

STELLENBOSCH UNIVERSITY

UNIVERSAL ACCESS POLICY

Draft 4

Reference number for this document	
HEMIS classification	0501
Purpose	To establish Stellenbosch University (SU) as a universally accessible university, which implies creating barrier-free access to all SU campuses and striving to ensure an accessible curriculum for successful study
Type of document	Policy document
Accessibility	General – internal as well as external
Date of implementation	1 January 2018
Date of revision	Every three years or sooner, if circumstances so dictate or as deemed necessary by the owner of the policy
Previous revisions	15 October 2011
Owner of this policy	Rector and Vice-Chancellor
Institutional functionaries (curators) responsible for this policy	Vice-Rector: Learning and Teaching; Senior Director: Student Affairs
Date of approval	December 2017
Approved by	SU Council

Key terms / Sleutelterme

English	Afrikaans
<i>Universal access</i>	Universele toegang
<i>Universal design</i>	Universele ontwerp
<i>Functional limitation</i>	Funksionele beperking
<i>Progressive realisation</i>	Progressiewe realisering
<i>Reasonable accommodation</i>	Redelike akkommodering

1. Introduction

In South Africa, but also globally, the emphasis is increasingly on building more inclusive societies where diversity in all its manifestations is valued and harnessed as key to a society's development and well-being. South Africa's higher education system reflects this, and so does Stellenbosch University (SU) with its increasingly diverse student body and staff corps that embody not only South Africa's strengthening democracy but also broader global trends. The Constitution of South Africa (1996) and the country's legislative framework, which is moulded on the Constitution, create an enabling environment to foster respect for diversity and to protect people from discrimination based on race, gender, disability or other criteria. These principles also feature strongly in the policy governing the higher education system, which emphasises the imperative to ensure that all members of society be able to participate equitably in and benefit from higher education.

In line with these developments in society in the broader sense, SU has increasingly sought to assert the importance of these values to its strategic vision and its role as a university in South Africa. The University's *Vision 2030* (2013b) emphasises the principles of diversity, human dignity, inclusivity, social justice and equal opportunities. Its *Institutional Intent and Strategy 2013–2018 (IIS)* (2013a), which is a more recent document, notes the prevailing "transformation mode" at the Institution, and the need for more flexibility and innovation. In this way, SU responds to the challenges faced by the country in a globalised world. The University recognises that these challenges have important implications for all its staff and students, which require new kinds of knowledge and skills as well as being committed to looking forward, to new possibilities and opportunities.

Central to SU's taking forwards these commitments is acknowledging that some students and staff have faced in the past, and still face, serious barriers to full participation in the academic programme and life at the University. Students and staff with disabilities are particularly important in this regard. While this policy focuses on overcoming the barriers that these students and staff experience, it also seeks to put forward new ways of understanding and responding to diversity among the University community – including the differences that disability brings. The premise of this policy, therefore, is that all people lie on a continuum of abilities and that, in the course of their lifetime, everyone will experience functional limitations that would place an inequitable burden on their ability to perform a certain function as well as other people. In other words, everyone depends on ways of interacting with their environment comfortably and easily, which may require particular forms of support and accommodation to function equitably in a specific environment. Therefore, SU's intention with this policy is to move towards a comprehensive universal access policy (for staff, students and all visitors to our campus) that seeks progressively to remove any barriers to any person that would restrict access to and participation in life on our campuses. If we are intent on removing the barriers

that restrict the participation of those individuals with the highest level of functional limitation, we will make the University fully accessible to all in the process.

2. Application of the policy

The Universal Access Policy applies to all people on campus: Management, the faculties and the support services, including all staff and students at SU.

3. Purpose of the policy

This policy outlines the principles and provisions that will guide SU towards establishing itself as a universally accessible institution of higher education that offers curricular and co-curricular spaces that are barrier-free to all its staff, students and visitors, thus ensuring successful inclusion from a disability perspective.

4. Aims of the policy

- 4.1** Clearly define important concepts regarded as essential to developing the University as a universally accessible institution of higher education.
- 4.2** Establish suitable systems, processes and practices to support all students and staff members who may experience particular functional limitations, thus enabling them to enter into and participate fully in all aspects of university life, and to highlight the various roles and responsibilities that will be required of those involved in providing such support.
- 4.3** Guide the provision of inclusive and universally accessible teaching and learning environments that would foster the full participation of all students in the academic programme, including having access to the necessary information systems on campus.
- 4.4** Guide the provision of inclusive and universally accessible working environments to ensure that all staff could contribute fully to the University's effective functioning.
- 4.5** Progressively adapt the physical design and structure of the campus and faculty buildings to ensure that they be fully accessible to all students, staff and visitors.

5. Key concepts informing this policy

5.1 Universal access (UA)

UA means that cultural, physical, social and other barriers have been removed that would prevent people from entering, using or benefiting from the various systems in a society that are available to other citizens and residents. Absence of accessibility or denial of

access means that some members of a community are deprived of opportunities to engage on an equal basis with others.¹

5.2 Universal design (UD)

UD means that products, environments, programmes and services are designed to be usable to all persons to the greatest extent possible without the need for adaptation or specialised design. The assistive devices and technologies that some individuals require, including some people with disabilities, must also meet the principles of UD, which makes it the most important tool for achieving universal access.²

5.3 Universal design for learning (UDL)

UDL can be defined as "a framework for designing curricula that enable all individuals to gain knowledge, skills, and enthusiasm for learning. UDL provides rich supports for learning and reduces barriers to the curriculum while maintaining high achievement standards for all." UDL calls for the integration of multiple means of representation, action and expression, and engagement into course curriculum³.

5.4 Universal design in physical planning (UDPP)

UDPP refers to the guidelines and standards for designing physical environments on campuses to provide UA, beyond the minimum requirements of the South African National Building Regulations, Section 10.

5.5 Functional limitation

For the purposes of this policy, 'functional limitation' describes people's level of functioning in various contexts at University; for example, how information or the physical environment is accessed, how students with different disabilities may have different needs regarding access to the curriculum and full participation in the classroom. Of course, functional limitations also affect staff with disabilities. Mostly, functional limitations are the result of inaccessible services, products, information and materials, not of a disability in itself.

5.6 Progressive realisation

The concept 'progressive realisation' expresses the fact that it will take time to realise all economic, social and cultural rights fully. Nonetheless, the obligation remains to move as expeditiously and effectively as possible towards that goal.⁴

¹ Adapted from *White Paper on the Rights of People with Disabilities*, 2016.

² Ibid.

³ Center for Universal Design, 2008.

⁴ Ibid.

5.7 Reasonable accommodation

‘Reasonable accommodation’ refers to necessary and appropriate modification and adjustment – which includes assistive devices and technology – to ensure that all persons can enjoy and participate in all human rights and fundamental freedoms equally. However, such accommodation should not be imposed in all circumstances; it should be provided when required by a particular case.⁵

6. Policy principles

The policy principles below aim to foster the inclusion of all people on SU campuses to the fullest extent possible, while acknowledging diversity⁶:

6.1 Universal design

Equitable use: design that is useful and marketable to people with diverse abilities

Flexibility of use: design that accommodates a wide range of individual preferences and abilities

Simple and intuitive use: design that is easy to understand and to use, regardless of the user’s experience, knowledge, language skills or current concentration level

Perceptible information: design that communicates the necessary information effectively to the user, regardless of ambient conditions or the user’s sensory abilities

Tolerance of error: design that minimizes hazards and the adverse consequences of accidental or unintended actions

Low physical effort: design that can be used efficiently and comfortably, and with the minimum fatigue

Size and space for approach and use: design of an appropriate size that offers sufficient space for approach, reach, manipulation, and use regardless of the user’s body size, posture or mobility

6.2 Redress and equity

This principle features strongly in South Africa’s Constitution and legislative framework. It recognises that, historically, particular groups in South Africa – such as people with

⁵ Adapted from *White Paper on the Rights of People with Disabilities*, 2016.

⁶ The Seven Principles of Universal Design, 2008.

disabilities – have suffered discrimination. Therefore, specific measures are required to redress these inequalities so that all people can participate equitably in our democracy, which includes our universities.

6.3 Inclusivity

This means building an inclusive academic and campus environment with institutional practices and systems flexible enough to respond to the differences that people may bring to the University. It requires a commitment to transforming existing Institutional environments to value and accommodate diversity, rather than seeking to assimilate everyone into an unchanging environment. To this end, building an inclusive and transformative institutional culture that respects and values diversity is especially important.

6.4 Institutional alignment

This principle is about ensuring that all aspects of the University's functioning, including its various policies and plans, be aligned to this policy, and about taking forwards its intentions.

7. Policy provisions

The principles stated above orient the policy provisions set out below.

Promoting universal access to all SU campuses relates to staff and students, and how interaction with information, products and services can be fostered.

All staff members – including SU Management – must take responsibility for universal access, not only staff at the Disability Unit, Braille Office or the Human Resources Division (HR).

- 7.1** University Management must take reasonable steps to inform all senior managers and deans, as well as the broader campus community, of this policy.
- 7.2** This policy requires that all faculties and departments on campus keep in mind the principles of UA, including universal design and universal design for learning, when working with staff and students.
- 7.3** The deans and senior managers must alert their respective heads and staff to the principles and provisions in this policy.
- 7.4** Departments must take care that all their processes, protocol documents and procedures comply with the principles and provisions of this policy, and strive towards universal access in the work that they do.
- 7.5** Achieving the above requires careful planning, from the stage of prospective students' first interactions to when they are fully-fledged members of the campus

community. Such planning must result in practical implementation plans for all activities involved – the admission process, distributing information to academic departments, sharing support services, et cetera – with due attention to the Protection of Personal Information Act (2013b).

- 7.6** Conversations of engagement must be organised to create a common understanding among the University community of the benefits of UA, UD, UDL, reasonable accommodation and progressive realisation.
- 7.7** Conversations meant in 7.6 can be undertaken in tandem with the ongoing conversations about transformation, seeing that the topic of transformation already has established a receptive audience and context for discussing universal access and related concepts, principles and applications in the various departments.
- 7.8** The Transformation Office and the Disability Unit can drive this process of raising awareness through training, with the collaboration of staff and students.
- 7.9** The Division for Learning and Teaching Enhancement (at the Centre for Learning Technologies) must train the focus of UDL specifically on teaching and learning.
- 7.10** HR staff must receive specific training regarding the Code of Good Practice: Key Aspects on the Employment of People with Disabilities (published in accordance with the Employment Equity Act (EEA) of 1998) to assist in drafting practical and feasible plans to meet employment targets.

8. Policy implementation: roles and responsibilities

- 8.1** The policy is to be approved by the University Council. The Rector has the responsibility to oversee the execution of the policy, while execution and management are delegated to the Rector's Management Team (RMT), specifically the Vice-Rector: Learning and Teaching (VR: L&T).
- 8.2** The VR: L&T and the Senior Director: Student Affairs are co-curators of the policy; i.e. they must ensure that it be formulated, approved, reviewed, communicated, made available and, in the last instance, implemented.
- 8.3** Deans and line managers must be informed regarding this policy.
- 8.4** Facilities Management fulfils a key role, being responsible for physical accessibility on all campuses.
- 8.5** The departments responsible for information technology also fulfil a key role, specifically regarding the dissemination of information: they must ensure that

information be disseminated and presented in ways that would make it accessible to all.

- 8.6** The Disability Unit is located in the Centre for Student Counselling and Development (CSCD), and thus resorts under the Student Affairs Division. Therefore, the Disability Unit must coordinate the functioning of students on campus, as this role relates to support and advocacy work. The unit head has a managerial function and must oversee all activities of the unit, such as facilitating reasonable accommodation and access in curricular as well as co-curricular spaces for students with disabilities.

9. Implementation

The policy must be implemented in the various environments at the University, including the academic, administrative and support services environments (with special reference to Administration, Student Affairs, Facilities Management and Information Technology). All other SU policies, such as those on language and on unfair discrimination and harassment, must be read together with this policy, the principles of which will come into operation immediately upon approval by Council.

10. Feedback and monitoring

The owners of the policy as well as its curators are responsible for establishing the requisite controls to monitor its implementation. The owner of the policy is accountable and the curators are responsible for reports regarding the policy, which include an annual report to the RMT on progress towards achieving the relevant objectives. The VR: L&T will set the date for submitting this report, which must include the following:

- 10.1** a report from each faculty and responsibility centre on progress regarding disability inclusion in their respective environments;
- 10.2** a summary of successes and challenges;
- 10.3** evidence of strategic thinking on how inclusion can be further improved; and
- 10.4** a report by the VR: L&T on the efforts undertaken campus-wide regarding disability inclusion.

11. Non-compliance

In the case of non-compliance with the policy, the custodians (VR: L&T and Senior Director: Student Affairs) must investigate the matter. Supportive actions must be discussed with a view to improved universal access and inclusion in the environment concerned, for alignment across campus. In the case of a refusal to adhere to the practices of universal access to foster inclusion, disciplinary procedures may be considered in accordance with the University's disciplinary procedures. Line managers must be informed regarding the principles and

provisions of this policy to ensure equitable treatment of all employees, visitors and students in their environment.

- 11.1** Line managers must inform the relevant department or designated official of barriers in their environments that need to be removed.
- 11.2** Should transgressions or barriers in an environment be allowed to persist, the process of mediation set out in 11.3 to 11.8 is advised:
- 11.3** In the case of academic grievances, personal engagement between the opposing parties (student and lecturer, or lecturer and departmental chair) concerned is the first option. Should that fail to resolve the problem, the prescribed grievance procedure has to be followed via the Academic Affairs Council and the relevant dean's office. The problem could also lie in physical spaces or information being inaccessible to a staff member.
- 11.4** Academic grievances may relate to the content or presentation of modules and graduate programmes, the learning environment or assistive technologies, or assessment procedures of undergraduate or postgraduate programmes.
- 11.5** Administrative grievances may relate to registration, programmes and subject choices, or study fees, and should be discussed with the administrative official involved, the faculty secretary or, if necessary, the Registrar.
- 11.6** Students who face a problem that cannot be resolved within their immediate environment must file a written complaint with the Disability Unit of the Student Affairs Division. If the Disability Unit cannot facilitate a solution, the Director of the CSCD must follow the official grievance procedure in consultation with the Senior Director: Student Affairs, who must take up the matter with the Academic Affairs Council or the Student Representative Council (SRC). As a last resort, students may report their case to the Equality Unit (unfair@sun.ac.za) or the University Ombud (ombudsman@sun.ac.za).
- 11.7** Staff who face a problem that cannot be resolved within their immediate environment must file a written complaint with HR. If HR cannot facilitate a solution, the Senior Director must follow the grievance procedure contained in the University's policy regarding human resources.
- 11.8** All other complaints (including those relating to the physical environment) may be reported to the relevant division, such as Risk and Protection Services or Facilities Management at fmhelpdesk@sun.ac.za.

12. Policy governance

The policy is to be approved by Council. Senate is to give its consent after consultation with the Institutional Forum. The owner of the policy is the VR: L&T, who must report annually to Council via the RMT.

13. Revision

This policy must be reviewed every three years – or sooner, as might prove necessary in light of the annual reports and the experiences of departments and faculties on SU campuses – always taking into account the progressive nature of realisation as outlined in this policy.

14. Disclosure

This policy is a public document, which is published on Stellenbosch University's website.

15. Repeal

The Universal Access Policy repeals and replaces the Disability Policy on Students with Disabilities, which was accepted by Senate and revised for the last time on 15 October 2011.

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