**Guidelines for the creation of equitable opportunities for people with disabilities in South African Higher Education**

**Cape Higher Education Consortium**

**Prepared for CHEC by**

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Table of Contents

1. Introduction 4

2. Guiding principles 7

3. Defining disability 12

4. The policy and legislative framework 16

5. The campus environment 16

6. Creating equitable employment opportunities for staff with disabilities 18

7. Creating equitable opportunities for students with disabilities to enter and succeed in higher education 21

8. The role and functioning of disability units 26

9. Monitoring and evaluation 28

**Appendix A: Legislative and policy framework**

**Appendix B: Summary of key roles and responsibilities**

**Appendix C: Some useful resources**

# Introduction[[1]](#footnote-1)

In December 2014 the Minister of Higher Education and Training announced the appointment of a Ministerial Committee tasked with the responsibility of developing “a Strategic Policy Framework for Disability in the Post-School Education and Training System” (DHET, 2014)[[2]](#footnote-2). This Ministerial initiative takes forward a commitment made in the *White Paper for Post School Education and Training* (2013) to improve “access to and success in post-school education and training (including in private institutions) for people with disabilities”(DHET, 2014). For higher education institutions, this policy imperative is not new and reinforces similar intentions outlined in the previous White Paper 3 (1997) on higher education and the National Plan for Higher Education (2001). At the policy level these goals around disability have always be recognised as part of a broader process of higher education transformation, focused both on redressing the inequalities of the past and building the capacity of the system to meaningfully contribute to South Africa’s development within a globalised, knowledge-driven world, including through greater responsiveness to diversity. These policy goals have also given meaning within the context of higher education to constitutional provisions and associated legislation that protect the rights of people with disabilities from unfair discrimination and recognise them as having been historically disadvantaged and thus the focus of measures aimed at redressing these inequities. This framework is strengthened by South Africa’s ratification of the United Nations Convention on the Rights of Persons with Disabilities and its Optional Protocol (2006).

Despite the existence of these strong enabling mechanisms, a number of barriers still exist that restrict access to and limit the participation of people with disabilities in higher education. In many respects, these barriers reflect the complex interplay between a range of internal and external factors that are both about how disability is understood and responded to in our society and broader systemic challenges faced by the post-apartheid public higher education system in South Africa. It is at the institutional level that the impact of these barriers is most evident, as institutions attempt to translate these policy goals into meaningful practice and grapple with them among a range of competing priorities.

This document has been developed by the Cape Higher Education Consortium (CHEC) as a contribution to the Ministerial initiative underway and as an enabling tool for higher education institutions in their efforts to address this transformation imperative. Its objective is to provide a framework to inform leadership thinking in this area rather than to outline a set of technical specifications on what should or should not be done. It also does not provide an exhaustive overview of all the key issues for institutions to consider but rather attempts to capture those issues that are seen as most important and if addressed, provide a strong, enabling framework for institutions to work within. The contents of the document draw from and attempt to reflect a consolidation of important insights that have emerged over the last twenty years in South Africa from research, institutional reflections on practice and initiatives towards improving the capacity of the higher education sector to address disability. The document also draws selectively from similar ‘tools’ developed for the higher education sector in other countries. While it is recognised that in most cases these international tools derive from contexts very different to South Africa and thus need to be read with caution, they still offer valuable pointers to principles of good practice towards which institutions and the sector as a whole can strive.

The intention throughout has therefore been to make meaning of the issues within the South African higher education context with its specific complexities and challenges, not least of which are the pervasive inequalities that still characterise the sector and the overall declining levels of state funding for higher education (DHET, 2013)[[3]](#footnote-3) Equally important, is the continued failure of the general education and training system to create the conditions for many students with disabilities to meet minimum entrance requirements and, as is the case for many students, prepare them adequately for higher education study (CHE, 2005; FOTIM, 2011)[[4]](#footnote-4). These factors impact directly on the capacity of institutions to respond to this area of concern. The guidelines therefore attempt to outline the core precepts that should underpin all institutional responses but which can and should be shaped at the level of practice within different institutional contexts.

These guidelines move from the premise that addressing disability in higher education should be directed towards creating the conditions for the equitable participation of all people with disabilities in higher education institutions (HEIs), in particular, staff and students with disabilities. To this end, the four sections that follow speak to broad issues that are important towards the creation of a non-discriminatory and equitable institutional environment. However, while there are a number of issues that are important towards the creation of such an environment and relevant to the concerns of both staff and students with disabilities, it is also extremely important for institutions to recognise the *differences that are required in responding to the needs of staff with disabilities and the needs of students with disabilities*.

For staff with disabilities the issues are about the creation of an equitable and just employment environment requiring attention to issues of employment equity, non-discriminatory conditions of employment and fair opportunities for development and advancement, with all of these imperatives being framed by specific policies and legislation pertinent to all employers. However, for students with disabilities the issue is primarily about ensuring ‘epistemological access’ to higher education and its benefits (Morrow, 1993)[[5]](#footnote-5). It is therefore about ensuring that students with disabilities are able to participate in all facets of the academic project (in and outside the classroom) and have fair chances to succeed in their studies. With these important distinctions in mind, Sections 6 & 7 deal with staff with disabilities and students with disabilities respectively. The last two sections look briefly at the role and functioning of disability units within institutions and the issue of monitoring and evaluation. In Appendix A and Appendix B summaries are provided of the important policy and legislative provisions in place and the main responsibilities required by all the key role players across the public higher education sector. Appendix C provides a list of some useful resources for institutions.

The focus of this document is on the creation of equitable opportunities for people with disabilities within higher education environments, either as employees or as students. It is therefore strongly orientated to considering the issues through the lens of the university as an employer and in relation to its core function of teaching and learning and the responsibilities of the latter towards facilitating access to the curriculum for students with disabilities. The document does not address in any meaningful way issues around curriculum transformation towards building greater understanding around disability and the value of research that seeks to build more inclusive societies. Both of these are extremely important to institutional transformation efforts and should also be given attention as part of institutional strategies to address disability.

# Guiding principles

The following core principles and concerns should underpin and inform how disability is addressed in all higher education institutions:

* ***A Leadership concern***

Like many other transformation challenges in higher education, addressing disability is a senior leadership concern. This means that it needs to be integrated as a key element of the transformation agenda into all aspects of the leadership’s strategic thinking and associated institutional planning. All senior managers need to be aware of the institution’s strategic intentions towards addressing disability and understand these intentions in relation to their specific areas of responsibility. They also need to have an adequate understanding of the policy and legislative framework governing disability in South African and be aware of its implications for higher education.

* ***Valuing diversity and the inclusive development of HEIs***

There is increasing recognition across the world that disability is one element of the diverse human condition and not a deficit that needs to be compensated for. For HEIs this means recognising disability as a natural part of the diversity of South African society and the broader globalised world and valuing what such diversity offers the academic project, both in relation to the nature of the knowledge produced and for the learning experiences of students, in and outside the classroom. For HEIs this means building an inclusive academic and campus environment with institutional practices and systems flexible enough to respond to the differences that such diversity may bring to the institution. It also means a commitment to transforming existing institutional environments to value and accommodate such diversity rather than pursuing solutions that seek to assimilate into an unchanged environment. Central to such transformation is institutional culture. Building an institutional culture that respects and values diversity is especially important towards the creation of an enabling environment receptive to change.

* ***A flexible teaching and learning environment***

The above principle is an especially important one in the design and functioning of the teaching and learning environment and building the capacity of an institution to respond to the differences that students bring to the teaching and learning process. It has particular relevance for the South African higher education context as the learning needs of students are increasingly informed by a complex set of influences, ranging from severe educational disadvantage and lack of preparedness for higher education study to the demands of the ‘digital age’. Towards addressing the needs of students with disabilities within this context two issues are especially important here:

* Firstly, it requires recognising the primacy of the teaching and learning process in the creation of equitable opportunities for students with disabilities to succeed in higher education. Central to this are institutional strategies aimed at building the capacity of academic staff to respond in integrated ways to the needs of students with disabilities in the classroom. This requires the central involvement of teaching and learning structures in addressing disability within institutions and integrating disability responsiveness into all processes towards the orientation and development of academic staff (See Section 7).
* Secondly, it means recognising that many students with disabilities, like their able-bodied peers, come from extremely disadvantaged educational backgrounds. Their learning needs and what they require to succeed in their studies therefore emerge both from the nature of their disability and what this means for how they access the curriculum (e.g. through Braille), as well as from the challenges of educational disadvantage and associated ‘under preparedness’. The teaching and learning support needs of students with disabilities cannot therefore be reduced to the provision of particular assistive devices and require a much more holistic approach by institutions.

Increasingly these imperatives are being captured under the concept of universal design and, when specifically applied to the teaching and learning environment, the concept of ‘universal design for learning’ or ‘universal design in education’. The following definitions of these concepts may be helpful for institutions:

**Universal Design**

“Universal design” means 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 specialized design. “Universal design” shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.

*United Nation’s Convention on the Rights of Persons with Disabilities, United Nations, 2006*

In education, this means the development of course content, teaching materials and delivery methods to be accessible for and usable by students across the broadest diversity ranges.  Inclusive education facilitates the access, participation and success of students.  This approach acknowledges that students with disability or other needs may learn differently, but are not less academically capable.

*Australian Disability Clearinghouse on Education and Training (http://www.adcet.edu.au)*

**Universal Design for Learning**

The term UNIVERSAL DESIGN FOR LEARNING means a scientifically valid framework for guiding educational practice that:

(A) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and

(B) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations of all students, including students with disabilities…

*Higher Education Opportunity Act of 2008 (USA).*

* ***Working within a non-discrimination framework and exploring innovative solutions***

South Africa’s policy and legislative framework that impacts on both staff and students with disabilities in higher education recognises disability as a basis of discrimination, acknowledging the historical impact of such discrimination and providing for its prohibition in a democratic South Africa (See Section 4 and Appendix A). This means that institutions are both legally obliged and ethically directed to ensure that the fair and equal treatment of people with disabilities is embedded into all their governance, planning and operational practices. Moreover, it requires the execution by staff and students of their responsibilities in a non-discriminatory matter.

Despite a commitment to non-discrimination as a principle, institutions are often challenged to remain true to the principle in a higher education environment severely challenged by high societal expectations, competing priorities, limited resources and significant teaching and learning challenges. In this context, the challenge of addressing disability, like other development challenges, is one that contains inherent tensions with imperatives often in seeming competition to each other. What is especially important in remaining true to a non-discriminatory framework is that institutions seek to mediate these tensions through careful and nuanced practices, rather than in the employment of seemingly simpler solutions that may directly or indirectly discriminate against staff and students with disabilities. It is with this concern in mind that the notion of universities within a region ‘specialising’ in a particular disability (Suggested in the White Paper, 2013) is strongly rejected and should not be considered as a possible option for the sector in moving forward.

It is recognised that mediating these inherent tensions is not an easy task and in many respects requires “counter intuitive” leadership thinking (Ndebele, 2007)[[6]](#footnote-6) – leadership thinking able to go beyond the probable to re-imagine what may be possible under the most difficult of conditions. It is important to note here that there is increasing evidence to indicate that some especially innovative solutions around addressing the needs of students with disabilities are emerging in the most resource constrained environments, with these solutions often having benefit for other students, such as those who are not studying in their mother tongue.

* ***Enhancing collaboration and partnership***

Within the policy framework that informs the functioning of the public higher education system in South Africa, including policies that speak directly to the issue of disability, the value of collaboration and partnerships is asserted. This imperative has especially important implications for addressing disability in higher education. On the one hand, building networks and partnerships between institutions as well as between institutions and disability role-players outside the sector, particularly non-governmental organisations offering services to people with disabilities and disabled people’s organisations (DPOs), provide important vehicles for sharing knowledge towards improved practice and drawing on expertise that the university may not have itself. However, while such collaboration is valuable it should always be seen as a way of strengthening and improving institutional efforts, rather than on removing any responsibility from the institution towards its students and staff.

Perhaps most important are those networks and partnerships that are set up at the institutional level. Throughout this document the issues that are raised all point to the importance of a strategic, holistic, integrated approach to addressing disability within institutions and taken the nature of universities, this cannot be achieved without building strong, sustainable partnerships, particularly across traditional institutional boundaries. Setting up intra-institutional forums and communities of practice are seen as a valuable way of harnessing institutional efforts towards addressing disability and ensuring that disability is appropriately integrated across the institution. At the institutional level building networks and communities of practice that draw on the experiences and insights of students and staff with disabilities themselves are regarded as especially important and a valuable source of knowledge to inform institutional practice.

# Defining disability

The United Nations Convention on the Rights of Persons with Disabilities defines a person with a disability in the following way:

Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

*United Nation’s Convention on the Rights of Persons with Disabilities, United Nations, 2006*

The Convention emphasises therefore that the concept of ‘disability’ has to be understood in a relational way – that is, it emerges out of the relationship between a person with an impairment and their environment, where they are confronted by “attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others” (UN, 2006).

If disability is understood in this way, then two issues emerge that are important to recognise: Firstly, the relational nature of disability suggests that it will always be “an evolving concept” (UN, 2006) and thus open to ongoing contestation and engagement. Secondly, the different environments in which people with impairments interact and participate create particular kinds of barriers that shape the nature and experience of disability in that context and may change as the environment changes. Thus the experience of disability is very different in an environment where few barriers exist for a person with a particular impairment compared to another environment where that person experiences a range of barriers. Perhaps the most obvious example here is where a person who uses a wheelchair works in a building that is fully accessible and enables them to move throughout the building without obstruction and have access to all its facilities. In another building where access is restricted to the use of stairs and the facilities are inaccessible to a wheelchair user, the experience of disability will be very different and the person’s ability to participate and be productive will be severely restricted.

The following issues that emerge out of this understanding of disability are regarded as especially important for higher education institutions to consider:

* In higher education the experience of disability will be shaped through the interaction between staff and students with particular impairments and the barriers that they may experience within higher education environments. In considering disability, the emphasis should therefore always be on the institutional environment, in particular, what barriers may restrict participation and what accommodations or changes may be possible to facilitate equitable participation.

The quotation below, taken from the United Kingdom’s first *Code of practice for the assurance of quality and standards in higher education* (1999) captures the fluidity of the concept of disability within the higher education environment and emphasises what it means for the way in which institutions understand and respond to students with disabilities.

**Who is disabled?**

There are many different ways of defining who is disabled. This code follows no particular model. Institutions should be aware that disability covers a wide range of impairments including physical and mobility difficulties, hearing impairments, visual impairments, specific learning difficulties including dyslexia, medical conditions and mental health problems. Some of these impairments may have few, if any, implications for a student’s life or study. Others may have little impact on day-to-day life but may have a major impact on a student’s study, or visa versa. Some students may already be disabled when they apply to an institution, others may become disabled or become aware of an existing disability only after their programme has started. Others may have fluctuating conditions. Some students may be disabled temporarily by accident or illness. Institutions will want to ensure that their provision and structures take into account, so far as possible, the full range of needs which disabled students may have, and that their provision is sufficiently flexible to cater to individuals’ changing needs throughout their periods of study.

*The Quality Assurance Agency for Higher Education, United Kingdom. Section 3: Students with Disabilities, 1999 (updated March, 2010).*

* The particular accommodation and support needs of individuals with disabilities cannot be determined solely on the basis of the ‘category’ of disability into which they fall or the specific nature of their impairment. This is especially important for students with disabilities and what informs how their learning support needs are determined. In the higher education environment, in particular, these needs will always be informed by a range of factors, including what assistive devices the student may have used in their schooling and thus the methods they have used to date to engage in the learning process. For example, not all Blind students use Braille, they may use other methods to communicate and access information. Understanding the specific accommodation and support needs of a student with a disability should always be the primary focus of concern for institutions rather than the specific nature of their impairment.
* The above concerns draw attention to the issue of disclosure or notification of disability by students and staff, both as a starting point towards establishing their support and accommodation needs and as a basis for meeting external reporting requirements (See Appendix A, especially the provisions of the EEA, 1998). Recognising that this issue remains a complex one, the following guidelines emerging from the national and international landscape may be helpful for institutions:
  + The reasons why a student or staff member is asked to indicate that they have a disability must be made clear. For example, in the staff recruitment process it should be clear that the information is required for employment equity purposes and the associated imperatives towards reasonable accommodation etc. (See Appendix A, especially Code of Good Practice).
  + The assurance should be given that the information given will not be used in a discriminatory manner and the right to confidentiality of the staff member or student will be respected.
  + For students with disabilities, in particular, the emphasis should be on establishing the support and accommodation needs of the student and what this will mean for their studies. Institutions may have different processes and mechanisms in place towards establishing these needs, determining what accommodations may be required and considering what they are reasonably able to offer the student. In all cases the overarching intention should be to encourage the student to indicate their support and accommodation needs without fear that this information will be used to discriminate against them in any away.
  + While it will always be necessary to determine the support and accommodation needs of individual staff and students, institutions are encouraged, as already emphasised, to work towards building their capacity to respond to greater diversity and thus anticipate in their planning a range of support needs that are likely to exist at any point in time.

# The policy and legislative framework

As the White Paper for Post-School Education and Training (2013) indicates, South Africa has a strong, comprehensive, enabling policy and legislative framework for addressing disability in the education sector, including higher education. As already indicated, the framework is orientated to both the enforceable protection of the rights of people with disabilities and creating the conditions for their equitable participation in society, including within education. Equally importantly is the recognition that people with disabilities have been historically disadvantaged and a number of elements of the framework are therefore orientated towards redressing these inequalities. For HEIs the framework therefore creates enforceable rights for people with disabilities in higher education and requires institutions to proactively work towards the creation of equitable opportunities as part of their responsibilities. South Africa’s legislative and policy framework is also informed by its ratification of the United Nations Convention on the Rights of Persons with Disabilities and its Optional Protocol.

In Appendix A the implications for HEIs of the most important policies and pieces of legislation are unpacked to provide guidance on their implications for the sector. It must be noted that what is covered in the appendix is not exhaustive. What are captured are those policies and laws that have the most direct impact on the participation of people with disabilities in higher education.

# The campus environment

The central principle that should guide institutions in the development of their campus or campuses is the principle of “universal design” defined above. This principle implies that the overarching intention should be to create campus environments that are as accessible as possible to all staff and students so that they are able to participate fully in the academic and social life of the university. But as the definition about suggests, accessibility extends beyond physical access. It also involves ensuring that all staff and students are able to make full use of the services provided by the institution and they are able to access all forms of institutional communication.

However, it is recognised that for many institutions making their campuses physically accessible presents significant challenges at the present time. On a number of campuses older buildings and other aging infrastructure create particular barriers. Similarly, as student numbers increase in line with the national imperative to increase access to higher education, existing campus infrastructure is placed under strain with competing demands for infrastructure funding. Despite these challenges building physically accessible and safe campuses must remain central to the efforts of institutions to create equitable opportunities for staff and students with disabilities. The challenge once again is to integrate this imperative into all forms of strategic planning around the development of campuses, especially as regards new buildings and the refurbishment of existing buildings. The following are important issues for institutions to take into account in this regard:

* Over the past few years the Department of Higher Education and Training (DHET) has emphasised the importance of addressing access barriers on campuses and has requested institutions to carry out disability audits to identify key barriers to access and determine what alterations are necessary. Some funding has also been provided to institutions to address access barriers through the earmarked funding given to institutions for infrastructural development. Some institutions have already made important progress through the use of this funding and institutions are encouraged to use the emerging insights into their access challenges to inform their plans for the development and modernisation of their campuses. It is also recommended that the DHET continue to allocate specific funding as part of infrastructure development to support ongoing institutional efforts to improve the physical accessibly of their campuses.
* Institutions should at all times be guided in their efforts by South Africa’s national standards on the built environment and its accessibility for people with disabilities. These standards (SANS 10400-S: 2011, published in April 2011 in accordance with the provisions of the National Building Regulations and Building Standards Act of 1977), in addition to outlining minimum standards that institutions would need to adhere to, also provide useful guidelines on key elements of the physical environment that are important to consider.
* Where specific changes to existing infrastructure are impossible or unreasonably difficult, institutions should always attempt to seek alternative solutions, where facilitating the full participation of a student or staff member remains the primary concern. Once again, it is often in the seeking of alternative possibilities that innovative solutions emerge.
* It is especially important for institutions to ensure that their library services and ICT infrastructure are fully accessible to all staff and students. In a context where there is increasing digitisation of knowledge resources (e.g. online journals etc) and the use of ICTs in teaching and learning, it is imperative that students with disabilities, in particular, are able to benefit from these developments.

# Creating equitable employment opportunities for staff with disabilities

As already indicatedAppendix A provides an overview of the legal framework that universities, as public employers, would be expected to comply with. The Code of Good Practice: Key Aspects on the Employment of People with Disabilities (2002) attached to the Employment Equity Act (no 55 of 1998) provides a comprehensive overview of those issues regarded as important in the employment process and within the workplace to ensure that people with disabilities are not unfairly discriminated against and able to enjoy the same opportunities as their able-bodied peers. The Code provides clarity on what would be regarded as appropriate practices towards preventing unfair discrimination and enabling people with disabilities to participate to their full potential. Institutions are strongly advised to see the Code as an important resource to guide and inform their human resource processes and practices. The following capture some of the key elements emphasised in the Code that are especially important for institutions to consider:

* ***Disability integration***

Once again building workplaces that facilitate the full participation of staff with disabilities involves integrating disability into all human resource practices and processes and building a work environment where diversity is valued as a key institutional asset. Without detracting from this principle, some institutions have regarded the adoption of a specific policy on staff with disabilities as an important enabling mechanism towards protecting their rights within the institution and framing institutional practice.

* ***Disability discrimination***

Discrimination against people with disabilities in the workplace takes places in many different ways, sometimes in unintended ways that are not always obvious. The Code suggests that the following forms of discrimination are especially prevalent:

* + Unfounded assumptions about the abilities and performance of job applicants and employees with disabilities
  + Advertising and interviewing arrangements which either exclude people with disabilities or limit their opportunities to prove themselves
  + Using selection tests which discriminate unfairly
  + Inaccessible workplaces; and
  + Inappropriate (or inaccessible) training for people with disabilities (Code of Good Practice, 2002).

This suggests that addressing discrimination involves changing attitudes about people with disabilities and the contribution they can make in the work place as well as addressing practices that directly or indirectly discriminate against them. Building a more equitable workplace supported by an organisational culture that values diversity therefore involves changes in attitude and organisational practice.

* ***Reasonable accommodation***

Creating equitable opportunities for people with disabilities in the workplace must involve a commitment to “reasonable accommodation” where the aim is to “reduce the impact of the impairment of the person’s capacity to fulfil the essential functions of a job” (Code of Good Practice, 2002). What is especially important to recognise here is that fulfilling the essential functions of the job does not always mean doing the job in the exactly the same way that it has been done in the past. Institutions should be aware that sometimes the nature of a person’s impairment may mean that they will use a different method to carry out certain tasks and responsibilities, but in doing so will not necessarily compromise meeting the essential functions of a job.

The Code also gives meaning to the notion of “reasonable” by recognising that some accommodations may place an “unjustifiable hardship” on the employer and may therefore not be possible. The Code outlines what this means:

**Unjustifiable Hardship**

Unjustifiable hardship is action that requires significant or considerable difficulty or expense. This involves considering, amongst other things, the effectiveness of the accommodation and the extent to which it would seriously disrupt the operation of the business.

An accommodation that imposes an unjustifiable hardship for one employer at a specific time may not be so for another or for the same employer at a different time.

*Code of Good Practice: Key Aspects on the Employment of People with Disabilities, Ministry of Labour, 2002*

Institutions are encouraged to therefore to consider carefully whether an adjustment or accommodation will seriously disrupt the effective academic or administrative functioning of the university. And, if the expenses involved appear to be considerable, whether there may be more cost effective ways of achieving the accommodations and in this way offer reasonable possibilities that can be considered.

# Creating equitable opportunities for students with disabilities to enter and succeed in higher education

This document has already emphasised the importance of addressing disability in higher education through an approach that seeks in the first instance to build inclusive higher education environments. Central to this is building the capacity of institutions to ensure that their systems, processes and practices that facilitate and support the student through all stages of the student life style are able to respond to diversity within the student population. For students with disabilities, this means ensuring that disability concerns are fully integrated into the systems, processes and practices that manage the entry of students into the institution; facilitate the organisation, delivery and assessment of the academic curriculum; assure the quality of academic offerings; and that support the development of students through co-curriculum provision. Put simply, institutions should strive to ensure that;

Wherever possible, the needs of students with a disability are met inclusively through mainstream services that enhance their independence as full members of the university rather than through separate services

*O’Connor, Watson, Power & Hartley (1998) Students with Disabilities: Code of Practice for Australian Tertiary Institutions*

This principle has important implications for how the roles and functioning of Disability Units are conceptualised within institutions and where they are located within the organisational organogram. These concerns are discussed further in Section 8. In the context of this discussion, however, what is important here is to consider what this means for the recruitment, selection and registration of students with disabilities (their entry into the institution) and their participation within the teaching and learning process, especially towards the achievement of the intended learning outcomes of the formal curriculum (their participation). This then draws attention to what is happening within the classroom and the extent to which students with disabilities are able to participate to their full potential in the processes of knowledge acquisition, sharing and production that happen here. There is increasing recognition that what happens in the classroom may be regarded as the most important concern for institutions towards ensuring that students with disabilities have fair chances to succeed in their studies and are able to benefit fully from what higher education has to offer. Below are the important issues for institution’s to consider towards facilitating the fair and equitable entry of students with disabilities into the institution and their participation within it.

## *The recruitment, selection and registration of students with disabilities*

* Taken the depth of the inequalities experienced by people with disabilities in accessing higher education in the past and the imperatives to increase access as part of the process of higher education transformation, institutions should actively seek to recruit qualifying students with disabilities and integrate this imperative into their enrolment planning.
* One of the most important barriers students with disabilities continue to experience in gaining entry into higher education emerges from perceptions within institutions about what they are believed to be able to do or not do and thus, what programmes they can be accepted into. While the selection of a student into a programme is always informed by a number of factors, the following are important to ensure that students with disabilities are not unfairly prevented from gaining entry into the programmes of their choice:
  + The criteria and procedures used for selecting students for a particular programme must always be relevant to the inherent requirements of the programme and should not unjustifiably disadvantage or restrict entry to students with disabilities. This means ensuring that programme requirements are informed by the learning outcomes that must be achieved, but which may allow for different learning methods towards their attainment.
  + Institutions should assess the academic competence and suitability of applicants with disabilities on the same grounds as those used for other applicants.
  + If after careful consideration there is a concern that an applicant with a disability may not be able to meet the requirements of a programme, the applicant should be given the opportunity to discuss the issues with the relevant personnel and explore alternative ways of meeting programme requirements.
* Institutions should ensure that all enrolment processes are fully accessible to students with disabilities at both the undergraduate and postgraduate levels. Important here is ensuring that students with disabilities are able to register without difficulty in their programmes and are able to access all necessary information about the requirements of their courses and the services in place to assist them (e.g. financial aid etc).
* Orientation and induction initiatives are recognised as important processes towards orientating students to the academic environment and building their confidence. All these initiatives should aim to facilitate the inclusion of students with disabilities so that they are made to feel part of the university community, rather than a separate group of students. Orientation initiatives, such as the traditional “orientation week” at most universities, also provide important opportunities to build awareness among the entire university community about disability and the value of diversity within the institution.

***Facilitating equitable opportunities for students with disabilities to succeed in their studies through inclusive teaching and learning environments***

An equitable learning environment is created by taking into consideration all aspects of the learning process: students, teaching staff, physical aspects of the environment, the curriculum, delivery strategies, assessment strategies and access to support services… Quality approaches to teaching and learning provide for flexibility while demanding intellectual rigour, academic excellence and competence in achievement for all students

*O’Connor, Watson, Power & Hartley (1998) Students with Disabilities: Code of Practice for Australian Tertiary Institutions*

## *Developing responsive teaching and learning practice*

* It has already been asserted that what happens in the classroom and thus the teaching and learning process may be regarded as the most important area of focus for institutions in their efforts to ensure that students with disabilities are able to gain ‘epistemological access’ to higher education and its benefits (Morrow, 1993).
* Recognising its importance in turn draws attention to teaching and learning practice and suggests that academic staff have a critical role to play in creating equitable opportunities for students with disabilities. Building their capacity to respond to the learning needs of all their students, including students with disabilities, must therefore form an integral part of all institutional efforts to improve and develop teaching and learning. There are a number of ways that institutions can develop such capacity:
  + Build a component on responsiveness to diversity and principles of universal design into induction programmes targeting new staff that is aimed at raising their awareness about the importance of the issue and provides insight into the full range of learning needs that they may be required to respond to in their teaching, including those of students with disabilities.
  + Develop modules and programmes on flexible teaching and learning practices and greater responsiveness to diversity, including disability, for inclusion into formal and informal staff development initiatives. Developing such input provides an important opportunity for institutions to collaborate towards the development of modules and programmes that can be used across the system.
  + Provide access for staff to specialist support where required to assist them in developing their capacity and building their awareness around the learning needs of students with disabilities and the possible implications of these for their practice.
* As already noted, there is increasing evidence emerging across the sector that where institutions or individual academics have made adjustments to teaching and learning practice or introduced particular accommodations to meet the learning needs of students with disabilities, these changes have demonstrated important benefits for other students as well, especially those from educationally disadvantaged backgrounds. Institutions are strongly encouraged to recognise the value that is added through improvements to teaching and learning that are aimed at responding to the needs of students with disabilities and to translate this value-add into mainstream institutional practice.

## *The provision of specific accommodations and additional support*

* In line with the understandings of “universal design” and “universal design for learning” noted above, it is important to recognise that for many students with disabilities some accommodations, including the provision of particular assistive devices and/or specialist support, will be required for them to be able to participate effectively in the learning process and access the curriculum.
* Institutions should recognise such provision as an integral part of their teaching and learning support system – that is, those mechanisms, processes and facilities designed to support the academic development of students. Once again, if the specific accommodations or specialist support required by the student cannot be provided without unjustifiable hardship to the institution, institutions are strongly encouraged to explore with the student what they may be reasonably able to offer and strive to reach a solution that will not result in the exclusion of the student.

## *Assessment, examination and progression*

* It is important that institutions also give attention to those policies, procedures and practices that facilitate the assessment of student learning. Once again these policies, practices and procedures should seek to ensure that they do not unfairly discriminate against students with disabilities in any way.
* Especially important here is ensuring that students with disabilities are given the same opportunities as other students to demonstrate the achievement of the required learning outcomes. But demonstrating the attainment of required learning outcomes does not necessarily mean always using the same methods of assessment or examination procedures used for other students. Facilitating equitable opportunities for students with disabilities to demonstrate their achievement of the required learning outcomes may mean; the use of alternative assessment methods where possible; the provision of adjustments to examination processes, such as additional time allowances; and the availability of examinations or the presentation of assessed work in alternative formats. The overarching concern for institutions should be flexibility without compromising the demonstration of the essential learning outcomes of the programme.

# The role and functioning of disability units

The two important sector-wide studies around disability in higher education that have been undertaken in South Africa over the last ten years[[7]](#footnote-7) have addressed at some length the role and functioning of those dedicated structures within institutions that deal with disability, most often called disability units. Both studies emphasise the differences that exist across the sector with regards to what is in place both in relation to their location within institutions, their role and functioning within institutions, and how they are resourced. Drawing from these two studies and from international insights where appropriate, it is important to recognise that no clear-cut model emerges that may be regarded as a blue print for what should or should not be in place within institutions – whether such structures should exist, where they should be located, what their role and functioning should be and how they should be resourced? As already suggested, there are innovations evident across the sector which challenge some of the more dominant perceptions around those factors that are most important for good practice to exist. These are all issues that institutions need to grapple with themselves within their own institutional contexts. With this understanding in mind, what follows is a brief overview of some broad pointers for institutions in their thinking around the most appropriate organisational arrangements for addressing disability most effectively:

* It is generally agreed that there is a role and place within higher education institutions for specialized disability units with dedicated staff and that these structures can be an important resource for institutions. Their role however should always be seen as an enabling one where they work to build the capacity all institutional functions to be able to respond effectively to the needs of students and staff with disabilities. They should not be seen as structures that are there to address the “problem” of disability within institutions by taking over core institutional functions that remain inaccessible to students and staff with disabilities.
* While these units have an important role to play within the institution towards raising awareness about disability and providing expert advice about issues of importance for both staff and students with disabilities, their role and functioning should always be seen as one primarily orientated towards the creation of equitable opportunities for students with disabilities to participate in the academic life of institutions and succeed in their studies.
* If this is recognised then these structures should always be seen as integral to the academic functioning of institutions and as such should be located within the institution so that they are able to support and influence the teaching and learning function, providing specialised support where necessary to students, advising around necessary learning accommodations and working with academic staff to facilitate flexible teaching and learning practices. This means, while institutions may have slightly different organisational arrangements for the management and delivery of the teaching and learning function, disability units should be seen as part of this function. Similarly, they should be positioned within institutions so that they have sufficient authority to influence practice and are able to participate in key institutional planning and decision-making processes.
* It is recognised that in a number of institutions the disability unit or specialist personal may not presently be directly located within the teaching and learning function. While these institutional arrangements may be appropriate for institutions at the present time, the units should still be seen as an integral part of the teaching and learning function of the institution. In a number of institutions this integration is happening through strong collaboration between the disability unit or personal and the structures directly responsible for teaching and learning. Such collaboration should be encouraged and strengthened.

# Monitoring and evaluation

Institutions should at all times ensure that their strategic intentions towards addressing disability, including building their capacity to effectively respond to the needs of students and staff with disabilities, form an integral part of the frameworks they use to monitor progress towards strategic goals and the effectiveness of organisational functioning. If disability is addressed holistically in the ways outlined in this document and the intention is to build inclusive higher education environments, then the evidence and data that is collected to inform monitoring and evaluation efforts must extend beyond quantitative statistics on the enrolment and throughput of students with disabilities. While such information is important, institutions should also aim to evaluate the impact and effectiveness of particular institutional initiatives and services and assess progress against strategic goals. An effective monitoring and evaluation tool to assist institutions in assessing their progress towards the development of more inclusive higher education environments would be a useful tool for the sector to consider developing.

developing.

**Appendix A: Legislative and Policy Framework**

**Overarching**

**United Nation’s Convention on the Rights of Persons with Disabilities and Optional Protocol (2006)**

* South Africa centrally involved in its development and formally signed both the Convention and the Optional Protocol in 2007.
* Enabling and comprehensive human rights framework protecting the rights of persons with disabilities with a strong emphasis on socio-economic rights. Outlines responsibilities of state parties towards ensuring that measures are put in place and conditions created for people with disabilities to fully enjoy these rights without discrimination (enabling and protective responsibilities).
* Reflects strong “paradigm shift’ in the way in which disability is understood, emphasising the evolving nature of the concept and stressing that disability results from the interaction between people with impairments and the society of which they are part. Has a comprehensive definition of “discrimination on the basis of disability”: It is defined as:

“any distinction, exclusion or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise, on an equal basis with others, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field. It includes all forms of discrimination, including denial of reasonable accommodation”.

* Article 24 deals with Education emphasising the realisation of this right without discrimination and the importance of building inclusive education systems. Section 5 of this article deals with post-school education and states:

State Parties shall ensure that persons with disabilities are able to access general tertiary education, vocational training, adult education and lifelong learning without discrimination and on an equal basis with others. To this end, State Parties shall ensure that reasonable accommodation is provided to persons with disabilities.

* Article 27 deals with Work and Employment and emphasises the right of people with disabilities to work on an equal basis with others within a “labour market and work environment that is open, inclusive and accessible to persons with disabilities”. The Article is comprehensive and addresses both issues related to conditions of employment and the broad scope of productive employment opportunities.
* The Optional Protocol allows individuals or groups of individuals from signatory States who feel that their rights have been violated in relation to the Convention to appeal to a Committee on the Rights of Persons with Disabilities set up by the UN for this purpose.

**Constitution of the Republic of South Africa (1996)**

* Section 9 of Chapter 2 of the Constitution (Bill of Rights) recognises that citizens may be directly or indirectly discriminated against on the basis of disability and thus outlaws discrimination on the basis of disability. This constitutional imperative has important implications for South Africa’s legislative framework which is subject to the Constitution.
* In taking cognisance of our history and the nature of existing inequalities Section 9.3 recognises that some groups of people have been historically disadvantaged and thus should benefit from measures specifically designed to redress these inequalities. People with disabilities are recognised as having been historically disadvantaged and thus should be targeted through redress measures.
* Some provision is made in Section 36 of Chapter 2 for the limiting of rights but stresses that this may only happen where “the limitation is reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom” and a range of relevant factors have been considered which includes exploring less restrictive means than limiting a person’s fundamental rights.

**Promotion of Equality and Prevention of Unfair Discrimination Act (Act 4 of 2000**

* Recognises disability, together with race and gender as an important basis for discrimination in South Africa and includes a specific section, Section 9 dealing with the “Prohibition of unfair discrimination on ground of disability”.
* Also includes in Section 28 special measures designed to “promote equality with regard to race, gender and disability” and places “a duty and responsibility” on “the state, institutions performing public functions and all persons to eliminate discrimination and promote equality on the basis of disability”.
* A schedule is attached to the Act with an “illustrative list of unfair practices in certain sectors”. Included in this is the education sector where among other practices, failing to “reasonably and practically accommodate diversity in education”.

**White Paper on an Integrated National Disability Strategy (1997)**

* Enabling framework to guide government policy and implementation across all sectors towards the creation of equitable opportunities for people with disabilities in South Africa. Argues strongly for disability to be recognised as a key part of South Africa’s post-apartheid reconstruction and development and thus integrated into all aspects of planning at national, provincial and local level.
* Emphasises the importance of the self-representation of people with disabilities in all processes of decision making that affect them in any way.

**National Building Regulations and Building Standards Act (No 103 of 1977)**

* Part S of the Act is entitled “Facilities for persons with disabilities. This is supported by a specific South African National Standard (SANS 10400-S: 2011) (published in April 2011) that provides detailed standards regarding the built environment and its accessibility for people with disabilities .
* These standards have important implications for institutions and their campus environments, especially for new infrastructural development projects.

**Employment**

**Employment Equity Act (EEA) (Act 55 of 1998 as amended)**

* Provides for the implementation of particular measures to redress inequalities in the national labour market resulting from the historical discrimination of particular groups of people.
* People with disabilities are recognised together with black people and women as having experienced such discrimination in the labour market and are therefore recognised as a ‘designated group’.
* Aims to promote equal opportunities and fair treatment in the workplace by eliminating unfair discrimination and implementing affirmative action measures to redress the historical disadvantage of designated groups.
* Designated employers in the Act (includes HEIs) are obliged under the Act to undertake various responsibilities including the development of employment equity plans and to report on progress against these.

**Code of Good Practice: Key aspects on the employment of people with disabilities (2002)**

**(linked to Employment Equity Act)**

* Comprehensive set of guidelines aimed at assisting employers in the promotion of equal opportunities and the elimination of unfair discrimination of people with disabilities and thus to support the meeting of their obligations under the EEA.
* Provides comprehensive definition of people with disabilities for the purposes of the Act.
* Gives guidance on workplace issues affecting people with disabilities such as reasonable accommodation and outlines non-discriminatory practices that should be used at different stages of the employment process, towards equitable conditions of employment and towards the building of inclusive workplaces where diversity is valued and respected.

**Higher Education**

**White Paper 3: A Programme for Higher Education Transformation (WP3) (1997)**

* People with disabilities recognised as having been historically disadvantaged in gaining access to higher education.
* Indicates a commitment to increase access to higher education for “black, women, disabled and mature students” as part of broader imperative towards increasing and broadening participation.
* Outlines principle of equity in higher education, indicating that it is both about having fair chances to enter higher education and to succeed and indicates that the principle involves removing any policies, structures and practices that discriminate, including on the basis of disability.
* Draws attention to curriculum and argues for “flexible models of learning and teaching, including modes of delivery, to accommodate a larger and more diverse student population”.

**National Plan for Higher Education (2001)**

* As operational framework for taking forward imperatives of WP3 recognises students with disabilities has having been historically disadvantaged in gaining access to higher education and commits government to increasing access to higher education for these students.
* Argues that this imperative is not just about historical redress about also about broadening the social base of students in higher education by including “non-traditional” students. Students with disabilities are identified as being part of this group.
* Says that institutions are expected in their institutional plans to indicate the strategies and steps that they intend to take to increase the enrolment of “non-traditional” students.

**White Paper 6: Special Needs Education: Building an Inclusive Education and Training System (2001).**

* Strongly focused on schooling system but broad imperatives are emphasised as important for higher education as well.
* Argues that historically many learners experienced “barriers to learning” and were effectively excluded from educational provision because the education system failed to “accommodate their learning needs”.
* Learners with disabilities recognised as having been most vulnerable in experiencing barriers to learning.
* Emphasises the importance of systemic change to provide for an education system able to accommodate the “broad range of learning needs (that exist) among the learner population at any point in time”.
* Suggests that because of the high costs involved some types of support facilities may need to be organised on a regional basis (does NOT suggest that institutions cater for particular types of disabilities but rather that support facilities may need to be shared as a way forward).

**White Paper for Post-School Education and Training (2013)**

* Chapter 6 deals with “Addressing Disability” across the post-school system
* Recognises that while strong policy and legislative framework in place “access and support for people with disabilities remains limited” and recognises existing inequalities across the system that contribute to challenges
* Outlines some of the key challenges experienced by people with disabilities, especially students with disabilities in gaining access to post-school provision and having equitable opportunities to succeed.
* Commits government to develop of strategic policy framework on disability “to guide improvement of access to and success in post-school education” which will include “norms and standards for the integration of students and staff with disabilities into all aspects of university or college life”.
* Incorrectly suggests that WP6 calls for “institutions in a region specialise in particular disabilities” but recognises that “this is restrictive in terms of access” (See above).

**Appendix B: Summary of key roles and responsibilities**

## Department of Higher Education and Training (DHET)

* Position disability as an integral part of the development and transformation of the public higher education system in South Africa.
* Facilitate and support the translation of South Africa’s enabling policy and legislative framework around disability into meaningful practice within higher education
* Provide sustainable funding support to institutions to build their capacity to address disability within their institutions. It is recommended that the present specification within the infrastructure development funding to support the development of universal access across campuses is retained and that disability is similarly included as an ongoing area of focus within the Teaching Development Grant. The latter should be used to support the building of inclusive teaching and learning environments through strategies such as staff development etc.

## Council on Higher Education (CHE)

* Position disability as an integral part of the quality assurance system for higher education institutions.
* Give particular attention to facilitating and supporting the development across institutions of inclusive teaching and learning environments and building capacity within teaching and learning to respond to greater diversity. Especially important here is ensuring that responsiveness to diversity and meeting the needs of students with disabilities is integrated into the Quality Enhancement Project (QEP).
* Undertake appropriate research where necessary to support the above efforts and to build good practice across the sector.

## Universities SA

* Build awareness and understanding among university leadership of the importance of addressing disability in higher education and of their leadership responsibilities in this regard. This should include building understanding of the value that is added to institutions through efforts to respond to greater diversity and what is required from different leadership functions within institutions.
* Continue to position disability as an important part of the transformation of higher education institutions and facilitate collaborative relationships and initiatives to strengthen institutional efforts and build greater capacity across the sector as a whole.

## National Student Financial Aid Scheme (NSFAS)

* Ensure that the provision of financial aid to students with disabilities in need remains a sustainable area of focus within the scheme and that efforts are made to expand the resource base for bursary support.
* Ensure that the bursary scheme is appropriately designed so that it provides holistic funding provision for students with disabilities and enables them to participate actively and confidently in their academic studies.
* Develop the capacity within NSFAS to ensure that all decision making processes around funding support to students with disabilities is informed by specialist knowledge around disability, including from students with disabilities themselves.

## Higher Education Institutions (HEIs)

* Integrate the imperative towards the creation of equitable opportunities for staff and students within disability into all strategic planning efforts so that addressing disability is positioned and understood as an important part of an institution’s strategic intentions and associated planning processes.
* Ensure that these strategic intentions are properly resourced and that funding is specifically allocated to drive them.
* Develop capacity within all core functions and professional services across the institution to respond to greater diversity among staff and students and, in particular, to meet the needs of students and staff with disabilities. Recognise in particular the primacy of the teaching and learning function in the creation of equitable opportunities for students with disabilities to succeed in their studies.
* Collaborate with other HEIs and relevant external structures to strengthen institutional efforts and build good practice across the sector.
* Within the institution establish and support collaborative relationships to address disability, particularly towards overcoming traditional institutional boundaries.

## Higher Education Disability Services Association (HEDSA)

* Provide a professional network and community of practice for staff working in the broad area of disability services within HEIs.
* Support the professional development of staff working in this area and build the professional base across the sector.
* Provide a resource to government and HEIs, particularly through specialised advice, advocacy and assisting institutions to build their capacity in this area.
* Establish and sustain links with similar networks in other countries, especially across the African continent and harness the value of such networks for the sector as a whole.
* Facilitate the sharing of good practice across the sector on an ongoing basis and through specific collaborative initiatives such as conferences, workshops etc.

## Students with disabilities

* Take full and personal responsibility for your academic studies and actively seek to maximise the benefits of successful higher education study.
* Work in collaboration with appropriate university structures and personnel to establish your support and accommodation needs and assist the institution to find reasonable and viable solutions that will enable you to participate actively in class and manage your studies effectively.
* Positively raise awareness about disability within your institutions through active participation in student governance structures and through the different co-curriculum activities your university has to offer, such as clubs and societies, sports, residence activities etc.
* Provide support to other students with disabilities where such support is needed and recognise your value as a mentor and guide for other students and towards building inclusive higher education environments.

**Appendix C: Some useful resources**

## South Africa

Council on Higher Education (2005). South African higher education responses to students with disabilities: equity of access and opportunity? *Higher Education Monitor*, no 3, September 2005. Pretoria: CHE.

Available: <http://www.che.ac.za>

FOTIM (2011). Disability in Higher Education. Project Report. Johannesburg. FOTIM.

Available: <http://www.hedsa.org.za>

Higher Education Disability Services Association (HEDSA) http://[www.hedsa.org.za](http://www.hedsa.org.za)

Department of Labour (2002) *Employment Equity Act: Code Good Practice: Key aspects on the employment of people with disabilities.*

<http://www.labour.gov.za/DOL/downloads/legislation/Codes>

Office of the Deputy President, (1997). *White Paper on an Integrated National Disability Strategy*. Pretoria: Government Printer.

<http://www.gov.za/documents/integrated-national-disability-strategy-white-paper>

*National Building Regulations and Building Standards Act (No 103 of 1977)*

Part S : “Facilities for persons with disabilities. (SANS 10400-S: 2011) (published in April 2011)

<http://www.jica.go.jp/southafrica/english/activities/c8h0vm00005sup5w-att/activities01_02.pdf>

## International

United Nations Convention on the Rights of Persons with Disabilities and Optional Protocol (2006)

<http://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>

Association for Higher Education Access & Disability (AHEAD) (Ireland)

<http://www.ahead.ie>

Association on Higher Education and Disability (AHEAD) (USA)

<http://www.ahead.org>

Australian Disability Clearing House on Education and Training.

http:// <http://www.adcet.edu.au>

Australian Vice-Chancellor’s Committee (2006). AVCC Guidelines relating to Students with a Disability.

http://www.utas.edu.au/\_\_data/assets/pdf\_file/0007/118969/avcc\_disability\_guidelines.pdf

Indian Institute of Management Bangalore (IIMB) & Fourth Wave Foundation (2011). Enabling Access for Persons with Disabilities to Higher Education and the Workplace: Role of ICT and Assistive Technologies.

<http://www.g3ict.org/download/p/fileId_883/productId_198>

National Educational Association of Disabled Students (NEADS) Canada

<Http://neads.ca>

The Quality Assurance Agency for Higher Education(1999) (United Kingdom). *Code of practice for the assurance of academic quality and standards in higher education.* Section 3: Disabled students (updated version Feb 2010)

<http://www.dds.qmul.ac.uk/documents/80826.pdf>

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2. Department of Higher Education and Training (2013). White Paper for Post-School Education and Training. Government Printer: Pretoria. [↑](#footnote-ref-2)
3. Department of Higher Education and Training (20130. Report of the Ministerial Committee for the Review of the Funding of Universities. DHET: Pretoria. [↑](#footnote-ref-3)
4. See list of resources in Appendix C. [↑](#footnote-ref-4)
5. Morrow, W. (1993). Epistemological access in the university. *AD Issues*, 1(1) [↑](#footnote-ref-5)
6. Ndebele, N (2007). Leadership Challenges. In Ndebele (2007). Fine Lines from the Box: further thoughts about our country. Roggebaai: Umuzi. [↑](#footnote-ref-6)
7. See CHE, 2005 & FOTIM, 2011 [↑](#footnote-ref-7)