ALTITUDE

THE NATIONAL CHARTER FOR UNIVERSAL DESIGN IN TERTIARY EDUCATION

Technical Report

Acknowledgements

Contents

Glossary

AHEAD	Association for Higher Education and Disability
AIC	ALTITUDE Implementation Committee
AIT	Athlone Institute of Technology
AONTAS	National Adult Learning Association
AT	Assistive Technology
ATU	Atlantic Technological University
AVMSD	Audio–visual Media Services Directive
CAST	Centre for Applied Special Technology
CEUD	Centre for Excellence in Universal Design
CSO	Central Statistics Office
DFHERIS	Department of Further and Higher Education, Research, Innovation and Science
QCSN	Quality Customer Service Network
EEA	European Economic Area
EPSEN	Education for Persons with Special Educational Needs
ESD	Education for Sustainable Development
ETB	Education and Training Board
ETBI	Education and Training Board Ireland
FE/FET	Further Education/Further Education and Training
FSD	Fund for Students with Disabilities
HCI	Human Capital Initiative

HE	Higher Education
HECA	Higher Education Colleges Association
HEA	Higher Education Authority
HEI	Higher Education Institution
IT	Information Technology
IUA	Irish Universities Association
MTU	Munster Technological University
NALA	National Adult Literacy Agency
NAP	National Access Plan
NCSE	National Council for Special Education
NDA	National Disability Authority
NFETL	National Forum for Enhancement of Teaching and Learning in Higher Education
NTO	National Tertiary Office
OECD	Organisation for Economic and
PATH	Programme for Access to Higher Education
PATH	Programme for Access to Higher Education
PLC	Post Leaving Certificate
QCSN	Quality Customer Service Network
QQI	Quality and Qualifications Ireland
RIA	Royal Irish Academy

SOLAS	An tSeirbhís Oideachais Leanúnaigh agus Scileanna
SoTL	Scholarship of Teaching of Learning
THEA	Technological Higher Education Association
TU	Technological University
UCC	University College Cork
UCD	University College Dublin
UD	Universal Design
UDE	Universal Design for Education
UDI	Universal Design of Instruction
UDL	Universal Design for Learning
UL	University of Limerick
UN	United Nations
UNCRPD	United Nations Convention on the Rights of People with Disabilities
UNICEF	United Nations Children's Fund
UNSDGs	United Nations Sustainable Development Goals
UoG	University of Galway
USI	Union of Students in Ireland
WAD	Web Accessibility Directive
WCAG	Web Content Accessibility Guidelines

Executive Summary

Ireland's education system is at a critical stage in its development towards inclusion. Greater diversity in the student population, national and international policy emphases on the right to an inclusive education for every learner, and the evolution of technology in education in recent decades, have drawn attention to the need for a more inclusive model of education across all sectors. Within tertiary education, there is a growing momentum towards an inclusive, universally designed, and unified sector in both policy and practice. In Ireland, further and higher education has, over recent decades, had to reflect on traditional policies, structures, systems of support, and pedagogical approaches for students. It is from this period of reflection that calls for a *National Charter in Universal Design in Tertiary Education*, or ALTIT**UD**E, have arisen. Research shows that Ireland has a robust national policy commitment to a universal design (UD) approach, and evidence of engagement of individuals in professional development and local implementation is plentiful. Despite these developments, however, evidence also shows that a commitment to UD is not evident in the institutional strategies and policies of many higher education institutions and education and training boards (Healy et al., 2023).

The ALTIT**UD**E Charter seeks to support institutions to address this gap and embed UD more sustainably over time in their structures and practices.

This Technical Report acts as an accompanying document to *ALTIT**UD**E, the National Charter for Universal Design in Tertiary Education,* launched in the Spring of 2024. The Charter is one of three related components made up of the Charter itself, this Technical Report, and an Implementation Toolkit.

The Technical Report is divided into four sections:

1. It provides a contextual overview for the Charter, outlining the rationale for its development and the challenges and enablers to an inclusive tertiary education system in Ireland and internationally.

2. It gives an overview of the origin and development of the Charter before highlighting the structure of the Charter, its strategic foundation and four pillars, aimed at increasing accessibility, flexibility and usability in tertiary education. The four pillars include: Teaching and Learning; Supports Services and Social Engagement; Physical Environment and Digital Environment.

3. It examines how the Charter aligns with existing international policies and national policies with a specific focus on Charter alignment with existing tertiary education policies and funding mechanisms.

4. The Technical Report concludes with a focus on Charter implementation and examines how this Charter can support institutions wishing to create more inclusive environments for students and staff. It provides an overview of how institutions can begin to implement the Charter with the formation of an Implementation Committee/Working Group and use of the associated Toolkit. This section concludes with an overview of the significance of the role of policy makers and national bodies in supporting institutions to adopt and implement the Charter.

The cross–sectoral development of the ALTIT**UD**E Charter and its associated outputs represents a landmark moment for the tertiary education sector, signalling its intent to place human diversity at the heart of its design and delivery.

It commits to a system where all learners are transformatively included through a universal design approach, which fosters student success for all. Underpinning this, is an effort to further operationalise a culture of shared responsibility for universal design, access & inclusion, by supporting the development of organisational structures which foster an 'everyone's business' approach to inclusion.

By adopting the Charter, tertiary education providers are invited to build on existing innovative policies and practices across the sector, using the Charter as a vehicle for greater coherence and collaboration on access and inclusion, both within and across institutions.

Section 1:
The Context for Universal Design Charter in Tertiary Education

1.1 Introduction

Universal Design is becoming an increasingly popular policy response to the growing diversity in student populations and evolving education systems worldwide. Originating in the field of architecture, Ronald Mace and colleagues from North Carolina State University in the United States founded the Center for Universal Design in 1989 and formulated its definition and seven guiding principles. Given the interest in the importance of UD internationally, this dynamic concept has been transferred to other areas of society including policy and legislation, technology and, of particular interest to this Technical Report, education. Often termed Universal Design in Education or UDE (Burgstahler, 2009; Burgstahler, 2020a, Burgstahler, 2020b), the focus is on whole system design:

> 'so that the physical and digital environments, the educational services and the teaching and learning can be easily accessed, understood and used by the widest range of learners and all stakeholders, in a more inclusive environment' (NDA, 2022a, p. 1).

While the number of students attending tertiary education in Ireland and internationally has increased in recent decades, the most notable feature of this trend is the growing numbers of students from diverse backgrounds (Claeys–Kulik et al., 2019). With these changes in student demographics, there is an increased focus on the extent to which further and higher education institutions, and mainstream education more generally, is inclusive (Quirke et al., 2019; SOLAS, 2020; Banks, 2023; HEA, 2021a; Healy et al., 2023).

This Technical Report has been written to support *ALTIT**UD**E — the National Charter for Universal Design in Tertiary Education* (herein called the Charter), which uses the UD principles as its foundation, and builds on significant existing work on UD in tertiary education in the Irish landscape (Kelly and Padden, 2018). Prepared by the ALTIT**UD**E Charter Technical Report Working Group, it acts as an explanatory document to the Charter itself and the accompanying Implementation Toolkit which supports the practical implementation of the Charter.

The development of all three elements has been overseen by the National UD Charter Group formed as part of the PATH 4[1] Phase 1 Universal Design Fund (DHERIS and HEA, 2023) to support the development and implementation of UD principles and practices in tertiary education. It is divided into four main sections: this section provides a contextual overview by outlining why Ireland's tertiary education sector needs a UD Charter by highlighting the challenges and enablers to an inclusive tertiary education sector.

Section 2 details the four pillars of the Charter itself and explores the key frameworks that underpin each pillar. This section also provides an overview of the origin and evolution of the UD Charter to date. Section 3 examines how the Charter aligns with existing international policies and national policies with a specific focus on Charter alignment with existing tertiary education policies and funding mechanisms.

The final section focuses on Charter implementation by outlining what the Charter will mean for institutions, how institutions can begin implementing the Charter and the role of policy makers and agencies in supporting institutions wishing to adopt and implement the Charter.

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1   PATH 4 is a strategic funding programme within the National Access Plan (2022–2028). Called the Programme for Access to Higher Education, it is implemented by the Department of Further and Higher Education, Research, Innovation and Science and the Higher Education Authority.

The ALTIT**UD**E Project has three core outputs as follows:

The ALTITUDE Charter

The vehicle for your institution to declare its intent to make incremental and sustainable progress towards embedding a universal design approach – Embedded in this document.

Implementation Toolkit

A practical toolkit with key guidance, self–assessment tools and case study examples of good practice in action, which support the implementation of the ALTIT**UD**E Charter.

Technical Report

Research report outlining the context for the development of the Charter, the evidence base that underpins it, the alignment of the Charter with legislation and policy, and recommendations on its implementation.

1.2 Why a National Charter of Universal Design in Tertiary Education?

1.2.1 Cultural context

The Charter comes at a crucial period in Ireland's education history. There have been dramatic changes in the profile of its tertiary education student population in recent decades (Healy et al., 2023). This includes students from diverse racial, religious, socio–economic, linguistic, and learning backgrounds and abilities. There has also been a dramatic increase in the number of students with disabilities. Student diversity is relatively new in Ireland compared to other national contexts and there has been a significant change in profile since the mid–2000s when policy changes regarding the inclusion of students with additional needs and disabilities (Education for Persons with Special Educational Needs Act (2004)) increased the prevalence of students with disabilities in local mainstream primary, secondary and, subsequently, tertiary education. The proportion of students with disabilities in tertiary education has increased significantly in recent years although inconsistencies in the data make this difficult to measure. According to the Higher Education Authority (HEA), 18 per cent of students cite having a disability. However, other data from AHEAD shows, however, that just 7 per cent are registered with supports, suggesting there is a significant cohort of students with disabilities who are not registered with supports. Many argue that this exponential rise in students with disabilities in HEIs has not been matched by a corresponding investment in support staff (AHEAD, 2022). Similarly, 7 per cent of the FET student population are reported to have at least one disability (almost 13,000 learners) in 2022, an increase from 10,500 learners in 2021 (SOLAS, 2023).

Other societal factors have also led to a more heterogeneous school population over the past two decades. Ireland's inward migration trends from the mid–1990s gradually created a more culturally and linguistically diverse student population (Faas, 2020; McGinnity et al., 2022). This migratory change has been linked to changing economic conditions and the expansion of the EU. More recently, the end of the Covid–19 Pandemic travel restrictions, the ongoing impact of Brexit, and the arrival of Ukrainian beneficiaries of temporary protection have also played a role (McGinnity et al., 2022). The Census of Population states that there are 535,475 non–Irish nationals (born outside Ireland) living in Ireland accounting for 12 per cent of the total population with the largest non–Irish groups being Polish and UK citizens (CSO, 2023). Studies show that immigration in Ireland has also brought increased ethnic diversity and while most immigrants in Ireland are of European origin, Black, Asian or other ethnic groups represent a small proportion of the population (McGinnity et al., 2018). The Growing Up in Ireland study has researched the participation of migrant students in tertiary education and found that that progression rates to higher education are broadly the same for Irish and migrant children from English and non–English speaking backgrounds (McGinnity et al., 2023). Estimates show that students from non–EEAA[2] countries make up over 8 per cent of the higher education student population (Groarke & Durst, 2019) . HEA data shows, however, that 23 per cent of students are not from a 'white: Irish' ethnic background (up from 13 per cent in 2015/2016) (HEA, 2022).

The data shows that patterns in FET differ somewhat. Almost a quarter of learners are non–Irish nationals, they come from 197 different nationalities, however, the majority of these learners are from Asia (38%) and Africa (34%) (SOLAS, 2021).

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2   Outside the European Union and the European Economic Area.

1.2.1.1 Access and widening participation

While much Irish education research and policy focus has, to date, been on how primary and second-level education can, and should, respond to changing student demographics (NCSE, 2019), there is an increasing emphasis on the need for policy responses to diversity and inclusion in post-secondary education (HEA, 2021a; SOLAS, 2020; THEA, 2018). Existing policies and practices in tertiary education are coming under scrutiny due to lack of access, inaccessible curricula and assessment, negative attitudes, lack of supports and physical barriers (Fovet, 2020; Järkestig Berggren et al., 2016).

In recent decades, access and widening participation have become a major policy priority in further and higher education. There is national and international pressure to increase the numbers of students from educationally disadvantaged schools and homes who are able to access university (Davis & Bull, 2023). In Ireland, there is growing recognition of the need to address inequities in how students access higher education given the significant underrepresentation of people from low socio-economic backgrounds (Smyth, 2018). Data highlights the disparities among students with just 10 per cent of students in higher education coming from disadvantaged backgrounds (HEA, 2022). The data also highlights that marginalised groups are affected more than others with just 1 per cent of people from Traveller Communities having a third-level qualification compared to 55 per cent of the general population (Smyth & Banks, Forthcoming 2024). Recognising this, the National Access Plan (NAP) (2022–2028) makes specific reference to issues of higher education access for students who are socio-economically disadvantaged including members of the Traveller and Roma communities (HEA, 2022). Access and widening participation is also evident in FET policy under the Strategic Priority area of Fostering

Inclusion (SOLAS, 2022). The profile and characteristics of FET learners show that it differs to the national population with a higher share of learners from extremely disadvantaged (0.2%), very disadvantaged (5.46%), disadvantaged (17.75%) and marginally below average (36.57) socio–economic backgrounds (SOLAS, 2019b). Attempts to address these issues are evident in the FET national system targets for widening participation. In 2022 these targets included 16,788 unique learners (including asylum seekers, persons with a disability, refugees, learners from Roma and Traveller Communities). Data shows however that Education and Training Boards (ETBs) had collectively engaged with almost 19,000 unique learners by the end of the year (SOLAS, 2022).

1.2.2 Legislative Context

International policy responses to increasing student diversity and changing student demographics have been notable in recent decades with an emphasis on the implementation of inclusive education and equity of access for every learner (UNESCO, 1994, 2020; United Nations, 2006, 2020). Universal Design, Universal Design for Learning and inclusion are key to achieving the right to education as outlined in the UN Convention on the Rights of Persons with Disabilities (UNCRPD) (United Nations, 2006) and the UN Sustainable Development Goals (SDGs) (United Nations, 2020) (detailed in section 3 below). At national context level, education policy is beginning to respond in the teaching and learning space with UDL appearing in legislation in the United States such as *Every Student Succeeds Act* (2015) and the *Higher Education Opportunity Act* (2008). Similarly, in South Africa, UDL is considered significant in its policy reform towards inclusive education (Dalton et al., 2019) whereas in Australia, UDL principles are being applied in the national curriculum (Evans et al., 2015). Ireland is unique in having a definition of UD in the Irish Disability Act (2005). It states that UD is:

'the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people, regardless of their age, size, ability or disability' (Disability Act, 2005, part 6).

This legislation is significant as it covers public places, the built and digital environments, services, and systems and is therefore aligned directly with the four pillars of the Charter (see section 2). Given this definition in national legislation and the establishment of the Centre for Excellence in Universal Design (CEUD), established as part of the Disability Act by the National Disability Authority (NDA)[3], the four pillars used in the Charter are therefore informed by decades of expertise and the promotion and development of standards directly applicable to UDE in tertiary education. There is some evidence to suggest that UDL is emerging in Ireland education policy also (Flood & Banks, 2021; Quirke & McCarthy, 2020) with the ALTIT**UD**E Charter itself offering another example of UD and UDL adoption at the highest level of policy.

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3   The NDA is a state agency on disability issues, providing independent expert advice to Government on policy and practice. See https://nda.ie/about

1.3 Ireland's Tertiary Education System

Also known as post–secondary education, tertiary education in Ireland consists of further education and training, and higher education. Tertiary education is overseen by SOLAS (the Further Education and Training Authority) and the Higher Education Authority (HEA), who operate under the aegis of the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS). Further Education and Training (FET) consists of a wide range of provisions including: Employment progression, Education Service to Prisons, Higher education progression, Pathways, Youth provision, Community education, Adult Literacy for Life and Learning in employment. At present, there are 16 regional ETBs, who are represented by the Education and Training Boards Ireland (ETBI) at national level.

FET offers a wide range of programmes and supports including programmes for foundation and transverse skills development (e.g., literacy and numeracy in Adult Education or Education Service to Prisons); programmes facilitating pathways and bridging gaps between vocational provision (for example, Youthreach and Back to Education Initiative) and vocational education and training opportunities (for example, Post Leaving Certificate courses, traineeships, and apprenticeships). Higher Education is made up of the university sector, the technological university sector; colleges of education; and several independent private colleges[4]. The HEA is the statutory agency responsible for the funding of universities and technological universities.

1.3.1 Challenges to an Inclusive Tertiary Education System

This section provides an overview of literature exploring the barriers to UD implementation and inclusion more generally. While the focus here is on tertiary education, it draws on research findings from across the education sectors.

Research has long highlighted the need for tertiary education providers to address the sustainability of on–campus support services, such as disability services, which have experienced a dramatic increase in student requests for 'academic accommodations' to support their learning and engagement (Capp, 2017). Irish higher education data shows, for example, that between 2012 and 2022, there was a 273 per cent increase in engagement with support services offering these kinds of supports in higher education (AHEAD, 2023).

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4   The degree–awarding institutions which can grant awards at all academic levels are the University of Dublin, National University of Ireland (Cork, Dublin, Galway and Maynooth), University of Limerick, Dublin City University, Technological University Dublin, the Royal College of Surgeons in Ireland, Munster Technological University, Technological University of the Shannon: Midlands Midwest, Atlantic Technological University and South East Technological University, as well as St Patrick's College, Maynooth (Pontifical University).

These patterns have highlighted issues around the sustainability of the disability services model in tertiary education and the associated administrative and financial costs (McCarthy et al., 2018). Research highlights the need to review the role of the Disability Officer and Disability Support Services more generally in light of changes in the teaching and learning space and the policy emphasis on inclusive education (McCarthy et al., 2018). However, Fovet (2021) highlights the need to re-examine the funding models of such services particularly where budgets are directly related to the numbers of registered students. Such a funding model creates a perverse incentive to maintain individualised supports and a system that is counterproductive to UDL implementation across campus.

In FET, disability and learner support structures are less formalised compared to higher education. To date the Funding for Students with Disabilities (FSD) in FET has been available to PLC learners and in 2024 consideration will be given to broadening the scope of programme eligibility for FSD to enable wider access to the fund for learners across the FET system. Despite the international and national-level policy commitment to UD and inclusive education more generally, there are,

however, well documented barriers to its implementation (Fovet, 2020; Scott, 2018). These barriers have resulted in a lack of coherence across tertiary education as to how this can be done and an acknowledgement amongst education stakeholders of the complexities in measuring its effectiveness (Fovet, 2020; Scott, 2018). These issues are also recognised by Burgstahler (2020b) who highlights the lack of communication between stakeholders engaged in each of the four pillars. She acknowledges the developments around UD in the individual pillars but notes the lack of interaction between, for example, the design of technology and the pedagogy used (Burgstahler, 2020a). Addressing this lack of coherence and interaction across the four pillars, is a central focus of the Charter and its associated Toolkit for Universal Design.

Another challenge in the implementation of UD has been the lack of consensus around language and terminology. The principles of UD have been applied to education in multiple forms resulting in numerous frameworks including Universal Design for Education (UDE), Universal Design for Learning (UDL), Universal Design for Instruction (UDI), Universal Instructional Design (UID) in addition to other concepts such as

Design for All and Inclusive Design. Many of these terms are used interchangeably and differ across different national systems and sectors within those systems. While there is clarity around the meaning of UD (using the seven principles) when applied to the built and digital environments and products and services, confusion often arises when UD and UDL are used interchangeably in the current tertiary education context. Using qualitative interviews and content analysis, Erdtman et al. (2021) perhaps best describe UD as 'enriching and provocative but also fuzzy and difficult to grasp' (p.158). While issues around language and terminology in research are common and an important element in academic discourse, the lack of clarity on the meaning of UD in tertiary education could act as a barrier in getting 'buy–in' from stakeholders including government departments and agencies in their policy development (Ryder & Duffy, 2022).

Alongside challenges in language and terminology, the ALTIT**UD**E Charter is being introduced at a time of change and reform in tertiary education more generally. Increasingly, national systems are seeking to close the gap between further and higher education and create a more unified tertiary education sector.

A significant element of the Charter consultation and development has been to create a Charter that is meaningful in both further education and training and higher education contexts. This aligns closely with the policy ambitions of the NAP 2022–2028 (further discussed below in section 3.2.2) to:

> 'Provide supports and opportunities for learning to all, recognising the needs of vulnerable learners and the most marginalised, and assist people in access to and progression through higher and further education and training, so as to grow prosperity across communities and build social cohesion.' (Department of Further and Higher Education, 2022a, p.27).

A significant step in this process towards a unified tertiary education system in Ireland has been the creation of the National Tertiary Office (NTO) (DFHERIS, 2022). The report, *Policy Platform: Progressing A Unified Tertiary System for Learning, Skills and Knowledge*, by Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) highlights inclusion as one of the five policy objectives. This goal is to create learning environments where:

'all potential learners, researchers and innovators can be enabled to participate and derive the maximum benefit from their education and skills development and their research interests' (p. 18). The Charter has thus been created with a unified tertiary view of UD and its development takes account of the diversity of provision across tertiary education more generally.

The Charter comes at a unique time in education where educational technology has transitioned from an Assistive Technology (AT) or specialist resource for students with disabilities to a core feature in mainstream education. The majority of students attending tertiary education have grown up in a digital environment, and given the recent developments in educational technology as a result of the Covid 19 Pandemic, are familiar with finding resources online, delivering tasks online, group work and cooperation online, and the use of social media (UDLL, 2017). This digitalisation is becoming normalised in tertiary education, but must be accompanied by relevant training for both staff and students (Healy, 2023) to enable equal access for everyone.

1.3.2 Enablers to an Inclusive Tertiary Education System

The Charter is being introduced at a time of significant change and development in Irish education. There is a growing momentum around UD and UDL implementation across the tertiary education system which is evident for example in the sectoral commitments to UD and UDL in FET, the dramatic growth in providing related professional learning for staff including digital badges and short courses, the growing number of postgraduate offerings, annual events and conferences. The development of awards and systems to honour the work of educators and support practitioners in implementing UD and UDL in addition to the growth in funding and research on the topic of UD and UDL in Ireland. Furthermore, funding in this area has begun to increase and there is a growing body of research on UDL in Ireland from the perspective of policy and practice.

In FET, there has been a significant high level policy commitment to UD and UDL in recent years which is evident in the publication of the *Conceptual Framework of Universal Design for Learning for the*

Further Education and Training Sector (Quirke and McCarthy, 2020) and *UDL for FET Practitioners: Guidance for Implementing Universal Design for Learning in Irish Further Education and Training* developed by AHEAD in partnership with SOLAS and ETBI (SOLAS, 2021). The national strategy for the FET sector, *Future FET: Transforming Learning, The National Further Education and Training (FET) Strategy 2020–2024* (SOLAS, 2020), makes specific reference to a universal design approach underpinning learning development and delivery (p. 38). These policy documents have shaped provision in a sector seeking to respond to an increasingly diverse learner population.

The numbers of staff engaging with the *Digital Badge for Universal Design in Teaching and Learning*, Ireland's leading UDL professional development programme for tertiary educators (Ryder, 2022), have been rising dramatically in recent years. This 10–week online course was developed by AHEAD and University College Dublin and delivered in partnership with the National Forum for the Enhancement of Teaching and Learning. In the first two years of the delivery of this programme, the numbers of participants who were awarded the badge annually were relatively low, but engagement rose dramatically in 2020 with the introduction of a new model of delivery and the onset of the Covid–19 pandemic. As of October 2023, almost more than 3,000 badges had been issued to professionals in FET and HE since its development.

Some universities offer local roll–outs of the Digital Badge in UDL. In 2022, Atlantic Technical University (ATU) established the UDL Centre of Excellence aimed at streamlining the work progressing UDL across ATU as well as create a community of UDL practice. In 2023, the University partnered with Donegal ETB, Mayo, Sligo, Leitrim ETB, and Galway Roscommon ETBs to form the West / Northwest UD Regional Hub sharing best UD practice. In Trinity College Dublin, the Trinity Inclusive Curriculum Project (detailed below) offers a Module in Inclusive Practices for Teaching and Learning aimed at university staff (teaching and support staff). This module stems directly from the Digital Badge in UDL, and participants receive the badge on completion. In UCC, the Centre for Integration of Teaching & Learning (CIRTL) also offers local roll–out of the Digital Badge in UDL.

The same partnership has now developed a new *Universal Design Beyond the Classroom* badge to support staff in non–teaching roles across the institution to explore universal design and how it can be applied within their practice. This badge was piloted with approximately 150 staff members from FET and HE and is running between October and December 2023, with the intention to deliver a national roll–out in 2024.

1.3.2.1 Postgraduate offerings

Perhaps the most notable development in recent years has been the increase in the use of UD and UDL in postgraduate offerings across further and higher education. Provision ranges from postgraduate certificate to masters qualifications and PhDs with much of the emphasis on enhancing practices in teaching and learning in response to increasing student diversity. One example is the *Post Graduate Certificate / Masters in UDL* which was established in 2021 and is aimed at educational personnel wishing to develop a variety of teaching methods and reduce barriers to learning by using flexible methods of teaching, assessment, and service provision. The programme carefully examines the neuro–educational research

connected to UDL which addresses how people learn. Based in ATU Sligo, it explores UDL implementation in a variety of contexts and critically examines it in practice as support to inclusion and access.

ATU, Sligo, also runs a *Post Graduate Certificate in Teaching, Learning & Assessment* is aimed at educators in higher education focusing on pedagogy and practice. It uses an inquiry–based approach, students on this programme can complete the *Digital Badge for Universal Design in Teaching and Learning* which is embedded in the content and assessment components of the modules of the programme.

UDL also features in the Master of Arts in Learning and Teaching (ATU, Donegal) with their module *Inclusive Curriculum Using Universal Design for Learning*. The programme is aimed at full–time primary, second–level and tertiary education teachers wishing to enhance their professional development, reflect on their own practice and develop new techniques and/or leadership skills.

In ATU, Galway, UDL features in the Masters in Teaching and Learning which is aimed at students working in further and higher education in Ireland and abroad. It features a module in *UDL Curriculum Design* which provides students with the skills and knowledge to be able to enhance the learning experience for a diverse student population through the creation of an inclusive curriculum underpinned by UDL.

UDL is evident in Athlone Institute of Technology (AIT) institutional policy and strategy with published guidelines on UDL within 'the curricula and approach to learning and teaching' in the Institute (Athlone Institute of Technology, 2022). UDL features in Learning, Teaching and Assessment Strategy 2022–2025 of the Technological University of the Shannon: Midlands and Midwest:

> 'the University is committed to providing an inclusive approach to curriculum design which is based on the principles of Universal Design for Learning (UDL), a framework that allows educators to apply a flexible approach to learning, teaching and assessment, for a diverse student population' (p. 14) (TUS, 2022).

Staff in AIT can complete a *Post Graduate Diploma of Learning, Teaching and Assessment* which focuses on UDL within its modules.

In University College Dublin (UCD) Teaching & Learning offer accredited programmes in University Teaching and Learning (UTL) with inclusion built into every module of these NQF level–9 programmes. It offers an Introduction to Universal Design in UCD self–taught training to all staff in the college and the UCD Access & Lifelong Learning provides workshops for staff on supporting students with disabilities and implementing Universal Design in the classroom, curriculum and in the physical environment. The UCD Toolkit for Inclusive Higher Education Institutions (Kelly & Padden, 2018) forms the basis of the Charter's accompanying Implementation Toolkit. In 2023, UCD published *Learning from UDL Leaders: UCD University for All Faculty Partner* to support the vision of creating a university for all (Padden et al., 2023).

In 2021, the City of Dublin Education and Training Board in collaboration with the School of Education in Trinity College Dublin created a new *Masters in Diversity and Inclusion in Further Education and Training* in specific response to the professional learning needs of ETB staff wishing to respond to growing diversity among students (and staff) in further education. The programme, which has two modules on Universal Design and Universal Design for Learning, is currently funded by the City of Dublin Education and Training Board and created in response to national priorities in relation to addressing the professional development needs of staff (teaching and non–teaching) working in the Further Education and Training sector. The programme can be taken part–time over three years and is made up of a one–year postgraduate certificate, two–year diploma and three–year masters.

Also in Trinity College Dublin, students at undergraduate level are able to complete a 5 ECTs Bespoke Open Module as part of their degree. The online module *Active Learning and Inclusion in the Digital Age* aligns closely with the UN SDGs and is offered in collaboration with Northampton University.

In addition to the expansion of undergraduate and postgraduate offerings in UD and UDL, there is growing interest in UD and UDL awards and systems of acknowledgement. Annually, AHEAD runs the *John Kelly Awards for Universal in Further and Higher Education* and seeks to acknowledge the innovative practice of teaching staff in further and higher education engaging with the Universal Design for Learning (UDL) Framework to deliver a more inclusive learning experience for their students. The award aims to celebrate and promote the use of UDL in further education and higher education settings. The NDA also runs *Universal Design Grand Challenge Student Awards* where design students of architecture, engineering, product, and software development can enter a competition that promotes and awards excellence in student projects that feature solutions for society more generally.

Alongside these broader developments in professional learning and staff recognition of same, there have been significant shifts in the research domain reflecting a growing interest in UD as a response to student diversity in education. In 2023 alone, there have been three international conferences on UD and UDL in

Ireland including ATU and Munster Technological University (MTU) third annual *Climbing the UDL Ladder Conference*, the Maynooth University conference, *Embedding a whole-of-institution approach to Universal Design for Learning (UDL) in Higher Education (HE)*, and in University College Dublin, the *University for All Symposium*.

Despite the broad range of practice sharing and professional networking events focused on UD, funding has been limited. The PATH 4 funding and commitment to UD signals a change in this regard however. Prior to this, there was funding associated with UD or UDL in the Irish context. For example, in their review of the current model of funding for higher education, in 2019, the HEA launched an Innovation and Transformation fund for HEIs in Ireland. Under this call, the Technological Universities (TU) Dublin was successful in securing a project on 'Transformative Student-Centred Learning Record'. Several of the work packages refer to UDL in future policy for TU Dublin including:

- Develop a coherent UDL policy for TU Dublin, based on clear vision and strategies;

- Initiate and build upon the support networks and partnerships as primary UDL resources;

- Identify priority programmes for engagement of learners as UDL partners;

- Initiate the redesign of curriculum processes and enhance teaching and learning, while maintaining learning outcome standards at designated NFQ levels.

More recently, however, Erasmus + funded a UDL specific project titled UDL-BOE Blended Learning in Schools: A Universal Design Approach. The project focused solely on second-level education, however, and sought to develop practical tools to help teachers deliver effective and engaging learning in a digital space. Based in Trinity College Dublin and in collaboration with universities in Spain, Belgium and Greece, the main target group of this project was second-level teachers although the UDL self-evaluation tool developed could be applicable to staff working in any education sector.

Section 2:
The ALTITUDE Charter
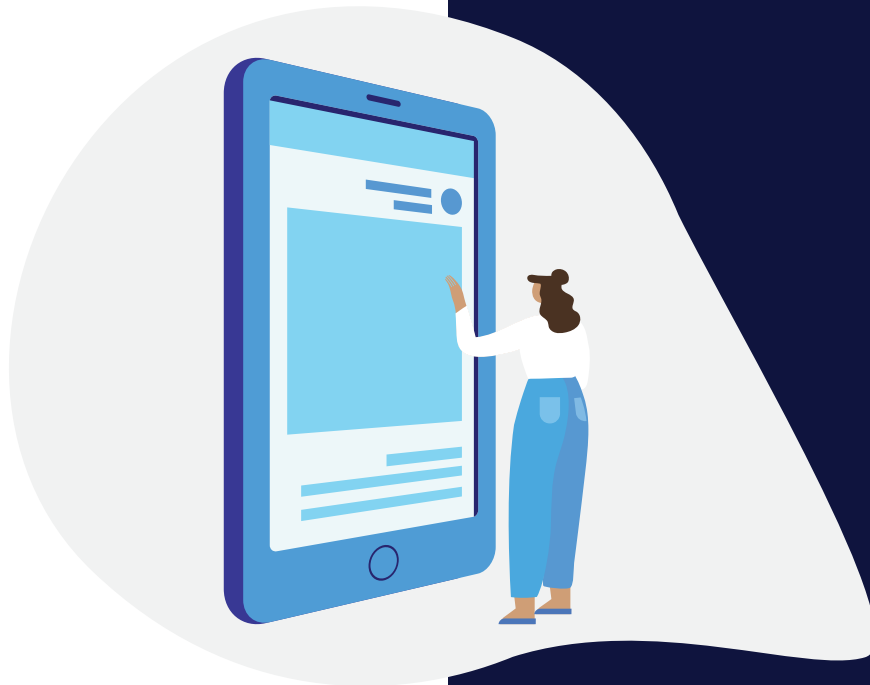
2.1 Origin and Development of the ALTITUDE Charter

The development of the ALTIT**UD**E Charter is informed by both international literature concerning UD in educational contexts, and widespread consultation with staff and learners in Irish tertiary education. This section provides an overview of the origin and development of the Charter over the past two years by highlighting landmark policies, initiatives and events that culminated in the Charter itself.

Given the strong commitment to a universal design approach embedded in the national FET Strategy, the publication of the National Access Plan in 2023 represented another landmark moment in the development of UD in Irish Education. The NAP announced a fourth strand of PATH specifically designed to support inclusive universally designed environments for all students. The PATH 4 Phase 1 stream introduced for the first time, a stream of funding dedicated specifically to developing UD projects in tertiary education. This section highlights the origin and development of the ALTIT**UD**E Charter and provides context to its launch and proposed implementation.

In the summer of 2022, the HEA invited proposals under the PATH 4 scheme. To coordinate a response to this call, AHEAD in partnership with the Irish Universities Association (IUA) and the Technological Higher Education Association (THEA) organised a national 'Think–In' to discuss the development of national collaborative projects in response to the HEA's call. The 'Think–In' resulted in the creation of four collaborative national work packages which addressed the criteria of PATH 4, Phase 1. As part of

this initiative, HEIs and ETBs across Ireland committed to being partners (providing funds), or collaborators (providing time and expertise) on the national packages. The four national projects consisted of:
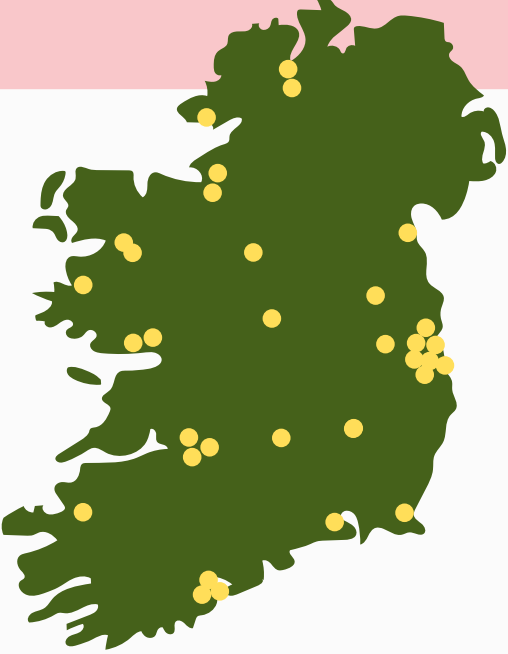
1. Develop a National Charter for the Implementation of Universal Design in Tertiary Education;

2. Universal Design training package for senior Leaders in Tertiary Education and a Symposium for Leadership;

3. Community of practice to explore collaborations and enhancements of opportunities for students with intellectual disabilities;

4. Developing a template Web Accessibility Statement for Tertiary Education Institutions.

2.1.1 Charter Consultations

The focus of this Technical Report examines the first of the four national projects, which is the development of the Charter. In December 2022, a 50+ member National UD Charter group with practitioners and UD experts from FET and higher education was established to coordinate and deliver the project.

The project is led by Atlantic Technological University (ATU), with Munster Technological University (MTU), University College Dublin (UCD) and University of Galway (UoG) as official HE partners. But supporting the development and delivery of the project is a 27–strong cross–sectoral collaborative partnership of national bodies, higher education institutions and education and training boards (see Figure 1).

Figure 1 — FET and HE contributors to development of the Charter

	National Collaborators	Regional Collaborators	Official HE Partners
	• AHEAD (Lead Collab) • Education & Training Boards (ETBI) • Irish Universities Association (IUA) • National Tertairy Office • SOLAS • Technological Higher Education Association (THEA)	• CETB • CDETB • DCU • Donegal ETB • Hibernia College • IADT • LMETB • MU • MIC • MSLETB • SETU • TCD • Tipperary ETB • TUB • TUS • UCC • UL	• ATU (Lead) • MTU (Partner) • UCD (Partner) • UoG (Partner)

The Charter was developed through a deep consultation process that aimed to engage all stakeholders in its development, underpinned by international literature on UD in educational contexts. The goal of this process was to foster collective agency.

This process began with a review of key literature on UD in educational contexts, in particular the literature on UDE (Burgstahler, 2009; Burgstahler, 2020b), and key existing work on the application of UDE in the Irish tertiary education landscape (Kelly and Padden, 2018). Following the initial review of the literature, a deep consultation process was designed and delivered to ensure the development was informed by a representative range of stakeholders from further education and training and higher education. Key elements of the consultation process included:

- **Phase One:** Internal consultation with the 50+ member National UD Charter group with practitioners and UD experts from FET and higher education (January 2023). This consultation informed the structure and key aims of Phase two.

- **Phase Two:** A 2–day national consultation event built into the AHEAD conference featuring 199 students and professionals from FET and Higher Education, utilising a Dialogues methodology to collectively identify challenges and solutions to UD implementation under the four pillars (Ryder & Duffy, 2022) (March 2023). Following Phases 1 and 2, an early draft of the Charter was developed to inform the next consultation phase.

- **Phase Three:** 18 focus group staff consultations facilitated locally in ETBs and HEIs around the country by project team members, providing direct feedback on the draft Charter by a further 191 staff members in roles spanning the four pillars (May–July 2023).

- **Phase Four:** 11 learner focus groups and approx. 1,219 learner survey responses providing direct input from FET and HE students on what would make their experience more inclusive and accessible under each pillar (October 2023–January 2024). A backwards design process was used to update the actions in the Charter and the underpinning toolkit, to ensure learner priorities were addressed. This resulted in the final draft of the ALTIT**UD**E Charter.

- **Phase Five:** Dialogue with key national stakeholders[5] to disseminate the Charter project, get feedback on its development, and build buy-in for its implementation (October 2023–March 2024).

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5   Stakeholders in this process included CEUD, QQI, THEA, IUA, ETBI, the NTUTTOR project, IUA Registrars, ETBI FET Directors Inclusion Strategy Group, SOLAS and the HEA.

2.2 Frameworks Underpinning the ALTITUDE Charter

'Universal design' is defined in the UNCRPD as the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design (United Nations, 2006). One of the central features of UD is its alignment with the social model of disability which locates the deficits within the environment. This signals a move away from a medical model of disability support which has traditionally been based on specialised adaptations. As a concept, UD originates in the 1970s from the work of architect Ronald Mace. Working with an interdisciplinary team of architects, product designers, engineers and environmental design researchers in North Carolina State University in 1997, Mace developed a set of 7 guiding principles for universal design, (CEUD, 2024) . The principles are:

1. Equitable Use
2. Flexibility in Use
3. Simple and Intuitive Use
4. Perceptible Information
5. Tolerance for Error
6. Low Physical Effort
7. Size and Space for Approach and Use

While these principles can be applied to the design of any product, environment, programme or service, over time, a range of frameworks have emerged which help us to situate universal design within more specific contexts. Universal design is more commonly associated with three domains: the built environment, products and services, and information and communications technologies (ICT).

Given the applicability of Universal Design in different areas of society, there has been much interest in the extent to which it can be adopted in education. Over the past three decades, researchers and policy makers have sought to align the principles of Universal Design to education systems often grappling with issues around access, resources, and inclusion. Termed Universal Design in Education (UDE) (Burgstahler, 2009), this is a universal, whole systems approach that affects all areas of educational institutions including teaching and learning, learner support, policies and procedures, the built environment and technological infrastructure. UDE requires both organisational and individual change and seeks to go 'beyond accessible design for people with disabilities to make all aspects of the educational experience more inclusive for students, parents, staff, instructors, administrators, and visitors with a great variety of characteristics' (Burgstahler, 2009, p.1). UDE supports institutions to implement universal design across these four domains:

- physical spaces
- information technology (IT)
- instruction, and
- student services

UDE supports educational institutions in identifying relevant frameworks, standards, and resources to guide development more specifically in each of the four domains (Burgstahler, 2009, 2013, 2020b).

As mentioned in section 1.2.2 , the inclusion of a definition of UD in the Disability Act (2005) is significant for the future implementation of the ALTIT**UD**E Charter. The work of the Centre for Excellence in Universal Design and the availability of the NDA guidance documents on the three domains of the Charter (physical environment, services and digital environment) provides an important backdrop to the Charter. Within the teaching and learning space, the NDA also recognises efforts to embed UD into the curriculum for design subjects (see more on the Student Grand Challenge in section 1.3.2.1). Alongside this legislative context, there have been several landmark further and higher education policy documents in response to the changing tertiary education landscape and student demographics (Department of Further and Higher Education, 2022b; Quirke & McCarthy, 2020; RIA, 2021; SOLAS, 2020). UD has become a central focus of these policies with UDL increasingly recognised within the broader UDE literature (Burgstahler, 2009) as a way to provide curriculum access for every student thus reducing the need for remedial work or individual accommodations for students. Increasingly, education research and policy are calling for changes in our institutions to move beyond a differentiated model with retrofitting or ad hoc attempts to respond to gaps in provision, and consider a proactive, universal, whole systems approach (Fovet, 2021). Others emphasise, however, the need to reconceptualise on–campus student supports which have a broader role involving the sensitisation of staff around strategies that seek to widen access and develop awareness (Sopko, 2008).

2.3 Structure of the ALTITUDE Charter

This section firstly sets out the vision and mission of the ALTIT**UD**E Charter project, it then details how adopting the Charter can support institutions and what adoption means for them, before discussing the four pillars and their origins in greater depth. Within each of the four pillars, the goal of each pillar is clearly defined in addition to the existing frameworks and guides that underpin them.

The vision and mission of the ALTIT**UD**E Charter project are as follows:

Project Vision

'Tertiary education institutions where **a**ll **l**earners are **t**ransformatively **i**ncluded **t**hrough **u**niversal **d**esign in **e**ducation.' (deriving the name ALTIT**UD**E)

Project Mission

'To support HEIs and ETBs to make sustainable progress towards systemically embedding a universal design approach, which places human diversity at the heart of tertiary education design and fosters student success for all.'

2.3.1 Strategic Enablers

Drawing from the literature, the Charter recommends key strategic enablers which institutions should develop to support the sustainable implementation of UD across the full staff and learner lifecycle, and incorporating the visitor experience. Each ETB and HEI can use these enablers as a guide in their UD implementation:

- Embedding UD & Accessibility in organisational strategy and policy

- Evaluating, celebrating, and sharing good UD practice across the institution and nationally

- Recognising UD and inclusive practice in recruitment and promotion of staff

- Leaders modelling and visibly supporting UD

- Promoting local and national collaboration, shared learning opportunities, and role–appropriate training in UD

- Partnering with students as appropriate in the design of policy & strategy, with a focus on disadvantaged cohorts

2.3.2 The 4 Pillars

Each of the four pillars has a distinct goal and a range of specific actions associated with it which allows for clarity and separation between the pillars. Each of the goals aims to reduce barriers and increase accessibility, flexibility and usability. The goals are as follows:

- **Learning, Teaching & Assessment:** Reduce barriers to learning by building more flexibility, accessibility, learner voice and choice into how programmes are designed and delivered.

- **Supports, Services & Social Engagement:** Reduce barriers to student success by ensuring student services and extra-curricular activities are flexible and accessible for all learners.

- **Physical Environment:** Reduce barriers in the physical environment by ensuring they are accessible, welcoming and sensory-aware spaces that support flexible use.

- **Digital Environment:** Reduce barriers to digital engagement by ensuring digital platforms & materials are accessible, easily navigated & understood by all.

Figure 2 — The 4 Pillars of the ALTITUDE Charter

Strategic Foundations				
The 4 Pillars	**Learning, Teaching & Assessment**	**Supports, Services & Social Engagement**	**Physical Environment**	**Digital Environment**
Goal	Reduce barriers to learning by building more flexibility, accessibility, clarity, learner voice and choice into how programmes are designed and delivered	Reduce barriers to student success by ensuring student services and extra-curricular activities are flexible and accessible for all learners	Reduce barriers in the physical environment by ensuring they are accessible, welcoming, and sensory-aware spaces that support flexible use	Reduce barriers to digital engagement by ensuring digital platforms & materials are accessible, easily navigated & understood by all.

Within each of the pillars, the Charter also provides a set of specific actions to guide the embedding of UD at a systems level through institutional processes, policies and practices in a range of areas such as recruitment and selection, professional development, quality assurance, professional practice, procurement, IT, and capital investment for example.

This is supplemented with a useful guide to key areas of professional development which can support staff under each pillar to embed a universal design approach, and key frameworks and guides which support implementation under the pillars.

Figure 3 — Relevant Knowledge and Training Topics Which Support Implementation of the Charter

The 4 Pillars	Learning, Teaching & Assessment	Supports, Services & Social Engagement	Physical Environment	Digital Environment
Key Frameworks and Guides	Inclusive teaching pedagogies such as Universal Design for Learning (UDL)	The Customer Communications Toolkit for the Public Service — A Universal Design Approach	Part M of building regulations and Universal Design principles	Web Content Accessibility Guidelines (WCAG)
Formal & Informal CPD	Digital Accessibility (Role–Based Content)			
	Equality, Diversity and Inclusion — Cultural Awareness			
	UDL	Universal Design		
	Learning & Teaching Practice		Access Auditing	Accessibility Testing
	Assistive Technologies			
	Technology Enhanced Learning			

More detail on the key frameworks and guidelines that underpin the four pillars is outlined in the next section.

Pillar 1:
Teaching, Learning and Assessment

The Learning and Teaching pillar of the Charter aligns with the scholarship of teaching of learning (SoTL) pedagogical research both in Ireland and internationally. This literature explores what constitutes 'good practice' in teaching and learning and is supported by peer–reviewed research. The SoTL is not based on a single set of principles. Rather it is an approach that emphasises reflection, critical reflection and reflexivity. Inclusion is a central focus, however, with research on teaching methods that create inclusive learning environments, strategies for inclusive assessment, active learning and inclusive pedagogies, technology enhanced learning and inclusive student engagement (Fanghanel et al., 2016; Hutchings et al., 2011; Tight, 2018).

Universal Design for Learning, is perhaps one of the most notable adaptations of UD, when it is applied to teaching and learning. Developed by the Center for Applied Special Technology (CAST) in the 1990s, a US non–profit organisation, the UDL framework guides the design and implementation of flexible and supportive learning experiences to meet the needs of all learners (Meyer et al., 2014). A key focus of UDL is equity by design that supports student engagement, interaction, and learning (Abell et al., 2011). The framework 'reflects an awareness of the unique nature of each learner and the need to address differences' through its three principles that guide educators to provide:

- Multiple means of representation: to give learners various ways of acquiring information and knowledge;

- Multiple means of action and expression, to provide learners alternatives for demonstrating what they know; and

- Multiple means of action and engagement, to tap into learners' interests, offer appropriate challenges, and increase motivation (CAST, 2022).

UDL has a strong literature base which has tended to promote its application and the need for its implementation across education sectors with a particular research focus in the research areas of disability and special education (Bray et al., 2022). While some studies have focused on the application of UDL in diverse educational systems (Jwad et al., 2022; Mackey, 2019; Qu & Cross, 2024), others focus on aspects of UDL–related to the creation of flexible instructional goals, methods, materials, and assignments (Smith et al., 2020). Over the past decade, several Systematic Literature Reviews (SLRs) have been undertaken (Bray et al., 2022; Ewe & Galvin, 2023; King–Sears et al., 2023; Rao et al., 2014) examining the evidence base for UDL. Findings from these SLRs are consistent and show the effectiveness of UDL in student engagement and learning outcomes (Capp, 2017; King–Sears et al., 2023). Much of the evidence base that does exist consists of small–scale studies, often in higher education, from the United States and other developed countries and Bray et al. (2022) note a lack of UDL research in developing countries. Some authors also point to the need for more empirical research (Murphy, 2021) while acknowledging the complexities of measuring the impact of a broad, non–prescriptive framework.

Operating in parallel and often overlapping with SoTL and UDL are a range of other inclusive pedagogies many of which seek to move away from a deficit model which assumes that marginalised students require resources beyond the classroom. Central to many of these frameworks is the need to embed equitable access and opportunity for success within the classroom and curriculum (Florian & Black–Hawkins, 2011). Other elements include the creation of a safe and supported learning environment which is evident in trauma–informed pedagogies, productive pedagogies and restorative justice and practices. These approaches contain core elements that value diversity and respect the dignity, experiences, and backgrounds of every student (Hayes et al., 2006; Lodi et al., 2021; Stokes, 2022).

Pillar 2: Supports, Services and Social Engagement

UD is linked with the usability and accessibility of products and services seeking to cater for the needs of a wide range of users.. Within the context of education, the UD Charter's second pillar, Supports Services and Social Engagement, focuses on the products and services domain in education. This can include the universal design of student services such as on–campus supports, for example, computer labs, libraries, admissions, registration, financial aid, tutor services, career guidance, student accommodation and centres for teaching and learning. The pillar emphasises the need to consider student diversity in the planning, policy making and evaluation of student services, students of all abilities, racial and ethnic backgrounds, genders, and ages can access and avail of supports and services. In Ireland, this pillar is supported by *The Customer Communications Toolkit for the Public Service* which is a toolkit developed by DPER'S Quality Customer Service Network (QCSN) in collaboration with the CEUD at the NDA for enhancing customer communication and service delivery in the public sector. It is based on Irish and international legislation and terminology and connected to actions of the *Better Public Services – the Public Service Transformation 2030 Strategy* which focuses on providing an 'inclusive, high quality and integrated Public Service provision that meets the needs and improves the lives of the people of Ireland' (DPER, 2023). Relating this to the Implementation Toolkit, it emphasises the best possible customer (or student) experience when they contact the public service (their institutions) regardless of the form of communication used: written, spoken, signed or digital.

Pillar 3: Physical Environment

The Universal Design of Physical Spaces is guided by the principles of creating physical environments that are welcoming, comfortable, accessible, attractive, and functional for all individuals, regardless of their abilities. The third pillar of the Charter, Physical Environment, ensures that the physical environment is inclusive, inviting, and accessible to everyone, including students and staff with and without disabilities (including older people, families etc). It goes beyond minimum regulatory requirements, such as Irish Building Regulations Part (M) — Access and Use (2010), which set out the basic provisions for building access. Instead, it embraces universal design principles to provide environments that accommodate diverse needs and eliminate organisational barriers. This approach aligns with the social model of disability, emphasising the importance of accessible environments over individual circumstances. The universal design principles for university environments include creating spaces that are easily usable by a wide range of individuals without requiring special treatment or separation. These physical environments should empower individuals to choose how they access and participate in all university activities, valuing and supporting diversity and difference. Additionally, they should offer a high–quality environment that prioritises safety and ensures safe egress, even in emergency situations.

Pillar 4: Digital Environment

The fourth pillar of the Charter relates to the digital environment in tertiary education. The Universal Design of Information Technology seeks to reduce barriers to learning for students through accessible and inclusively designed technology, digital platforms and digital communication. It takes account of IT development and the gap in knowledge between product design and the 'full spectrum of user diversity'. Much of the focus of this pillar is around 'computer manufacturers and software developers in creating products that are usable by a broad audience' (Burgstahler, 2009, p.3). Of particular importance to this is the World Wide Web Consortium (W3C) which is a consortium overseeing a set of protocols, the Web Accessibility Directive (WAD) 2016/2102 and the Web Content Accessibility Guidelines (known as WCAG) which are an internationally recognised set of recommendations for improving web accessibility and other IT (See section 3.1.2 for international policy alignment with the Digital Environment pillar of the Charter). WCAG stems from universal design and seeks to ensure interoperability and universality in web design. The Guidelines rest on four principles (POUR): that IT be

1. perceivable,
2. operable,
3. understandable, and
4. robust.

They are based on the understanding that many IT companies do not take the full spectrum of user diversity into account when they develop products, unintentionally erecting barriers for people with disabilities and others (Burgstahler, 2009, p.3). The WCAG guidelines explain how to make digital services, websites, and apps accessible to everyone and includes accommodations for 'blindness and low vision, deafness and hearing loss, limited movement, speech disabilities, photosensitivity, and combinations of these, and some accommodation for learning disabilities and cognitive limitations' (WCAG, 2024).

For education providers, this pillar emphasises accessible communications and ensures awareness of the importance of accessible IT during the procurement and purchasing of same. In addition to the design and development of IT, this pillar considers the importance of physical placement and location of technology and computers to ensure accessibility for every learner.

Section 3: Charter Alignment with Policy
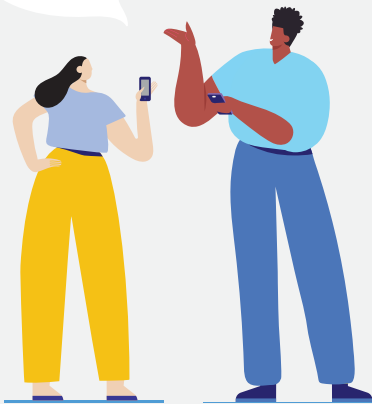
3.1 International Policy

There have been major developments in the area of inclusive education over the past 30 years. The World Declaration on Education for All (UNESCO, 1990) was followed by a series of international policies and conventions including the Salamanca Statement (UNESCO,1994), the Dakar Framework for Action (UNESCO, 2000) and the Policy Guidelines on Inclusion in Education (UNESCO, 2009). Many of these documents stress the need for national systems to focus on access to education, equity and the right to education, and support for those in need. Crosscutting each of the documents are issues around our continued use of mainstream and special education and the ongoing need for implementing inclusive education policies and strategies.

A major focus of this Technical Report is to address how the Charter will support national, international and institutional goals. The aim of this section is to demonstrate the extent to which the Charter aligns with existing policies and strategies ranging from international conventions such as the UNCRPD to international or European guidelines and strategies for specific areas such as technology. Using the four pillars of the Charter it maps existing international conventions, directives, regulations, strategies and guidelines to the four pillars: Learning and teaching; Support services and social engagement; Digital environment; and Physical environment.

Figure 4 — ALTITUDE Charter Alignment with International Policy

The 4 Pillars	Learning, Teaching & Assessment	Supports, Services & Social Engagement	Physical Environment	Digital Environment
International policies, strategies, guidelines	United Nations Convention on the Rights with Disabilities			
	United Nations Sustainable Development Goals			
	Union of Equality: Strategy on the Rights od Persons with a Disability 2021/30			
	European Accessibility Act (EEA)			
	UNESCO Framework for the implementation of Education for Sustainable Development (ESD) beyond 2019			
	EUA University without Walls			
	Design for All – Accessibility following a Design for All approach in products, goods and services extending the range of users			
	EUA University without Walls			
			Audiovisual Media Services Directive	Accessibility and usability of the built environment – Functional requirements
			European Union Regulations 2020*	
			'Marrakesh' Directive	

*(Accessibility of Websites and Mobile Applications of Public Sector Bodies)

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3.1.1 International Policies Spanning the Four Pillars of the Charter

The **United Nations Convention on the Rights of Persons with Disabilities (CRPD)** provides a framework to promote, protect and ensure the rights of all people with disabilities and promotes equal rights in all areas of life. The Convention sets specific requirements for how member states should promote policies to ensure that persons with disabilities could fulfil essential human rights, such as access to education. The Convention outlines no new rights, instead it brings together in one document all existing rights outlined in other conventions and international human rights treaties. Ireland signed up to the UNCRPD in 2007 and ratified it in 2018. Its relevance to this Technical Report is significant in that it elaborates particular aspects of the system that must be transformed, made inclusive and more accessible to all learners including:

> 'buildings, information and communications tools, the curriculum, educational materials, teaching methods, assessments and language and support services' (NDA, 2020, p. 4).

Its alignment to the Charter is evident the Convention's inclusion of the original definition of UD from the Center for Universal Design at North Carolina State University:

> 'design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design' (Article 2).

This definition also references the inclusion of 'assistive devices for particular groups of persons with disabilities' where needed (Article 2) relevant to the Digital Environment pillar of the Charter. Erdtman et al (2021) highlight further definitions of UD throughout General Comments of the Convention. They note how General Comment 2 of the Convention states the need for a 'strict application of universal design to all new goods, products, facilities, technologies and services' is a means for achieving full accessibility (UN General Assembly, 2007).

Furthermore, General Comment 7 on Article 4.3 and 33.3 (Participation of persons with disabilities in the implementation and monitoring of the Convention) proposes the active involvement of people with disabilities in 'decision–making processes' and 'the universal design process' when it comes to accessibility requirements and laws (Erdtman et al., 2021). Accessibility to the physical environment, including buildings, is required by Article 9 of the CRPD which outlines that one important way of making the physical environment accessible is to:

> 'develop, promulgate, and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public' (UN General Assembly, 2007).

Perhaps most relevant to this Technical Report, however, is Article 24, Education of the Convention, which defines inclusive education as education that accommodates all students regardless of their ability 'without discrimination and on an equal basis with others' from preschool to tertiary education (United Nations, 2006). Article 24 contains the first explicit legal enunciation of the right to inclusive education and sets out the ways in which national contexts must comply. Ireland's ratification of the UNCRPD in 2018 has drawn attention to the need to revisit national–level policy and legislation in order to comply with international policies and conventions. In General Comment 4 on Education, the definition UD is holistic and takes account of UDL as a 'branch of UD that emphasises flexibility in instruction and the assessment of learning processes' (Erdtman et al., 2021). General Comment 4 provides a framework that includes a 'whole systems approach' which embeds 'the necessary changes in institutional culture, policies and practices'. Outside the teaching and learning pillar of the Charter, the Convention makes reference to the Digital Environment in General Comment No. 6 (UN, 2018) on equality and non–discrimination, where it recommends proactive work with 'accessibility through universal design or assistive technologies' (p.6).

Aligned to the CRPD, the EU has adopted a new ten-year **Strategy for the Rights of Persons with Disabilities 2021–2030** taking into account the diversity including 'long-term physical, mental, intellectual or sensory impairments (in line with Article 1 of the UNCRPD)'. The Strategy makes references to UD in the context of the UNCRPD principles calling for mainstreaming the UD approach for better accessibility and provision of reasonable accommodation for persons with disabilities (European Union, 2021).

Universal Design is important within the context of the UNCRPD as a tool for implementing the guiding principle of Agenda 2030 to 'Leave No One Behind'. UNESCO have made UD a policy priority with the **Education 2030 Framework for Action (2015)**, which seeks to provide a framework for implementing SDG 4, Quality Education, which prioritises 'inclusive and equitable education for all' (UNESCO, 2015). Other SDGs related to the Charter include 8 (decent work and economic growth), 9 (sustainable industry, innovation and infrastructure), 10 (reduced inequalities), 11 (sustainable communities), and 16 (peace, justice and strong institutions).

The inclusion of tertiary education in the SDGs is also significant, with Target 4.3 stating the aim that by 2030, all women and men will have equal access to technical, vocational and higher education. By having a significant impact on students' awareness and contribution to a prosperous society, tertiary education is viewed as a change agent and catalyst in the development of sustainability-related issues (Žalėnienė & Pereira, 2021). Having a tertiary education may also have a significant impact on future generations' mindset on environmental and social issues (see Figure A6.6 in Indicator A6). The SDG4 agenda recognises the central role of higher education through Indicator 4.3.2 on participation in tertiary education (OECD, 2022).

The Global Education Monitoring (GEM) Reports offer a useful way in which to monitor education under the SDGs with a particular reference to SDG4. UD and UDL feature in these reports with one of the ten recommendations in the 2020 Global Education Monitoring Report, *All Means All,* to apply UD:

'Ensure inclusive systems fulfil every learner's potential. All children should learn from the same flexible, relevant, and accessible curriculum, one that recognises diversity and responds to various learners' needs. Language and images in textbooks should make everyone visible while removing stereotypes. Assessment should be formative and allow students to demonstrate learning in a variety of ways. School infrastructure should not exclude anyone and the huge potential of technology should be exploited' (p.21).

This report notes how the 'UDL concept encapsulates approaches to maximising accessibility and minimising barriers to learning' (p. 3) and points to the need for technology in creating accessible and inclusive learning environments (GEM, 2020).

At a European Union policy level, there are several significant legal policy documents relating to some or all of the pillars of the Charter. UD and a 'design for all approach' to accessibility is recommended by the **European Accessibility Act (EEA)** which is due to be implemented in 2025. The EEA seeks to ensure equal access to products and services for people with disabilities on a equal basis with others. The minimum standards set out in the EEA (EN: 17161:2019) use a UD approach at all levels in organisations to continuously improve and address the accessibility and usability of the products and services they provide (European Union, 2019). This Act aligns with all pillars of the Charter as it aims to improve the functioning of both public and private sector organisations and remove barriers to accessing products and services These can include: computers and operating systems; access to audio–visual media services such as television broadcast and E–books or E–commerce (NDA, 2022b).

Relating to products, goods and services, the Design for All – Accessibility following a Design for All approach in products, goods, and services – Extending the range of users (2019) is a European Standard (Standard I.S. EN 17161:2019) about the use of UD across all levels of an organisation in order to improve the accessibility and usability of their products and services. It relates to all pillars in the Charter and can be used by tertiary education to comply with national and international legislation on access, equity, and inclusion. The Design for All standard sets

out recommendations for organisations to 'extend their range of users by: identifying diverse user needs, characteristics, capabilities, and preferences; by directly or indirectly involving users; and by using knowledge about accessibility in its procedures and processes' (CEUD, 2023).

The Marrakesh Directive or The Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired, or Otherwise Print Disabled is a related piece of EU legislation on the limitations and exceptions to copyright rules in order to permit reproduction, distribution and making available of published works in formats that are accessible to persons who are blind, visually impaired or otherwise print disabled (Ferri & Donnellan, 2022). The Directive involves 6 EU Member States including Ireland and seeks to respond to the lack of access for people with disabilities and was influenced by, and viewed as, complimentary to the UNCRPD 'guaranteeing the accessibility of published works to persons with disabilities, and supporting the realisation of the right to participate in cultural life affirmed by Article 30 CRPD' (Bantekas & al., 2018 cited in Ferri & Donnellan, 2022).

UD and equity in education have been major themes in European education policy over the past number of decades. Sustainable and equitable design form part of the recently published *EUA Universities Without Walls: A vision for 2030* policy report which calls for universities across Europe to be 'communities of learners, academics and professional staff with open boundaries' (p.5) and within both physical and virtual spaces they should be 'designed in a holistic way to accommodate the different needs of a diverse university community and allow for flexible and blended approaches' (EUA, 2021). The report makes specific reference to the need for equity and inclusion in teaching and learning and suggests that learning and research environments are 'designed to accommodate the needs of a diverse student and staff body' (EUA, 2021, p.6).

3.1.2 International Policy Related to Specific Pillars of the Charter

In this section, legislation specifically relating to individual pillars of the Charter is outlined with particular reference to the Digital and Physical Environment pillars. Perhaps the most significant development in EU legislation in the digital space has been the **Accessibility of Websites and Mobile Applications of Public Sector Bodies Regulations (**S.I. No. 358/2020) which was transposed into Irish law in 2020. The key purpose of these regulations is to ensure that all citizens can access services and participate in society and promote and facilitate accessible digital developments and reduce the need for individuals to take legal action to ensure basic access (AHEAD, 2021). Under these regulations, all public sector bodies are required to make their websites and mobile applications (apps) accessible with the guidelines organised under 4 principles: perceivable, operable, understandable, and robust [POUR] (AHEAD, 2021). The regulation applies to most types of content including; office file formats (Word, PowerPoint and PDF documents), videos, forms, as well as intranets, extranets and their contents. Furthermore, they must have a clear Accessibility Statement on their website. Much of the guidelines for compliance of the Accessibility of Websites and Mobile Applications of Public Sector Bodies Regulations can be found in the **Web Content Accessibility Guidelines** or WCAG 2.2 (2023) which set out a single shared standard for web content accessibility for individuals, organisations and governments internationally. The WCAG documents outline how to make web content more accessible for people with disabilities (including visual, auditory, physical, speech, cognitive, language, learning, and neurological disabilities) and is aimed at web content developers (such as page authors or site designers), web authoring tool developers or web accessibility tool developers (WC3 Web Accessibility Initiative, 2023). Related to the digital environment and the increasing use of media services in tertiary education (such as YouTube) the EU's **Audio–visual Media Services Directive (AVMSD)** is relevant to the Charter. This Directive governs EU–wide coordination of national legislation on all audio–visual media — traditional TV broadcasts and on–demand services.

European standards and guidelines are also available specifically for the Physical Environment pillar of the Charter and align directly with the UNCRPD detailed above. The **European Standard I.S. EN 17210:2021** *Accessibility and usability of the built environment – Functional requirements* are particularly relevant to the Charter. Published in 2021, this standard describes 'basic, common minimum functional requirements and recommendations, applicable across the full spectrum of the built environment, for an accessible and usable built environment, following the Design for All/Universal Design principles'. It includes elements of the physical environment such as pedestrian areas, entrances, routes in horizontal circulation, routes in vertical circulation, rooms, equipment and facilities, toilets and sanitary facilities and exit and evacuation routes (Klenovec & Ginnerup, 2021).

3.2 Charter Alignment with National Policy

A key feature of the Irish education policy landscape in recent years has been an emphasis on inclusive education and a growing awareness of diversity among both learners and practitioners. This section explores how the implementation of the Charter supports strategy, policy, and initiatives for both HEIs/ETBs to make progress on national and international policy goals and commitments. Similar to the international policies detailed in the previous section, many of the pieces of national legislation detailed below span the four pillars of the Charter (See **Figure 5 –**) and highlight the extent to which each pillar is interconnected.

3.2.1 National Legislation

As mentioned, UD is defined in the **Disability Act 2005** which covers public places, the built and digital environments, services, and systems. The Act established a statutory basis for providing access to mainstream public services and it details actions to support the provision of improved access to public buildings, services and information. One of these actions was the establishment of CEUD by the NDA in 2007 (discussed in section 1.2.2 above) which aims to support the achievement of UD in Ireland by contributing to the development and promotion of standards. The CEUD works with relevant bodies to ensure UD is built into training and education for staff as well as promoting general awareness and understanding of UD in Ireland. UD also features in the NDA's **National Disability Inclusion Strategy 2017–2021** (later extended to 2022) which focuses on how public services should be universally designed and accessible to all citizens. This cross departmental government policy specifies the actions to be taken, the body responsible for taking the actions in addition to a suggested timeframe. The Strategy supports progress in delivering on the obligations in the UNCRPD. It spans all four pillars of the Charter but refers to specific areas, such as the Digital Environment, stating that, for example, public sector websites should be designed with UD principles and suggests that information is available in accessible formats and easy to understand (p.15). Progress on the National Disability Inclusion Strategy is monitored and the **Final Review of Progress on Indicators of the National Disability Inclusion Strategy (NDA, 2023)** which details progress on the indicators and provides a summary of same.

Figure 5 — ALTITUDE Charter Alignment with National Policy

The 4 Pillars	Learning, Teaching & Assessment	Supports, Services & Social Engagement	Physical Environment	Digital Environment
National legislation	Disability Act (2005)			
	Equal Status Acts (200–2004)			
	Irish Human Rights and Equality Commission Act (2014)			
	European Accessibility Act (EEA)			
	Education for Persons with Special Educational Needs Act (2004)			The Building Control Act (1990–2007)
	The Irish Sign Language Act (2017)			The Health Safety and Welfare at Work Act (2005)
	Higher Education Authority Act (2022)			
National strategies and guidelines	Inclusive Education Framework (2011)		Web Content Accessibility Guidelines (WCAG) 2.3 (2023)	Building Regulations Technical Document M (2022) Access and Use
	National Disability and Inclusion Strategy (2017–2011)			
	ESD to 2030: Second National Strategy on Education for Sustainable Development			

Other national legislation that is aligned to the Charter includes the **Equal Status Acts of 2000 and 2004** which **r**efer to various forms of discrimination on 9 named grounds, including discrimination based on a person having a disability. Under the Acts, anyone providing services to the public must 'do all that is reasonable to accommodate' the needs of a person with a disability. Accommodating the needs of people with a disability involves providing an acceptable standard of facilities in circumstances where, without these, it would be impossible or difficult to avail of the service provided. The Acts span the four pillars of the Charter as it relates to any setting, including tertiary education.

Similarly, Section 42 of the **Irish Human Rights and Equality Commission Act (2014)** is also application to the Charter and tertiary education more generally in that it states how organisations to have regard to the need to: eliminate discrimination; promote equality of opportunity and treatment of staff and people for whom its provides services; and protect the human rights of its members, staff, and the persons to whom it provides services. Also related to equality of access in education is the **Irish Sign Language Act, 2017** which was signed into law in 2017. The Act recognises Irish Sign Language (ISL) as a native language of the State and provides that the 'community of persons using Irish Sign Language shall have the right to use, develop and preserve Irish Sign Language'. It sets out requirements and obligations on public bodies for the provision of ISL services and makes specific references to the duties and responsibilities of those in educational provision (although it predominantly refers to primary and second–level education).

3.2.2 Irish Government Policy Related to Specific Pillars of the Charter

Much of this section refers to the pillars of the Charter, Learning and Teaching and Support, Services and Social Engagement although they are not strictly limited to them and often relate to the Digital and Physical Environment pillar as well. Of particular note, however, is the expansion of the role of the Higher Education Authority in recent decades and the implications of this on equity of access to education. Introduced in 2022, **the Higher Education Authority Act** replaces a previous Act from 1971 and reforms the legal basis for the functions of the HEA to improve oversight and regulation in higher education in Ireland. The Act provides for a system performance framework and the associated performance agreements with each of the higher education institutions. Under this Act, the HEA can hold HEIs to account regarding their responsibility for performance and governance. While autonomy and flexibility are recognised as important features of higher education, the HEA now has a mandate to measure and assess the strategic performance of higher education institutions with a view to strengthening the performance of individual

institutions and the higher education system as a whole and to ensure institutions' accountability (HEA, 2023).

The implementation of UD is also aligned with the aims and objectives in **ESD to 2030: Second National Strategy on Education for Sustainable Development** spans the continuum of education in Ireland and places a focus on the creation of sustainable learning environments. Aligned with SDG4 (detailed above), ESD in Ireland aims to

> 'Focus on values and promote active democratic citizenship and inclusion as a means of empowering the individual and the community' (p.7).

Given the remit of the tertiary education sector, there is also overlap between the Charter and national legislation on resources and provision for special educational needs in special and mainstream education. The **Education for Persons with Special Educational Needs Act (2004) (EPSEN)** was considered a landmark policy document explicitly addressing the needs of students with special educational needs in Ireland (Government of Ireland,

2004). Almost 20 years old, EPSEN is currently under review involving a consultation with multiple stakeholders including children and young people in special and mainstream schools (Department of Education, 2022). This consultation is taking place at a time of change in the teaching profession and the level of engagement with UDL professional learning (Healy et al., 2023; Quirke et al., 2023). Furthermore, there is a growing evidence of UDL in curriculum reform (Flood & Banks, 2021) and education policy, such as the recently published policy advice on special schools and classes from National Council for Special Education (NCSE) (NCSE, 2024). UD and UDL feature heavily in the policy recommendations in this document with an emphasis on: enhancing the role of 'inclusion, UDL and disability awareness' in teacher, school leader and other school staff professional learning (p.122); reviewing curriculum frameworks and content to ensure they are underpinned by a UDL approach (p.125), and the use of UD in the design and development of school buildings (p.75) (NCSE, 2024).

Also within the pillars of the Charter, Teaching and Learning and Support, Services and Social Engagement, the **Adult Literacy for Life Strategy** (Government of Ireland, 2021) seeks to complement and reinforce other government strategies including Healthy Ireland Strategic Action Plan 2021–2025 (Ireland, 2021), Pathways to Work 2021–2025, Ireland's Roadmap for Social Inclusion 2020–2025, and the work currently underway on the first Well–Being Framework for Ireland (Government of Ireland, 2023). Developed by SOLAS, it aligns with international policies including the sustainable development, social and economic goals of the EU, UNESCO, and the OECD. The strategy states that 'Universal Design approach is critical in encouraging systems and solutions that can be accessed, understood and used by all persons regardless of age, size, ability or disability'. There are numerous references to UDL and a UD approach such as implementing the 'Universal Design for Learning (UDL) guidelines and use the UDL resource toolkit across all literacy provision' (p. 12).

While much of the Digital Environment policy and legislation is covered within international directives and standards, there are specific guidelines available from the CEUD in the NDA on Universal Design in ICT including the WCAG 2.2 documents detailed above. Within the Physical Environment pillar, however, there are several policies of note for universal design. **The Building Control Act 1990–2007** is the basis of building control and it allows for the establishment of building control authorities. The Act provides for the making of building regulations and deals with issues such as building standards, workmanship, conservation of fuel and energy and access for people with disabilities. Part (M) of the **Building Regulations Technical Guidance Document M 2022 Access and Use** sets out minimum provisions for the access and use of buildings. In general, Building regulations apply to the construction of new buildings and to extensions and material alterations to buildings. In addition, certain parts of the regulations apply to existing buildings where a material change of use takes place. Section 25 of the Disability Act applies Part (M) retrospectively to public buildings, as defined in the Disability Act. Section 25 requires the upgrading of older public buildings so that they comply with Part (M) within a ten–year timeframe

of any amendment to Part (M). Also aligned with the Charter, the **Safety, Health and Welfare at Work Act 2005 and 2010** and **Safety, Health & Welfare at Work Regulations (General Application) 2007** contain provisions that apply to almost all workplaces. Included are regulations dealing with the physical environment at the place of work, welfare facilities and the suitability of the workplace. Regulations requiring that employers consider specific risk groups when assessing certain tasks are also included.

3.3 Charter Alignment with Tertiary Education Policy and Funding Streams

3.3.1 Alignment with tertiary education policy

In the context of the Charter and UD implementation in tertiary education, the **National Access Plan (2022–2028)** is, perhaps, one of the most significant shifts in policy in recent times. NAP states in its ambition statement:

> 'that our higher education institutions are inclusive, universally designed environments which support and foster student success, equity and diversity' (p. 22).

This represents a commitment to UD in tertiary education and offers recognition to the ongoing work at institutional level around UD awareness and implementation; to address issues in equality, diversity and inclusion (HEA, 2022). In its Objective 1.3, the NAP specifies its aim to 'embed a whole–of institution approach to student success and universal design' and argues for the measurement of UD changes in HEIs including 'inclusive teaching practice, accessible VLEs, staff training, appointment of UD champions, improved campus accessibility and qualitative review' (HEA, 2022). With the student at the centre of most aspects of NAP, there is strong alignment between the five Strategic Student–Centred Goals and the first five UD Principles indicating the extent to which theory is influencing policy design.

Table 1 — Alignment of Goals of the NAP and UD Principles

Strategic Student–Centred Goals of the NAP, 2022–2028	UD Principles (Burgstahler, 2009, 2020)
Goal 1: Inclusivity	Equitable use
Goal 2: Flexibility	Flexibility in use
Goal 3: Clarity	Simple and intuitive use
Goal 4: Coherence	Perceptible information
Goal 5: Sustainability	Tolerance for error

Source: Compiled by the authors.

The latest NAP and the Charter are, however, being introduced at a time of change and integration between the further and higher education sectors in Ireland. In the **Strategy Statements of Quality and Qualifications Ireland (2022–2–24)**, the Quality and Qualifications Ireland (QQI) emphasise how it has developed an integrated approach to quality and qualifications in the tertiary system in all its diversity — i.e. further and higher, education and training, teaching and research, public and private. A similar integration of different parts of the tertiary system is now identified as a key challenge at national policy level with the establishment of the **NTO**. In different ways, this challenge is addressed through national strategy for the FET sector, (SOLAS, 2020), the **Action Plan for Apprenticeship 2021–2025** (DFHERIS, 2021), and the **Higher Education Authority Act (2022)** (Government of Ireland, 2022), each of which also brings new tasks and emphases for QQI.

Equality, diversity and inclusion consistently feature in high level tertiary education policy. In the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) **Statement of Strategy 2021–2023** (HEA, 2021a) inclusion is highlighted as one of six strategic goals. The Strategy specifies the need to:

> 'Provide supports and opportunities for learning to all, recognising the needs of vulnerable learners and the most marginalised, and assist people in access to and progression through higher and further education and training, so as to grow prosperity across communities and build social cohesion' (p.6).

This Strategy also makes reference to an integrated tertiary education system with a focus on developing talent and skills with the 'diverse and progressive pathways allowing progression across and between different institutions across tertiary education' (p.9) (HEA, 2021a).

Similarly in FET, the **Future FET: Transforming Learning, The National Further Education and Training (FET) Strategy 2020–2024** (SOLAS, 2020), strongly upholds that FET is for everyone and ensuring a consistent learner experience is a central component of this. At the core of the FET Strategy 2020–2024 are three strategic pillars: building skills; fostering inclusion; and facilitating pathways. The strategic pillar of fostering inclusion recognises the need to provide consistent learner supports with a universal design approach underpinning learning development and delivery; situate FET in the community; and target priority cohorts by providing consistent literacy and numeracy supports. The strategy also commits more specifically to adopting a UDL approach in shaping its future provision. It states for example, that 'FET and ETBs more generally should have learner support ensuring that all learners are supported in a consistent

manner, with a universal design approach underpinning learning development and delivery' (p.38). This will be done by developing and applying good practice guides and toolkits on inclusive practice across the system, adopting a UDL approach in shaping its future provision' (p.45). Active Inclusion has been a key goal of the Further Education and Training sector for many years, and it emphasises the need to foster inclusion as a strategic priority in the most recent FET Strategy FET Strategy 2020–2024. As part of this, SOLAS and AHEAD developed *UDL for FET Practitioners Guidance for Implementing Universal Design for Learning in Irish Further Education and Training* (SOLAS, 2021). SOLAS support the ETBs as primary providers of FET in the roll–out and implementation of the guidelines through embedding UDL–related parameters within ETB funding requirements. Efforts to achieve the goal of inclusion and ensure consistency of support for all learners, are evident in the publication of a UDL conceptual framework (Quirke & McCarthy, 2020), and in the **Strategy for Technology Enhanced Learning in Further Education and Training 2016–2019** which positions technology as central to FET provision (SOLAS, 2019a).

Inclusion and diversity forms a central part of **Ireland's National Skills Strategy 2025 — Ireland's Future** with one of the six objectives of the Strategy being active inclusion to support participation in education and training and the labour market (DES, 2021). The Strategy has a particular focus on DEIS and policy reform for 'disadvantaged and underrepresented groups' (p.101) in our education system and this aligns with all four pillars of the Charter. Specific to the higher education sector, **Ireland's Future Talent: Charter for Irish Universities** also emphasises the role of equality and inclusion but focuses on gender equality and suggest universities should be able to implement the recommendations of the Gender Equality Task Force on Higher Education in order to advance diversity, inclusion and equality more broadly (IUA, 2018). The **Strategy of the Technological higher Education Association (THEA)**[6] also emphasises the importance of equality, diversity, and inclusion, which, it states, is achieved through 'the provision of educational opportunities for learners, firmly embedded in equitable and inclusive admissions' policies that actively target those who would not otherwise enter higher education' (p. 9).

UD is also emphasised in the **Student Success Toolkit** which was developed by the National Forum for the Enhancement of Teaching and Learning in Higher Education (the Forum) as a sectoral guiding framework for embedding student success (NFETLHE, 2021a). The resulting framework contains three key pillars, looking at enabling capabilities, culture and practices. Under the 'Enabling Institutional Practices' pillar, the Framework states that a key enabling practice is when 'teaching approaches and learning design… are underpinned by the principles of universal design' (NFETLHE, 2021a, p.1). Furthermore, the Forum also developed a toolkit (NFETLHE, 2021b) in consultation with key stakeholders including AHEAD, which supports institutions to build their Student Success Strategy. This toolkit makes a more overt inclusion of UDL in the statements listed to support the three key pillars of a quality student success strategy, referencing the importance of policy and strategy alignment with UDL, UDL in programme and service design, alignment of systems and processes with UDL, and the importance of providing UD–related professional development (NFETLHE, 2021b).

6   This is the representative body for the technological higher education sector in Ireland.

System or strategic performance agreements in FET and higher education detail the priorities for government for both sectors and allow for strategic dialogue between government and providers. In higher education, a new **Systems Performance Framework 2023–2027** (HEA, 2023) was recently published by the HEA and will run for four years (2023–2027). It explains the role of the Framework and the creation of Performance Agreements with HEIs within the context of the HEA Act (2022) (See above). The new Framework seeks to enhance performance, financial management, governance and transparency across HEIs and allows individual institutions to see the extent to which they are aligning with the national strategy. The application and monitoring of progress in universal design is possible through indicators, where the Framework captures key data on system–level health including: teaching and learning, research and innovation, access and participation, and engagement. Monitoring forms part of this process, through annual reporting and strategy and performance dialogue with the HEA (HEA, 2023). Similar to the Systems Performance Framework and the use of Compacts in HEIs, the FET sector uses Strategic Performance Agreements (SOLAS, 2022) to plan for FET provision through a

strategic dialogue between ETBI and individual ETBs. Each ETB must outline in their Strategic Performance Agreement, how they will support national objectives in FET and align with the objectives in the national FET Strategy (SOLAS, 2020). The National System Report accompanies the Strategic Performance Agreements between SOLAS and all 16 ETBs for the period 2022–2024 (SOLAS, 2022).

3.3.2 Alignment with tertiary education funding streams

There are several funding mechanisms aimed at addressing equality, diversity and inclusion in tertiary education with some focusing on educational institutions as a whole (UD) and others focusing on elements of teaching, learning and student engagement (UDL). The ALTIT**UD**E Charter seeks to use existing national funding streams to support UD practice where institutions can be supported to adopt the Charter through non–discretionary core spend across departments/funding streams. This section outlines existing funding mechanisms where one or more of the UD pillars is a central or partial focus.

The **Programme for Access to Higher Education (PATH)** funding is a dedicated fund, broken into five strands, committed to increasing participation by underrepresented groups in higher education (see section 2.3 above for more detail). Valued at over €30 million, the PATH 4, Phase 1 and the National Access Plan is a Universal Design fund aimed at creating inclusive universally designed tertiary education environments.

The **Strategic Alignment of Teaching and Learning Enhancement Funding in Higher Education** (SATLE) represents a significant commitment to the enhancement of teaching and learning in Irish higher education. The €5m funding allocation is available to each eligible institution and is designed to enable the development of a strong foundation for future enhancement of teaching and learning within each institution in line with local priorities.

The **Fund for Students with Disabilities** is relevant to the Charter as it assists institutions in tertiary education to help students with disabilities have the necessary assistance and equipment to enable them to access, fully participate in and successfully complete their chosen course of study. The FSD is one of the main funding sources supporting participation by students with disabilities in approved programmes and courses in Ireland.

In higher education, **HEA Performance Funding** is a process for recognising the positive performance of institutions based on the mission–based performance compacts agreed between DFHERIS and the HEIs and aligned with institutional strategic plans and the HEA's System Performance Framework.

Also in 2023, DFHERIS announced the **Devolved Capital Grant** of €40 million for the specific improvement of college campuses. Seven universities, five Technological Universities, two Institutes of Technology and six other colleges are benefitting from this fund which is aimed at improving access and upgrading facilities for people with disabilities. This fund clearly aligns with the Physical and Digital Environment pillars of the Charter as it can be used for energy efficiency and decarbonisation upgrades, investment to support universal access, general ICT and equipment upgrades, health and safety works and minor works and equipment. Capital investment in the physical environment of FET is also evident in the **Further Education and Training (FET) Strategic Infrastructure Upgrade Fund** which was announced in 2022 to upgrade facilities and equipment across 13 FET projects.

The work of the Charter also complements the remit of educational agencies and organisations focusing on widening participation in tertiary education and equality, diversity and inclusion more generally. As discussed in section 1.3.1 above, inclusion is one of the core aims of the NTO which seeks to improve pathways between further and higher education for learners where the implementation of the Charter would facilitate this process. Similarly, the Charter is relevant to the newly announced National Apprenticeship Alliance and the newly formed research body Taighde Éireann – Research Ireland which amalgamates the functions of the Irish Research Council (IRC) and Science Foundation Ireland (SFI) to create a new competitive funding agency for research and innovation. Related to the implementation and monitoring of the Charter, however, the Athena Swan Charter is a valuable template in which to embed systems of equality through a standardised award system.

3.4 Charter Alignment With Examples of Institutional Good Practice

There are examples of good practice in UD implementation in further and higher education settings across Ireland. The lack of coherence at national level around UD implementation is well acknowledged and has led to some providers creating their own UD policies and implementation plans. This section provides an overview of existing good inclusion practices in the HE/FET sector with a particular focus on how they can assist in the implementation of the ALTIT**UD**E Charter.

There have been several significant developments in UD implementation in specific institutions in recent years such as the publication in 2017, of the **UCD Toolkit for Inclusive Higher Education** (Kelly & Padden, 2018). The Toolkit takes a whole–institutional approach and focuses on the four institutional pillars of a typical higher education institution including: Pillar 1: Programme and Curriculum Design, Teaching and Learning; Pillar 2: Student Supports and Services; Pillar 3: Physical Campus and the Built Environment; Pillar 4: Information Technology Systems and Infrastructure. There is a self–assessment exercise provided under each of the pillars consisting of a series of statements which result in a score which helps respondents to identify any gaps in their inclusive practice. The UCD Toolkit for Inclusive Higher Education forms the basis of the Implementation Toolkit further discussed in section 4 (below).

In the University of Galway , a **Universal Design and Accessibility Policy** is another example of good practice in relation to policy available for students and staff (University of Galway, 2021). The document outlines

the university's commitment to the development and implementation of UD for all staff, students and prospective staff and students. One of its key priority areas is to enhance and embed 'Universal Design and accessibility as an active manifestation of our core values of Respect, Openness, Sustainability and Excellence'. This document highlights how its UD policy aligns with international and national policy related to UD, inclusion, and access[7]. Informing policy, however, is research undertaken by the University of Galway on the student voice which highlights barriers to inclusion with a view to improving retention, progression and performance (Wijeratne et al., 2022).

Universal Design for Learning features as one of six thematic areas in the **National Project in the Technological Higher Education sector N–TUTORR** project which is a collaboration across the Technological Higher Education sector aimed at transforming the student experience. It aims to support learning, teaching and assessment by focusing on transforming the student experience and development capacity among staff focusing on the SDGs, EDI and UDL.

In Trinity College Dublin, the **Trinity Inclusive Curriculum (Trinity–INC) Project** aims to embed the principles of diversity, equality and inclusion across all teaching and learning. Trinity–INC works, however, with the College community and includes the staff and students, academic and those in educational support roles. It aligns somewhat with the Charter as it is structured around four equal pillars of initiatives including: academic (through the creation of a community of practice and a professional learning module); student pillar (student–partner programme); an institutional pillar; and infrastructural pillar which seeks to support capacity across College to further inclusive teaching and learning practices.

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7   Similar to this Technical Report, this document draws upon the UN Convention on Rights of People with Disabilities in addition to national–level policies including the Equal Status Acts 2000 to 2018, The Employment Equality Acts 1998 to 2018, Section 42 of the Irish Human Rights and Equality Commission Act 2014 and the European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020, The Disability Act 2005, the Education for Persons with Special Educational Needs Act 2004, The Safety, Health and Welfare at Work Act 2005, The Building Control Act 1990–2007, The National Disability Inclusion Strategy 2017—2021, and The Irish Sign Language Act 2017.

The EDIT Project, **Embedding EDI into the Curriculum of the Technological Sector** is also significant as it is a sectoral project involving a charter and toolkit for TUs wishing to embed EDI into the curricula. Six key principles of curriculum design have been embedded into a charter, and a toolkit to enable the implementation of these principles is in the final stages of development.

In 2022, Dublin City University published the **Dublin City University Strategic Connections Grid.** This document seeks to map how concepts and principles of Universal Design for Learning are aligned with existing strategies and policies within DCU and could be an important example in the context of the Charter where ETBs and HEIs could usefully align the four pillars with their own evolving institutional level policies. The DCU Strategic Connections Grid cites the DCU Strategic Plan with specific reference to elements of diversity and inclusion. It details components of the DCU Strategic Plan such as Teaching and Learning and the Student Experience, it highlights references to UDL in DCUs Assessment and feedback in Teaching and Learning Policy, their Learning Support Policy and their Academic Integrity and Plagiarism policy.

In FET, some ETBs have published their own UD or UDL implementation plans in response to higher level FET policy (Quirke & McCarthy, 2020; SOLAS, 2019, 2020). One example is the **Tipperary ETB Universal Design for Learning Implementation Plan for FET** which uses the CAST Framework to focus on leadership in UDL implementation across five different phases: explore, prepare, integrate, scale and optimise. The implementation plan results from a survey of providers which identified a willingness to learn, collaborate, and implement UDL and has a UDL Task Group to oversee and support UDL implementation across programme providers throughout 2023. The implementation plan states, however, that this roll–out does not have an endpoint and will continue beyond the initial implementation (Tipperary ETB, 2022).

Section 4: Charter implementation

This section provides an overview of how the Charter can be utilised by institutions and national bodies in FET and higher education. Based on the consultation process and elements of this Technical Report, it provides recommendations for how efforts to implement the Charter can be sustained and monitored at an institutional and system level. The work of the Technical Report Advisory Group identified three areas of interest for the implementation of the Charter: firstly, identifying how the Charter can support institutions and what its adoption will mean. Secondly, guidance on how to develop an ALTIT**UD**E Charter Implementation Committee/Working Group, including how to identify the relevant roles required to sufficiently span the four pillars of the Charter. The third focus of the Advisory Group sought to identify how policy makers and agencies can support institutions to adopt and implement the Charter.

4.1 How Adopting this Charter Can Support Institutions

Adopting this Charter will:

- Provide a vehicle for your institution to declare its intent to make incremental and sustainable progress towards embedding a universal design approach, in line with its resources, culture and strategy.

- Promote the development and sharing of policies, structures, and strategies in your institution which support the sustainable implementation of a universal design approach.

- Support a culture of shared responsibility for universal design, access & inclusion in your institution, by promoting development of organisational structures which foster an 'everyone's business' approach to inclusion.

- Develop a more unified language of and commitment to a universal design approach in your institution and across the tertiary sector, fostering greater opportunities for partnership, collaboration, and shared learning.

- Support your institution to comply with Irish law and work towards goals in a range of key national and international strategies concerning universal design, accessibility, student success, sustainability, and inclusion.

What Does It Mean for Institutions to Adopt the Charter?

Adopting this charter is a declaration of positive intent by your institution to make incremental and sustainable progress towards embedding a universal design approach in the systems and practices of the institution.

It commits the institution to establishing a standing committee or working group structure (or adapting an existing one) to advance this goal, using the Charter as a roadmap to foster collaboration, identify opportunities for progress and guide decision–making.

The Charter recognises that different institutions are at various stages of UD adoption and have differing levels of available resources. It encourages institutions to build on existing good work in the institutions, and make steady progress in line with their strategy, culture, and values. It encourages prioritises a process of iterative transformation over time, rather than unsustainable attempts to transform culture and practice in a short timeframe.

4.2 Forming an Implementation Committee/Working Group

A significant first step in Charter adoption by ETBs and HEIs is the formation of an implementation committee or working group. Adopting institutions will develop a committee/working group (or adapt an existing one) that works best for their organisational structure and governance processes.

The makeup of the group should aim to maximise the impact of the Charter, ensuring representation of senior management, heads of key functions relating to the Charter Pillars, student representatives and UD–knowledgeable staff members.

This group will oversee incremental progress to develop strategic enablers for a sustainable UD approach (see Fig 3), and foster collaboration to advance related goals in the 4 key pillars (Fig 4). Key to this effort will be using policy and strategy review cycles to embed UD at the strategic level, and to identify opportunities provided through national and local funding streams to advance goals within the pillars.

The group will support collaborations and developments between departments and across functions (across the four pillars) within each institution, and it is anticipated, will liaise with a national UD community of practice.

It is noted that many HEIs and ETBs have existing committees focused on universal design or accessibility that would be well placed to evolve their responsibilities and membership to include implementation of the ALTIT**UD**E Charter in their key responsibilities.

Some institutions may choose to have pillar subgroups which can feed into the main working group, while others will take a different approach to advancing the pillar–based goals. Figure 6 outlines an example implementation structure, with some of the recommended roles in ETBs and HEIs involved in supporting implementation at different levels of the institution highlighted. Note that this list is not exhaustive or prescriptive, and institutions should adapt their working group membership and approach to implementation in line to align with their culture, staffing structures, resources, and strategy.

Figure 6 — Sample ALTITUDE implementation structure

Sample ALTITUDE Implementation Committee/ Working Group Makeup

FET Example

Director of FET

Chaired by a Senior Figure and featuring Key Senior Staff

HE Example

Registrar

Director of Organisation, Support & Development

PLC Principal Reps

Programme/Centre Manager Reps

Area Coordinator Reps

Head of Procurement

Adult Education Officer Reps

UD Knowledgeable Staff Reps

Learner Reps

Chief Operations Officer

Relevant University Management Team Reps

Dean of Students

Academic Department Head Reps

Head of Procurement

Head of Equiality, Diversity and Inclusion

Student Union Reps

UD Knowledgeable Staff Reps

Heads of key professional services relating to the Charter pillars e.g. Learner Support, TEL Coordinators, PD Coordinators, Buildings, IT, etc.

Learning, Teaching & Assessment

Supports, Services & Social Engagement

Physical Environment

Digital Environment

80

Learning, Teaching & Assessment	Supports, Services & Social Engagement	Physical Environment	Digital Environment
• Academic/Teaching Staff, Tutors • Programme Coordinators/Faculty Heads • Educational Developers • Learning technologists/ TEL professionals • Lecturers/Researchers in Academic Practice • Exams & Quality Offices/ Committees	• Student Unions/Councils & Other Learner Forums • Student Services • Access/Learner Support Office/Disability Services • Libraries • Clubs & Societies, & Other Social Forums • Commercial/Corporate Services	• Estates/Buildings • Facilities • Health & Safety • Compliance Office • Fire Officer/Fire Marshalls • Student Accommodation • Procurement	• IT and AV Services • Web content creators incl. admin staff • VLE System Administrators • Communications (internal & external) and Marketing • Learning technologist/ TEL professionals/ Assistive Technology Officers • Procurement

4.3 The ALTITUDE Charter's Implementation Toolkit

The Toolkit for Inclusive Higher Education Institutions (Kelly & Padden, 2018) was originally developed for use in University College Dublin and across the Higher Education sector both in Ireland and internationally. It was developed in response to the expressed need of colleagues who were committed to inclusion but needed a practical guide on how it should be implemented both institutionally and individually. The structure of the Toolkit is designed to capture all aspects of the student experience across the four pillars referenced in the ALTIT**UD**E Charter, but also including a 'strategic enablers' piece which covers institutional policy and strategy.

The Toolkit has been used extensively in UCD as the basis for 'University for All' – UCD's institutional change initiative for embedding inclusion (Kelly, Padden & Fleming, 2023). Since the original development of the Toolkit, the sector has moved on significantly in its understanding and practice of Universal Design and inclusion in tertiary education overall. UCD are now redeveloping the Toolkit to ensure that it is as relevant and applicable as possible to those working in the sector. UCD are exploring ways to make the Toolkit more applicable to those in Further Education and Training as well as Higher Education and have gone through a number of feedback and revision processes as part of this work. The ALTIT**UD**E Charter group provided extensive feedback on the original Toolkit identifying areas for changes or additions, feedback was then gathered from the sector at the AHEAD conference and finally through the ALTIT**UD**E staff and student consultation process. All of this feedback has been considered by the Toolkit development team, Dr Anna Kelly, Dr Lisa Padden and Dr Bairbre Fleming of UCD Access & Lifelong Learning.

The Toolkit is designed to be used as a self–assessment tool, ideally in a workshop format with colleagues from across an institution/organisation or within a discipline or professional service team. In practice, in UCD the Toolkit workshops have included a number of elements including a student panel to share experience, an overview of access and inclusion related data relevant to the area, a brief training session on Universal Design and finally the self–assessment usually using only a selection of the statements from the Toolkit in order to focus conversation and make the best use of time. As part of these workshops the scores from the self–assessment are recorded but more importantly examples of good practice and specific suggestions for improvement projects are also recorded for each statement. The Toolkit contains examples of good practice from across the sector, additional resources and also some potential challenges with suggested solutions. This practical guidance has also been updated with examples from some of the recent innovations in the sector in the area of Universal Design.

Ultimately, the toolkit will provide key guidance, self–reflective tools, and case study examples of good practice in action which support the implementation of the ALTIT**UD**E Charter.

4.4 How Policy Makers and National Bodies Can Support Institutions to Adopt and Implement the Charter

For the ALTIT**UD**E Charter to be a success, the support of policy makers and national bodies will be vital. Some ways in which these stakeholders can support the adoption and implementation of the Charter are explored below.

Funders/Policy Makers

As outlined previously in this paper, both SOLAS and the HEA have identified the promotion of a universal design approach as a key strategic priority in important national strategies. There are many ways in which policy makers can support and encourage institutions to adopt and implement the Charter including:

- Introducing a time–bound funding stream to support institutions considering adopting the Charter to engage in strategic dialogue and conduct initial set–up of the key Implementation Committee/Working Group.

- Specifically, and intentionally engaging institutions on their efforts to embed a UD approach in the Strategic Performance dialogue process, encouraging institutions to adopt the Charter and set goals around UD in their performance agreements.

- Reviewing existing funding streams to see where opportunities exist to amend criteria to encourage a UD approach, or to include the ability to use the funding to initiate a UD–focused project, for example in the teaching and learning space, capital funding, funding for digital transformation and research funding streams.

- Making a strong commitment that all new relevant funding streams will contain criteria that require awardees to consider a UD approach in project delivery for example capital funding, funding for digital tools and infrastructure, funding for the promotion of teaching and learning practice and to support success.

- Tying future core funding increases to institutional adoption of the Charter, and measurable progress on implementation.

- Through dialogue with the ALTIT**UD**E Charter Group and national representative bodies, consider how they can play a role in the formal Charter adoption process.

National Bodies and Other National Opportunities

Key institutional national representative bodies (e.g. IUA, THEA, HECA, ETBI), important national agencies (e.g. QQI, NTO, USI, CEUD), and independent organisations supporting the sector (e.g. AHEAD, Aontas, NALA) also play an important role in encouraging and supporting Charter implementation. Actions to consider include:

- Greater intentional collaboration between IUA, THEA and ETBI to jointly advocate for changes to national tertiary policy/funding streams which support Charter implementation, collaborating with bodies such as AHEAD in the process.

- Important institutional representative bodies collaborating with national organisations supporting the tertiary sector to create opportunities for shared learning on ALTIT**UD**E implementation, for example jointly operating an ALTIT**UD**E national community of practice and a biennial national ALTIT**UD**E congress to bring the community together.

- Developing national recognition processes for good practice in the implementation of ALTIT**UD**E. For example, AHEAD and University College Dublin are planning to revamp the previously outlined John Kelly Awards to more closely align with the Charter and recognise good practice under each pillar.

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