

## Disability Action Plan 2022-2027

### Consultation Comments and Responses Table

#### Question 1:

Do the actions listed in the draft Disability Action Plan meet the Disability Duties, to promote positive attitudes towards people with disabilities and to encourage participation by disabled people in university life?

Consultee Comments	Response
<p><b><u>Student</u></b> As an individual who has a disability, I feel that my needs have been met.</p>	Noted.
<p><b><u>Student</u></b> Yes, the actions listed in the draft Disability Action Plan meet the Disability Duties.</p>	Noted.
<p><b><u>Anonymous</u></b> Yes – the two duties /aims should be central to the every-day life of the University. However, I felt that the word "duties" conveys negative connotations. The two aims should not be approached as duties that the University must complete - they should be a natural thread woven into the ties that bind us together as an organisation and in how we interact with one another.</p>	<p>Ulster University is committed to mainstreaming disability equality through its policies, practices and processes, and to creating an inclusive working and learning environment. It is also 'values-led'; one of the values being 'inclusion'.</p> <p>In relation to the Disability Action Plan, the 'duties' language and positive actions are legislative requirements that the University (as a public authority) is required to adhere to, as detailed in Section 49a and Section 49b of the Disability Discrimination Act 1995, as amended.</p>
<p><b><u>Student</u></b> Yes, in writing and in theory. In practice, no.</p>	<p>The University has been awarded Disability Positive AAA+ accreditation for work in ensuring that disability equality is prioritised, for both staff and students. To achieve accreditation, employers must complete a Disability Positive Audit that focuses on employment-related disability good practice. Employers can use this audit to establish areas where they are implementing Disability Positive practice and identify where action is required in order to enhance standards.</p> <p>The University seeks to continually improve in this regard and reports regularly to the</p>

	Equality Commission for Northern Ireland (ECNI) on progress relating to the implementation of the Disability Action Plan.
<p><b><u>Student</u></b>  Yes, I believe they do.  I look forward to seeing how the plan progresses.</p>	Noted.
<p><b><u>Staff</u></b>  Yes. I welcome all of the actions.</p> <p>The ambitions outlined during the 'The Disability Duties and UU Disability Action Plan' session on 5th December 2022 are very encouraging also.</p> <p>I liked to hear that efforts are not just for compliance purposes but because Ulster wants to be truly inclusive. It is encouraging also to hear our efforts should not be and are not just a tick box exercise. I think we need actions and not just words. I think the new proposed group with students and staff representation is a great idea so long as shared lived experience and potential enhancements information is not lost.</p>	<p>Noted.</p> <p>Noted.</p> <p>As outlined in Action 2.10 of the Disability Action Plan 2022-2027, the University will establish an Internal Disability Advisory Forum, which is representative of the staff and student body, to engage with and to help inform decision making and project planning.</p>

**Question 2:**

Are there other ways in which the commitment to the disability duties could be better demonstrated?

<b>Consultee Comments</b>	<b>Response</b>
<p><b><u>Student</u></b>  There could be more awareness surrounding hidden disabilities such as autism.</p>	<p>This action was detailed in the University's previous Disability Action Plan, so it is now considered 'mainstreamed' activity. Training on hidden disabilities, such as autism, is included in the staff training programme and will be available throughout the lifecycle of the Disability Action Plan 2022-2027.</p> <p>The Staff Disability Network also provides disability awareness sessions for members.</p> <p>A <a href="#">Neurodiverse Group (ND Group)</a> facilitated by Student Wellbeing has also been established. The ND Group is a social outlet facilitated by AccessAbility Advisers for students with autism.</p>

<p><b><u>Student</u></b> Increased student awareness of AccessAbility and clarify the Reasonable Adjustment Recommendations (RARs) process, either through social media or student emails prior to the start of term, to ensure adjustments can be put in place in good time.</p> <p>Ideally, disabled students would be able to attend lectures and seminars virtually on days where physical symptoms have worsened, or alternatively, be provided with a full recording.</p>	<p>Information on AccessAbility services and RARs are promoted to prospective students via email and at open days, including through the Market Engagement team. Information is communicated regularly to current students through social media, all-student emails, bi-monthly Student Wellbeing newsletters and on the Student Wellbeing website.</p> <p>Recorded lectures on Blackboard Learn, in addition to live lectures, is seen as good practice but it is not provided as standard as the University does not have the infrastructure to support this.</p> <p>Some modules may offer both in-person and synchronous online as a hybrid model. Previous recordings captured during lockdown could also be available in subsequent years to new cohorts but for many modules, content would become outdated quickly.</p> <p>Where a RAR stipulates that a recording must be made available for a given student, then the module team would need to provide this service.</p>
<p><b><u>Anonymous</u></b> Rethink universal design to apply not only to students in the classroom, but to all facets of university life, including staff employment.</p>	<p><i>Relating to Action 2.4</i> Universal design for learning (UDL) is a <i>teaching</i> approach that works to accommodate the needs and abilities of all learners and eliminates unnecessary hurdles in the learning process.</p> <p>Ulster University is committed to making its content accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. This is underpinned by Action 2.5 of the Disability Action Plan which sets out to develop and promote guidance for staff in regard to ensuring information is accessible.</p>
<p><b><u>Anonymous</u></b> Throughout this draft strategy [action plan] there are measurable outcomes for the people responsible for completing each action. I think this is measurable and is a clear way to monitor progress.</p>	<p>Noted.</p>

<p>However, there is no reference to any financial support from the University to achieve this strategy's outcomes. I would like to see the University commit financially to supporting the actions outlined in this strategy and investing in our colleagues who overcome obstacles and challenges to be there for our students and to support the business of the University.</p>	<p>In the Foreword to the Disability Action Plan, the Vice-Chancellor commits to making available the necessary resources to ensure the effective communication and successful implementation of this plan.</p>
<p><b><u>Student</u></b> All staff present on campus should be aware and have training for people with invisible disabilities.</p> <p>People with invisible disabilities are not treated fairly on campus in the brief experience I have had.</p>	<p>All staff are also required to complete mandatory Disability Awareness training. Specific training on hidden disabilities is included in the staff training programme.</p> <p>The University is keen to know more about the experiences of people with invisible disabilities, so that any barriers to participation are removed. Staff in Student Wellbeing or <a href="#">EDI</a> are available to address your concerns.</p>
<p><b><u>Student</u></b> I feel as though it would be hard to navigate the new Belfast building if you were blind or had another form of visual impairment.</p> <p>There is also not much awareness around hidden disabilities such as autism spectrum disorder, Irritable Bowel Disease or chronic fatigue.</p>	<p>The University recognises the importance of ensuring that buildings are accessible. In the Disability Action Plan 2022-27, an action is included at 2.10 to take account of opportunities to improve both physical and digital accessibility.</p> <p>The University's <a href="#">Wayfinding signage protocol</a> aims to provide clear, consistent guidance to enable the application/installation of way finding signage across our estate, including braille. The University's <a href="#">Physical Access and Egress Policy</a> seeks to ensure that the University estate is universally accessible as this will provide equality of access and egress for all students, staff and visitors to the University.</p> <p>Training on hidden disabilities is included in the staff training programme. The Staff Disability Network also provides disability awareness sessions for members.</p> <p>A <a href="#">Neurodiverse Group (ND Group)</a> facilitated by Student Wellbeing has also been established. The ND Group is a social outlet facilitated by AccessAbility Advisers for students with autism</p>

<p><b>Staff</b></p> <p>By improving signage in the new campus. For example, the fact that the plan recognises both visible and non-visible disabilities should also be demonstrated in our signage. To this end, a sign that says "Not all disabilities are visible" could be placed in critical locations of the new campus.</p>	<p>Noted. The University's <a href="#">Wayfinding signage protocol</a> aims to provide clear, consistent guidance to enable the application/installation of way finding signage across our estate.</p> <p>Signage to raise awareness of Hidden Disabilities has been requested.</p>
<p><b>Student</b></p> <p>Action 1.3 - I think the awareness workshop is a great idea, but I would like to see more actions being taken after this. For example, what the University does/or will do to support members of the Black, Asian and Minority Ethnic (BAME) communities at Ulster following the awareness of issues they face in terms of disability or in general. On a similar note, I think an awareness workshop or something similar focusing on how disabled people specifically were impacted by Covid could be useful - by this I mean people who are vulnerable to Covid-19 because of pre-existing conditions.</p> <p>Actions 2.5 and 3.2 - I was curious if this also includes providing British Sign Language (BSL) or Irish Sign Language (ISL) interpreters for public university events or lectures, for example. Of course this is only required if there is a need or demand for it by students, but it is a key part of accessibility for hard of hearing / deaf students.</p> <p>Action 2.1 - It is great to see a plan for scholarships. I was wondering if this included both undergraduate and postgraduate scholarships, as it can be quite hard to fund postgraduates with student finance NI providing no grant for example.</p> <p>Action 2.6 - In terms of trying to get more representation for disabled people on the Students' Union Council, perhaps a proposed item could be to create a position for disability representatives Student Council?</p>	<p>The University will monitor and report on the impact of this workshop as part of its annual report to the Equality Commission.</p> <p>The Disability Action Plan is a fluid document. Any further actions arising from the workshop can be added to the Disability Action Plan.</p> <p>As a public authority and as an inclusive institution, the University provides BSL or ISL interpreters when required.</p> <p>The Medical Education Scholarships are for students who have completed an undergraduate degree. The Community Scholarships are for students entering their undergraduate degree. The University also offers a number of other scholarships, several of which are open to postgraduate students. The list is available here: <a href="https://www.ulster.ac.uk/scholarships">https://www.ulster.ac.uk/scholarships</a></p> <p>Action 2.6 to 'Promote and encourage applications for membership to Council and its committees within the University from people with a declared disability' directly relates to the University Council. This is a completely separate body from the noted Student Council which is administered and governed by UUSU. The UUSU has long since noted the need to ensure its Student</p>

	<p>Council has a broad and varied range of contributors and to ensure the issues pertinent to all students are captured.</p> <p>As such, a number of diversity seats exist on the Student Council, which includes nine Equality Councillors who must be drawn from certain groups, including those students who disclose that they are disabled. To show further commitment to this end, UUSU implemented a new 'Equality and Belonging' Student Officer in 2022, who is tasked to oversee engagement and representation of all groups, which again has specific reference to those that may define as being disabled. UUSU continues to take feedback from its student members on where gaps may exist and are committed to filling these where it is appropriate and achievable.</p>
<p><b><u>Staff</u></b> Annual Widening Access &amp; Participation (WAP) Key Performance Indicators (KPIs) for self-declared and Disabled Student Allowance (DSA) could be mentioned as an action perhaps also.</p> <p>Make it easier for staff to know what and when mandatory training is required. It isn't always easy to find information about when it is needed.</p> <p>It disappoints me that many times I and others have spoken up about our lived experience of disability and suggested potential improvements. We have contributed in the past to groups representing someone with lived experience of disability, but suggestions are not always actioned and/or take a long time and various reiterations to be considered/actioned. We seem to often fix problems after rather than avoid them in the first instance. I welcome the suggestion to handover the list of accessibility issues for the review of the new campus so that these are not lost when the project comes to an end.</p>	<p>This is an action already mainstreamed within various areas of the University, requiring statutory monitoring and reporting of the number of students who self-declare that they are disabled and who apply for DSA.</p> <p>Mandatory training for staff is monitored and automated reminders are sent to individuals and to line managers to encourage completion. The functionality of the new training platform is continually under review and your comments have been noted.</p> <p>Noted. The University welcomes the feedback it has received from representative disability groups and is working to rectify the unexpected accessibility issues identified on the new campus.</p>

**Question 3:**

Are there any other comments you would like to make in regard to the draft Disability Action Plan?

Consultee Comments	Response
<p><b><u>Student</u></b> Action 3.1 [celebrating] the research/teaching that directly impacts on disabilities within society. It could also incorporate disabilities into a typical scenario to help further reinforce the similarity and humanness and to help dismantle the normativity regarding disability.</p>	<p>Noted. Your comments have been shared with the PVC for Research at the University.</p>
<p><b><u>Anonymous</u></b> Action 2.2 (<i>Ring-fence posts annually across Business Support Services</i>) - I would not be in favour of ring-fenced posts for staff with disabilities. I believe the way forward to increase the number of staff employed by the University would be to provide all staff, and in particular staff on recruitment panels, with unconscious bias training. I think that ring-fenced posts can come across as patronising and can create divides in the workplace. I think the primary way to increase the number of applications from people with disabilities is to ensure that the public perception of the University in-general is that it is a great place to work; a welcoming place; a place where talent is nurtured and a place where no matter what your personal challenges are, you will be supported to be the best that you can be.</p> <p>Action 2.4 (<i>Explore concept of Universal Design for Learning</i>) - This is an excellent action/concept. However, a thorough and intensive training programme will be required to train staff well in-advance of this being implemented. My general experience of training at Ulster University involved being sent a SharePoint link to a 40-page manual. This is not how to train staff effectively or an effective way to ensure buy-in from colleagues. There needs to be face-to-face training delivered. I would consider making it mandatory for academics involved in teaching.</p> <p>Action 2.7 (<i>Relating to Demystifying Public Appointments workshop</i>) - Where these events are held is an important consideration. The venue must be accessible. If someone with a physical</p>	<p>Noted. This 'positive action' complements a number of pre-existing initiatives including Unconscious Bias Awareness training for recruitment panels and positive PR that promotes the University as an inclusive and welcoming place to work.</p> <p>The University provides a comprehensive training programme for staff. Your comments with regards to training on Universal Design for Learning has been shared with the action-owners.</p> <p>Noted. The University is currently reviewing its guidance on planning accessible events.</p>

disability arrives at the front door of the Coleraine campus, it is awkward. It's embarrassing to advise people that they need to access the building by going round to the rear of the university. They do not get to experience the pride or feeling of going through the front door.

Action 2.8 (*Relating to the Reasonable Adjustment Protocol*) - [I do not think Schools/Departments should bear the cost of onboarding colleagues and implementing reasonable adjustments to perform their job]. Back to that unconscious bias training - the interview panel will be aware that there will be a cost to onboarding a colleague where a physical disability is clear. This feels wrong. It feels like this could unconsciously or indeed consciously contribute to the hiring process. Discrimination is not always intentional, but it is unethical. There should be a central fund to financially support the onboarding and ongoing support of staff with disabilities.

Action 2.9A (*Relating to review of RAR process*) - Academic staff cannot make decisions on the health or wellbeing of students. Student and Staff Wellbeing must be properly resourced to be able to provide adequate support to staff and students in a timely manner. The Wellbeing team provides a good service considering their limited resources within the University, but they must continue to be supported with staff and resources. This is another area the University could provide a financial commitment.

Action 2.9B (*Develop and implement the CRM Recruit platform*) - There needs to be face-to-face training. My own experience [regards training in Customer Relationship Management] is being sent the manual. This is not an effective way of training staff.

Action 2.10 (*Establishment of an Internal Disability [Advisory] Forum*) - This is a great idea. However, it is my concern that without terms of reference and financial support for the outcomes of this Forum, it will become another talking shop without meaningful action.

Noted. Your comments have been shared with the action owner.

Noted. The Vice-Chancellor commits to making available the necessary resources to ensure the effective communication and successful implementation of the Disability Action Plan. This commitment is outlined in the Foreword.

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**Student**  
Consult disabled people on disability awareness training. Make sure terminology



<p>is correct because it matters a lot. For example, some 'training' companies are still teaching organisations to use the term 'Asperger's' or 'high functioning autism' which is highly offensive and undermines an autistic person's lived experience.</p>	<p>The University engages with key stakeholders to design the internal mandatory Disability Awareness training.</p>
<p><b><u>Staff</u></b>  This plan appears to be too inward looking. While having a sharper focus on staff and students, it appears to be ignoring the community around the campus. For example, we have a North Belfast Community Benefit Framework and there are a lot of people with disabilities who might be helped directly or indirectly by using strategies such as: allowing families to use our lecture rooms for training; improve physical health and wellbeing through using the gym facilities; and enabling our healthcare specialists to provide education on healthy eating and wellbeing, or empowering our employability specialists to mentor people with disabilities in the acquisition of key employability and entrepreneurial skills.</p>	<p>As a widening access University, there is a comprehensive and long-standing programme of Community Engagement and Schools Outreach, which includes extensive work with the Ashton Centre – one of the organisations involved in the North Belfast Community Benefit Framework.</p> <p>Through the Ulster University (UU) Science Shop, the Community Engagement team continues to engage with disability and equality-focused issues with voluntary sector partners across NI. These activities are considered 'mainstreamed'.</p> <p>In terms of encouraging participation in Higher Education, one of the criteria used to encourage those under-represented groups is students declaring a disability and those with disability support allowance.</p> <p>For a comprehensive review of annual activities at Ulster University, visit <a href="#">Community Engagement at Ulster University</a> or the <a href="#">Ulster University Section 75 Annual Progress Report</a>, for further information.</p>
<p><b><u>Staff</u></b>  This plan appears to refrain from learning from other local, regional and international institutions who do a great deal of transformative work. For example, Harkin Institute of Drake University, and the Zero Project organisation (which engages with global innovators, decision-makers, and opinion leaders to identify, curate, and share inclusive solutions), to name a few, have good practices to share.</p> <p>Our plan should include an action point that explicitly emphasis an openness to learn from other potential partners: To develop</p>	<p>The University is a member of the National Association of Disabled Staff Networks – a super-network that meets regularly to connect and represent disabled staff networks, learning from best practice locally and across Ireland, England, Scotland, Wales and Canada.</p> <p>The University also holds the position of NI Advisor on the National Association of Disability Practitioners – the Professional Association for disability and inclusivity practitioners for further and higher education across these islands.</p> <p>While continuing to learn and engage with bodies across the sector; this feedback will form a new action within the Disability</p>

<p>local, regional and international networks so that UU can learn and continuously improve its knowledge of and commitments to disability inclusion.</p>	<p>Action Plan (<i>Action 2.11</i>), to host a Policy Co-Designing Workshop, aimed at developing and expanding local, regional and international networks, with a commitment to enhancing disability inclusion.</p>
<p><b><u>Student</u></b> I wondered if any of the disability training mentioned in this document included specific training on neurodivergence.</p> <p>Just a point on prioritising the actions. It states in Action 2.10 that there are physical barriers in accessing new buildings and facilities for staff, students and visitors at the University. I just wanted to write that I would hope that a point like this should take quite a high priority.</p>	<p>The staff training programme includes training on neurodivergence.</p> <p>Noted. This is a high priority action.</p>
<p><b><u>Staff</u></b> I think there is still scope for the University to review and make policies and processes much more inclusive. I can speak for someone with a physical and unseen disabilities and a person who works to support WAP students and those with disabilities.</p>	<p>Noted. The University has implemented monthly Policy Clinics, to support policy owners to adopt a collaborative approach to developing and reviewing policies and ensure that they are inclusive. The University welcomes feedback on ways to enhance inclusion.</p>
<p><b><u>Staff</u></b> The Disability Action Plan is an encouraging read, open and informative. Having a disability whether seen or unseen is not easy and knowing that there is a recognition of and support within the workplace if needed makes a big difference in handling life.</p>	<p>Noted.</p>
<p><b><u>Student</u></b> Thank you for making this consultation plan available. While it is positive to see the Disability Action Plan, and certainly not before time, I am left wondering about some aspects of it. I would appreciate if you could confirm how many disabled students and staff members were consulted during the research and formulation stages, and whether such individuals will have the opportunity to discuss this other than through channels such as these.</p> <p>UUSU also currently have several policies relating to disability, which do not appear to</p>	<p>As detailed in the Foreword, the actions have been informed by engagement with disabled colleagues and students; Disability Awareness surveys and through feedback from the Staff Disability Network and external partner organisations. As outlined in Action 2.10 of the Disability Action Plan 2022-2027, the University will establish an Internal Disability Advisory Forum, which is representative of the staff and student body, to engage with and to help inform decision making and project planning.</p> <p>UUSU has adopted a wide range of policies to promote equality, diversity and inclusion.</p>

have been addressed within the plan. Therefore, I would like to know how such policies have been incorporated. I am yet to see any signage relating to Hidden Disabilities awareness and have not seen any reports to confirm how such matters are being addressed. Furthermore, access and egress from campuses and getting around them is still incredibly poor.

Although I believe that awareness is important and necessary, the many workshops noted in the plan are perhaps not the best way to achieve this. Conferences, such as Harkin Disability are a fantastic resource and allow staff members sufficient time to process a wide range of concepts. Additionally, it is not clear whether such educational measures will include disabled people. Listening to our experiences is likely to be the most effective way to achieving change.

Furthermore, the onus appears to be on staff adhering to guidelines (e.g., in utilising accessible software), rather than the University stating that a particular procedure must be followed. While many students come forward and make their needs known, there are many more who do not; it even states it within the plan... only 4.9% of staff have reported a disability.

There are currently no accurate figures regarding actual disability in NI and Ulster University does not currently report these for staff or students within reports

Actions that have been included in previous Disability Action Plans are now considered 'mainstreamed' into their activities. One example is the adoption of the Hidden Disabilities Sunflower Lanyard Scheme, which was an action in the previous Disability Action Plan (2019-2022). Wearing the Sunflower Lanyard discreetly indicates to people that they may need additional support, help or a little more time. The request for signage to increase awareness in relation to Hidden Disabilities is in process. The University's new Disability Action Plan should include 'new and unique' actions.

The University has adopted a Wayfinding Strategy to assist with access and navigation around the campuses. Wayfinding is particularly important for Ulster University due to its varied and complex campus structures. As each campus develops it becomes more complicated, so people need visual cues such as maps, directions, and symbols to help guide them to their destinations. As noted above, Action 2.10 to form a Disability Advisory Forum, will help inform and advise the University on physical and digital access issues.

Noted. The University actively encourages staff to attend, and facilitate conferences, to enhance learning. The Action Plan is a live document, and we welcome proposals for additional actions on an ongoing basis.

Disclosure rates depend on self-declaration, so the onus is on the individual to voluntarily share this information. Alongside a comprehensive training and disability awareness programme, the University uses the Reasonable Adjustments Protocol to assist staff in implementing adjustments to remove barriers in the workplace.

According to the NI Statistics and Research Agency (NISRA), 21.7% of respondents aged 16-64 (Apr-Jun 2017) reported a long-term illness and a disability. The NI Census

<p>addressing equality gaps (e.g. in pay). The University cannot hope to break the stigma around disability if it leaves accessibility options down to staff discretion. However, I do recognise that every person's needs are different.</p> <p>It is also necessary to ensure that those students and staff who still cannot be on-campus due to Covid are fully supported. The plan has not acknowledged these difficulties, with students being unable to attend some or all of their lectures. The University's advice was "attend or take a leave of absence". This is simply not good enough in terms of reducing barriers to education, particularly as a leave of absence can have very significant financial consequences for a person also reliant on state benefits. It would be necessary for the University to also address such issues, and to investigate the experiences of disabled people and benefit entitlements, as these individuals would usually be considered as "complex cases" owing to their student status.</p> <p>While the Disability Action Plan 2022-2027 is a move in the right direction, there is a great deal more work that needs to be done. Thank you for providing me the opportunity to include my comments.</p>	<p>(2021) found that 24% of the NI population stated that their day-to-day activities were limited because of a health problem or disability. The University continues to proactively review equality gaps in pay. The last Equal Pay Review included an analysis by disability. This is currently not reported in our gender pay gap analysis.</p> <p>The University's preferred approach to delivering the curriculum is 'active and collaborative learning' which promotes learning and social interaction amongst students and staff. This approach is best achieved through a hybrid <a href="#">mode of learning</a> which is where students attend in-person and also have some learning online. Provisions are in place to ensure staff and students are supported, with each case considered on an individual basis.</p> <p>The <a href="#">University's Student Wellbeing</a> team work with Schools, Faculties and professional services to ensure that students have the opportunity to access comprehensive and consistent support for the duration of their academic studies and will support all students with regards their individual requirements.</p> <p>Noted.</p>
<p><b>Staff</b> I think there is still scope for the University to review and make policies and processes much more inclusive.</p> <p>The new programme for disabled students to enhance their employability sounds fantastic.</p>	<p>Noted. The University has implemented monthly Policy Clinics, to support policy owners to adopt a collaborative approach to developing and reviewing policies and ensure that they are inclusive. The University welcomes feedback on ways to enhance inclusion.</p> <p>Noted.</p>