 million to be invested each year over a period of 3 years) may be required to bring the estate up to the required accessibility standard. This would amount to 5-6% of the current Capital Plan and would need to be top sliced in order to ensure priority. The panel noted the importance of including the University owned residential estate in the accessibility survey as well as the space and pathways in between buildings.

4.3.6   The panel welcomed the review of the accessibility of the estate. The panel **recommends** that the University devise, and allocate appropriate funding for, an action plan to address areas of inaccessibility which emerge from the review.

4.4   **Access Guides**

4.4.1   The Director of Estates reported that on completion of the access review Disabled Go would produce access guides for approximately 300 buildings and 600 teaching spaces. These access guides would be available by September 2017 and would be launched during Welcome Week at the start of the 2017-18 academic session. An

online guide and mobile app would be available for each building which could be personalised to the needs of each individual user. These would significantly assist the development of Individual Access Plans.

4.4.2   The panel **recommends** that Estates ensures that the Access Guides are developed in collaboration with disabled students and local estates and facilities officers.

4.5   **Accessibility Policy and Guidance**

4.5.1   The panel noted that Estates was currently developing a new Accessibility Policy, and accompanying guidance, with the assistance of an independent NRAC registered consultant. The documents were due for consideration at the March 2017 meeting of the Estates Committee. The new policy would establish a set of overarching principles on accessibility which would be reflected in the Estate Strategy. The new guidance could be used to ensure quality standards above the statutory minimum, should the University determine this appropriate. The panel was in agreement that the new policy must set out a set of appropriately aspirational standards for accessibility (given the scale and standing of the institution).

4.5.2   The panel **recommends** that Estates ensures that the documents set out a set of appropriately aspirational standards for accessibility (given the scale and standing of the institution) and that disabled students are involved in the development of the documents in order to draw on their expertise and ensure effective communication with student body.

4.6   **Personal Emergency Evacuation Plans**

4.6.1   The panel noted that there was no effective system or infrastructure to generate and execute Personal Emergency Evacuation Plans (PEEPs).

4.6.2   PEEPs are designed to plan in advance for those who may need assistance or special arrangements during an emergency evacuation of the building they are occupying. Any student or staff member who may need assistance in an emergency evacuation must complete a PEEP. The PEEP would then be retained by their School or Support Group and copies would be distributed to the Disability Office (students only), University Fire Safety Adviser (UFSA), University Security and the disabled person.

The Fire Safety Unit (FSU) reported that the vast majority of student PEEPs which they helped to formulate were entirely successful and acceptable to the individual students. However, with an increasing number of students and staff using facilities across the institution, in addition to visitors to the University, it has become increasingly difficult to coordinate the PEEP system. Because of the general inaccessibility of the Estate, students requiring a PEEP outside normal office hours may find they are restricted to attending events in ground floor rooms only. Disabled students may therefore not be able to enjoy the same range of facilities and events as able-bodied students.

4.6.3   The panel heard from a student who had had a particularly unsatisfactory experience arranging a PEEP, due to the inaccessibility of the school building, which had in turn led to a formal complaint. It was noted that this had eventually been resolved with the implementation of a mobile trained Recovery Team providing coverage between certain hours. However, staff raised concerns regarding the suitability of this

approach as a model of accepted practice for wider dissemination across the University. In particular it was noted that it went against family friendly policies and would therefore be unsustainable for many teaching office and school facilities staff.

4.6.4 Staff reported that the PEEP system continued to function due to the goodwill and reliability of trained individual staff members. The roles were voluntary and attract no incentive (in contrast with those of first aiders) which can make recruitment and retention difficult, as can the need to provide coverage outside regular office hours. Due to this the PEEP system was geared towards daytime office-hours coverage and therefore a particular concern was the need to ensure cover for postgraduate students given 24/7 access to buildings. Oversight of this has been a cause for concern for Directors of Professional Services (DoPS) with several having to make ad hoc arrangements for staff to be present in buildings after-hours for research seminars attended by disabled postgraduate students. Furthermore, even when there were teams in place in larger areas, the teams may be small, and it can be difficult for staff to combine their PEEP role with other duties.

4.6.5 The panel noted a lack of clarity in regard to the PEEP process and the roles and responsibilities of those involved. If a student required a PEEP it was highlighted on their LP (as long as the student had engaged with the SDS) and then this would act as a trigger for the School to initiate the preparation of the PEEP following receipt of the LP. However, it was acknowledged that schools did not always initiated the PEEP process at this point.

4.6.6 The panel **recommends** that the group convened by the Vice-Principal People and Culture develops an effective system to generate and execute PEEPs, and that this is developed as a matter of urgency.

4.6.7 Staff suggested that PEEP coordination may be facilitated by the development of Generic Emergency Evacuation Plans (GEEPs) for each building, stored on the central timetabling system, with a clearly identified staff member acting as point of contact. It was also suggested that the involvement of University Security staff would provide another possible option for the system. Staff also noted that evacuation lifts, refuge spaces and emergency communications systems should be integral to the designs of all new University buildings.

4.6.8 It was noted that development of GEEPs for each building is limited by the inadequacies of fire action planning generally. Many buildings in the estate have neither a current fire action plan nor identified refuge places. There is no readily available list of fire co-ordinators.

4.6.9 The panel **recommends** that the Fire Safety Unit (within Health and Safety) address as a matter of urgency, the development and publication of a fire action plan for each building in the estate, collate a list of fire coordinators for each building, liaise with estates to identify where additional refuge areas and evacuation lifts need to be commissioned (June 2017).

4.7 **Timetabling**

4.7.1 During the review disabled students shared their experiences of being timetabled to teaching and examination venues which were inappropriate and therefore inaccessible.

4.7.2 In several instances students reported that their school had not been alerted to the problem until the student had had to deal with the consequences of misallocation. This was particularly distressing when it occurred immediately before an examination. The panel also noted teaching and support staff frustration with the lack of communication from SDS and the central Timetabling Unit in relation to the requirements of disabled students and the accessibility of teaching space. Of particular concern was the lack of sufficient and accurate accessibility data on the central timetabling system. Staff suggested that SDS could provide basic information (such as a check list) to ensure all adjustment needs were covered. This could also include contacting the Timetabling Unit to alert them to the needs of any students with agreed adjustments.

4.7.3 The panel **recommends** that the Timetabling Unit ensure that the central online timetabling system include more information on categories of accessibility, setting out the exact definition of who would be able to access each room. It was noted that this information should be available from the accessibility audits and guides to be commissioned by Estates.

4.7.4 The 2015 Periodic Review of SDS recommended deeper engagement between schools and the Timetabling Unit. The panel noted that the Director of the SDS and Head of the Timetabling Unit were currently exploring options for improving engagement with schools. These include SDS representation at the Timetabling Operations meetings and the feasibility of surveying all teaching spaces for inclusion on the central system. The panel encourages SDS and Timetabling Unit to continue to explore options.

4.8 **Maintenance**

4.8.1 The panel noted that accessibility is often restricted due to long standing breakdown of equipment essential for access such as lifts and doors.

4.8.2 The Director of Estates acknowledged that currently there were no systematic arrangements for capturing and reporting maintenance issues. However, revised operational structures and management practices were being introduced (including an integrated Helpdesk) which would enable the establishment of performance measures, response times and fault tracking. In particular, revised structures were currently being developed for lift maintenance and reliability (historically a particular problem). These enhancements would allow for a more strategic approach to maintenance issues.

4.8.3 The panel **recommends** that Estates develop an effective strategy to identify and address urgent repair and maintenance issues (such as those which facilitate access of disabled individuals).

4.8.4 The panel noted that students and staff were frustrated that there was no way to report accessibility or related maintenance issues directly to Estates. An easy to use, online feedback system would be greatly valued particularly if its existence was

proactively marketed to students so that they could feel confident reporting issues. It was suggested that a transparent online 'issue log' (similar to the one currently used by Information Services) available to all students and staff would be useful. This log could also flag up where routine maintenance was planned that may impact on accessibility.

4.8.5   The panel **recommends** that Estates develop an online feedback mechanism for users to highlight accessibility and related maintenance issues to estates, and for Estates to respond with estimated timelines. This mechanism should be proactively marketed to students.

4.9   Signage

4.9.1   The panel noted that another major area of concern was poor signage, with numerous examples of bad practice (particularly in regard to inappropriate font styles and sizes) from across the estate cited by students. However, the Main Library was held up as an example of good practice with clear, simple signage positioned at eye level throughout the building.

4.9.2   The Director of Estates confirmed that a new protocol had been developed which was compliant with legislation and would be applied to new builds going forward. However, there was no resource to retrofit.

4.9.3   The panel **recommends** that Estates ensure that all signage is clear, legible at distance in an accessible font, and at eye level where possible.

4.10   Parking

4.10.1   The panel noted that the provision of and access to disabled parking across the University had become a particularly troubling issue for many students and staff. Of specific concern was the safeguarding of disabled user access during building maintenance/construction and the Festivals (especially in the George Square area). More general concerns were also raised in regard to the number of disabled parking spaces across the estate and the relatively small size (i.e. meeting statutory requirements but practically inaccessible to many users) and inappropriate surfaces of some of the allocated bays (e.g. on cobbled areas).

4.10.2   The Director of Estates noted that the University had no specific policies to ensure continued accessibility of the estate during buildings work (which seemed to be in line with other institutions across the sector). However access was robustly monitored and controlled via Edinburgh Council's building control mechanism, with all significant building works requiring a building warrant addressing issues of access.

4.10.3   The panel noted that the Parking Office and the Festivals Office were aware of the issues and worked together when problems arose to ensure disabled parking areas were kept accessible, particularly around the Main Library and George Square area during the Festivals. The main problem appeared to be the abuse of the disabled parking system due to inappropriate parking by building contractors, deliver drivers and some members of Estates staff. Estates endeavour to ensure that staff and visiting contractors are made aware of the issue and the need to keep disabled space accessible at all times, with individual members of staff personally responsible for any

fines accrued due to inappropriate parking. More generally, the provision of disabled parking space across the estate is allocated on the basis of specific demand.

4.10.4   The panel **recommends** that the Director of Estates implement clearer and more regular communication to Estates staff and to contractors regarding the requirement that disabled parking space is kept accessible at all times.

4.10.5   The panel noted that the approach to disabled parking seemed to be reactive to particular issues or individual demand. The panel was in agreement that the University needed to be more proactive and establish an effective long term solution for these types of problem, whether during Festival period or otherwise. Clear accessible directional signage to alternative locations may be one aspect of necessary alternative arrangements (e.g. to other existing disabled parking spaces) or to temporarily allocated spaces which were not a significant distance away from the buildings which need to be accessed. Input from disabled staff and students in regard to the design, location and allocation of disabled parking spaces was advisable. In regard to the specific issues around the Main Library, it was acknowledged that this was complicated by the fact that the area was a public highway maintained by Edinburgh Council, however a long term solution may involve the installation of bollards with intercom access via the Library front desk.

4.10.6   The panel **recommends** that the Director of Estates ensures that strategies are developed to improve access to disabled parking spaces.

4.11   Disability Awareness Training

4.11.1   There was a general sense that many individual Estates staff were "doing a good job", with students reporting individual instances of good practice (such as the Servitors in the David Hume Tower striving to keep the lift available for priority use by disabled students). However that support tended to be reactive, after problems had emerged, instead of anticipative and therefore avoiding the problem in the first place. The issues mentioned above were indicative of a possible lack of awareness amongst Estates staff as to the personal impact and significance of seemingly minor accessibility problems. Numerous individual examples of this were cited in relation to both poor design practice (such as toilets designed with insufficient space for guide dogs, wheelchair or hoist users) and poor maintenance practice (such as the ramp into Allison House being removed for repair for 12 weeks but no alternative arrangements being made in the meantime).

The panel noted that noted that Estates had instigated Disability Awareness Training for Estates Staff, which was primarily focussed on professional staff responsible for development and operation of the estate. The panel was in agreement that there seemed a need for a more comprehensive cultural shift with Estates, including staff responsible for maintenance as well as those working at a more strategic level.

4.11.2   The panel **recommends** that Estates staff participate in enhanced disability awareness training, ideally involving disabled users themselves, in order raise awareness and understanding of the impact of accessibility issues.

4.12   Performance Indicators

4.12.1   The panel noted the importance of targets in focusing attention on issues and ensuring that work was completed. To this end, the University's new Strategic Plan would be accompanied by an indicator in relation to the accessibility of the estate. The panel asked the Director of Estates to elaborate on Estates' accessibility targets and how progress towards an accessible estate would be measured.

4.12.2   The Director of Estates acknowledged the value of targets but confirmed that no targets had been developed or agreed in relation to the accessibility of the estate. The Director of Estates was also not aware of other institutions across the sector with performance indicators of this nature. Furthermore, he noted a concern that any target set may be arbitrary and meaningless until the exact scale of the issue had been ascertained. This would become clear after the baseline accessibility survey had been conducted and the level of adjustment and funding required had been established.

4.12.3   The panel acknowledged the difficulties due to the historic legacy of the issue but noted that it was important for Estates to use the opportunity to input on to the development of meaningful targets rather than being assigned targets by an external consultant or agency.

The Director of Estates suggested that it would be more helpful to establish a set of overarching principles, via the proposed accessibility policy and guidance developments, and then to have these reflected in the Estate Strategy. Furthermore, the Director of Estates suggested that the critical issue was not necessarily access to buildings or physical space but rather services relating to the student experience. It was suggested that this was reflected in the legislation and building regulations which required *services* to be accessible, and if a service cannot be accessed in a specific location then the service should be relocated, either on a temporary or permanent basis dependant on student need.

4.12.4   The panel acknowledged the difficulties ensuring access to buildings due to the complex fabric of the existing estate but noted that the University required accessible buildings in which to deliver the services related to the student experience. Furthermore, there was a need for performance data in order to ensure institutional oversight of the accessibility of the estate.

4.12.5   The panel **recommends** that the University give consideration to performance indicators (for the new strategic plan) which monitor and report on accessibility of the estate.

4.13   Governance and Accountability

4.13.1   The panel noted the importance of a clear line of responsibility in order to ensure that the institution has strategic focus on accessibility issues and to ensure that work is undertaken and completed. To this end, the panel explored the process for securing resources for work on the accessibility of the estate. It was noted that it was possible for Estates to make requests to the Estates Committee for additional capital funding to make ongoing accessibility adaptations to estate. It was also noted that it was within the remit of the Estates Committee to prioritize work to make the estate more accessible. However, the panel noted that, to date, it appeared that insufficient funding had been allocated specifically for accessibility improvements given the scale

and complexity of the estate, but equally, the funding that had been made available had neither been prioritised nor expended.

4.13.2   The panel **recommends** that Estates and the Estates Committee give greater priority to high levels of accessibility in future plans for new buildings or refurbishment of buildings.

4.13.3   The panel **recommends** that Estates and the Estates Committee perform a regular (perhaps annual) review of activities and performance around inclusive access as part of the Equality Duty.

4.13.4   The panel **recommends** that the Director of Estates ensure clarity about the responsibilities of each of Estates and the operational unit (School/Deanery/College or support group) occupying a building in ensuring access.

4.13.4   The panel **recommends** that SDS take a lead role in championing the cause of disabled students and acts as a source of expert advice for students and staff (including Heads of School) seeking to address disability-related problems.

4.13.5   The panel noted that there was no specific plan to invoke a rolling programme to enhance access, however the Director of Estates suggested that this would be an inevitable requirement out of the current accessibility review. The Convenor of the Estates Committee confirmed that all new buildings comply with statutory building standards and regulations. Accessibility was integral to the design process and the architectural brief for each new building and therefore committing additional resources had not been prioritized. The Convenor of the Estates Committee also noted that the University has student representation on the project board of each new development, ensuring student input from the design stage through to project sign-off.

The Panel noted that an institution of the size and significance of the University of Edinburgh may wish to be more aspirational in supporting access to its estate than simply complying with the minima set by building standards. The Director of Estates noted that the new accessibility policy and guidance could be used to ensure quality standards above the statutory minimum should the University determine this appropriate.

4.13.6   The panel noted that students and staff were in agreement that the accessibility of the newer buildings was generally good. For example, 50 George Square was singled out as having good lift access for wheelchairs and smooth floors.

However, students reported that there were still accessibility problems with some of the University's newest builds and refurbishments due to design issues which overlooked the needs of disabled users. For example, Levels café in the new Outreach building in Holyrood was cited for its poor accessibility due to the heavy doors. Wheelchair users reported that the disabled toilets in the David Hume Tower were too small. It was noted that the University had yet to signed-up to the "Changing Places" campaign (http://www.changing-places.org/) for fully accessible toilets/changing spaces. Concerns were raised regarding whether there had been meaningful consideration of disabled access and parking needs at the new Quartermile development. Disabled students also noted the importance of ensuring that more subtle barriers to accessibility, such as the size, acoustics and lighting of teaching space, were not overlooked by the University when planning enhancements to the estate.

It was noted that disabled students and staff were not necessarily involved or consulted during the design phase of new build or refurbishment projects. Students and staff were in agreement that the involvement of disabled users during the development of estates projects could help the University avoid many of the problems and issues highlighted throughout the course of the day.

4.13.7   The panel **recommends** that Estates involve disabled students and staff during the design stages of refurbishment or new build projects in order to ensure due consideration of accessibility from a user perspective.

4.13.8   Students and staff noted concerns that there were a number of areas where the historic and inaccessible nature of the buildings made them unfit for purpose (i.e. being accessible to all students) and particularly unsuitable for a modern University. New College (School of Divinity) and Buccleuch Place (School of Economics) were specifically singled out in this respect. Students and staff also raised concerns that the University seemed to give insufficient consideration as to how it ensures that the accessibility requirements of students and staff are met in teaching areas not owned by the University (i.e. those owned by the National Health Service or other collaborative partners).

Both students and staff posed the following strategic question: how does the University strike a balance between the attraction of the richness and diversity of the historic estate and the accessibility needs of students within a modern University?

5.   Conclusion: Scale of Ambition

In the course of the review the panel noted a lack of clear, strategic vision in regard to the needs of disabled students. There appeared to be fundamental disagreements as to where ultimate responsibility lay either for providing accessible buildings or for ensuring adjustments were made. In this context, a shared responsibility has meant that no one has taken responsibility.

The panel was in agreement that an institutional conversation was required to determine the University's strategic approach to disabled students: either choosing to comply with minima requirements or choosing to set the sector standard for support for disabled students. Students and staff noted that the University prides itself in being a creative beacon with cutting-edge research and sector leading innovations. They would like their University to show the same creativity and innovation in regard to disability.

List of Recommendations

Paragraph Reference	Recommendation	Responsibility
2.2.3	The panel **recommends** that the Student Disability Service (SDS), as the professional service with specific expertise in relation to disability, must be the ultimate authority in regard to *identifying* what is a 'reasonable' adjustment.	Student Disability Service
2.2.4	The panel **recommends** that responsibility for the *implementation* of agreed adjustments rests with the schools, and therefore ultimately with each Head of School.	Heads of School
2.2.6	The panel **recommends** that the University change the status of agreed adjustments from a recommendation to a *mandatory* requirement to implement.	University Senior Management
2.2.7	The panel **recommends** that Senate Curriculum and Student Progression Committee (CSPC) ensure that the University academic regulatory framework is amended to reflect this change in time for the start of the 2017-18 academic session.	Curriculum and Student Progression Committee
2.2.9	The panel **recommends** that SDS build closer relationships with schools so that SDS Disability Advisers understand the discipline-specific issues that may impact on certain adjustments. The panel also **recommends** that SDS and schools engage in a programme of two way communication to ensure that schools are aware of and kept up to date with changes to the full list of adjustments and that SDS are appraised of significant changes in courses or programmes. As a minimum, the panel **recommends** that a formal meeting between SDS and each school occurs once each semester.	Student Disability Service
2.2.10	The panel **recommends** that SDS undertake a historic analysis of problematic adjustments.	Student Disability Service
2.2.11	The panel **recommends** that schools involve SDS and disabled students and staff during the programme, course and assessment design process.	Heads of School
2.3.2	The panel **recommends** that schools undertake an annual review of adjustments and submit a report to Disability Committee/Central Management Group (CMG) in regard to the number of adjustments made and the number implemented and not implemented.	Heads of School
2.3.3 4.13.4	The panel **recommends** that SDS take a lead role in championing the cause of disabled students and acts as a source of expert advice for students and staff (including Heads of School) seeking to address disability-related problems.	Student Disability Service

2.4.4	The panel **recommends** that the AILP receives a high profile relaunch with the specific support and endorsement of senior leaders in the institution.	University Senior Management
2.4.6	The panel **recommends** that SDS conduct a focused, small-scale audit of the AILP, after the initial launch and communication phase, to investigate how successful implementation of the policy has been, as well as to identify any obstacles to full implementation.	Student Disability Service
2.5.3	The panel **recommends** that SDS consider ways of clarifying the role of the service within the adjustment process, particularly as a way of manging student expectations of the service.	Student Disability Service
2.5.5	The panel **recommends** that SDS, with input from schools as needed, produce a concise 1-2 page student user guide to the adjustments process, encompassing the main roles and responsibilities of SDS and of the School that the student is affiliated to. This guide must be proactively promoted to students.	Student Disability Service
2.6.3	The panel **recommends** that schools should also ensure that there is clarity in the way the CoA role / system is communicated and promoted to students to facilitate their navigation of the adjustment process within their school.	Heads of School
2.6.5	The panel **recommends** that schools introduce a senior designated single point of contact for each disabled student, with whom students can raise issues or concerns about implementation of adjustments, and other disability related issues such as accessibility, and who is empowered to act with the authority of the Head of School to resolve problems with adjustments. This does not need to be a new role but might be given to an existing senior lead (e.g. Director of Learning and Teaching). The details of this role should be widely publicised within the school and the role should include oversight of the CoA system to ensure that it is working efficiently and effectively.	Heads of School
2.6.6	The panel **recommends** that **Professional Service Departments** with significant student-facing responsibilities (e.g. Library; Estates; Accommodation; Catering and Events; Centre for Sport and Exercise) should also identify and publicise a named point of contact for disabled students facing challenges in their respective areas.	Professional Service Departments
2.6.7	The panel **recommends** that SDS put in place training and support for the aforementioned role of designated single point of contact for disabled students, including but not limited to creating a network of these staff to share best practice.	Student Disability Service

2.7.3	The panel **recommends** that SDS establish a formal network of CoAs (akin to the Senior Tutor Network for PT system) with regular meetings and events for staff to share and disseminate good practice and support peers across the University.	Student Disability Service
2.7.4	The panel **recommends** that SDS hold an Open Day to raise awareness of and promote the Service to school staff (possibly held in conjunction with other services).	Student Disability Service
2.8.2	The panel **recommends** that SDS produce clearer guidance for schools on who has responsibility for disseminating LPs and how they should be used.	Student Disability Service
2.8.4	The Panel **recommends** that SDS review the LP email template sent to schools to ensure that specific information is directed to specific points of contact in the adjustment process, highlighting specific updates and actions required.	Student Disability Service
2.8.6	The panel **recommends** that Student Systems ensure that the new EUCLID reports provide more information about the nature of individual student disability in order to help frontline staff understand and assist students when they make contact with schools.	Student Systems
2.9.4	The panel **recommends** that the project to enhance SDS data systems is delivered (as planned) by the end of the current academic year, 2016-17. This should include a single portal which lists all the adjustments for any individual student and/or all the adjustments for any individual class is required. The portal should be able to assemble relevant information throughout the student lifecycle starting at confirmation of admission.	Student Systems
2.10.2	The panel **recommends** that Vice-Principal People and Culture bring a proposal to Central Management Group (CMG) that all staff are required to take part in a programme of equality and diversity training. This training may be best delivered electronically to meet staff needs and to ensure that staff completion of training was easily logged. Oversight of school compliance should be provided by central Human Resources in order to provide sufficient monitoring authority to the process.	Vice-Principal People and Culture
2.10.3	The panel **recommends** that SDS collaborate with the Institute for Academic Development (IAD) to produce an online resource for staff encompassing training requirements, good practice case studies, and guidance on competence standards for academics and staff involved in teaching and	Student Disability Service and Institute for Academic Development

	assessment administration. There should also be greater visibility of CoAs on the SDS website with contact details/links for all school CoAs.	
2.11.3	The panel **recommends** that SDS encourage 2/3/4 year students to seek adjustment assessments during the summer period and investigates options (including additional space on other areas of the campus if needed) to make greater use of sessional staff at peak times.	Student Disability Service
2.11.4	The panel **recommends** that school/college admissions teams collaborate with SDS to encourage new students to seek adjustment assessments outwith start of the academic year/busy semester times.	Student Disability Service and school/college admissions teams
2.12.3	The panel **recommends** that SDS make wider use of student focus groups to enhance student engagement with the service.	Student Disability Service
2.12.4	The panel **recommends** that SDS consider the viability of coordinating and supporting a disabled students' network as a forum for student with disabilities to air their views.	Student Disability Service
2.13.2	The panel **recommends** that University marketing materials (e.g. the prospectus) include positive images of disabled students to reflect the student cohort and encourage inclusivity.	University Communications and Marketing
2.13.3	The panel **recommends** that SDS and the Student Association collaborate to recognise and award schools for good practice in support for disabled students.	Student Disability Service and the Students' Association
3.3	The panel **recommends** that the University develops a policy for Authorised Interruption of Studies (AIS) encompassing both taught and research students.	Academic Services
4.1.8	The panel **recommends** that Estates involves disabled students in the reviews of accessibility, policy and guidance implementation, and during the design stages of refurbishment or new build projects in order to ensure due consideration of accessibility from a user perspective.	Estates
4.3.6	The panel **recommends** that the University devise, and allocate appropriate funding for, an action plan to address areas of inaccessibility which emerge from the review of support for disabled students.	University Senior Management

4.4.2	The panel **recommends** that Estates ensures that the Access Guides are developed in collaboration with disabled students and local estates and facilities officers.	Estates
4.5.2	The panel **recommends** that Estates ensures that the Accessibility Policy and accompanying guidance documents set out a set of appropriately aspirational standards for accessibility (given the scale and standing of the institution) and that disabled students are involved in the development of the documents in order to draw on their expertise and ensure effective communication with student body.	Estates
4.6.6	The panel **recommends** that the group convened by the Vice-Principal People and Culture develops an effective system to generate and execute PEEPs, and that this is developed as a matter of urgency.	Vice-Principal People and Culture
4.6.9	The panel **recommends** that the Fire Safety Unit (within Health and Safety) address as a matter of urgency, the development and publication of a fire action plan for each building in the estate, collate a list of fire coordinators for each building, liaise with estates to identify where additional refuge areas and evacuation lifts need to be commissioned (June 2017).	Fire Safety Unit
4.7.3	The panel **recommends** that the Timetabling Unit ensure that the central online timetabling system include more information on categories of accessibility, setting out the exact definition of who would be able to access each room. It was noted that this information should be available from the accessibility audits and guides to be commissioned by Estates.	Timetabling Unit
4.8.3	The panel **recommends** that Estates develop an effective strategy to identify and address urgent repair and maintenance issues (such as those which facilitate access of disabled individuals).	Estates
4.8.5	The panel **recommends** that Estates develop an online feedback mechanism for users to highlight accessibility and related maintenance issues to estates, and for Estates to respond with estimated timelines. This mechanism should be proactively marketed to students.	Estates
4.9.3	The panel **recommends** that Estates ensure that all signage is clear, legible at distance in an accessible font, and at eye level where possible.	Estates
4.10.4	The panel **recommends** that the Director of Estates implement clearer and more regular communication to	Director of Estates

		Estates staff and to contractors regarding the requirement that disabled parking space is kept accessible at all times.	
4.10.6	The panel **recommends** that the Director of Estates ensures that strategies are developed to improve access to disabled parking spaces.	Director of Estates
4.11.2	The panel **recommends** that Estates staff participate in enhanced disability awareness training, ideally involving disabled users themselves, in order raise awareness and understanding of the impact of accessibility issues.	Estates
4.12.5	The panel **recommends** that the University give consideration to performance indicators (for the new strategic plan) which monitor and report on accessibility of the estate.	University Senior Management
4.13.2	The panel **recommends** that Estates and the Estates Committee give greater priority to high levels of accessibility in future plans for new buildings or refurbishment of buildings.	Estates and the Estates Committee
4.13.3	The panel **recommends** that Estates and the Estates Committee perform a regular (perhaps annual) review of activities and performance around inclusive access as part of the Equality Duty.	Estates and the Estates Committee
4.13.4	The panel **recommends** that the Director of Estates ensure clarity about the responsibilities of each of Estates and the operational unit (School/Deanery/College or support group) occupying a building in ensuring access.	Director of Estates
4.13.7	The panel **recommends** that Estates involve disabled students and staff during the design stages of refurbishment or new build projects in order to ensure due consideration of accessibility from a user perspective.	Estates