

**Implementing Inclusive Teaching and Learning
in UK Higher Education – Utilising Universal
Design for Learning (UDL) as a Route to
Excellence**

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Executive Summary

This research begins to illuminate a national picture of Universal Design for learning (UDL) in UK higher education (HE), identify good practice and make recommendations useful to the HE sector.

UDL is an approach based on planning for a diverse university community, rather than being surprised by diversity and attempting to retrofit adjustments for people who do not conform to the mythical norm stereotype.

The researchers have extensive experience of working with disabled students and share a commitment to developing inclusive HE based on UDL principles.

UDL is on the agenda partly because the UK HE sector is currently considering reforms to the Disabled Students' Allowance (DSA). Individualised DSA funded reasonable adjustments have been the primary means of supporting eligible disabled students until recently, although some universities are working towards embedding UDL and inclusive practices which aim to reduce reliance on DSA. (Scotland's approach to DSA varies slightly but operates similar principles so this research is relevant to the four nations.)

Existing research is mainly small scale, often from the perspective of researchers with a strong commitment to UDL. Approach and terminology varies between studies making comparison difficult.

Primary research informing this report focusses on staff and students from four English universities and disability practitioners from across the sector. Findings from focus groups, interviews and questionnaires were thematically analysed to draw out commonality and differences.

Broadly, students from widening participation (WP) institutions tended to focus on access to staff time. Staff revealed a strong commitment to facilitating student success through, for example, reliable use of virtual learning environments and allowing lecture recording. Russell Group students were more interested in interventions to lighten heavy workloads, such as prioritised reading lists. Staff were not all enthusiastic about having their lectures recorded.

Student interviews from three participating universities revealed difficulty navigating services and systems to support learning, including DSA. An example of a map providing a joined-up picture of such services is presented. Creating such documents and covering what professional services can offer during induction is recommended.

Desktop research revealed pockets of UDL-informed inclusive pedagogy and delivery, and a very patchy evidence base on which to build a sector-wide picture. Examples of good practice included: inclusive virtual learning environments, effective use of technology, and multiple means of engagement and access to professional services.

Some studies cited, framed around an entitlement model, located disability firmly under the equalities umbrella, understood intersectionality and saw UDL as broader than a disability concern.

This research suggests that UDL can benefit all students, including those ineligible for DSA, as well as staff and other stakeholders. (International disabled students and those studying less than fifty percent of a full-time course cannot access DSA.) Research evidences that disabled students are not the only group requiring assistance. Links to a student self-assessment with signposting to services are provided in this report.

Senior leadership buy-in and joined-up thinking between various players responsible for students' experiences were identified as essential to success. Linking UDL with TEF preparation was proposed.

Staff with expertise in UDL expressed frustration about their lack of influence. Professional bodies like The National Association of Disability Practitioners (NADP) were considered influential, but also lacking in senior leadership involvement.

Staff development around UDL was found to be variable, usually not compulsory and rarely evaluated in terms of sustained impact. Staff described practical development requirements, especially around technology.

Points of comparison between institutions and research are virtually impossible without a reliable benchmarking tool with which to evaluate and map existing provision. A sector-wide benchmark does not currently exist. An example baseline document is provided in this report.

DSA and UDL are not mutually exclusive. Both systems have merits and limitations. Reduction of reliance on DSA and eradication of DSA are not the same thing. This report provides examples of bespoke reasonable adjustments required by some disabled students. A combination of such DSA-funded adjustments where necessary, and with minimal bureaucracy, and an underpinning UDL approach to learning is advocated.

This limited and small-scale research fulfils the aim of making some useful recommendations. Data analysis to date has revealed headline themes. Further work is planned.

A more detailed report is available from the principal investigator:

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Abstract

The UK higher education (HE) sector is undertaking reforms to the Disabled Students' Allowance (DSA), until recently the primary means of funding support for eligible disabled students. (Operation of DSA is slightly different in Scotland but similar principles apply.) In a government-commissioned report, embedding Universal Design for Learning (UDL) and inclusive practices was proposed as an approach to reducing reliance on the DSA. This research examines the circumstances in which UDL is currently operating in a cross-section of English higher education providers with a view to contributing to a currently patchy evidence base. Focus groups, interviews and questionnaires were utilised to collect data from four universities and disability support staff. Pockets of good practice such as inclusive virtual learning environments were identified, and it is noted that such strategies benefit all students rather than just those who would have been entitled to DSA. Strategic engagement and embedding UDL was thought to require joined-up thinking between various staff groups under the direction of a named senior leader. Participants suggested that this did not happen coherently. Students felt that systems in place to support their learning were hard to navigate. Some staff were surprised that they were not communicating about this as effectively as they thought. A sector-wide benchmark does not currently exist and would be a helpful tool for creating a stronger foundation on which to build change.

Introduction

Layer's report 'Inclusive Teaching and Learning in Higher Education as a route to Excellence' was produced by the Disabled Students Sector Leadership Group (DSSLG) in January 2017 at the request of Jo Johnson, the then Minister of State for Universities and Science. DSSLG was tasked with identifying various actions which could be implemented by UK providers of HE, in order to develop inclusive practice and ultimately reduce reliance on Disabled Students' Allowances (DSA). Concern about rising costs had been on the agenda since David Willetts, during his tenure as Minister of State for Universities and Science, first proposed DSA reforms (Hansard Commons, 2014). Both ministers framed their requests around embedding inclusive practice to reduce the requirement for individualised reasonable adjustments.

UDL and inclusion encompass all facets of university life, not just teaching and learning (Martin, 2016; Martin, 2017; Milton et al., 2016; Milton et al., 2017). This research aims to contribute further evidence upon which to consider approaches to developing, delivering and evaluating inclusive HE practice at institutional and sectoral level. Currently foundations on which to build a picture of UDL across the sector are inadequate (Draffan et al., 2017a).

Disabled students and university staff from two widening participation (WP) and two Russell Group universities provided most of the primary data via interviews and focus groups. Disability services staff from the National Association of Disability Practitioners (NADP) also contributed via a focus group. Secondary source data was gathered from research, legislative and policy documents.

Stakeholders responsible for inclusive teaching and learning policy and procedure will find this report useful. Ideas presented are largely relevant to all students, particularly those from WP backgrounds, and to other stakeholders including staff.

Aims of the research

1. Outline an approach to delivering inclusive practice within courses of study to mitigate the risks identified in Layer (2017).
2. Understand how disabled students experience the teaching and learning environment.
3. Utilise UDL principles as a framework for evaluating disabled student experiences.
4. Investigate how a small representative cross section of UK HEIs are adopting the principles of inclusive practice and UDL.
5. Collate case studies to inform best practice from examples 1 to 4 towards the development of a baseline provision of UDL incorporating DSA changes across the sector.

Literature Review

Terminology

The terms inclusion, UDL and The Social Model of Disability merit some explanation. Layer (2017) noted various terminology in research, legislation and policy to describe 'inclusive teaching and learning practices' with a degree of imprecision, and disciplinary and regional variation. While being the focus of this research, disabled learners are only part of the broader UDL and inclusion story (Martin, 2017; Milton et al., 2016). UDL's emphasis on inclusion and eradicating barriers to participation is in line with Social Model (of disability) thinking (Oliver 2009) which is arguably focussed more narrowly on disability equality.

UDL

Originally from America, the UDL framework provides a growing international evidence base for its efficacy as a model for inclusive practices (Al-Azawei et al., 2016; Bracken and Novak, 2019). The US Federal Government defines UDL as:

A scientifically valid framework for guiding educational practice that provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged. UDL reduces barriers in instruction, provides appropriate accommodations, supports and challenges, and maintains high achievement expectations for all students including students with disabilities (US Congress, 2008).

UDL grew out of the broader concept of Universal Design (UD) (Burgstahler, 2015) and is relevant to every aspect of university life. Pre-entry processes, alumni activities and concerns of staff and other stakeholders would be encompassed in a truly inclusive approach to UDL (Martin, 2008b). Planning, design, delivery and evaluation of curricula (goals, assessments, methods and materials) are relevant UDL considerations (National Center on Universal Design for Learning, 2011). UDL aligns with the UK Professional Standards Framework for teaching and supporting learning in HE (Advance HE, 2019b). Advantages of UDL extend beyond disabled learners and apply to different teaching and learning situations (Burgstahler, 2015; Hockings, 2010; LaRocco and Wilken, 2013). Innovations such as accessible e-learning, distance and blended learning, multiple-format curricula resources and accessible digital technologies are all congruent with UDL principles (Everett, 2017). UDL practice also applies to staff and other stakeholders and is relevant beyond the classroom (Martin, 2017).

Inclusion

Inclusion is an underpinning principle of UDL (LaRocco and Wilken, 2013; Lawrie et al., 2017; Milton et al., 2016). Layer (2017) referenced the Higher Education Academy definition:

Inclusive learning and teaching recognises all students' entitlement to a learning and experience that respects diversity, enables participation, removes barriers and anticipates and considers a variety of learning needs and preferences without directly or indirectly excluding anyone. (p12)

Considering all aspects of the student journey, rather than only teaching and learning, is emphasised by Farrar and Young (2007) in their guide for supervising disabled research students. Their focus on doctoral students illustrates that inclusive practice is relevant beyond undergraduates.

Best inclusive practice takes account of the whole of a student's life and views the curriculum as what happens within and beyond the setting of formal learning. It involves the whole organisation, not one part of it. (p3)

The Teaching Essentials Toolkit from Sheffield Hallam University (2016) characterised inclusive practice as:

- Being Flexible – open to change and versatile
- Being Equitable – ensuring consistency and accessibility for all
- Working Collaboratively – involving students and stakeholders
- Supporting Personalisation – recognising that successful learning and teaching is governed by personal difference
- Embracing Diversity – creating opportunities to develop awareness of diversity and global issues.

Notably the quote taken from Sheffield Hallam does not specifically reference disabled students, because the guide takes the view that inclusive practice is about everyone.

Inclusive practice involves planning for all members of the community rather than planning for the mythical norm and expecting everyone else to fit in. This principle is relevant beyond students who identify as disabled (Jones, 2018; Knight et al., 2018; Leadley-Meade and Goodwin, 2019; Reinhardt et al., 2018).

Social Model of Disability

The Social Model of Disability (Oliver, 2009) theorises impairment and disability as separate inter-related ideas. Social Model thinking is relevant to UD, UDL, social inclusion and inclusive practice. Eradication of barriers to facilitate participation is a common theme.

Disability is conceptualised in Social Model terms as socially constructed, additional to impairment and created or exacerbated by environment (Martin, 2008c). Spinal injury, for example, may create mobility impairment. Stairs would constitute a disabling physical barrier. UD theorists would argue that ramps are of universal benefit.

In keeping with Social Model thinking, 'disabled students' rather than 'students with disabilities' is used in this report. This reflects the idea that students with impairments often face external disabling barriers which are not part of their being but are socially constructed (Wilson and Martin, 2018; Oliver 2009); i.e. they are disabled by policies, practices and procedures which are not inclusive or cognisant of UD. UK universities are challenged by Social Model theorists

on their reliance on Medical Model diagnostic labelling as a gateway to DSA (Wilson and Martin, 2017).

Legislative Background.

UD, UDL and inclusion are embraced conceptually by the entitlement model underpinning the Equality Act 2010, which applies to UK HEIs and extends beyond promoting equality of opportunity towards a more proactive stance (Equality and Human Rights Commission, 2016).

The Equality Act characterises disability as a protected characteristic alongside eight others, including gender and age, and recognises intersectionality. Unlawful discrimination on the grounds of race and disability, for example, would be covered. As the legislative duty is anticipatory, universities are expected to plan ahead rather than trying to retrofit adjustments for disabled people.

David Willetts initially proposed DSA reforms in 2014 as Minister of State for Universities and Science. Discrimination legislation (Disability Discrimination Act 1995; Disability Equality Duty 2005; Equality Act 2010) dictated that reasonable adjustment costs cannot be charged to the disabled person but custom and practice meant that DSA often paid for adjustments which universities were legally expected to provide. Willetts' DSA reforms were aimed at 'rebalancing' costs of supporting disabled students by shifting the expense of reasonable adjustments to institutions and reserving DSA for more specialist provision. In 2016 the Disabled Student Sector Leadership Group (DSSLG) was formed at the request of Jo Johnson, then Minister of State for Universities and Science, to investigate ways to reduce reliance on DSA. Layer reported on the DSSLG's findings in 2017. He recommended embedding UDL and inclusive practice into HEIs to minimise reliance on DSA-funded individualised reasonable adjustments.

Despite government concerns about rising DSA costs (Willetts, 2014), the Equality Act 2010 offered some protection to disabled students against reduction in support post-DSA reforms. The Public Sector Equality Duty is anticipatory. Section 7.26 and 7.27 of the Equality Act 2010 Technical Guidance on Further and Higher Education (EHRC, 2014a) outlines requirements for action planning towards equality objectives. The Equality Duty (EHRC, 2014b) requires universities regularly to publish accessible equality information and specific measurable objectives (section 149). Draffan et al. (2017a) argue that universities can only meet Equality Act responsibilities and anticipatory duties if there is sector-wide agreement about the principles, enactment and evaluation of inclusive teaching and learning practices. In a Spanish study, Moriña (2017) cautions that 'the legal right to access higher education is not enough, there must also be practical mechanisms' (p.3).

Layer (2017) does not contradict the understanding that for some students, additional bespoke provision will be necessary to supplement that which UDL provides. The 2018 UK Quality Code for Higher Education, Advice and Guidance: Enabling Student Achievement includes the need for 'clear, accessible and inclusive policies and procedures to enable students and staff to identify when support mechanisms may be required for academic and personal progression' (Quality Assurance Agency for Higher Education, 2018, p3). Further requirements include 'an accessible, inclusive and engaging community that incorporates staff and students to facilitate a supportive environment' (Quality Assurance Agency for Higher Education, 2018 p4).

Reducing DSA support without a viable plan B was not an option which the government could legally consider. Reforms were framed within the more palatable rhetoric of embedding inclusive practice and UDL. The updated UK Quality Code clearly states that: 'Providers should define, coordinate, monitor and evaluate staff roles and responsibilities to ensure students

have access to the support and opportunities required to achieve their personal and academic goals' (Quality Assurance Agency for Higher Education, 2018, p9). Under 'Expectation for Quality' the code clearly references 'support that is accessible and inclusive of all students, but not the same for all students' (Quality Assurance Agency for Higher Education, 2018, p.2). Establishing boundaries between bespoke solutions based on individual assessments, and addressing learning needs via UDL, is central to DSA reform.

While Layer (2017) emphasised broad benefits of UDL, his report cautioned that 'evidence suggests that very few HE providers have actually embedded inclusive practice across their degree programmes beyond pockets of good practice' (p18). Draffan et al. (2017a) concluded that the evidence base on which to build a sector-wide picture of UDL is thin, and comparison between HEIs is impossible without mechanisms for like-for-like understanding such as common baseline or framework documentation. This view was corroborated by the 'Models of support for students with disabilities' report to HEFCE (Williams et al., 2017), which noted increase in disabled student numbers alongside reduction in DSA support and variations in inclusive practices between universities. Williams et al. (2017) recommended Continual Professional Development (CPD) particularly for staff newly responsible for service provision and inclusive practice developments.

When the Equality Act (2010) was first introduced, a strategic level approach to action planning was implemented and scrutinised externally by the Equality and Human Rights Commission (EHRC) through the publication of Equality Objectives. Arguably, external scrutiny of embedding of UDL would focus the sector around implementation. Institution-specific action planning, based on assessment of current UDL practices, and setting and evaluation of clearly defined targets for improvement, would enable universities to gain an informed picture of their own progress. Sector-wide baselining would allow for comparison between institutions.

Evidence of UDL

HEIs appear to operate with a mixture of aspects of UDL in relation to pedagogy and delivery. Examples, which could benefit everyone, include: multiple means of presenting information, offering a range of assessments, lecture capture, networked inclusive technology, accessible virtual learning environments (VLEs) and provision to record lectures (Draffan et al., 2017a; Hockings, 2010; Lawrie et al., 2017; Powell, 2013). Layer (2017) argued that embedding inclusive practice would significantly reduce, although not eradicate, the requirement for individualised reasonable adjustments via DSA. Research on equality factors beyond disability, focusing on benefits of inclusive practice, similarly generates evidence which is insufficient to enable the sector to formulate any sort of baseline. Examples include: Schoepp (2018) who considers entry requirements for second-language speakers, and Reinhardt et al.'s (2018) work with refugee learners.

Examples of expensive bespoke DSA-funded support include note takers for individuals and assistive technology on students' own or part DSA-funded laptops (Draffan et al., 2017b). In December 2015 Jo Johnson informed the House of Lords in a written statement: 'In 2012/13 DSAs provided £145.8 million of additional support for 64,500 disabled higher education students, compared with £101.3 million awarded to 47,400 students in 2009/10, a rise of around 44%' (Johnson, 2015). Arguments for UDL emphasise universal benefit and Layer (2017) draws on these palatable ideas, rather than placing undue emphasis on cost saving. Networking assistive technology, for example, would help many students and reduce the necessity for individualised technology. Reduce is not the same as eradicate. Some disabled students would still require bespoke solutions when university technological resources and

computer rooms cannot meet many specialised requirements. DSA funds specific one-to-one assistance from, for example, a specialist mentor or study skills tutor qualified to work with dyslexic students (DSA-QAG, 2018a). Such services would be difficult to replicate without DSA.

Technology not necessarily badged specifically as ‘assistive’ is rapidly developing accessibility features (Newman and Beetham, 2018). While use of screen readers, text to speech and other technologies for academic purposes are becoming commonplace, some disabled students will still require personalised technology (Draffan et al., 2017b).

The relevance of UDL to students from various WP backgrounds is considered by researchers who understand that learners enter university with different levels of academic grounding (Leadley-Meade and Goodwin, 2019; Marginson, 2016; Sanders and Rose-Adams, 2014; Reay et al., 2010; Richardson, 2015; O’Shea, 2016). Skills and confidence in critical reading, using technology for academic purposes and academic writing sometimes require support and development (Leadley-Meade and Goodwin, 2019). Aoun et al (2018) found that students may not make effective use of feedback when language used is unfamiliar and over-technical. Information literacy was identified by Rosman et al. (2018) as a skill which students may need to develop. Being the first within a family to progress to HE brings particular challenges (O’Shea 2016; Reay et al., 2010; Wise et al., 2018). There is not scope here to explore these ideas further beyond understanding that disability equality is only one aspect of UDL.

Layer’s report recognises that embedding UDL in HE could not happen overnight. Draffan et al. (2017a) suggest that progress towards UDL could only be achieved if approached strategically and viewed as an evolving journey at a national, organisational and professional level. Compelling arguments for some sort of sector-agreed baseline, which would support further research that could allow for comparison between institutions, are articulated in Draffan et al’s response to Layer.

Strategic Planning for Change

Strategic leadership and external scrutiny are identified by Layer (2017) as essential to change management. Emphasis is placed by Lawrie et al. (2017) on creating a strong evidence base, and contextual understanding of ‘top down’ and ‘bottom up’ pressures and varying perspectives across institutions and the sector. Wise et al. (2018) emphasised the important role of the university governing body in change management and the value of diversity within university governance. The Equality Challenge Unit in 2016 characterised governor involvement as a legal duty in the university strategic approach to the equalities agenda (Advance HE previously Equality Challenge Unit, 2016).

‘Student Voice’ (Advance HE, 2019a) is seen as key to planning for progress towards UDL by many researchers and policy makers. There is no such thing as ‘the typical student’ (Seale, 2009). Requirements differ based on individual and course factors. Overgeneralising from views of small unrepresentative groups is problematic and tokenism is to be avoided. Homogeneity by impairment label (for example assuming all autistic learners have the same requirements) is particularly problematic (Martin, 2008a). Undergraduates and postgraduates may have different needs which vary at different stages of the course. Placements, laboratory work, research degrees, distance learning and international student experience all come under the UDL umbrella. Draffan et al. (2017a) caution against ignoring the requirements of students other than full-time young undergraduates. Postgraduate, distance and blended learning, and part-time routes also merit consideration within UDL. Requirements of doctoral students are

specifically considered by some researchers including Chown et al. (2015) and Parker-Jenkins (2018). Beardon et al. (2009), Camacho et al. (2017), Hastwell et al. (2012 and 2017), Hughes et al. (2013) and Madriaga et al. (2008) provide useful examples of acting on student feedback to improve university experience. In these studies, students were not exclusively concerned with teaching and learning and commented extensively on life beyond the classroom.

Layer (2017) is unspecific about student involvement, but recognises the need to engage staff in cultural changes at institutional and sectoral level. Similar conclusions were reached by Everett (2017) and Mitchell (2014) who described stakeholder buy-in as critical to the success of inclusive teaching and learning practices nationally and internationally.

While HE currently lacks a coherent sector-wide framework, including baseline standards for inclusive teaching practices, this is already embedded within the school sector. Key documents include The School Teaching Standards (Department for Education, 2011), School inspection handbook (Ofsted, 2018) and Special Educational Needs and Disability (SEND) Code of Practice: 0 to 25 years (Department for Education, 2015) and Children and Families Act (2014). Local authorities, schools and colleges are required by the Special Educational Needs and Disability (SEND) Code of Practice (Department for Education, 2015) to publish information on available provision for disabled young people. 'Quality First Teaching' and a 'Graduated Approach' to support are common principles aiming to ensure that requirements of all learners are factored into school culture, strategy and planning (NASEN, 2015). The Children and Families Act (2014) entitles those with the most complex needs to an Education and Health Care Plan (EHCP) up to the age of 25. EHCPs operate extensively in Further Education as well as schools and aim to ensure joined-up services between health, social care and education. Occasionally disabled university students arrive with EHCPs. These do not replace, but can inform DSA needs assessments.

Although no similar statutory protocols exist in HE to assess, baseline and develop UDL, processes have been created, mainly at institutional level. AHEAD 'Licence to Learn' Guidelines are an example of a recent European initiative which emphasises stakeholder involvement to 'create a sustainable and coherent policy through clear visions and strategies' (UDLL Partnership, 2017). The AHEAD protocol poses a series of fairly generic questions including those listed below. Baselining enabled comparison by requiring different universities to respond to the same questions.

- Do you have an over-arching institutional policy for inclusive teaching and learning?
- Are you using the expert knowledge of the diverse learner?
- Is a clear and challenging vision for UDL understood by all?
- Have sustainable strategies at all levels been implemented?
- Have you developed action plans for implementation coherent with budgets and other important plans?
- Have you used/developed a system for evaluation and quality assurance?
- Can your policies, procedures and systems for evaluation with outcomes be internally and externally scrutinised?

(UDLL Partnership, 2017)

Collaboration between leaders, staff in various roles and students is essential in order to create as comprehensive a baseline as possible. An incomplete picture will emerge if participation is too narrow. Institutions can begin action planning to embed UDL with confidence when they have a shared vision between stakeholders (Everett, 2017).

Planning for inclusive curricula is part of the anticipatory duty of the Equality Act (2010) and includes all 'qualifying institutions' and all students, whether international, part-time, distance learners and those who do not qualify for DSA. The institution is not absolved of responsibilities under the Equality Act while the student is on placement or in the provision of pre-entry and alumni services.

The Teaching Excellence Framework (TEF) (Department for Education, 2017) has created a means to compare universities from the perspective of student experience of teaching and learning. Disabled students within TEF are encapsulated within widening participation concerns, engaging with the whole student body and meeting 'the desired outcomes of the work described in the Access and Participation Statement' (Office for Students, 2018). TEF results are in the public domain and can therefore influence student choice. While TEF is not without its critics (Wood and Su, 2017), the processes around scrutiny leading to a TEF rating of bronze, silver or gold, are a little more nuanced than the arguably blunter instrument of the National Student Survey (NSS) or various league table measures. TEF may have potential for assisting with planning and evaluation of UDL developments at institutional and sectoral level. Massie (2018), in a study involving 89 HEI Programme Directors, concluded that training and preparation around the TEF of staff in pivotal roles in relation to student experience was not always adequate. The UK Professional Standards Framework could also conceivably be adapted to suit the principles of UDL. Arguably the TEF focusses the imagination of senior staff more because the results are so tangibly open to public examination.

Baselines and Frameworks

Action planning, based on joined-up stakeholder engagement, leading to setting of clearly articulated objectives, enables progress to be measured. Bromley (2009) distinguishes between evaluating high-level institutional goals and specific activities at the micro level. Bromley's model asks a series of straightforward questions and utilises a levels system to distinguish between high-level goals and specific activity relating to individual projects. The approach makes for easy comparison and has much to offer the idea of creating a baseline against which to evaluate progress towards UDL.

Defined benchmarks could translate into a common framework useful to ascertain the extent to which individual institutions are succeeding in embedding UDL. A mechanism for comparison between universities could illuminate a broader picture and inform strategy across the sector. Currently there is no such sector-wide set of benchmark standards so comparison is difficult.

Wray (2016) developed an institutional framework, a summary of which is included as an example. Based partly on research by Chantler et al., 2009, it uses four dimensions against which institutions can evaluate progress towards inclusive practice. Utilising a developmental model, it allows academic departments to self-assess, identify good practice and targets for improvement, and collaborate beyond silos. Students score practice against the same dimensions in order to triangulate evidence and ensure that student experience informs developments.

Agreement about terminology facilitates discussion about shared vision which can support the action and evaluation cycle and promote the idea of all being on the same page. Senior leadership engagement and alignment with institutional priorities is crucial in order for a university to buy in to UDL (Everett, 2017). Guskey (2000) argues that this applies to all initiatives which aim for systemic and cultural change. Structural sector-wide benchmarked approaches, such as those around TEF preparation, allow for sector-wide comparisons for

policy makers, students and others. Benefits of such joined-up thinking are emphasised by Layer (2017) but his report fell short of articulating a practical framework within which to operationalise its recommendations.

General guidance on processes around evaluation are provided within The UK Quality Code for Higher Education (Quality Assurance Agency for Higher Education, 2018). Specific advice about who should be involved is lacking. Guskey (2000) emphasises understanding the purpose, aims and context of any evaluation in order to determine the approach and consideration of who should be involved. Stakeholders' engagement and taking a longitudinal approach in order to understand any long-term impact is emphasised by Kneale et al. (2016) in their HEA study considering ways to effectively evaluate teaching development activities. By 'all stakeholders' Kneale et al. (2016) mean senior leaders, lecturers, educational developers, other professional services staff and students. The importance of benchmarking is also articulated by Kneale et al. (2016), who found that their area of enquiry also lacked such a thing on which to build a coherent evidence base which compared like with like (in evaluation teaching development activities). Capturing long-term impacts of work on UDL is problematic without a clearly articulated benchmark.

Layer (2017) provides a limited number of practical examples of ways to take the UDL agenda forward, such as De Montfort University's adoption of universal lecture capture and notes in advance. Various universities have similar practices but these are not benchmarked sector-wide. York St John University's Inclusive Learning, Teaching and Assessment Framework (Wray, 2016) and Anglia Ruskin University's Inclusive Teaching Checklist (Anglia Ruskin University, 2017) provide institutional specific benchmarks. NADP developed a template for inclusive practice aimed at autistic students and encompassing all aspects of the student journey from pre-entry to post-exit (Martin, 2008b). Just presenting staff with various checklists to complete is likely to have little impact on development of in-house practices.

Pockets of research illuminate attempts to embed UDL in individual HEIs. The Institute of Physics (IoP) (2017), for example, explored inclusive teaching and learning within physics departments. While individual reasonable adjustments appeared to be embedded to an extent, the IoP report found that academics did not appear to be particularly familiar with UDL practices. IoP therefore initiated inclusion-focussed staff development for academic and professional services staff. Hanesworth's (2015) HEA study includes practical approaches designed to enable potential, enhance belonging and engagement, raise interactivity, awareness and understanding, and instil self-reflection for students and staff.

Layer (2017) considers the role professional bodies could play in evaluating academic programs against competence standards. Professional bodies have collaborated to create guidance which considers reasonable adjustments to enable disabled students to demonstrate competences (Advance HE previously Equality Challenge Unit, 2015). Their influence rarely extends to institutional planning beyond specific courses.

Universities have multiple competing priorities. While the Equality Act (2010), NSS, TEF, and subject-specific TEF (STEF), due for piloting by the Office for Students in 2018/19, may provide impetus towards UDL, mechanisms for compliance checking do not seem particularly rigorous.

Staff development

While HEIs make some staff development topics compulsory, UDL is usually not on the list. UDL staff development delivered nationally via NADP conferences attracts few academics and

hardly any senior leaders. Draffan et al. (2017b) reached 7,000 + participants with a Massive Open Online Course on Digital Accessibility and Inclusive Teaching and Learning Environments. Web-based resources on inclusion and UDL have been created by AHEAD (2015). Building strong networks and partnerships to progress UDL underpins the Universal Design – License to Learn Erasmus+ project (2017) which considers collaboration, institutional structures, key players and student involvement. Williams et al.'s (2017) research into enactment of DSA reforms found variable practice, limited staff development and lack of university-wide inclusive policies. The importance of evaluating impact of staff development was emphasised by Kneale et al. (2016) who found little evidence that this occurs routinely.

A complicating factor exists in that DSA-funded workers are increasingly unlikely to be university staff. DSA reforms initiated by Willetts (2014) specify that providers of non-medical helpers (NMH), such as mentors and note takers, must bid for DSA contracts via a competitive two-quote system. Private NMH provider businesses with agile recruitment and payment systems can price institutional NMH providers largely out of the market. There is no comprehensive picture of training, accreditation and supervision of NMHs employed beyond the students' HEI. This concern is yet to be resolved despite attempts by the Department for Education (DfE) to ensure quality of NMH provision. Martin et al. (2017) and Milton et al. (2017) advocate for supervision as well as training of mentors. The DSA Quality Assurance Group were directed by the DfE to produce a NMH Quality Assurance Framework (QAF) and Register for NMH providers (DSA-QAG, 2018b). Eligibility to quote for supplying depends on registering and complying with the QAF through an annual audit. Provided suppliers comply with QAF they can deliver, without necessarily meeting standards laid down by the institution. An inclusive, developmental approach focussed on student autonomy and independence will reduce reliance on NMH support over time. Suppliers currently depend on DSA for work.

Student-Facing Initiatives

In response to a strategic objective to extend WP beyond the front door, London South Bank University (LSBU) Education Division developed a self-assessment tool for undergraduates which signposted them to professional services relevant to requirements they identified (Leadley-Meade and Goodwin 2019). Background research illuminated gaps in student understanding of necessary academic competencies, and available support services. Pre-entry self-assessment covered academic skills, such as Harvard referencing, and signposted relevant resources such as library workshops. Self-assessment informed conversations with personal tutors. Students were able to navigate support via a joined-up map and were surprised and positive about available help. Rates of accessing professional services increased and students sought help earlier. LSBU is a WP university and staff are aware that students do not begin their journey as fully-formed academics.

Rousseau and Eley (2010) created induction activities which alerted postgraduates to support services beyond the academic team. 'This will help the student to develop a certain degree of independence' (p9). As part of induction, Rousseau and Eley (2010, p9) mapped sources of support with students. Counselling, finance, health, accommodation, peer mentoring, clubs, societies and student union were identified. Students did not include disability services, possibly reflecting reluctance to show an interest publicly. UDL emphasises the ordinariness of disability. Student expectation of doctoral supervisors was discussed by Parker-Jenkins (2018) who felt that boundaries were not always clear. Mapping services beyond supervision would provide clarification as well as a more robust safety net.

In a consultative guide on postgraduate induction, Loughlin et al. (2010) emphasise catering for a diverse student body including disabled, mature, part-time, and international and distance learning students. Loughlin et al. (2010) recommended sensitivity to gender and religion during induction by, for example, including information on various faiths and presentations by staff of all genders. Disability-focussed examples coalesce around accessible materials and adjustments for students with physical and sensory impairments in Loughlin's (2010) guide. An updated version could usefully focus more on inclusive practices.

Draffan et al. (2017) suggested the following considerations for the outcomes of Layer to be strategically and operationally useful at institutional and sector level.

- Successful inclusive teaching and learning practices involve planning, design, delivery and evaluation of curricula outcomes as part of a UDL agenda.
- Sector-wide agreement about minimum expectations for inclusive teaching and learning practices that adhere to the Equality Act 2010 is required.
- Strategic leadership, student voice and stakeholder engagement are essential.
- Outcomes must be open to longitudinal public inspection.
- Staff development is vital.
- Effective implementation and training in use of technologies is required.
- Students need clear pathways to support.
- Sharing of expertise is necessary to support research into evidence of good practice.
- Personalised support will be needed for some students alongside being flexible, equitable and proactive in the provision of multiple means of curricula presentation and assessment modes.

Conclusion

Layer (2017) identified the need to capture current information about how universities are adapting to DSA reforms and argued for embedding UDL to reduce reliance on DSA. Establishing a means of evaluating the effectiveness of this endeavour in reducing barriers for disabled and disadvantaged students is necessary at sectoral as well as institutional level. Consistent baseline data is unavailable so comparison between universities is problematic. A sector-wide analysis informed by a common framework document could offer an effective research tool to facilitate comparisons. Lessons from the school sector about standards which apply across institutions could be useful.

Draffan et al. (2017a) suggested a sector-wide survey to illuminate plans to embed UDL and inclusive practices at institutional level and begin to produce some common data across the sector. This could support long-term plans for developing the necessary tools and skills to progress UDL across the sector.

UDL is broader than disability, as are the duties of The Equality Act (2010). Enhancing UDL practices could improve the university experience of all students and other stakeholders including staff. Comparable minimum expectations for inclusive teaching and learning practices could usefully be built on TEF requirements.

While the report focusses on sector responsibilities towards students, including the requirements of the TEF, the whole university community could benefit from UDL. Embedded UDL reduces reliance on bespoke adjustments and makes inclusive practices widely available. This would not render DSA redundant as some disabled students would still require individualised provision.

Staff development is essential. Kneale et al. (2016) caution that evaluation needs to consider longer-term impacts, not just immediate reactions. Compulsory training on UDL is unusual beyond Equality Act compliance and inclusion in some HEPs' internal academic practice certification. Including employees in various roles is important and universities should consider DSA-funded people employed by third parties.

A patchy approach to strategic engagement, practical implementation and assessment of progress towards UDL at an institutional and sector level is apparent. Research is insufficient to provide a comprehensive evidence base on which to build and is not always informed by student voice and other relevant stakeholders. Lack of a comprehensive baseline makes the task more difficult. Researchers concerned with UDL often emerge from roles without sufficient power to exert influence beyond their limited orbit. Senior leadership and governing bodies are not visibly blazing a trail.

NADP operates nationally and is committed to embedding UDL into the post-compulsory education sector via professional development of staff working together across silos. Membership of NADP is primarily disability practitioners. Joined-up working is difficult to achieve.

Terminology around UDL and inclusion is confused. A common framework and baseline protocol could help to build a shared understanding.

This research makes evidence-based recommendations about ways in which UDL could be progressed beneficially across the sector.

Methodology

Within a qualitative paradigm (Silverman, 2000) the researchers gathered rich commentary from a small number of staff and students from four English universities representing a range. In addition, insights were gathered from disability practitioners attending the NADP conference.

Ethics

Ethical clearance was gained from participating universities and NADP. Participants were fully informed of the purpose of the study and their right to withdraw. Anonymity applied to individuals and contexts. Recruitment and participation conformed to equitable practice.

Methods

Comparative case studies were utilised (Merriam, 1998; Yin, 2017) to examine the phenomenon of UDL in higher education in a range of settings. Thematic analysis was employed to draw out key themes and make comparisons between institutions, staff in different roles and undergraduate and postgraduate students (Hsieh & Shannon, 2005). Focus groups, individual walking interviews and questionnaires were used.

The involvement of participants conformed to the 'Assigned but informed' method Fajerman & Treseder 2000, Radermacher 2006. (See figure below).

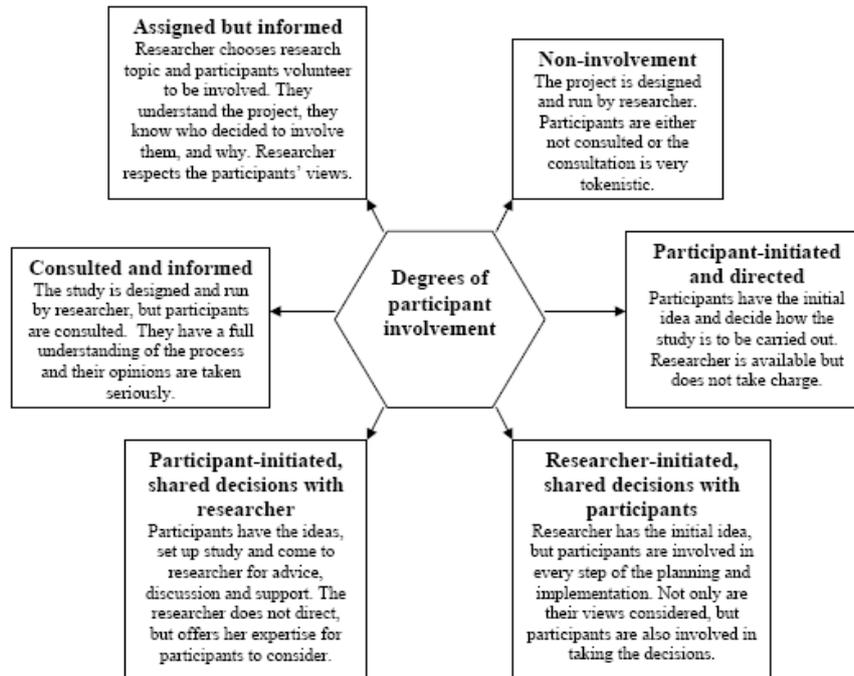


Figure: Degrees of participant involvement: adapted by Radermacher (2006) from Fajerman and Treseder (2000)

Semi-structured interviews were used to elicit feelings, attitudes and perceptions (Puchta and Potter, 2004). Broad headings covered specific aspects of UDL including: multiple means of representation, action and expression, and engagement.

Participants

Four participating universities included two large inner city institutions with diverse students from widening participation (WP) backgrounds (Bigcity WP, and Midcity WP University) and two from the Russell Group (Treetop and MidRussell). Students included undergraduates and postgraduates. NADP participants were drawn from a wide range of UK university disability services.

Research Questions

1. What challenges and opportunities do academic staff in UK HE courses face in meeting the demands of proposals in the Layer (2017) paper – Excellence for All?
2. To what extent can existing courses of study be mapped onto UDL principles?
3. What are the limitations of applying UDL dimensions to UK HE courses of study?
4. Are disabled students afforded flexibility in access to the curriculum in UK HE courses as suggested by UDL?

Results

Demographics

University	Academic staff	Professional Services staff	Undergraduate Students	Postgraduate Students
Midcity WP (FG, I)	11	9	-	-
Bigcity WP (FG, I)	2	3	2	5
MidRussell (FG, I)	5	-	-	4
Treetop (Q)	4	6	151	135
NADP (FG)	-	20	-	-

Q=Questionnaire. FG=focus group. I= interview

Summary of themes which emerged

Data was collected by four different researchers who each responded to a mutually agreed protocol and common set of questions. The configuration of focus groups and walking interviews varied and Treetop University gathered some data via questionnaires, which allowed them to capture insights from a larger number of participants but reduced the nuance of the exercise. These factors combined with the phenomenology of each of the researchers may impact on the extent to which comparisons can be made between institutions.

Common themes appear to have emerged from comparing data between the groups of participants and institutions. Differences also emerged between universities, the views of staff in different roles and undergraduate and postgraduate students.

Key findings

1. Joined up thinking between staff working in various roles was identified by each group as an important aspect of ensuring that the students were able to access the various services which the institution provides. Students did not necessarily feel that they knew how to access various services and some found the bureaucracy associated with various processes, including accessing the DSA, to be daunting. Communication between staff and students was not always as effective as staff thought.
2. Technology was valued by staff and students alike in each setting and very little distinction was made between making use of accessibility functions and using assistive technology. Greater levels of awareness of available technology and how to use it effectively was identified as important by staff and students. Communication about this was not always effective.
3. Students found the provision of notes in advance on virtual learning platforms to be very helpful. The practice appeared to be more embedded in WP universities although variation between courses was noted by professional services staff.

4. Recording of lectures was viewed as an entitlement for students, particularly for staff in WP contexts. Students who felt that routine access could not be assumed found this disappointing.
5. Time with helpful, understanding, well-informed staff was highly valued by students. Staff expressed frustration about the demands on their time and the expectations and requirements of students. In WP universities staff acknowledged that students required detailed study skills input at least initially, and discussed plans to embed this more fully in order to help students to develop their academic skills and learner autonomy.
6. Staff involvement in the embedding of UDL at a strategic level was variable but staff were highly committed to the inclusion agenda and UDL principles. Nobody working at a strategic level was interviewed for this research but staff emphasised the importance of strategic level buy-in and translation of strategy into action.
7. Students on different courses had different experiences of the university. Time with staff and access to services was felt to be particularly limited by part-time students. Staff felt that students sometimes assumed that services were not available in the evenings when this was not the case. They acknowledged that communication with other staff and students about service availability would be helpful.
8. Students from the most elite university in the sample expressed the most worry about academic concerns such as examinations and the volume of reading. WP university students described a greater degree of expectation that staff would be willing to help them and to explain things.
9. Staff teaching on courses with a disability equality or social justice theme expressed the highest level of awareness of and commitment to UDL as an equalities concern relevant beyond the population of disabled students.
10. All students identified stressors which could be addressed via UDL and inclusive practices. This related to academic issues such as the provision of notes in advance and issues beyond the classroom such as the building of community.

Discussion

A great deal of information was gathered during this project. This report provides an initial analysis but there is still more to be done with the rich resource of data which was generated.

Desktop research revealed pockets of relevant research and the lack of a baseline against which to make comparisons and gain either an institutional or sector-wide picture of UDL. This project has argued for the need to address this gap in order to inform research and policy development, to facilitate institutional action planning and to allow for sectoral comparisons. UDL is bigger than disability, and although Layer (2017) was concerned with the experiences of disabled students, it may be worthwhile to look at UDL developments through a wider lens.

Embedding UDL requires joined-up thinking and involves staff in a wide variety of strategic and operational roles, not just lecturers. Students often find it difficult to work out how things join up within the institution and do not necessarily understand where to go in order to access support. They may well not know what sort of help they need and universities are not necessarily very clear in the way they communicate this sort of information. Professional services staff and

academics need to work together with the student at the heart of the process in order to make the workings of the institution transparent to the end user.

Staff are not necessarily resistant to UDL but staff development, while important, is not compulsory and is not necessarily evaluated in terms of longer-term impact. While being keen on technological solutions some staff feel that they lack practical training in how to make it work. The anticipatory nature of the Equality Act (2010) is not well understood by all staff and this can make it difficult for disabled students to, for example, feel that they can confidently record lectures without having to ask permission. Senior leaders could influence this concern by ensuring compulsory high-quality evaluated staff development around UDL as a strategic priority. Policy around recording of lectures could reduce the variability of response by lecturers.

Structures such as the TEF have potential in relation to the development of UDL as a strategic priority. Universities have conflicting pressures and UDL is unlikely to float to the top of the prioritisation tank unless it is understood as fundamental and pervasive by senior staff and governors who are in positions of real influence. UDL researchers and practitioner enthusiasts often occupy less influential positions within the HEI hierarchy and this is a source of some frustration, particularly for experts in UDL who work in professional services roles. Multi-disciplinary research teams which include student stakeholders are most likely to be able to create useful research which could influence strategy, policy and practice.

Participants also expressed concern about the need for a strategic-level response to the embedding of UDL and felt that senior buy-in would be essential in this regard. A gap between strategic initiatives and translating these into practice was identified by participants. This research did not include senior leaders and this is a fault in the design which is discussed further under limitations.

This research has scratched the surface of the UDL debate and illuminated wide gaps and inconsistencies in its foundations. It has contributed staff and student perspectives and identified possible future avenues for research and development.

Good practice examples follow in an attempt to translate the outcomes of the research into something which might usefully be employed in the service of developing UDL in UK HEIs.

Limitations

Within each participating university, participants came from a particular academic area and their comments are not necessarily reflective of the picture of UDL in other parts of the same institution. Indeed, professional services staff from Bigcity WP University made the point that the practice of putting notes on the VLE in advance did not routinely occur in other courses.

Case studies took place in four settings which provided a cross-section of different types of university but the researchers are aware that what happens in one part of one Russell Group university, for example, is not necessarily replicated in another Russell Group university. Student voice was unfortunately not captured in Midcity WP University.

The research did not engage with staff in high-level strategic leadership roles directly. Further research could usefully address this omission.

NADP practitioners added a different perspective but the participants in the NADP focus group were self-selecting UDL enthusiasts attending a conference about embedding inclusive practice.

The researchers are also all self-confessed UDL enthusiasts and the phenomenology of the researcher inevitably exerts an influence in qualitative research.

While transcripts of interviews and focus groups have been analysed to reveal emerging themes, a greater degree of analysis is possible with existing data.

Gaps in available research literature have been illuminated in this project but because these gaps exist, the picture of UDL this research is able to paint is fairly scant.

The project has identified the requirement to develop a baseline against which to assess the current state of play around UDL in institutions and across the sector. One example is summarised as a possible starting point for baselining but further research is necessary in order to make more confident recommendations.

Links to a student-facing self-assessment are provided as an example of a process which would enable students to work out what sort of skills they need to develop and how to access sources of support. This idea requires further development.

One example only of an imperfect joined-up map of services that students could access is provided.

Areas for Future Research

The findings of this research extend beyond ways to put a sticking plaster on the hole left by the DSA and have much to offer universities beyond the UK.

Future research could usefully engage with senior leaders.

Project Outputs

All of the proposed outcomes coalesce around the idea of making a contribution towards the development of a baseline against which to assess sectoral progress towards UDL. Papers and conference contributions aim to address this overarching aim but recognise that this will not happen overnight and therefore propose a staged approach.

From the range of baselining tools investigated the framework developed by Wray (2016) is recommended for further development.

Joined-up thinking across teams has been identified as important, therefore outputs will be aimed at academic and professional services staff and will consider ways in which they can work together effectively.

Outputs aimed at high-level strategic players are planned as senior leadership buy-in has been identified as important for developing UDL.

The LSBU student self-assessment and signposting tool is shared here with working links so that it can be tried in other universities. It has been identified as a useful approach to giving students the chance to think about their own development requirements and be proactive in seeking support from appropriate services

Academic papers are currently being prepared for SRHE publications and The Journal of Inclusive Practice in Further and Higher Education (JIPFHE). Further publication outlets are being researched.

Conference paper proposals have been accepted for the National Teaching Fellowship symposium, NADP 2019 International Conference and the UK Inclusive Practice Network, annual conference 2019. A proposal has been presented to the SRHE 2019 conference.

Impact

Usefulness is a principle which has underpinned this project, and positive impact on students is the most important concern for the researchers. Ultimately strategic developments across the sector towards a greater engagement with UDL are only useful to the student if they impact effectively and consistently upon policy and practice.

The appendices which follow are included to address the notion of usefulness by providing practical guides and protocols which could be used to further UDL in UK HEIs. The researchers are interested in further collaborative work which has the potential to impact positively on student experience and success.

Appendices

York St John University Template

Information about York St John University Inclusive Learning, Teaching and Assessment Framework

The framework contains four sections – before teaching, after teaching, assessment and quality assurance. Within each section there are three elements (A, B & C). Heads of Programmes are asked to complete the form indicating a score of 1-5 on each element with **1 being the lowest** rating and **5 the highest**. The information can be used to prioritise action planning. Examples of indicative good practice are provided. It is suggested that the views of a range of staff are sought. Action planning may be done at module and/ or course level.

For more information contact: wraym2@lsbu.ac.uk

Example of Service Map

Need help or advice?

University can sometimes be an overwhelming place, and from time to time we all need a little additional support or information. Here's some of the ways we can help with that:

University Advice Service

Student Advice – Offers a wide range of face to face or telephone advice, support and guidance on issues relating to finance, debts, housing and any aspect of settling into University life.

Student Mental Health & Wellbeing

Mental Health and Wellbeing – Confidential support and advice with personal or emotional difficulties, including access to counselling. Offers face to face or telephone appointments.

Disability & Dyslexia Support

Disability & Dyslexia Support provides advice and information about disabilities, specific learning difficulties (including dyslexia), mental health conditions or other medical conditions.

Drop in to the Student Life Centre

(t) 0207 815 6454 (e) studentlife@lsbu.ac.uk

Skills for Learning

Learning Resource Centre – Free additional support for any student who may want to improve their academic ability or professional skills
(e) studyskills@lsbu.ac.uk

Immigration & International Student Advice
Offering free specialist immigration and visa advice, alongside social cultural information & support for international students

(t) 0207 815 7036 / 6189 /7037

(e) international.advice@lsbu.ac.uk



Advice
Service

Students' Union Advice Service

We offer free confidential and impartial advice and guidance to any student who may face difficulties with the university and their studies.

(t) 0207 815 6060 (e) info@lsbsu.org (w) www.lsbsu.org/advice

Academic Misconduct ● Student Disciplinary Matters ● Student Complaints

Full Time Students' Union Representatives

President

president@lsbsu.org

VP: Welfare & Equalities

vp.welfare@lsbsu.org

VP: Education

vp.education@lsbsu.org

VP: Activities Employability

vp.activities@lsbsu.org

Communities on the Campus

Lesbian, gay, Bi, Trans+ or questioning students

www.lsbsu.org/lgbt

Women students

www.lsbsu.org/women

Black, Asian, Arab & Minority Ethnic Students

www.lsbsu.org/bame

Disabled (incl. dyslexic) Students

www.lsbsu.org/dds

International Students

www.lsbsu.org/international

European Union Students

www.lsbsu.org/eu



Contraception & Sexual Health

Confidential impartial information and advice on anything related to sex, contraception (including accessing condoms)/emergency contraception or sexual health testing/screening available to every student <http://www.uow.org/unisex>

Links to LSBU Student Support Assessment Tools

Link for Pre-Entry Survey 2016 Student

View: https://libguides.lsbu.ac.uk/ld.php?content_id=32243635

Link for Post-Entry Survey 2016 Student

View: https://libguides.lsbu.ac.uk/ld.php?content_id=32243637

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