

Proposal Action Plan Studying with a Functional Impairment

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Introduction

In September 2022, an audit entitled 'Assuring accessibility for students with a functional impairment' was conducted. One of the audit's recommendations is that a EUR-wide Action Plan should be drawn up for this theme (see Appendix 1). The Executive Board therefore decided to instruct E&S to draw up and coordinate this Action Plan and to monitor its implementation.¹ It asked E&S to come up with a proposal before the end of 2022 about how this Action Plan will be drawn up.²

This proposal briefly specifies the themes that will be addressed in the Action Plan. It also specifies which organisational units and/or persons will be involved.

Ambition and objective of the Action Plan

The Action Plan must lead to better, clearer and, where necessary, uniform services for the students with a functional impairment of a standard that they might expect from EUR on the basis of laws and regulations, the commitments made and the formulated ambitions. Responsibilities, timelines and implementation requirements will be specified.

Themes and parties concerned

The following aspects of accessibility will be worked out in detail in the Action Plan:

1. *Physical accessibility*

- This involves ensuring and formulating a long-term vision of the (legally required) physical accessibility of the campus and buildings. It must be established that the physical accessibility of the buildings and the site will be tested periodically (RE&F).
- RE&F (project manager and policy advisor SMF) is responsible for the input for this aspect.

2. *Digital accessibility*

- This involves the obligation (WCGA standard) that websites must comply with. This theme covers both the EUR websites and the applications used by students, such as Osiris and Canvas. On all websites and applications, it must be established and publicised that the government standard for digital accessibility applies. Accessibility must become part of supplier management so that applications and tooling purchased by external parties comply with the digital accessibility standards.
- M&C (website), E&S/ABO (educational applications) and possibly IT are responsible for the input for this aspect.

¹ Executive Board 15 September 2022; agenda item: 02.01 Internal A&R: Studying with a functional impairment. This satisfies the long-standing wish to follow up on the SMF Project Plan 2018-2020.

² The Action Plan also includes a number of other recommendations from the Audit.

3. *Flexibility of education*

- The main point of focus here is hybrid education. It also concerns matters such as compulsory attendance and being able to switch tutorials.
- How can a central service on campus help students with a functional impairment to enter into a dialogue with the faculty at which they are studying? The University Council will be involved in working this out.
- The party responsible for the input for this aspect is a working group to be set up in which policy makers and/or study advisors from the faculties are represented. PM Appoint independent chair for working group.
PM This will also be linked with the Educational Vision and the Accessibility Plan.

4. *Individual provisions*

- Guidelines for allocating individual provisions must be drawn up by the Examining Boards so that it is clear what students can expect in the case of standard tracks. The guidelines must also explain which level of support the student can expect and where the support ends. It is important that the guidelines are coordinated between the faculties – for example, as minimum standards – with room for exceptions depending on the nature and content of the study programme.
- The Examining Board Secretary meeting is responsible for this in consultation with E&S/SMF.
- In addition, there are also provisions that will be made available from SMF, such as software and parking permits.

5. *Testing and examining*

- The focus here is on clarity and consistency when students are applying for an examination provision, but also on supplying study advisors with clearer information about the various provisions. Here it is also important to examine the current range of provisions and what may be missing. Finally, alternative examination methods will be examined – for example, when a student with a visual impairment has to take an examination that includes graphs.
- E&S/Examination Organisation, IT and the Faculty Examining Boards (Secretary meeting and possibly Chairperson meeting) are responsible for the relevant input.
- Students can request examination provisions through Osiris Zaak. Based on an evaluation, it will be examined how the application processes for support take place through Osiris Zaak. The parties involved are E&S/ABO and a contact person for each faculty (study advisor or secretary of the Examining Board).

6. *Student counselling*

- Here, it is important to identify the subjects for which E&S/SMF facilities is responsible and to indicate when this is the responsibility of the faculties. It is also indicated when a student can be referred by the study advisors to a student counsellor SMF and vice versa.
- E&S/SMF is responsible for the input in collaboration with the faculty study advisors.

7. *Information supply*

- This relates to information on the central website for (prospective) students about studying with a functional impairment and the referral to both internal and external websites for help and support.

A format will also be drawn up that can be placed on the public websites of each individual faculty so that clear information is provided.

The websites of the faculties must be expanded with examples of the specific support that is possible – also for future students.

Finally, there is the question of how students can be reached most efficiently – for example, if there are disruptions or roadworks.

- For the information on the websites, PS/M&C will be involved as well as M&C contact persons in the faculties.
RE&F and E&S/SMF will be involved when it involves information about malfunctions, etc.
- The designations of the students with a functional impairment must be checked so that the students can more easily recognise themselves in the designation. E&S/SMF in collaboration with study advisors.

8. *Monitoring and giving advice*

- This involves drawing up indicators to monitor the progress of the activities that follow on from the Action Plan.

ABD/CPC and ABD/AZ, in collaboration with E&S/SMF, are responsible for this.

- It will also be determined how and when E&S/SMF will be involved in new EUR-wide developments that may be related to accessibility.

Input for this aspect will be supplied by, among others, ABD/CPC, D&I, Student Wellbeing, ABD/AZ.

- The number of individual provisions that are allocated must be monitored in order to determine the associated structural developments (E&S and faculties).

Timeline Action Plan SMF

November-December 2022:

- proposal Action Plan will be adopted by the Executive Board
- the Programme Director meeting and the Operational Management meeting will be informed about this

January-May 2023:

- A new SMF policy advisor will start working at E&S. From that moment onward, a start can be made on making this Action Plan more specific.
- For the various themes, E&S/SMF will regularly coordinate with the parties concerned and a schedule will be drawn up for each theme that includes deadlines for providing input and making decisions.
- Progress reports on the formulation of the Action Plan will be included in Ellen van Schoten's monthly SMF progress interviews with E&S and RE&F.
- It should be noted that the students with a functional impairment will not be explicitly mentioned, but the 'Nothing About Us Without Us' principle will of course be taken into account: a focus group of SMF students – who can provide their feedback at various times – will be created.
- Besides students, the University Council will also be asked to take part.
- The draft Action Plan will be submitted for consultation to the Programme Director meeting and the Operational Management meeting.

May-July 2023:

- The aim is to have the SMF Action Plan adopted by the Executive Board before the summer of 2023 so that implementation can start in the 2023-2024 academic year.

Appendix 1. Audit report 'Assuring accessibility for students with a functional impairment'

Conditions for implementing the recommendations

- A. It must be made clear how the objectives of the declaration of intent and the legal obligations for students with a functional impairment are specifically implemented at EUR. It is recommended that all organisational units and Examining Boards that are responsible for a component of accessibility are obliged to explain every year what has been done for this target group and how the objectives were implemented. This explanation can be given, for example, as part of the annual preparation for the bilos (bilateral meetings) on the theme of diversity. (CPC and AZ)

AZ and CPC will ensure that the subject is included in the bilo preparation in the spring of 2023. Based on an annual report from the organisational units, it will be explained how the objectives are being implemented. A format for the annual report will be established by AZ and CPC in collaboration with the SMF team.

Urgent recommendations (non-compliance)

- B. The recommendations issuing from the reviews of the buildings and grounds that have been carried out must be implemented so that EUR complies with the government standards for physical accessibility. The estimate, which was made in 2020, is that an additional budget of €1.2m will probably have to be made available for this. (RE&F)

Deadline: 2023 and beyond, budget can be recalibrated and has not been included in the REF Budget Plan at this point in time

It is not feasible to realise all technical and facility-based adjustments in 2023. It is a gigantic amount of work that requires a huge effort from a number of RE&F employees, in addition to the project manager, and it cannot be completed in 1 year. That is also the reason why the €1.2m that was applied for at the time, has been spread over 3 years. A number of other universities have also done it in this way.

- C. On all of the websites and applications, it must be established and publicised that the government standard for digital accessibility applies. (M&C)

The accessibility statement will be publicised on EUR.nl (NL/EN) in Q4. For the other websites of the organisational units, the deadline will be set in connection with the EUR-wide Action Plan.

I & II. The framework & the organisation

- D. The student at the front should not notice that the responsibility at the back is divided. It is recommended that the SMF team is structurally involved in the broader policy themes (accessibility, diversity and student welfare) that have interfaces with this target group. The EUR-wide commitment to this target group can be coordinated in this way. (E&S)

- E. The commitment to this target group must be based on an EUR-wide and specific Action Plan. In this plan, the objectives in the letter of intent can be translated into specific services. The tasks for which EUR will accept responsibility must be explained. The Action Plan must also clarify the tasks/areas for which the EUR will not accept responsibility and the limit with regard to possible support. For example, minimum standards can be defined in the Action Plan. The plan must be drawn up on the basis of contributions from the organisational units that are ultimately responsible for sub-areas of accessibility. The SMF team is the overarching knowledge centre. The SMF team should be tasked with coordinating the preparation of the Plan and monitoring its implementation. The SMF team must issue an alert if the objectives of the Action Plan are not being achieved. (E&S)

In Q4 2022, E&S will issue a proposal about how the Action Plan will be created. The SMF team has been understaffed for 1.5 years now due to long-term illness. A new employee who can draw up an Action Plan is now being recruited. The appointment of this employee is a precondition for adoption of the recommendations.

III Information

- F. The designations of the students with a functional impairment must be checked so that the students can more easily recognise themselves in the designation. (E&S)

This recommendation will be tackled in connection with the Action Plan. In Q4 2022, E&S will issue a proposal about how the Action Plan will be created.

- G. The possibility of getting students with a functional impairment to volunteer this information when they are registering must be implemented for all students so that this group can be provided with targeted information about support (E&S) and malfunctions of lifts and doors, for example. (RE&F)

From the next academic year onward, this option will be offered to Bachelor's students. In relation to the Action Plan (see other recommendation), E&S will assess when this option can be offered to Master's students.

Here, REF is dependent on E&S as to when these names have been registered. As soon as this has taken place, everything can be arranged within a month so that the right people are informed in case of malfunctions.

- The websites of the faculties must be expanded with examples of the specific support that is possible – also for future students. (Faculties)

A deadline for this recommendation will be set in connection with the Action Plan by the meeting of Students with a Functional Impairment (recommendation E).

IV. Assuring accessibility

- Responsibility for physical accessibility must be clearly assigned within RE&F. Accessibility must be structurally integrated in the processes and policy choices. (RE&F)

Deadline: responsibility was assigned in Q4 2022; unfortunately, there is understaffing on this issue due to the departure of 1 colleague.

Integrate into processes and policy choices Q1-Q2 – 2023

Responsibility can only be properly assigned after the vision and policy have been determined.

- It must be established that the physical accessibility of the buildings and the site will be periodically tested (RE&F).

This coincides with the integration into processes and policy choices Q1 – Q2 2023

The review of the buildings that were not yet reviewed in 2019 (the majority, only a few building components were reviewed in 2019) is included in the Action Plan of the Physical Accessibility project.

The Action Plan also includes a sub-project 'Implementation & Embedding (Management)'. Periodic testing will be arranged in that sub-project.

- It must be established that all websites and applications must be periodically tested against the legal accessibility guidelines so that the websites and applications remain accessible to students with a functional impairment. (M&C)

M&C is responsible for EUR.nl and myeur.nl. The other websites and applications at EUR include a huge number of components, such as the websites of the organisational units and all the applications. A list of these must be drawn up so that the status can be kept up to date for each website/application.

A review depends on funding from the organisational units. A deadline for this recommendation will be set in connection with the Action Plan by the meeting of Students with a Functional Impairment (recommendation E). As soon as the objectives in the field of digital accessibility have been established in the Action Plan, M&C can agree with the organisational units when this recommendation will be implemented. M&C will report progress on this recommendation to the Internal Audit & Review Function.

- Accessibility must become part of supplier management so that applications and tooling purchased by external parties comply with the digital accessibility standards. (M&C & E&S)

A deadline for this recommendation will be set in connection with the Action Plan by the meeting of Students with a Functional Impairment (recommendation E).

E&S will discuss the accessibility standard with the external supplier. The digital accessibility standard will be included in the list of non-functional requirements for new suppliers.

- Guidelines for allocating *individual provisions* must be drawn up by the Examining Boards so that it is clear what students can expect in the case of standard tracks. The guidelines must also explain which level of support the student can expect and where the support ends. In this process, it is recommended that the guidelines are harmonised between the faculties – for example, as minimum standards – with room for exceptions depending on the nature and content of the study programme (Examining Boards Secretary meeting).

The deadline for this recommendation will be discussed in the Examining Boards Secretary meeting on 19 September 2022.

- The number of individual provisions that are allocated must be checked and monitored to see whether there is an upward trend that is expected to be

implemented. In that case, the capacity of study advisors, study deans, secretaries and examination provisions must be made appropriate (**E&SA and faculties**).

A deadline for this recommendation will be set in connection with the Action Plan by the meeting of Students with a Functional Impairment (recommendation E).