**Technology and accessibility in further education (FE)**

Blind and partially sighted student access to information and assistive technology (AT) in further education.

Report delivered by All Able Ltd on behalf of Thomas Pocklington Trust

# 1.Executive summary

Many young people choose to leave school and move into college, to help them take that next step into adulthood. This is an exciting time for any student as they hone their education towards the area of work they would like to enter and take those next steps to independence.

This is the path chosen by many blind and partially sighted young people. However, we know that their journey can often encounter many barriers that aren’t experienced by their peers, through surveying colleges, speaking to learning support teams and to blind and partially sighted students.

Vision impairment is a low incidence disability, 0.2% of children and young people up to the age of 25 in the UK are estimated to have a vision impairment [1]. No two blind or partially sighted students are the same, each will use their sight differently and will access information in a different way. However, there are several approaches that can be taken to ensure that colleges and further education providers are accessible.

Improving organisational digital accessibility can reduce the amount of one-to-one support, allowing blind and partially sighted students to learn independently and help prepare for transition into higher education (HE). An accessible-by-design approach to learning, teaching and assessment resources can improve the quality of the learning experience for all.

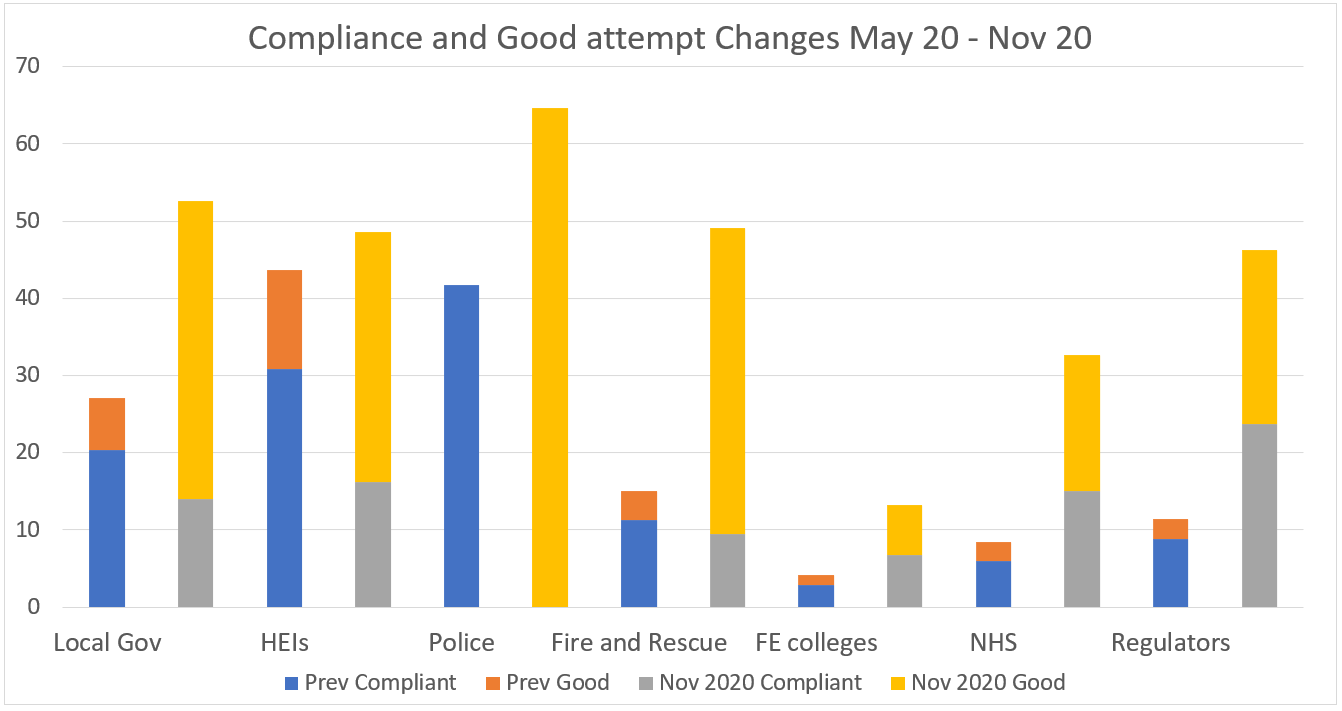
This paper outlines the findings of research conducted by All Able Ltd on behalf of Thomas Pocklington Trust. The research investigates accessible information practices, compliance with accessibility regulations and how blind and partially sighted students access information and assistive technology (AT) in mainstream further education (FE).

All Able’s research incorporates data from a documentary analysis of FE college websites, a survey of Special Education Needs and Disabilities (SEND)/Assisted Learning Support (ALS) teams across the sector, and interviews with students and staff in FE colleges across the UK.

## Findings

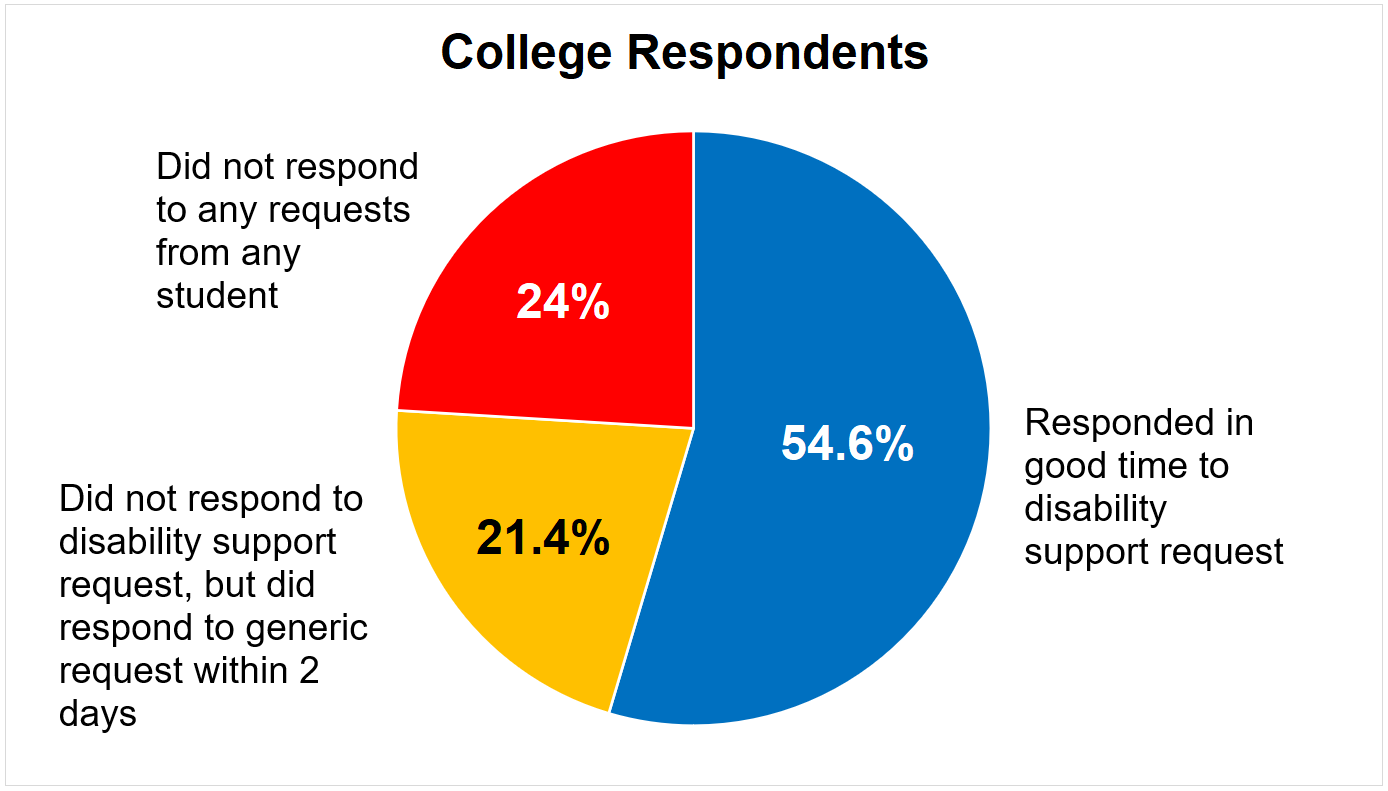
The findings show a lack of compliance with accessibility regulations across the sector and a prevailing culture where accessibility is not built in to support equal opportunities for disabled students:

1. The level of compliance with regulation requirements across the sector was only **13.36%,** being the lowest of all public sector groups. This means that **in 8 out of 10 colleges, blind and partially sighted students will not be able to access core services**. This shows a prevailing culture of disregard for the needs of blind and partially sighted students and is in breach of legal responsibilities.



2. College application processes are not set up to respond to requests from blind and partially sighted students. Often administration teams are unaware of what support is available so requests for information are ignored. Results show that **almost half** of all contacted colleges did not

respond to requests that mentioned being blind or partially sighted. This leaves blind and partially sighted students not knowing whether a college will enable them to progress their education.



3. Colleges do not prioritise accessibility as the responsibility of all staff. The accessibility of learning platforms is not sufficient to support learning. Unanimous agreement across respondents shows sole reliance on SEND/ALS teams is disguising broader fundamental issues with the accessibility of digital learning platforms, learning and assessment resources, and teaching practices.

**Recommendations**

The following high-level recommendations are aimed at a wide range of stakeholders who are best placed to affect change across the FE sector. There are many actions that Government, college leadership and college staff can and should take to improve the support available for blind and partially sighted students.

**1. Urgent action is required to improve legal compliance with accessibility regulations across the FE sector for digital systems and learning resources.**

The UK Government should target guidance for college leadership networks to highlight the digital accessibility legal requirements and the broader benefits of investment in this area towards an inclusive education for all.

1. **College leadership should deliver an accessible by design approach in FE colleges.**

College leadership with the support of the UK Government should develop organisational capabilities to improve compliance with the regulatory framework and remove barriers so that mainstream assistive technologies have maximum impact for all students (particularly students with disabilities and additional access needs).

1. **FE colleges need to improve resourcing and support for SEND/ALS teams to encourage organisational adoption of more inclusive mainstream accessibility practices.**

SEND/ALS teams need support to effectively break out of the ‘vicious circle’ of being unable to adopt more inclusive mainstream means of supporting students due to ‘*overreliance on individualised adjustments, which affects the ability of the students to work independently and to be fully included along with their peers*’ [2].

1. **FE colleges must ensure access to AT and effective training for partially sighted students in FE.**

Blind and partially sighted students in FE should be supported to develop skills and confidence in the use of assistive technologies and alternative format techniques, as well as encouraged to self-advocate to represent their needs to college staff to ensure that these needs are always met.

1. **FE colleges should embed accessibility training for all students in FE colleges as a core employability skill.**

This provides the additional benefit that peers on the same modules as blind and partially sighted students will better understand their requirements to further support inclusion in group work and presentations.

All recommendations are supported by proposed practical actions directed at all levels of college staff and senior policy makers, that can be taken to improve the accessibility of digital platforms and content. The practical actions cover the following areas:

1. Implement a digital accessibility policy

2. Map the extent of the college digital estate and student interactions with college systems and resources

3. Ensure policy and processes are in place and followed by digital content teams

4. Invest in training to support staff

5. All colleges must not procure new digital systems that do not meet digital standards

6. Engage with all students to foster the creation of a more inclusive community.

In support of the high-level and practical recommendations, All Able and Thomas Pocklington Trust are working on a suite of resources including links to a wide range of existing resources.

*“Honestly, it kind of makes me question my future...like if they're not adapting any of the stuff [learning materials] ...why even bother to put in the effort? It makes me lose confidence in learning and whether I'm going to be able to actually get a job or go to uni or pursue what I want to do… I sometimes feel like I just kind of get ignored.”*

**(Student with a vision impairment)**

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# 2. Further education (FE) assisted learning support (ALS) [[1]](#footnote-1) context

As public sector bodies, all FE colleges are legally obliged to develop accessible websites, learning, teaching and assessment materials, in accordance with [The Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018](https://www.legislation.gov.uk/uksi/2018/952/made). However, our findings indicate that there is a lack of awareness, engagement and compliance with these regulations across the FE sector.

Improving organisational digital accessibility allows blind and partially sighted students to learn independently. It reduces the amount of one-to-one support benefiting learning and increasing confidence. Accessibility can be achieved through individual adjustments, or more centrally, by embedding and designing accessibility into teaching, learning and assessments for every student. The latter approach is cost effective requiring fewer resources and one-to-one support. It benefits the student by encouraging independent learning, helping to prepare them for transition into Higher Education (HE).

Centralising an accessible by design approach has wider benefits across the student body, beyond helping those with education and health care plans (EHCPs). Accessible learning, teaching and assessment resources can also benefit those with less complex access needs, improving the quality of learning experience for all:

*[If the environment was more accessible] “… it would be good for me because I'd have way more confidence in what I'd like to learn and be able to get a lot more things done... I honestly think it would help a tonne, mean me being able to actually move up in what I wanted to do. It would give me a lot more confidence in the work and would make me feel a lot better about learning.”*

**(Student with a vision impairment)**

An accessible by design change to the FE sector would help address disability support issues identified through other extensive research. For example, The Visual Impairment Centre for Teaching and Research (VICTAR) Longitudinal Transitions Study report 2021 considered the post-school experiences of young people with vision impairment. The study followed the experiences of 82 young blind and partially sighted students for 11 years as they completed their compulsory education and followed various pathways. This included further education, higher education and employment. A key finding of the VICTAR research was that students who were more confident and resourceful had a better experience and were able to adapt to institutional accessibility failings in the wider education sector:

[On young blind and partially sighted students being resourceful] *“To a certain extent, this has served the young people well, with problem-solving skills being seen as an important enabler for positive outcomes. However, in some cases, the young people were limited by this approach, and, in particular, where they were unable to make adjustments to enable them to access company systems. In these situations, while the young people were restricted by poorly designed systems which were beyond their control, they were often further restricted by their limited knowledge of other solutions, such as magnification software and low-vision aids.*

*The most positive accounts came from those young people who had developed a range of skills for accessing information, which allowed them to tailor their approach, applying different strategies according to the task they were undertaking.”* [2]

Through analysis of feedback from staff and students in FE, this research has sought to identify key barriers to teaching, learning and assessment (TLA) (including learning and information materials) and outline basic recommendations to develop a more inclusive information environment. The development and adoption of basic accessibility principles will enhance colleges’ capabilities to offer a more embedded and discrete level of support. This will address disabled students’ concerns to not be seen as different (‘the ones with support workers’). By developing strategies for effective independent study that utilise standard assistive technologies[[2]](#footnote-2), and the delivery of accessible learning resources by design will positively improve engagement, attainment, and progression to HE.

Delivering accessible learning resources will mean that intensive one-to-one non-medical support can be targeted at those most in need of it, whilst enabling SEND/ALS teams to focus on barriers that cannot be as readily adjusted centrally such as laboratory experiments and complex transcription in Science, Technology, Engineering, Maths and Medicine (STEMM) subjects.

This will help to improve compliance with the regulatory framework and remove barriers in order that assistive technologies can have maximum impact for all students (particularly blind and partially sighted students).

Existing good practice models such as Advanced Practitioner networks could be explored to catalyse a cultural shift in a meaningful but sustainable way.

This approach reinforces the Skills for Jobs: Lifelong Learning for Opportunity and Growth white paper view that ‘colleges...play an important role in ensuring education is accessible to all, including those with additional needs or disabilities’ [3] and that ‘digital and blended learning’ are key to improving the accessibility of teaching delivery. Our recommendations foster an accessibility by design approach, which will address the requirements of SEND/ALS learners and

deliver demonstrable benefits for all learners to support mainstream study and integration:

*“Increasing the sheer volume of tertiary education does not necessarily translate into social, economic, and personal good. That depends on the quality,* ***accessibility****,**and direction of study.”* [3]

The UK digital accessibility regulations obligate colleges to develop accessible by design approaches to teaching, learning and assessment inclusive of learning and information materials, so by connecting this research and its recommendations to legal requirements we are seeking to positively impact both compliance and cultural change agendas.[[3]](#footnote-3)

The traditional medical (individual) model of disability would posit that it is the ‘functional limitations’ of disabled people that are the reason for exclusion, rather than institutional oversight:

“There are two fundamental points that need to be made about the individual model of disability. Firstly, it locates the 'problem' of disability within the individual and secondly it sees the causes of this problem as stemming from the functional limitations or psychological losses which are assumed to arise from disability.” [4]

Seeking to deliver accessible by design services at the point of need without any retrospective adaptation is a move towards the social model of disability:

“The genesis, development, and articulation of the social model of disability by disabled people themselves is a rejection of all of these fundamentals. It does not deny the problem of disability but locates it squarely within society. It is not individual limitations, of whatever kind, which are the cause of the problem but society's failure to provide appropriate services and adequately ensure the needs of disabled people are fully taken into account in its social organisation.”

[4]

## 2.1 Current support model

Discussions with SEND managers outlined that a typical support model for blind and partially sighted students in FE comprises targeted support designed by a Qualified Teacher of Children and Young People with Vision Impairment (QTVI) and delivered by ALS staff in conjunction with teaching teams. Many young people with support needs may need may not have an EHCP.

Currently, blind and partially sighted students access assistive technology (AT) via learning support teams. Embossers, Braillers, and other equipment allocated to the student while at school may follow them into FE, but this isn’t always the case. The QTVI may recommend other or updated equipment which either the local authority or the college should then purchase.

Staff working with blind and partially sighted students are expected to have undertaken relevant training to develop an inclusive approach to delivery of learning and teaching materials.

Although this support model can offer excellent local levels of support to individual students it is very resource intensive and means that students are reliant on ALS teams for study support:

*“So, there's been a recognition of a need for support there. [Student] is automatically funded for very expensive pieces of equipment, quite often all we need to say really is ‘[Student] needs this...it's going to help,’ and they’ll automatically get that. So, there's certainly a willingness from the local authority to provide [Student] with what they need. So much so that I think it’s often used as a crutch in the classroom, because the local authority will provide everything. So, I think from our perspective, there's no issue with funding, for example, people are perfectly willing to make sure [Student] is funded to have what they need. And there's people like us that are happy to help with that. So that's great. There's no shortage of that.”*

**(ALS team member)**

Although this is an example where local support is sufficient, this may not be the national perspective as indicated by the findings of Royal National Institute of Blind People (RNIB) report ‘*Left out of Learning: Local authority education provision for children and young people with vision impairment in England.’* [5]This report found that:

* Just under half of local authorities (LAs) have cut or frozen vision impairment (VI) education services budgets over the last two years
* A quarter of local authorities report current or proposed reviews affecting how the VI service is organised, managed, or funded, which could result in further cuts to provision
* Children and young people face a postcode lottery for the specialist support they need to participate in education and access all the opportunities childhood has to offer

Whilst pockets of good practice were identified, overall, the findings show a system of specialist provision under significant pressure. [5]

A move to a more accessible by design approach within colleges may reduce some of the support costs for local authorities which, as above, have already been identified as being under huge pressure.

## 2.2 Changes to support expectations

In recent years, the expectation for disability support and the provision of accessible services has changed for the public sector. [The Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018](https://www.legislation.gov.uk/uksi/2018/952/made) builds on the expectations of the Equality Act 2010, with a specific focus on digital mediums. All public sector bodies, including FE colleges, are required to be proactive in ensuring that all digital aspects of their services are accessible for students, staff and the public.

Existing research indicates a significant lack of compliance with the 2018 digital accessibility regulations among colleges [6]. This lack of compliance with accessibility legislation, coupled with interviews with college ALS staff, suggests a reactive approach to student support, rather than an accessible- -by-design anticipatory one as is expected by law.

SEND managers indicated that FE providers should seek to be more inclusive and consider support for all students at the universal level but were unclear on the strategic means to achieve this, or the practical measures to adopt locally.

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# 3. Research Questions

The research addressed the following questions:

A. How do blind and partially sighted students access teaching, learning and assessments (TLA) (including learning and information materials) and AT whilst studying in FE colleges?

B. What are the barriers for accessing TLA materials and AT in FE colleges?

## 3.1 Methodology

All Able Ltd. conducted the research with [Dr Jennifer Leigh](https://www.kent.ac.uk/uelt/staff/apt/profiles/jleigh-latest.html) (University of Kent) and colleagues at [Kent and Medway Progression Federation (KMPF)](http://www.kmpf.org/about-us/about-us/) for specific insights into the FE sector.

The research used the following methods to address the proposed research questions, and the methodology gained ethical approval through the Centre for the Study of Higher Education Ethics Committee.

### 3.1.1 Survey

A survey sent to FE colleges to gather information on awareness, understanding and implementation of the 2018 regulations. This survey focussed on:

* digital accessibility implementation and compliance including websites, virtual learning environments (VLEs) and learning and information materials
* corporate strategies, staff awareness and adoption of an accessible- by-design approach
* attainment, retention and progression of blind and partially sighted students, to compare with existing data sources.

The survey results helped to inform against question A by giving insight into the college methodologies and practices for enabling access to TLA materials, and question B through the direct identification of barriers and areas where college practices do not match up to legal and student expectations.

### 3.1.2 Documentary analysis

A documentary analysis of websites and VLEs of FE colleges to assess the current extent to which they are meeting the 2018 digital accessibility regulations. All Able has conducted similar studies mapping the current levels of compliance in public sector bodies. [6]

Analysis of regulation compliance for college websites and VLEs allows us to answer both research questions. The lack of compliance, even after a 2-year grace period, in the regulations may indicate significant barriers to accessing TLA materials for blind and partially sighted students.

### 3.1.3 Student and staff interviews

Originally, we proposed to use the qualitative interviews following the diary-interview method [7] with students and staff to identify lived experiences of barriers, challenges and good practice in accessing TLA materials and AT. However, due to the pandemic, access to students in a ‘typical’ college setting was not possible. We therefore adapted the format to ask students to describe a typical week based on their recall of campus-based life, as well as their experiences in lockdown.

Interviews were semi-structured to allow for exploration of topics of interest to each participant and to reflect unique experiences more effectively. All findings are anonymised.

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# 4. Findings

Our research includes findings from three data sources: a documentary analysis of FE college websites, a survey of SEND/ALS staff and interviews with staff and students.

## 4.1 Accessibility statements analysis

Under the 2018 digital accessibility regulations, accessibility statements are a key indicator of institutional accessibility health, highlighting issues that are likely to affect users. The regulations came into effect on the 23rd of September 2018, all organisations were given a two-year grace period to produce accessibility statements for existing external facing websites and other digital content.

Accessibility statements are legally required documentation, it is a legal requirement, that they are publicly available on all public facing websites in the [required format](https://www.gov.uk/government/publications/sample-accessibility-statement/sample-accessibility-statement-for-a-fictional-public-sector-website), as of 23rd September 2020 when the grace period for the regulations ended. They act as an indicator of accessibility health because they are easy to complete and represent an organisation's awareness of their accessibility limitations regarding one of their highest traffic websites. As such, a lot can be learnt from the quality of an accessibility statement and the guidance it contains. For example, there are common pitfalls in accessibility statements which demonstrate a lack of understanding of the purpose of the document or can indicate how low accessibility is on the organisation’s agenda.

A good statement offers clear guidance for users with disabilities or users of AT on how to effectively navigate accessibility issues with a platform and how they can get support if required. Accessibility statements come out of testing against the international standard [Web Content Accessibility Guidelines (WCAG) 2.1](https://www.w3.org/TR/WCAG21/), which detail success criteria requiring digital platforms to be perceivable, operable, understandable and robust. They cover topics such as keyboard navigation, error messaging, colour usage, interactive content and magnification, among many other requirements.

### 4.1.1 College website results

The websites of all 427 FE colleges in the UK were analysed against the published [All Able Ltd accessibility statement grading methodology](https://www.allable.co.uk/research/accessibility-statements-v4#h.ioceu2wn3i8k), to assess the current extent to which colleges are meeting the 2018 regulations.

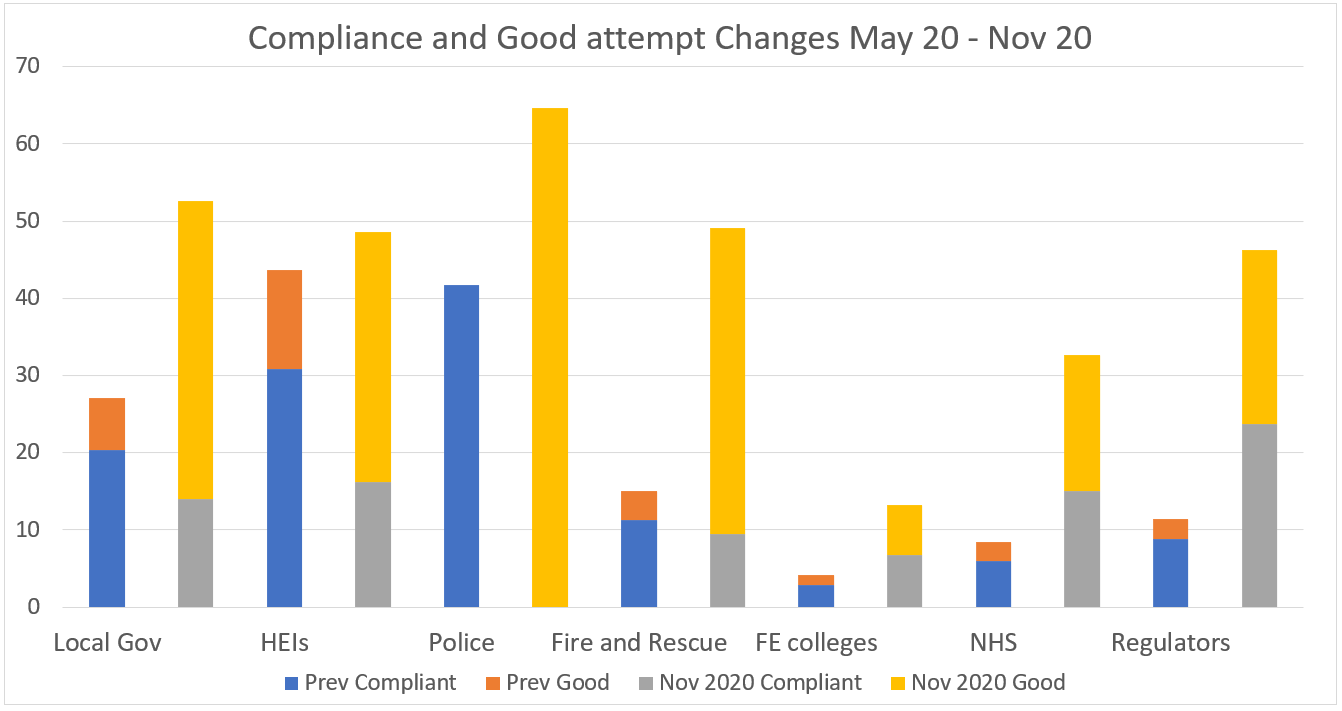
All websites were given a statement grade in one of the following categories: compliant, good, partial, poor or no statement, in line with the grading methodology.

The level of compliance with regulation requirements across the FE sector was only **13.36%,** the lowest of all public sector groups. After three years of the regulations being in effect, for FE colleges to be significantly behind to this extent, is symptomatic of a sector that is unable to react.

In previous research, All Able directly contacted the principals of all colleges without a statement prior to the end of the grace period urging the importance of compliance and the risks of taking no action.

By comparing compliance figures from May 2020 and April 2021, we can see only a minor shift in compliance or good attempts (4.16% up to 16.6%) has occurred in the last year. These results indicate a disconnect between leadership and awareness of their legal responsibilities.

Graph 1 compares levels of compliance with the regulations of FE colleges to other groups, (including universities, local government, etc). The level of compliance with the regulations is far below what might be expected. FE colleges demonstrate significantly less compliance (13.36%), than other comparative groups such as local government (52.55%) and universities (49.25%).



Graph 1: Percentage levels of compliance with the regulations of FE colleges to other groups (including universities, local government, etc.)

There could be several reasons for the significantly lower levels of compliant statements in FE colleges when compared to other areas of the public sector. The main three reasons identified by All Able through our experience in the analysis of accessibility statements across the public sector are as follows:

**1. Lack of staff availability or skills**

Smaller organisations can struggle to assign resources to complete the testing which precedes the completion of an accessibility statement or can lack the in-house skills needed to complete the testing. The results from the survey lend weight to this being an issue.

This has also been seen in other small organisations within scope of the regulations, such as parish and town councils.

**2. Lack of resources**

Colleges often suffer from a lack of available funding to take steps to improving accessibility support which cannot be tied back to a single student or paid for through EHCPs. Often this means external resources cannot be procured to cover the skills or resourcing gap needed to address regulation compliance.

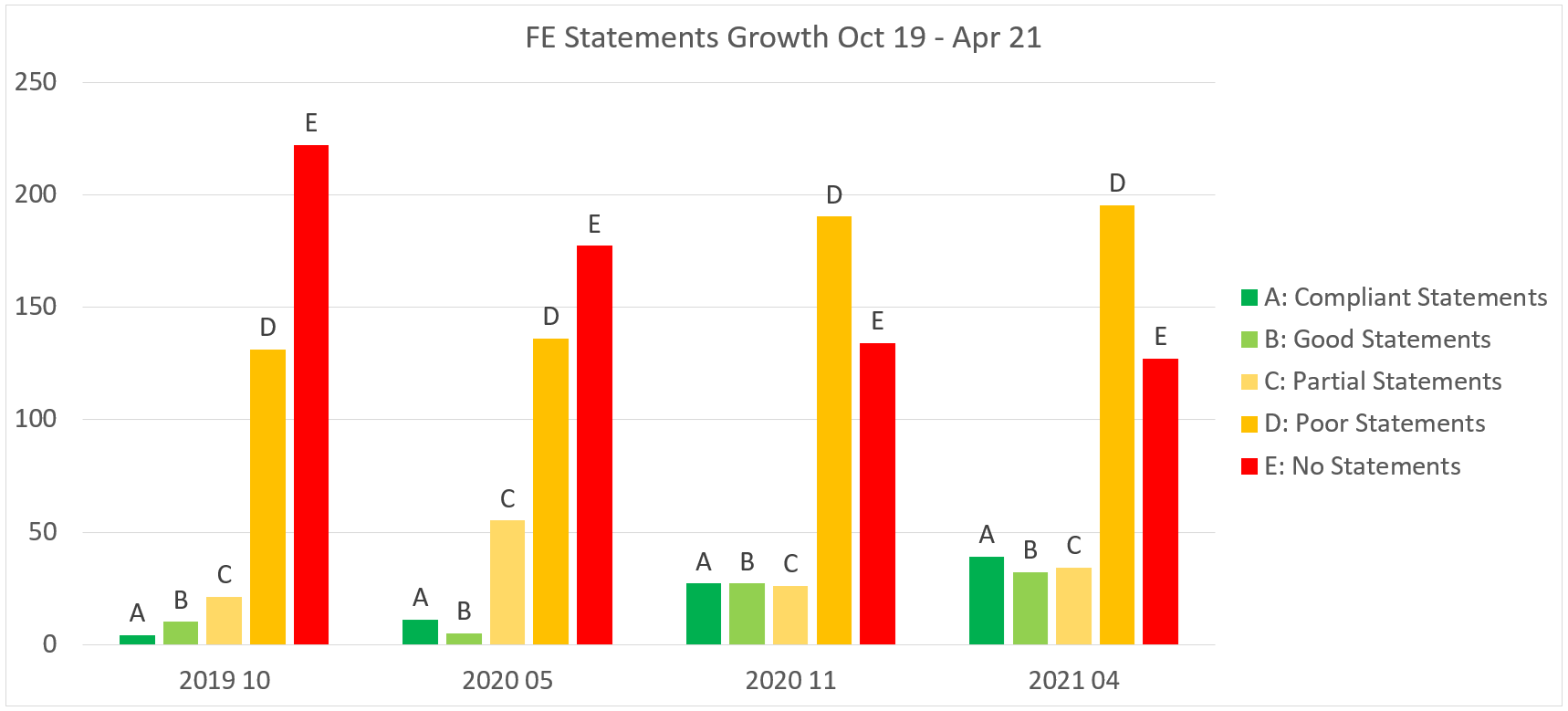
**3. Lack of awareness and engagement**

Colleges may not be aware of the regulations or their obligations as public sector bodies. Awareness raising by the UK monitoring body for the regulations, the Central Digital and Data Office (CDDO), may not have reached the appropriate responsible individuals for FE. To date awareness raising has been directed at central government departments, local government and HE institutions.

All Able has monitored changes to accessibility statement compliance within the FE sector from October 2019 up to April 2021, as demonstrated in Graph 2. There has been worryingly little growth in compliant statements, from 4 up to 39 instances (1.03% to 9.13%), over the 18-month period from a within the 427 HE organisations. There are still 127 colleges (29.74%) with no statements, 195 (45.67%) colleges that provide poor advice and 34 (7.96%) colleges with a partial statement that does not meet regulation requirements.

This means that 8 out of every 10 colleges in the UK do not provide accessibility information to an extent which is useful for users or meets legal requirements.

Further to this, out of the 107 statement examples which make some form of claim to compliance, only 11 colleges say they are fully compliant with the regulations. A further 91 say they are partially compliant and 5 admit to not being compliant. **89.7% of colleges that have made some attempt at monitoring the accessibility of their websites list some form of accessibility blockers with their services.**



Graph 2: Growth of accessibility statement compliance across the FE sector October 2019 – April 2020

These result shows that disabled students looking to study in FE, are more likely to come across inaccessible systems. They present moderate to serious accessibility blockers for students wishing to find prospectus information or to apply to study.

These moderate to serious blockers do not affect all students equally. The poor information provided by most statements can leave students struggling to what information they can or cannot access or what they can do about this. This information is expected from the colleges as a legal requirement.

This is concerning because it represents a clear and distinct disadvantage to disabled students at the very first stage of progressing their FE journey. Front facing information is overwhelmingly inaccessible and most colleges are not delivering the public facing services required to by law.

### 4.1.2 Common statement pitfalls

Analysis of the most recent FE statements has identified examples of common pitfalls which demonstrate various issues or failings:

**Outdated information** - Commonly, pre-existing accessibility information is presented in place of compliant accessibility statements. It is evident that colleges have not updated their accessibility guidance in some time when they mention standards (WCAG 1.0) and browsers (Netscape, AOL) that have not existed since 2008. Information within these statements is of no use to users as they are based on tools or practices that no longer exist.

**Lack of any information** - As identified in Graph 2, a significant portion of the FE sector is yet to provide any form of accessibility information for their main website. This means any users with additional access needs have no clear route for support and must resort to generic contact routes, if any exist. This issue is compounded given the findings of the persona-based research (section 4.2), where we found mentioning having a disability when contacting a college via a generic email address, can mean that blind and partially sighted students are disproportionately like to receive any response to their enquiry. contact routes is likely.

**Available in an inaccessible format** - Given the widespread omission of accessibility issues on FE websites, getting to an accessibility statement may often not be possible for a user with additional access needs. Statements are often presented as inaccessible Word or PDF documents. In either case the primary user group for which this information is designed for, are unable to access it.

**Clear lack of understanding of current or pre-existing regulations** - In many examples, statements provide inaccurate information which can lead to confusion and a lack of useful support. Some statements are presented mentioning the Disability Discrimination Act 1995, which is only applicable in Northern Ireland (having been replaced in the rest of the UK with the Equality Act 2010) despite authors not being in Northern Ireland. Other statements evidence a lack of understanding of the scope of the regulations, with common misuse of exemption clauses or exemptions being claimed as a disproportionate burden. In either case, these examples demonstrate a lack of understanding of applicable legislation and their effects.

**Disproportionate burden misuse** - A significant number of public sector bodies blatantly misuse disproportionate burden clauses to attempt to avoid responsibilities to support disabled users. **31 FE colleges** made a claim of disproportionate burden in our analysis. Through previous [All Able research on disproportionate burden misuse](https://www.allable.co.uk/research/disproportionate-burden-research), it is likely many of these claims will have been made without the appropriate amount of evidence to support the validity of the claim.

## 4.2 Persona based research into prospective blind student support

Following our assessment of accessibility statements, we looked at how prospective students are directed to student support information and how if the public facing website is not accessible, a prospective student could contact the college. This activity had multiple purposes in supporting the research:

* Providing direct SEND/ALS contacts to better direct survey communications
* Providing information on VLE in use
* Provide information on VLE accessibility compliance and staff awareness of the requirements
* Provide evidence of working contact routes, guidance material or support in place for disabled students when navigating the colleges’ digital estate.

To help us understand how prospective students are directed to student support information and college contact information, we contacted a selection of colleges (who had agreed to receive feedback on this exercise) through their generic contact routes (e.g., email or web form). A student persona was used for consistency, of a prospective blind student who;

1. wanted to be put in touch with SEND/ ALS disabled student support and
2. ii) to know about the accessibility of platforms used by the college i.e., the college’s digital platforms.

The responses indicated a worrying mixture, in the quality and usefulness of guidance and information provided to prospective blind and partially sighted students. In almost half of contacted cases no response was received. When a response was received the student persona, was often directed to the appropriate learning support team. However, the quality of the responses was poor. Many failed to provide useful information.

* 33.87% could not even say which virtual learning environments were being used
* Only 3.28% gave legally required information on compliance or directed to useful compatibility information for disabled students.

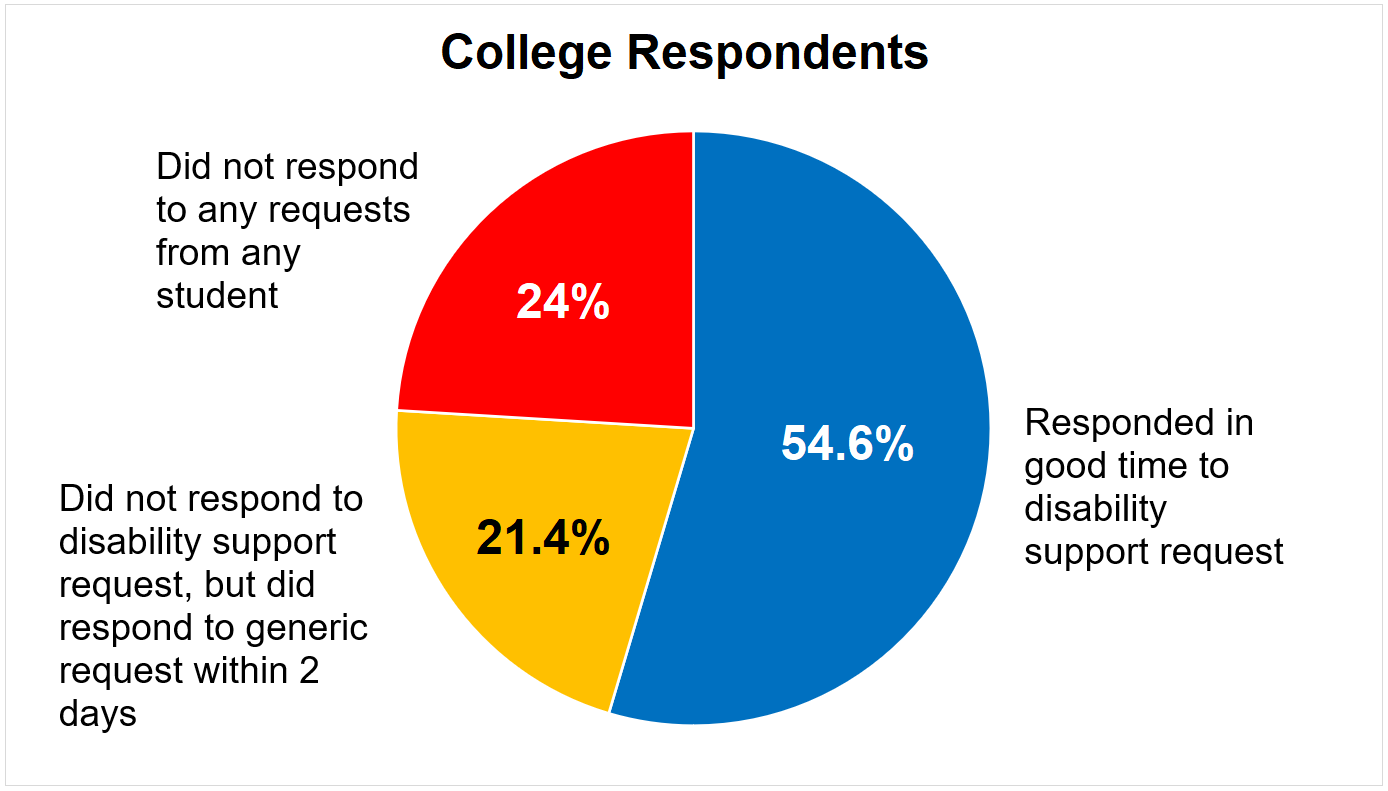
It should be noted that while answers to the query from a prospective student about VLE platforms were sparse, in most SEND/ALS team members were eager to engage on a one-to-one basis and discuss the users individual needs after an application to the college had been made.

This reflects findings in the VICTAR 2021 [2] report and All Able’s responses from SEND/ALS staff (sections 4.3 and 4.4) with regards to the prioritisation of one-to-one support and barriers to providing information, such as VLE compliance status which is reliant on an accessible-by-design philosophy.

The results of the first round of persona testing prompted further testing, a prospective student persona contacted colleges that had not responded in the initial round, but this time made no mention of disability.

We found that approximately half of those organisations who did not respond to the request for disability support responded this time within 2 working days.

54.6% of FE colleges contacted responded to the request for disability support in good time, 21.4% did not respond to the disability support email, but responded within 2 days to a query that did not mention disability, and a final 24% did not respond to at all.



Graph 3: College respondents to persona requests

Several observations can be made regarding the experience of these interactions:

* There is a clear disconnect between front line communications and SEND/ALS support staff
* Mention of disability is likely to cause a delay in response or for the query to be “passed round” until it is lost
* Colleges barely have any information on public facing systems and practically no information on internal systems that can be easily shared with those requesting information
* Because of the lack of accessibility awareness for internal systems, there is a continued reliance on one-to-one support and remediation as opposed to an accessible- by- design approach.

These observations were presented back to SEND/ALS staff during All Able interactions to unanimous agreement from staff on the accuracy of the observations.

These shocking response figures, along with our observations potentially leave blind and partially sighted students not knowing whether a college will enable them support them until they have enrolled or committed to that organisation, further pushing reliance on SEND/ALS student support to provide individual adjustments to cover the lack of embedded organisational accessibility.

## 4.3 Survey responses

The [Colleges Student Support Survey](https://docs.google.com/forms/d/e/1FAIpQLSfEr1jP68PdDnUpzWEX6sZlCFVAgXzgYxTm6YJn5mQGuv_j9w/viewform) comprised 13 questions aimed at SEND/ALS staff. The survey sought to find out how partially sighted students are supported during their time in FE, the level of Assistive Technology (AT) provision and the accessibility of learning materials and online platforms within the colleges. We were also keen to understand how far along the accessibility maturity journey SEND/ALS staff felt their colleges were.

### 4.3.1 Survey findings

Notwithstanding concerted efforts to publicise the survey through key networks (see Appendix 2), the overall number of survey responses was disappointing, with 11 colleges submitting detailed responses. Several respondents along with anecdotal feedback from others unwilling to respond, noted a lack of confidence in understanding institutional accessibility and concerns of potentially incriminating colleges, may have played a part.

The low response rate (see Appendix 3 for a detailed breakdown) may indicate that college staff do not feel confident answering questions on wider levels of accessibility and support for students with disabilities. Although options were given to reply anonymously, respondents were hesitant to offer details about their accessibility compliance

for fear of placing themselves at risk of Equality Act challenges.

Survey responses reinforced the lack of awareness of the regulations in alignment in section 4.1 and a broader lack of accessible-by- design approach reflected in college policy or working practices:

“*Change in society is required - that having a disability is not a barrier to getting to university / aspirations, career and lifestyle - too often the SEND status quo prefers to categorise the disabled learner as a*

*'victim' and not an 'achiever'. This view needs to change to enable the disabled learner to have high expectations for achieving. We need a whole organisation approach with funding to create an environment that drives the societal shift of disabled learner from 'victim' to 'achiever'.”*

Responses also indicated a reliance within colleges on one-to-one support rather than an accessible by design strategy:

*“I am available to students to complete their work all the time but the college needs to put in place suitable resources for VI students to make learning more accessible and adaptable.”*

In addition, there were concerns about access to training for blind and partially sighted students in the use of assistive technologies (please Appendix 4 for comparative AT use) and accessible formats:

Visually impaired students face the following challenges; general lack of training in the use of Braille instruction, lack of Braille machines and their materials, slow writing during lectures and during exams and problems in their mobility around the college.

## 4.4 Sample Staff and Student interviews

The interviews we undertook with staff and students in colleges evidenced the human impact of failings. There were numerous examples of blind and partially sighted students being directly disadvantaged on account of their disability

The following themes were identified:

* Lack of organisational inclusion, accessibility and anticipatory adjustments
* Over reliance on SEND/ALS teams
* Failure to effectively support the delivery and effective use of AT provision
* Lack of staff disability awareness.

Semi-structured interviews were conducted with blind and partially sighted students and SEND/ALS staff from a small selection of colleges from across the UK.

The key findings reinforce the documentary analysis and survey findings with students and staff clearly outlining the lack of inclusive practice as a key barrier to accessibility. This is seen in inaccessible software, systems, processes and a prevailing culture in colleges where student support departments are viewed as the only teams in colleges that have a responsibility to anticipate the requirements of people with disabilities.

VICTAR highlighted the impact on students of a lack of organisation inclusion and accessibility:

*“At almost every stage, the research identified aspects of the participants’ lives which would have been* ***easier, more positive, fairer, and less excluding*** *if some aspect of broader society had been more inclusive or if adjustments had been anticipated. This includes accessible institutional IT systems, appropriate processes, and forms (e.g., Access to Work, job recruitment), and accessible transport systems and shops. Perhaps of key importance is the attitude of others. Repeatedly, the barriers experienced by young people were intertwined with other people’s negative attitudes and ignorance”* [2]

All Able’s interview participants similarly commented on this negative impact:

*“It just seems every time they tell you there's something fantastic you can do for visually impaired students there's always something bigger that's going to prevent it from being used. It’s like we've got a train that does everything but we're going to put a barrier in the way of the tracks, so it doesn't matter how fast that train goes, it's not going to get anywhere because something is going to stop it, like the exams, like the software.”***(ALS team member)**

### 4.4.1 Horizon scanning

The sentiments expressed by both staff and students indicate a lack of horizon scanning on behalf of the organisations and staff. This is partly due to the pressures of maintaining existing levels of support (increasing due to the perceived reduction in specialised support in favour of mainstream provision) and a prevailing ‘[medical model](https://www.scope.org.uk/about-us/social-model-of-disability/)’ view in mainstream colleges that SEND teams are ‘responsible’ for students with disabilities, rather than being supported to be facilitators of the adoption of inclusive practices as part of a team of educators with collective responsibilities for all learners:

*“When it comes to resources, adapting them is our job. So, we make sure the resources are adapted to [name of student], but sometimes we might not notice that they haven't been adequately adapted in the first place. In terms of resources being provided. I'd say, and this is very harsh, but almost no resources have been provided in an appropriate format as there's a tendency to over rely on us as a department...So there's been times in the past where [name of student] is being provided with a handout for a book that they have to read. And I can't print that off in Braille because the handout has been provided as an image...and then they don't have the original source for that document. So, they've certainly adequately prepared a handout for the [wider] class but they haven't looked at it and thought that's not going to work for everyone. And why would they? Because they've never encountered a scenario where it's going to be a problem, so I think that kind of sums up any sort of issues we have.*

*And it goes back to something you mentioned earlier about training, it would be nice for staff to be trained in visual impairments so it wasn't just seen as our job, but, it was something that they considered in the first place, because if they had, they might go on a website to look up how other people with visual impairments cope. And when they're buying new equipment..., they might turn around and ask, oh, I've actually got a student who’s blind how can this help them? Which, obviously, is a question that's never asked.”*

**(ALS team member)**

*“For [the student] to be able to access the course, they have to research equipment that they can use. To interact with the software, they have to create resources for interacting with lessons. Where these aren’t automatically available in the industry or classroom environment the ALS department is left to do this.”*

**(ALS team member)**

*“So, I'm able to read the worksheets that are being provided. The reason I need a Learning Support Practitioner (LSP) is because there may be some content on a whiteboard, for example pictures, that the LSP would need to describe.”*

**(Student with a vision impairment)**

### 4.4.2 Inclusive approach

ALS practitioners felt that a more inclusive approach at a college level would have immediate impacts on the work they do:

*“I think it is part of a vicious cycle as well, [Student’s] visual needs are much higher than their learning needs. If their visual needs were catered to, then we just wouldn't need to be in class and the funding that's provided for us, could be reallocated elsewhere.”*

**(ALS team member)**

*“I think tutors need more training in disability awareness, not just visual impairments, all disability awareness...So there'll be tutors that will say, ‘well, if you look at the screen or look at what's on screen,’ and I'll say, ‘well, they can't’ and this is his third year here, we shouldn't still be at this point. To a new tutor I'd understand, but some tutors they have had for three years are still making comments like that...I don't know if at some point you get used to it, but you shouldn't have to.”* **(ALS team member)**

Some feedback indicated a failure to provide accessible resources that when linked to poor AT provision can create a fundamental barrier to learning and progression:

*“So, it's also a bit like the computer says ‘no,’ quite often, for a lot of things. And then it seems like a lot of the stuff [name of student] needs is never supplied. Because they finish their course in three weeks and we're literally having to rob Peter to pay Paul with things like we've got to use a reading pen for their reading exam now because ZoomText doesn't read tables, or text boxes. I don't know if there is software that reads maths, but [name of student] can't do their maths exam because the only resource he's got is a basic talking calculator.”*

**(ALS team member)**

One interviewee highlighted that the need for a classroom assistant (due to the visual nature of delivery of teaching via whiteboards and printed handouts) made them feel self-conscious about the support they were receiving:

*I have someone read and scribe for me, so I'm sitting there, twiddling my thumbs and just talking while they write it down whereas other students are buckling down trying to get their work done, and I feel sometimes like I'm distracting them or something, because I'm talking the whole lesson.*

**(Student with a vision impairment)**

On the subject of senior managers and policy makers:

*“And that's the thing, a lot of people that make decisions don't know what they're making decisions about because they've never experienced [disability], so they don't know what it's like...If it was their child in the room with a visual impairment you can guarantee their attitude would be different. And that's not the way it should be.”*

**(Student with a vision impairment)**

Another interviewee suggested that involving people with disabilities in the design and development of college programmes and systems is vital:

*It's not always a matter of speaking to every possible disabled person, either. If you speak to one person, because of their experiences, they've got a higher probability of knowing what other people with different kinds of disabilities might need.*

**(Student with a vision impairment)**

On the subject of system development and procurement:

*“I really think people, particularly web developers, and app developers need to be more aware of the fact that the content they are creating needs to be accessible for those who may not be able to see it and who may not be able to read documents back or who may not be able to access those apps. There needs to be more emphasis put on the fact that we do have equal rights to be able to access those types of web applications or mobile phone applications as anyone else with sight. And I think not only just for blind and visually impaired people, but I think for people who have motor difficulties, some applications may not adhere to those requirements. It's not the fault of the developer, I think we need to find a way of making developers more and more aware of this. I mean, this is not every developer, I'm just thinking if they don't know how to make applications accessible like if they don't know the code for it, we should implement training for that.”*

**(Student with a vision impairment)**

Interactions with staff and ALS teams reinforced that the lack of institutional awareness had a significant impact on the blind or partially sighted student experience. ALS teams clearly identified that, even with one-to-one support or attempts to make resources more accessible, the comparative outcome for disabled students is challenging.

### 4.4.3 Supplied assistive technologies

Blind and partially sighted students echoed a frustration that if given reliable tools to learn and accessible resources, they could get on independently:

*“I feel I am a good learner and want to learn. Unfortunately, the big impact is, I can't really do it on my own.”*

**(Student with a vision impairment**)

*“I could do the work if everything just worked correctly.”*

**(Student with a vision impairment)**

*“It just really wasn't great. A lot of things like PDFs and text on the internet would not get read. It was very inconsistent over whether it would want to work or not.”*

**(Student with a vision impairment)**

### 4.4.4 Exams and assessments

Respondents reported issues with exams and assessment materials delivered by exam boards. Accessibility issues with core documents such as exams were not purely the domain of the college to fix and exam boards should be doing more to make exams accessible by design:

*“That's a hard thing for the staff. It's like, [name of student] had an exam which they were really confident going into. We were like he’s going to smash this, but the amount of issues we had - it wouldn't read some of the paperwork and it was just badly worded in general, and, as someone that's meant to be helping [name of student], to watch that level of enthusiasm slowly decrease over a three hour exam is just so disheartening, because you sort of think, what's the point in us doing this when we can't support them properly because we're not being given the resources that they need to be able to be supported properly.”*

**(ALS team member)**

### 4.4.5 In depth discussions

The following are more in-depth interview findings from two partially sighted students at one college:

**3rd year IT student with a vision impairment.**

Due to the difficulties with the accessibility of learning resources and lack of access to exams (exam paper in inaccessible format) they were unable to complete the course in the expected timeframe and are moving to a different college to study for their second-choice career in Catering.

They attribute this ‘churning’[[4]](#footnote-4) to a lack of resources, staff awareness and support for him in his chosen subject (IT).

What would you want the Minister for Education to know about your experience of education?

*“I want him to know that education, for me, having sight issues, is obviously very difficult. Because a lot of the software on the computers isn't very good - it will either have issues or things just won't work and taking time to fix those issues just takes away from the time I could be spending getting work done and learning...and having so little resources to do stuff like exams and then, not really providing resources that I would need is frustrating as well...When someone's writing something on the whiteboard, and I just can't, can't see, I'll definitely feel like I'm missing out on vital information.*

*I would say, consider what everybody needs. For being able to learn successfully obviously people are going to need different things in different ways that they would learn. So, I think it's important that they at least speak to people with disabilities and collect information on how they learn and figure out the best way to go about sorting their issues out.”*

What would you like to see happen?

*“Better resources for people that are learning with visual impairment and just disabilities in general, like computer stuff and going through the setup of software carefully not just putting it on there expecting it to work and for exam stuff I’d just like actually make sure it's adapted and is going to work well with everyone that has a disability and not just expect people to use what's available.”*

**3rd year Music Production student with a vision impairment.**

They experience difficulties with the accessibility of Music Production software that is standard to the industry. They really enjoy the subject and are very keen to pursue a career in the industry but are very aware of the support they will need and are frustrated by the lack of independence afforded to them by the fundamental inaccessibility of the systems that are used for Music Production. These systems are highly visual (multi-layered graphic equaliser and sound visualisers) and complex and therefore purely making them ‘technically’ accessible to screen reader navigation will not be sufficient for meaningfully equitable access:

*“Well, for me, I use an iPad for listening to music, which I also use for education. But I'm trying to independently use a MacBook with Logic on it, because I'm learning to be a music producer. So, I want to be able to independently go home and produce my own music. So, make a career out of it. All that stuff, really. But the problem is that some of the things you have to do are very visual...”*

What would you want the Minister for Education to know about your experience of education?

*“If you also look at the future ahead of you, if you want to be a musician, as a blind person, I think the manufacturers of this stuff [software], need to look at how they're going to make it accessible to the partially sighted. So, I don't think it's just down to training up your teachers or lecturers or whoever you're with, you know, I think that the government also needs to be pushing the manufacturers, or anyone who makes all these recording products to think about partially sighted accessibility...*

*There's a lot that needs to be done in that respect...not just for, as I said earlier, it's not just for education...I feel that I have a career ahead of me. And if you want me to have that, independently and sufficiently, these companies need to start now. They can't - I don't want to be rude - but now is the time to start. If you want people like us to, you know, be as I said, independent, which is the key word here, then, this is what I say to these companies. You know, let's start [being accessible] before it gets too late.”*

What would you like to see happen?

*“I'd like to see it [software and information] work with VoiceOver\* on the computer. And I think I'd like it to be so that I wouldn't have to worry about using a mouse to get to a certain bit, or, you know, for graphics, especially when you do producing and things like that. I think it needs to be so that the VoiceOver can read the image of the graphic.*

*So, I guess, it should be like a sat nav, I guess of some sort. But instead of directions. It's telling you what buttons you should, or whatever button you press, it should sort of tell you what you're doing with that. And I think maybe more keyboard shortcuts as well, would be helpful.*

*So, I think, for the partially sighted musicians, cut all the visual stuff out, obviously, leaving it for the ones that can see it. But for the ones that can't see and can't do it, you know, with a touch screen, make it accessible for us, so that we can do it via shortcuts, or buttons on our machines, or whatever it is. It's just got to be something we can do hands on. That's how I see it.”*

\*VoiceOver is a screen reader for Apple products that reads aloud the contents of a desktop for people who cannot navigate visually*.*

### 4.4.6 Interview summary

The interviews bring the human impact of a failure to make anticipatory adjustments and embed an accessible by design approach. This has an impact to progression, retention, and a sense of belonging in the college community these failures cause.

Although many of the interviewees highlighted accessibility challenges and barriers some spoke very powerfully about the positive impacts of well-designed accessible systems, although we would argue (and the law states) that this should be the absolute minimum expectation for all public sector digital systems:

[On being able to access a web form to book a college event]: “*I was filling in a form for college and putting all of the information into text boxes and VoiceOver was telling me where everything was and whether it was required to answer and when I tried to submit it and accidentally forgot a question VoiceOver read out that I’d missed a question - I think it was something like a question had been left blank. I was elated. I was absolutely elated because I felt like I was included whereas at school I would have had to have someone help me fill it in and I just felt absolutely elated that I was able to do it effectively. It felt really humbling.*

*It was a lovely experience to just be able to access that, and I feel strongly about that, because I feel like blind people should be able to access websites and applications equally as much as sighted or even partially sighted people. It's really, really important to me that we all get the same access.”*

**(Student with a vision impairment)**

# 5. Recommendations

## 5.1 High-level recommendations

These high-level recommendations are aimed at of stakeholders who are best placed to affect change across the FE sector. There are actions that Government, college leadership and college staff can and should take to improve the support available for blind and partially sighted students.

**1. Urgent action is required to improve legal compliance with accessibility regulations across the FE sector, for digital systems and learning resources.**

The UK Government should target guidance at college leadership networks to highlight the digital accessibility legal requirements and the broader benefits of investment in this towards creating an inclusive education for all.

The FE sector is falling significantly behind other areas of the public sector in compliance with the accessibility regulations. The Central Digital and Data Office (the regulation monitoring body) should prioritise awareness raising within the FE sector. All stakeholders including the UK Government, disability charities and student organisations should advocate compliance to FE colleges and take prevailing opportunities to raise this with college principles and senior leadership.

**2. College leadership should deliver an accessible-by-design approach in FE colleges.**

College leadership with the support of UK Government should develop organisational capabilities to improve compliance with the regulatory framework and remove barriers so that mainstream assistive technologies have maximum impact for all students (particularly students with disabilities and additional access needs).

An accessible-by-design approach aligns with objectives for supporting learners with special educational needs and disabilities (SEND) in England outlined in the SEND Code of Practice (Department for Education, 2015) [8], which calls for ‘preparing for adulthood from the earliest years’ and the *Skills for Jobs: Lifelong Learning for Opportunity and Growth* white paperview that ‘*colleges...play an important role in ensuring education is accessible to all, including those with additional needs or* disabilities’ [7]

An accessible-by-design approach will not resolve all accessibility issues for blind and partially sighted students and therefore a sensible mixture of one-to-one and organisational accessibility is required to deliver the best possible support. However, beginning the journey to improved organisational accessibility maturity will allow SEND/ALS teams to focus their efforts on the significant challenges to access.

Key, is to develop an inclusive environment to enable blind and partially sighted students to become independent learners, minimising the need for individual adjustments, therefore supporting students through individual reasonable adjustments in situations where it is not possible to overcome barriers through inclusive practice. The best way to really understand student requirements is to involve them in all discussions about delivering support.

The government should also seek to address gaps in provision for blind and partially sighted students in FE, by exploring the possibility of extending the Disabled Students’ Allowance (DSA) scheme to cover FE settings.

**3. FE colleges must effectively resource and support SEND/ALS teams to encourage organisational adoption of more inclusive mainstream accessibility practices.**

This will impact both compliance and cultural change agendas. SEND/ALS teams need support to effectively break out of the ‘*vicious circle’* of being unable to adopt more inclusive mainstream means of supporting students due to ‘*overreliance on individualised adjustments, which affects the ability of the students to work independently and to be fully included along with their peers’* [2]. This in turn hinders their ability to positively impact engagement, attainment and progression to HE. The intensive local support (described as a *‘crutch’* by one of our respondents) masks the broader lack of institutional accessibility which is indicated by the lack of accessibility statements (4.1) and broader compliance with accessibility regulations (4.2 and 4.3).

* This includes being able to use procurement to ‘force’ third party suppliers to deliver accessible software, systems, and services to support colleges in meeting accessibility obligations.
* The government should seek to raise awareness of accessible practices in ongoing policy developments such as the ‘Skills for Jobs’ White Paper and the National Strategy for Disabled People.

**4. FE colleges must ensure access to AT and effective training for partially sighted students in FE.**

It cannot be assumed that all blind and partially sighted students in FE are fully confident in the use of assistive technologies. They should be supported throughout their time in FE to develop skills and confidence in the use of assistive technologies and alternative format techniques, as well as being encouraged to self-advocate to represent their needs to college staff to ensure that these needs are always met.

**5. FE colleges should embed accessibility training for all students in FE colleges as a core employability skill.**

This provides the additional benefit that peers on the same modules as blind and partially sighted students can better understand their requirements to further support inclusion in group work and presentations. In addition, it will prepare them for life in the public sector where accessibility by design is a core requirement under the regulations.

## 5.2 Practical actions recommended

The high-level recommendations are a useful start for the wider stakeholder discussions that must take place to address the issues outlined in this report at a sector level. However, we also wish to provide a starting point for practical actions that college staff can take to begin affecting change.

These following practical recommendations are aimed at college staff and should be used as a guide for actions to take. Some of these actions will require the support of college leadership, while others can be adopted by any member of staff into their working practices.

1. **Implement a digital accessibility policy**, making it clear that delivering an accessible by design approach is the responsibility of all staff, not just SEND/ALS teams:
   1. Set up a Digital Accessibility Working Group (DAWG) involving all key stakeholders (including senior leaders) in the college to support clear and open conversations around strategic priorities for improving the digital accessibility of college systems.
   2. Speak with disabled students to understand their requirements, seek their help to test digital systems to ensure needs are met and policies are informed by these needs. This could be achieved through setting up a college disabled students’ network.
   3. Set clear targets for levels of improvement year on year. Building an accessible by design organisation takes time. Organisations can use tools such as Blackboard Ally to monitor the accessibility health of documents on their VLE to provide quantitative evidence of improvement.
2. **Map the extent of the college digital estate and student interactions with college systems and resources.**

Identify the accessibility issues for each website/system/platform/learning resources and prioritise remediation to those areas that will have the greatest impact first:

* 1. Test accessibility for each of the identified websites/systems/ platforms/learning resources. This will be proportionate to the college’s ability to fund or self-conduct and should start with easier actions such as basic automated checking using web accessibility tools, or in-built checkers such as the Microsoft or Adobe Pro accessibility checkers, and build to in-depth manual testing, testing with assistive technologies and user research with disabled students to not only ensure compliance with legal requirements but also delivery of useful accessible content.
  2. Invest in web teams and staff responsible for digital platforms and content to develop proficiency with assistive technologies and competency in testing for accessibility issues. By upskilling staff in identifying accessibility issues even at a moderate level, can have significant knock-on effects for accessibility improvements and reduce reliance on 3rd party testing and accessibility auditing.
  3. Produce accessibility statements as is required by law and further accessibility guidance available to all to support ease of use for college digital systems and workarounds for known accessibility issues. For many systems delivered by 3rd parties such as most VLE platform foundations and the Microsoft O365 suite there is often ample accessibility support information available.
  4. Ensure that front-facing communications and marketing teams, student support teams and academic staff know who their SEND/ALS support teams are, how to contact them and the basics of handling questions about accessibility from prospective or current students.

1. **Ensure policy and processes are in place and followed by digital content teams.**

Apply pressure under the policy to creators of digital content such as web pages, and creators of learning resources to deliver content which meets basic accessibility standards. For web this would be compliance with applicable content success criteria of the Web Content Accessibility Guidelines (WCAG), and for documents this would be at minimum having no issues flagged by the Microsoft or Adobe Pro accessibility checkers.

* 1. Accessibility issues with core documents such as exams are not purely the domain of the college to fix. Exam boards should be doing more to make exams accessible by design.

1. **Invest in training to support staff.**

Staff should be supportedin learning basic accessibility principles and adjustments they can make to content to improve accessibility. For example, supporting learning resource creators in understanding how to make fully accessible documents, provide high quality text descriptions for complex images and diagrams, or how to make accessible formulae in STEMM subjects.

1. **All colleges must not procure new digital systems that do not meet accessibility standards.**
   1. Make sure everyone in the college who purchases systems is aware of digital accessibility legal requirements and the key questions to ask of suppliers to ensure that they effectively evidence the accessibility of their products in tenders and contracts.
   2. Make sure procurement teams are confident in assessing the accuracy of any claims made by suppliers.
   3. Make sure meeting digital accessibility legal requirements and technical standards (WCAG 2.1 AA) are included into contract documentation.
2. **Engage with all students to foster the creation of a more inclusive community**.
   1. Support all students in the use of assistive technologies (AT). Presenting assistive technologies as productivity tools standardises their use for general study and gives further credibility to the recommendation that accessible by design approaches should be supported as the outcomes benefit everyone in the college.
   2. Run sessions as part of ‘learning skills’ modules or teaching to support de-stigmatisation and normalisation of accessibility adjustments to foster a more inclusive environment, such as the framing of assistive technology as productivity tools or delivering ‘empathy lab’ sessions focussed on blockers to learning and access needs, and what everyone can do to be more inclusive.
   3. Students understanding accessibility barriers, access needs and actions they can take will prepare them for life in the working world with a further employability skill.

## 5.3 Recommendations for future research

There is a great deal of awareness raising work to be done in FE. The following work would be helpful to monitor and further facilitate sector progress:

* A suite of practical resources needs to be developed in the form of an ‘FE digital accessibility toolkit’ to give clear guidance on realising the recommendations in this report in supporting colleges to develop accessible by design approaches. This could be facilitated by a group of industry experts including Thomas Pocklington Trust, All Able Ltd, and leading AT providers.
* As sector inclusive practice develops, good practice examples need to be captured where colleges have adopted successful practices and policies. Sharing these case studies will help to encourage others to adopt similar practices and create clear sector benchmarks to aspire to.
* An extension of the survey and interview approaches to include teaching staff and senior managers in colleges to capture the levels of awareness of these important groups.

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# Appendices

## Appendix 1: The research team

### All Able Ltd

All Able is a consulting company committed to using our expertise to help public sector organisations remove barriers and deliver accessible and inclusive services that work for everyone. We believe that everyone should have equal opportunity to utilise public services, get an education, and engage with their communities to live an enjoyable and independent life.

The All Able team are an award-winning group of individuals who have been instrumental in the UK (United Kingdom) adoption of the Public Sector Bodies (Websites and Mobile Application) Accessibility Regulations 2018 alongside many other accessibility advancements. The All Able team have worked with every area of the public sector and know the challenges of delivering effective services during times of austerity. Our specialist knowledge in the delivery of accessibility will help public sector organisations build services that remove barriers for staff and citizens to provide work and community environments that include everyone.

Web: [www.allable.co.uk](http://www.allable.co.uk)

Twitter: [@All\_Able](https://twitter.com/All_Able)

LinkedIn:[@all-able-ltd](https://www.linkedin.com/company/all-able-ltd/)

**Ben Watson – Director, All Able**

Ben, a former law librarian and qualified teacher, has a passion for inclusive design that has led him into researching and implementing approaches to inclusive information and technology provision for education.

In 2015 he initiated the [OPERA (Opportunity, Productivity, Engagement, Reducing barriers, Achievement) project](https://www.kent.ac.uk/student-support/opera). This project reconsidered approaches to learning and teaching, digital systems and assistive technologies and catalysed a shift towards anticipatory reasonable adjustments and inclusive practice by design. This work has been hugely influential and was recognised in 2018 with Times Higher Education Award for Outstanding Support for Students.

Ben is also one of the founding chairs of the Further and Higher Education Digital Accessibility Working Group (FHEDAWG) which has worked directly with the Government Digital Service to develop guidance for the Higher and further education sectors to best meet obligations under the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.

**George Rhodes – Director, All Able**

George is an experienced and award-winning professional having worked with every aspect of the public sector. For several years George's focus has been on the delivery of accessible and inclusive services for all citizens.

Known for his extensive knowledge on UK accessibility legislation, he is the author of the [only example of monitoring accessibility statements](https://www.google.com/url?q=https%3A%2F%2Fabilitynet.org.uk%2Fnews-blogs%2Fpolice-praised-updated-uk-accessibility-statements-research&sa=D&sntz=1&usg=AFQjCNF4TTtmfcq_9_nCxrPNTOrjatZQgQ) in Europe and his work on both statements and disproportionate burden misuse has been discussed by the European Commission as an exemplar for delivering accessibility for public services.

### Supporting Experts

**Dr Jennifer Leigh – supporting expert**

Jennifer Leigh is a Senior Lecturer in Higher Education and Academic Practice in the Centre for the Study of Higher Education, University of Kent. She has been a project manager on several large funded mixed-methods studies including two for the Tizard Centre: Imagining Autism and Costs and Outcomes of Skilled Support for Individuals with Complex Needs funded by the Arts and Humanities Research Council and National Institute for Health Research respectively. Her current research primarily uses creative research approaches to focus on issues of identity and marginalisation.

**Kent and Medway Progression Federation (KMPF)**

KMPF is a partnership between Canterbury Christ Church University, the University of Kent, the University for the Creative Arts, the University of Greenwich, Canterbury College, the EKC Group, Mid Kent College, HEAT (Higher Education Action Tracker), Laser Learning Awards, Switch Youth Services and over 70 schools and colleges in Kent and Medway.

KMPF work to raise the aspirations and attainment of young people from backgrounds who might not otherwise consider progression to HE. Most young people with whom they work are from disadvantaged backgrounds or comprise first generation HE applicants, meaning they are the first in their immediate family to go to university.

### Thomas Pocklington Trust (TPT)

Thomas Pocklington Trust is a national charity dedicated to enabling and empowering blind and partially sighted people of all ages to live the life they want to lead. We are committed to increasing awareness and understanding of their needs and aspirations, to working with partners and to developing and implementing services which meet these needs to increase independence and improve lives. These include:

* Acting as an advocate and positive change agent for blind and partially sighted people.
* Creating opportunities for blind and partially sighted people seeking employment.
* Enabling opportunities and supporting blind and partially sighted people whilst in and entering education.
* Facilitating the voice and encouraging self-determination of blind and partially sighted people.
* Being an effective partner and grant funder based on our knowledge of the sector.

Web: [www.pocklington-trust.org.uk](http://www.pocklington-trust.org.uk)

Facebook [@thomaspocklingtontrust](https://www.facebook.com/thomaspocklingtontrust/)

Twitter: [@TPTgeneral](https://twitter.com/TPTgeneral)

LinkedIn:@pocklington-trust

## Appendix 2: Survey engagement routes

To promote responses to the survey, the following dissemination routes were utilised:

* All Able and Thomas Pocklington Trust social media posts
* All Able and Thomas Pocklington Trust websites
* Sight and Sound Remote but not Restricted Podcast
* JISC digital accessibility regulations mailing list
* JISC Assistive Technology Steering Group
* JISC digital accessibility community of practice
* Advanced practitioner networks
* Localised College SEND/ALS practitioner meetings
* Conference promotions (Kent Digital Accessibility Conference 2021, Naidex 2021)
* Direct contact of SEND/ALS teams identified across the majority of UK colleges
* Escalation through the Further and Higher Education Digital Accessibility Working Group and Policy Connect

## Appendix 3: Detailed survey results

Based on the responses received we can identify the following:

* The number of students with vision impairment in the colleges who responded to the survey ranged between 1 and 10.
  + some respondents cited lack of access to accurate data so could not provide a firm number
* There was a mixture of in-house and external specialist support in place for assessment, training and AT in class and exams
  + External support included: QTVI, sensory support teams in local authorities, specialist suppliers for resources to enable blind and partially sighted students to access learning and assessments, Braille specialists, AT providers and guide dog staff.
* Assistive technologies used included: Jaws, ZoomText, Supernova, office accessibility apps, RNIB Bookshare, iOS accessibility software, Seeing AI, BrailleNote Touch, Visionbook, Siri, talking calculators and hardware CCTV Magnifiers as well as other Braille services.
* Feedback was mixed concerning how well colleges fostered student independence. Some felt confident that students were well supported to learn independently as they progressed through their life at college, whereas others felt students were entirely reliant on staff for support.
* In terms of staff training the picture was again mixed. There was very little specific training offered to support mainstream accessibility by design approaches. This was further borne out in responses to questions about preparations to meet the [Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations](https://www.legislation.gov.uk/uksi/2018/952/made), where many indicated a very individualised (medical model) approach to meeting students' needs on a one-to-one basis.
* In relation to meeting legal requirements under the [Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations](https://www.legislation.gov.uk/uksi/2018/952/made) there was a reliance on one-to-one support rather than mainstream accessible provision.
  + It should be noted here that one-to-one support is not an accepted way to meet the regulation requirements which expects a proactive approach to accessibility instead of one-to-one remediation.
* Data was available in relation to attainment, retention, and progression of blind and partially sighted students which may be useful for future research in this area
* Barriers to the broader adoption of inclusive strategies were perceived to be:
  + Inaccessible digital information
  + Software and mobile applications
  + A lack of staff awareness of the needs of people with vision impairments
  + Some respondents also highlighted a lack of training for students in the use of technologies and adaptive materials such as Braille.
* Barriers to learning resources and Assistive Technologies were:
  + Cost
  + Lack of organisational information technology (IT) strategy
  + Human resources
  + Student confidence

## Appendix 4: AT usage

To an extent, the AT preferences of partially sighted students in FE are not the immediate concern of this report, which instead focuses on the accessibility of digital systems which will enable all assistive technologies to perform more effectively. The University of Birmingham (VICTAR 2014, 2017 and 2018) produced helpful reports that measure the use of a selection of assistive technologies among partially sighted people in university, sixth form/FE college, employment, apprenticeships, and those who were NEET/Other as part of a longitudinal study:

* Jaws 11 42.3%
* ZoomText 8 30.8%
* Supernova 6 23.1%
* NVDA 1 3.8%

**(VICTAR, 2014)**

* Supernova (magnification and screen reader) 7
* Jaws (screen reader) 5
* Magnification/screen reader inbuilt into Windows/Apple operating system 5
* ZoomText (magnification) 4
* Unspecified magnification software 2
* Mouse with inbuilt magnification 2
* CCTV 1

**(VICTAR, 2017)**

This data indicates that there remains a reliance on proprietary assistive technologies and does not reflect the growing influence of free and open-source alternatives such as those built into Windows and Mac operating systems as well as mobile interfaces such as iOS and Android.

## Appendix 5: Resources

In support of the practical recommendations within the report, All Able and Thomas Pocklington Trust are working on a suite of resources to expand on the guidance with further useful information and links to a wide range of existing resources.

It is the hope that these additional resources will give further clear guidance on realising the recommendations in this report in supporting colleges to develop accessible by design approaches.

The resources will include detailed datasets and interactive maps showing the publicly available information gathered as part of this research for example, a map detailing FE colleges’ main website compliance.

# Disclaimer

**Copyright**

This report has been produced by All Able Ltd on behalf of Thomas Pocklington Trust. Material within this document, including text and images, is protected by copyright. It may not be copied, reproduced, republished, downloaded, posted, broadcast, or transmitted in any way except for the intended purposes. Prior written consent of the copyright holder must be obtained for any other use of material. Copyright in all materials and/or works comprising or contained within this document remains with Thomas Pocklington Trust. No part of this document may be distributed or copied for any commercial purpose.

**How we used data provided**

All personal or identifiable data collected through this research has been anonymised before publishing. Any contact information provided will be kept for the duration of the research and a further six months at which point it will be deleted. All contact information will not be used for purposes beyond that of conducting this research.

Data regarding publicly available information on the colleges was collected alongside information regarding colleges internal systems and contact routes. Only that information which is already publicly available will be disclosed through this report or subsequent resources associated with this research. All information regarding internal systems or communication processes has been anonymised and can only be discussed as part of sector trends.

**Accuracy**

Every effort has been made to ensure the accuracy of this report and its recommendations at time of writing. Information on compliancy, IT platforms and communication practices is likely to change over time and as such the accuracy of this report should be viewed with respect to the time of writing.

This report is for general information only and is not legal advice.

All Able Ltd and Thomas Pocklington Trust will not accept liability for any loss, damage or inconvenience arising because of any use of, or the inability to use any information contained within this document.

1. We have chosen to use the term Assisted Learning Support (ALS) to represent the work done by support teams in colleges who offer one-to-one study support to students. Alternative terms we are aware of for this work are Learning Support Practitioners (LSP) and Educational Support Assistants (ESA). [↑](#footnote-ref-1)
2. Standard desktop and mobile operating systems now have inbuilt screen readers and there are many. additional open-source options that come close to matching the functionality of market leaders. [AbilityNet](https://mcmw.abilitynet.org.uk/) provide advice on making devices easier to use if you have a disability and the University of Kent provide a comprehensive list of recommendations for[tools that can make your online experience better](https://www.kent.ac.uk/tools). Technologies such as [RoboBraille](https://www.robobraille.org/) and [Seeing AI](https://www.microsoft.com/en-us/ai/seeing-ai) can support fully independent approaches to both the creation and remediation of accessible learning materials. [↑](#footnote-ref-2)
3. There are existing networks of support and extensive resources available to support organisations in adopting accessible by design approaches to meet legal compliance obligations. All Able Ltd. has been instrumental in the creation of these across the Education sector including the [Lexdis Digital Accessibility Toolkit](https://www.lexdis.org.uk/digital-accessibility/), the [JISC network of practice and legal guidance](https://www.jisc.ac.uk/accessibility), [rich media guidance for the Disabled Students commission](https://www.advance-he.ac.uk/knowledge-hub/guidance-captioning-rich-media) as part of our role within the [Further and Higher Education Digital Accessibility Working Group (FHEDAWG)](https://www.lexdis.org.uk/wp-content/uploads/2019/07/Further-Higher-Education-Digital-Accessibility-Working-Group-Terms-of-Reference.docx) which reports to the [All-Party Parliamentary Group for Assistive Technologies (APPGAT)](https://www.policyconnect.org.uk/appgat). Our recommendations include encouragement to utilise these resources and networks to expedite improvements made by colleges. [↑](#footnote-ref-3)
4. Churning is characterised by the young people repeating years in college, or repeatedly taking courses at the same level (or even lower levels) and appearing not to make a positive progression. [↑](#footnote-ref-4)