

June 2021

## **NCBI Submission to the HEA National Plan for Equity of Access to Higher Education (2022-2026)**

### **Introduction**

NCBI (National Council for the Blind of Ireland) is Ireland's national sight loss agency. Our mission is to transform the lives of people who are blind or vision impaired so they can live confidently and independently. At NCBI, we believe people who are blind or vision impaired should have the same opportunities, rights and choices as others to fully participate in society.

According to 2016 Census figures, there are currently 54,810 people with sight loss in Ireland. This is a figure we know to be on the rise, from the increase in demand we have witnessed for our own services in the past five years. In 2020, we offered support and services to approximately 8,000 people who are blind or vision impaired. Of this figure, 2,000 were new referrals to NCBI.

### **Sight Loss and Higher Education**

While progress has been made across the Irish education sector, there are still groups in our society who are under-represented in higher education. In the last ten years, the numbers of students in Higher Education with sensory disabilities has grown at half the rate of students with disabilities more generally. (AHEAD, 2020) The decline of students with sensory disabilities enrolling in higher education is a worrying trend.

Access being the main barrier inhibiting students with vision impairments. In 2019, NCBI embarked on a study with 1,277 students. The study wanted to determine what barriers students encountered which inhibited them from reaching their true potential in education. The top five barriers were:

1. **Access** to curriculum and learning materials
2. **Access** to training and the use of assistive technologies
3. **Access** to expanded core curriculum supports
4. **Access** to transitional supports
5. **Access** to work opportunities /employment

Data from AHEAD shows that in 2017 / 2018, only 1.8% of students registering with a disability at third level (undergraduate and postgraduate) had a vision impairment. Since 2013, this proportion has dropped, whilst the number of students registering with disabilities overall has increased. At 1.8%, students who are blind or vision impaired represent the second smallest category of students with a disability in third level education. People who are blind or vision impaired who are seeking education require extra support. Educational structures need to become more individualised, equipped and responsive to the individual needs of the person with impaired vision.

As part of this submission, we have included some recommendations and background information on several supports which have the potential to support people with sight loss in higher education. **Please contact June Tinsley, Head of Advocacy and Communications for further information on this submission via email to [june.tinsley@ncbi.ie](mailto:june.tinsley@ncbi.ie) or on 087 9955076. For further information on NCBI and the supports we provide, please see <https://www.ncbi.ie/>**

### **Access to the built environment, curriculum and assessment**

The built environment of each campus must be compliant with disability access guidelines, however accessibility for those with sight loss can sometimes be overlooked during campus planning and retrofitting. NCBI provide a range of mobility and other rehabilitation services to increase the independence and dignity of blind and vision impaired people throughout Ireland. If accessibility and mobility through the built environment for a person who is blind or vision impaired was included within planning processes, many of the issues often encountered by our service users could be reduced or avoided. NCBI can provide advice and support to institutions in this regard through our access audit service. Prioritising the accessibility and walkability of campuses and satellite campuses for students and staff with sight loss will ensure greater accessibility for all.

An Expanded Core Curriculum for children who are blind or vision impaired accepts that education is not just academic based. This same Expanded Core Curriculum and understanding also needs to exist for adults. Although NCBI are currently working alongside the Department of Education and Skills, we seek the Expanded Core Curriculum to be officially recognised and NCBI supported as a complementary service

provider, to support and strengthen the structures to become more individualised, equipped and responsive to the needs of children and students with impaired vision. It is essential that adults who may have recently started on their sight loss journey are also encouraged to develop and exercise these core skills too, including sensory efficiency, orientation and mobility, independent living, career education, self-determination, social interaction, recreation and leisure and assistive technology.

### **Our recommendations:**

1. Collaboration with planning and buildings departments in HEI's across the country to ensure accessibility of the built environment for blind or vision impaired students
2. HEA support the recognition of the Expanded Core Curriculum for vision impaired children, and adults in higher education who have recently suffered sight loss.
3. HEA support for NCBI to be recognised by the Department of Education and National Council for Special Education as a complementary service provider.

### **Timely access to orientation and mobility supports**

In order for a person who is blind or vision impaired to have control over their lives, they must be able to navigate the built environment. As well as the accessibility services highlighted in the above paragraph, NCBI also provides a specialist assessment, working with an individual to identify areas where they face difficulty in daily living, such as safely navigating to education centres, employment location, and other places. While the disability support services in some HEI's do have a link with NCBI, this occurs on an entirely ad-hoc basis.

There is a significant shortage of trained and qualified orientation and mobility (O&M) workers and practitioners, which has been declining in recent years. Timely access to orientation and mobility training and supports is essential in a successful transition into Higher Education for people who are blind or vision impaired. The state must play a leading role in ensuring that appropriate funding and skills training are being made available to enable blind or vision impaired students to gain or regain their independence.

### **Our recommendations:**

1. HEA to provide funding and training of mobility officers throughout education institutions across the state
2. Collaboration between the HEA and NCBI to create an effective and practical mobility and orientation programme for students with sight loss.

### **Tailored supports**

Third level students who are blind or vision impaired who are attending Higher Education require extra support. Educational structures need to become more individualised, equipped and responsive to the individual needs of the person with impaired vision. Equitable and consistent supports to provide direct teaching instruction in alternative learning methods for certain subjects should also be made available, including STEM subjects, music, and assistive technology. It is essential to the success of students who are blind or vision impaired to have easy access to tailored career guidance.

As the national sight loss agency in Ireland, NCBI already have a variety of tailored support assessments in operation for service users. This is a service we would be very much open to collaboration on with the HEA.

### **Our recommendation:**

1. HEA collaboration with NCBI in identifying alternative learning methods specific to the needs of a blind or vision impaired student

### **Structured Transition Paths for 3rd Levels**

The Department of Further and Higher Education, Research, Innovation and Science must ensure that structured systems are in place to provide a smooth transition between educational systems for adolescents who are blind or vision impaired. A timely, clear and well-focused transitional plan should take into consideration the views of the student, parent(s) and educational team in order to prepare and equip the student with the necessary curriculum access solutions and life skills.

In order to assess and provide these supports, it is imperative for campus disability officers / access officers to be aware of the challenges faced by students with sight loss. One way to solve this issue would be to have a more formalised relationship between NCBI and disability officers nationally. This would ensure a clearer understanding of how to support the needs of students who are blind or vision impaired. Presently, this relationship operates on an ad hoc basis largely founded

on good relationships established between various NCBI staff and campus disability officers.

### **Our recommendations:**

1. Supported education transition solutions for students with vision impairment, with ringfenced funding, must be a priority for the Minister for Education, the Junior Minister for Special Needs Education, and the Minister for Higher Education
2. Formalised relationship between NCBI support staff and campus disability officers in each HEI and within the HEA itself
3. Training provided by NCBI as part of induction process for campus disability / access officers.

### **Timely access to assistive technology**

A recurring issue when transitioning from second level to higher education relates to access to assistive technology. On completion of second level education, assistive technology aids are retained by the Department of Education making it an unperson centred system resulting in the student having to reapply again when securing a place in Higher Education. While Disability Support Services within higher education institutions have access to the Fund for Students with Disabilities, there can be a delay between registration of the student and providing them access with their required assistive technology. As larger institutions tend to have a pool of technology available to them, this may be more of an issue for smaller centres. Most, if not all HEI's now allow students to complete part of their registration online, where students have the option of disclosing their disability. NCBI would request that any assistive technology is made available to a student within four weeks of their registration taking place. This timeframe would ensure students receive technology in a timely manner and would not adversely effect their ability to begin learning at the same starting point as their peers.

Timely access to assistive technology may also be a factor affecting state exam performance, which has a direct impact on the students' progress from second level to higher education courses. Between 2017 and 2020, an average of 29% of the assistive technology budget allocation went unspent by the NCSE. This may indicate that students who were accounted for as part of the allocation did not avail of the assistive technology reports they were deemed to require.

Year	Allocation €	Actual Expenditure €	Variation €	Variation as percentage
2017	See note*	2,444,727	See note*	See note*
2018	2,956,583	2,382,785	-573,798	-19%
2019	3,493,593	2,577,180	-916,413	-26%
2020**	3,498,527	2,013,236	-1,485,291	-42%

**Table 1: Assistive Technology Budget and allocations 2017-2020, NCSE**

*\*The assistive technology allocation for pupils with SEN was included within an overall allocation for special educations initiatives. Therefore, a specific annual allocation for assistive technology is not available for 2017.*

*\*\*All figures for 2020 are provisional until the conclusion of the departmental audits / Comptroller and Auditor General audits.*

The DARE and HEAR access routes can be invaluable to a student to demonstrate how their sight loss has impacted their second level education, However, it may not facilitate a complete and accurate picture of how a delay in supports have potentially affected the student's education and entry to third level or higher education.

### **Our recommendation:**

1. Four-week turn around between registration of a student with special education needs, and the provision of the assistive technology required
2. Access to immediate assistive technology across all levels of education, similar to the Disability Federation of Ireland's 'Assistive Technology Passport' proposal. This proposal calls for lifelong access and funding for assistive technology for people with disabilities, specified to their needs.

### **Reasonable accommodations and Independence**

As every individual is unique so too are their needs. Subsequently, there are a number of reasonable accommodations open to blind or vision impaired students in higher education. These may include assistive technology in the form of laptops, electronic magnifiers; reading material provided in electronic or large print form, learning support, note taking, and exam accommodations. It's important that blind or vision impaired students in all HEI's have the ability to develop their independence while also availing of reasonable accommodations that support their ability to learn. Because this is an extremely fine line to cross, NCBI would advocate the option of one-on-one assessments for students with a

vision impairment when registering with their respective disability support service.

According to the Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2018/19 Survey released by AHEAD, some disability support staff in higher level institutions are concerned about how the increase in students with a disability may be impacting their ability to assess and offer suitable accommodations. The academic year 2018/2019 saw the largest increase in students per disability support advisor since the AHEAD surveys began, with figures rising by 37% since 2012. While individual assessments are offered in larger institutions such as TCD and UCC, it is not a standardised across the state. Allowing for these assessments can support each student in working towards supports that will foster their independence and support their ability to learn.

### **Our recommendations:**

1. Support and training provided by NCBI as part of induction process for campus disability / access officers responsible for assessment requests related to reasonable accommodations and exam accommodations that would be required by students who are blind or vision impaired.
2. Recruitment of additional campus disability / access officers should begin without delay, with additional funding allocated to the retention and training of same.

### **Bookshare Ireland as a preferred learning format**

Students with sight loss have a number of different reading and research format's open to them since the use of technology became more mainstreamed in higher education. While some do still use Braille, many now opt to have their core texts or recommended reading transferred to a PDF file or audio format. Many of the challenges faced by students with sight loss are comparable to students with print disabilities, such as Dyslexia. According to the AHEAD Students with Disabilities survey, published in 2020, 1 in 10 students in Higher education have Dyslexia, with only 2.3% of the student cohort (5,718) currently registered for support in Higher education.

NCBI's Library Access Service studied international best practice to find solutions for the provision of equitable access to curriculum for students who are vision impaired or have print disabilities, which resulted in the

creation of the largest accessible digital library in Ireland, Bookshare Ireland. Through one off funding received from the Department of Education and Skills in 2019, the NCBI Library Access Service developed Bookshare Ireland. As of 30th April 2021, the Bookshare service is actively supporting over 600 students with immediate access to over 700,000 titles in multiple accessible digital formats.

To further enhance features and areas within Bookshare Ireland, the NCBI Library Access Team are currently working on the following Access projects:

- **Accessible Exams:** From 2021, Bookshare can also offer a platform for the sharing of accessible learning materials, including exam papers and materials across all subjects, departments and institutions.
- **Accessible Maths:** Access to the innovative integrated MathML software, for the first time, will make mathematics and STEM accessible to students with print disability. MathML is a screen-reader compatible markup system used to annotate mathematical equations, now expanding to chemical formulas, charts and graphs, diagrams and even art. MathML ensures books, texts and documents are fully accessible and enables students to navigate and toggle through equations, without having to rely on manual inputs of alt-text descriptions. NCBI and Benetech are currently developing this programme for integration with Bookshare Ireland in 2021.

These programmes will undoubtedly be a support to students in higher education institutions as they prepare for examinations. NCBI is more than willing to discuss the supports on offer through Bookshare and its developing programmes with the Higher Education Authority.

**Our recommendation:**

1. Support the call for continued funding from Department of Education for continuity of the Bookshare Ireland platform.

## Further reading:

### **AHEAD**

- Students with Disabilities Report 2018/2019: [Students with Disabilities Engaged with Support Services in Higher Education in Ireland 2018/19 \(ahead.ie\)](#)
- Students with Disabilities Report 2017/2018: [Numbers of Students with Disabilities Studying in Higher Education in Ireland 2017/18 \(ahead.ie\)](#)
- Students with Disabilities Report 2016/2017: [Numbers of Students with Disabilities Studying in Higher Education in Ireland 2016/17 \(ahead.ie\)](#)

### **Census 2016:**

- Disability in Ireland 2016: [Types of Disability - CSO - Central Statistics Office](#)

### **Comptroller and Auditor General**

- Appropriation Accounts 2019: [Vote 26 - Education and Skills \(audit.gov.ie\)](#)
- Appropriation Accounts 2018: [Vote 26 Education and Skills \(audit.gov.ie\)](#)
- Appropriation Accounts 2017: [Vote 26 Education and Skills \(audit.gov.ie\)](#)

### **NCBI National Council for the Blind of Ireland**

- Bookshare: [NCBI Bookshare](#)
- Children and Young People: [Children and Young Person's - NCBI](#)
- National Training Centre: [National Training Centre - NCBI](#)

### **NCSE National Council for Special Education**

- Assistive Technology: [Assistive Technology/Equipment in Supporting the Education of Children with Special Educational Needs - Research Report No. 22 \(ncse.ie\)](#)
- Annual Report: [Annual Reports & Annual Accounts \(ncse.ie\)](#)

### **Oireachtas Library and Research Service:**

- Parliamentary Question 29605/21: [Departmental Budgets – Parliamentary Questions \(33rd Dáil\)](#)