

# Inclusive Campus: Accommodation and Social Space

## Guidance 2008



Equality Challenge Unit supports the higher education sector in its mission to realise the potential of all staff and students whatever their race, gender, disability, sexual orientation, religion and belief or age, to the benefit of those individuals, higher education institutions and society.

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# Equality Challenge Unit

## Inclusive Campus: Accommodation and Social Space

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# 1 Introduction

## 1.1 Purpose of guidance

*'We shape our buildings, and afterwards our buildings shape us'*

Winston Churchill, House of Commons (meeting in the House of Lords), 28 October 1943

This guidance aims to encourage and promote an inclusive approach to the provision of accommodation and social space in the higher education sector. It has been developed to support the provision of a positive, safe, accessible, welcoming environment for all students, whatever their age, disability, race, religion and belief, gender or sexual orientation.

Equality Challenge Unit (ECU) has worked closely with professional groups connected to residential services and estates management to produce this guidance. It is intended to be useful to managers and staff connected to providing residential services, wardens and housekeepers, student unions, and others with an interest in equality and diversity issues in relation to accommodation and social space on campus.

The need for this guidance was indicated through information received by ECU in workshops and through discussions with national disability organisations about students' experiences in higher education. These sources confirmed that there are still discriminatory barriers for different groups of students entering and progressing through higher education, caused by physically and socially inaccessible and inappropriate environments. In particular, concerns were raised about the provision of accommodation and associated social spaces for students with mental illness, physical impairments, mature students, and very young students. Students with dependent family members, and observers of some religious and cultural practices, were also cited as not being well catered for.

This study has clarified that, although there are many examples of excellent inclusive practice of accommodation and social space in higher education institutions (HEIs), more needs to be done to ensure that equality issues are consistently embedded in all policy and practices related to accommodation and social space across the sector. To assist the process, this guidance provides an outline of existing equality legislation and the background context for current and future residential provision. It also focuses on issues that can affect certain groups, and provides practical examples of strategies for eliminating discriminatory practices that have been suggested by the sector. It does not attempt to provide detailed design guidance, which can be found elsewhere (see Section 6, page 35), but focuses on equality principles that should inform policies and practices.

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This guidance is intended to be timely – considerable expansion and renovation are planned for many higher education sector estates, which may affect the way accommodation and social space is provided. To prevent opportunities being wasted, it is vital that equality considerations are included from the outset. In addition, the development of student accommodation, both on and off campus, is increasingly being provided by private or independent organisations. Potentially, this could have a detrimental impact on student welfare and equality and diversity issues if safeguards are not put in place. This guide is therefore also intended to promote how partnerships with external providers can ensure inclusive environments and that equality and diversity issues are embedded within their agreements.

### *Project methodology*

ECU has developed this guidance in collaboration with professional bodies including the Association for Student Residential Accommodation (**ASRA**), Association for University Directors of Estates (**AUDE**), and frontline staff and users of residential and social space in higher education. The objectives of this guidance are to:

- = identify current legal and social issues connected to providing accommodation and social space to meet diverse requirements
- = identify inclusive and positive initiatives and principles that promote equality and diversity
- = consider how inclusive practices for future developments for accommodation and social space could be supported.

As part of the research for this project, in-depth interviews, site visits and a small-scale survey seeking information about current practices and equality issues were carried out during March and July 2007. Student accommodation managers and estate directors with a remit for residential accommodation and social spaces were involved in this investigation. Other information was gathered through enquiries received by ECU, at workshops and seminar groups, and through discussions with professional bodies and national disability organisations. The findings and recommendations are based on these sources, along with evidence from literature reviews and web searches.

### **1.2 Legislation**

All staff associated with providing accommodation and social space in higher education must comply with equality legislation and embed equality into all their policies and practices through mechanisms such as equality impact assessments (see page 23). Universities are also likely to have their own in-house policies in connection with estates development that support equality and diversity, which

will need to be complied with. Registered Social Landlords, such as housing associations supplying student accommodation, should also have well developed equalities policies through working under the regulation of the Housing Corporation.

Currently, the domestic legislative framework applicable to services, facilities and accommodation provision in the higher education sector comprises a number of separate pieces of legislation enacted over the past 40 years to protect people against discrimination and to promote equality. Unlike legislation concerning gender, sexuality, race, age and religious belief, which protects everyone regardless of their particular characteristics, the disability legislation covers only people who are disabled within the meaning of this legislation.

The Equality Act of 2006 established the Equality and Human Rights Commission (**EHRC**), which started work on 1 October 2007. It has replaced the existing commissions (the Disability Rights Commission, Equal Opportunities Commission and Commission for Racial Equality). As well as undertaking work in these areas, it also has the remit for discrimination on the grounds of age, sexual orientation and religion and belief.

With a view to simplifying the legal framework, the Government has consulted on a Discrimination Law Review, which is intended to inform a Single Equality Bill. The Government is committed to there being no regression of rights overall, so that the protection offered by the current legislation should be maintained.

### **Disability: Disability Discrimination Act 1995 as amended (DDA)**

#### *Discrimination against individuals*

This Act prohibits discrimination against disabled people, that is, people who have, or have had, a physical or mental impairment that has a substantial long-term adverse effect on their ability to carry out normal day-to-day activities (**section 1(1) of the DDA** as amended).

A mental impairment no longer has to be clinically well recognised. The day-to-day activities are:

- = mobility
- = manual dexterity
- = physical coordination
- = continence
- = ability to lift, carry or otherwise move everyday objects
- = speech, hearing and eyesight
- = memory or ability to concentrate, learn or understand

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= perception of the risk of physical danger.

Some conditions are automatically covered:

= severe disfigurements

= impairments that are controlled or corrected by the use of medication, prostheses, an aid or otherwise

= progressive symptomatic conditions

= HIV, cancer and multiple sclerosis at the point of diagnosis.

**Part 4 of the DDA** offers protection to prospective and existing disabled students. Various aspects of university life are covered, including residential accommodation and accommodation-finding services. There are four possible ways in which a university can discriminate against a disabled student, as follows.

- = Direct discrimination – treating a student less favourably on the grounds of their disability.
- = Treating a disabled student less favourably for a reason relating to their disability, without justification (known as disability-related discrimination).
- = Failing to make reasonable adjustments (such as providing an auxiliary aid or service) where a provision, criterion or practice (covering all aspects of student life, including residential accommodation) or a physical feature of any of their premises puts disabled students at a substantial disadvantage compared with their non-disabled peers – known as the ‘reasonable adjustment duty’.
- = Victimisation (which protects anyone, not just a disabled person).

In addition, disability-related harassment is prohibited.

The reasonable adjustment duty is of most relevance to providers of residential accommodation. It is an anticipatory and continuing duty, so education providers should plan to meet the needs of disabled students, make the adjustments that may be required, and periodically review their policies and provision. If an individual student has told someone in confidence about their disability, this may have a bearing on the way in which a reasonable adjustment can be made, or whether one can be made at all.

When considering what adjustments to make, the Disability Rights Commission’s **Post 16 Code of Practice** lists certain factors for education providers to take into account, including the effectiveness of the step in preventing the disadvantage, the type of service being provided, the nature of the institution or service and its size and resources, and the practicability of the adjustment. The Code advises that the effectiveness and practicability of a particular adjustment should be looked at first, then the financial aspects.

Where a university occupies premises under a lease, it may need to obtain consent for making reasonable adjustments. The duty to make reasonable adjustments remains even if consent is not given for altering a physical feature. It will be the university, rather than the landlord, that needs to make the adjustments; the university has to seek the necessary consents from the landlord (as well as other statutory consents, such as planning permission, etc.), by applying in writing. (Universities should make it clear when requesting consent to alterations that they are doing so to comply with the reasonable adjustment duty under Part 4 of the DDA, and should attach plans and specifications of proposed works).

The guidance states that universities should anticipate the need to obtain such consents and allow sufficient time to obtain them. It is necessary to look at the specific circumstances of the case to determine whether a landlord's (or superior landlord's) consent to making adjustments is being reasonably or unreasonably withheld. Pursuant to the **Disability (Educational Institutions) (Alteration of Leasehold Premises) Regulations 2005** (SI 2005/1070), if the lease requires the landlord to give consent to an alteration such as a reasonable adjustment that the university is requesting, and the landlord does not do so, the landlord will be deemed to have unreasonably withheld consent.

However, these regulations do allow a landlord to reasonably withhold consent to the making of alterations in certain situations, such as where the landlord has to obtain consent from others and that consent has not been given, or where the landlord/superior landlord does not know, and could not reasonably have been expected to know, that the university is proposing the alteration to comply with its duty to make reasonable adjustments under Part 4 of the DDA.

Consent can be given subject to certain conditions, such as an obligation to obtain other appropriate consents (e.g. planning permission), and allowing the landlord/superior landlord to inspect the work before and/or after it has been completed.

If the terms of the lease prevent the university from altering premises, if the alteration is one that the university wants to make to comply with the reasonable adjustment duty under Part 4 of the DDA, the DDA will override the terms of the lease and entitle the university to make the alteration, provided all the necessary consents are obtained.

If consent is unreasonably withheld, or if the landlord fails to reply to an application for consent within 42 days of receiving the university's application (there are additional time limits if a superior landlord is involved), or attaches conditions to their consent, the education provider (as well as a disabled person affected by the application) may make a claim against the landlord in the County Court (England and Wales) or in the Sheriff Court (Scotland) pursuant to **Schedule 4 (11) 6 (1A) of the DDA**.

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The court will decide whether the landlord's refusal or any conditions imposed are unreasonable, and can authorise (with or without conditions) the education provider to make the alteration under a court order. In addition, if a disabled student brings proceedings against the university under Part 4, in relation to a failure to make a reasonable adjustment in leasehold premises, either the disabled student or the university can join the landlord as a party to these proceedings prior to the hearing of the claim. The **Post 16 Code of Practice, Chapter 12**, advises a university to consider bringing an application for a declaration that a landlord has unreasonably withheld consent, to avoid the risk of having no defence to a Part 4 claim, as described above.

Universities are responsible for the acts of their employees, although they may have a defence if they can show that they have taken reasonably practicable steps to prevent discriminatory acts, such as providing staff training and developing disability policies. Universities are also responsible for the acts of their agents, provided they are done with their express or implied authority (see Section 2.3, page 15).

Separately, Part 3 of the Act covers the provision of goods, facilities and services, and will cover the use of residential accommodation in universities by non-students, such as disabled people attending conferences. There is a similar duty to make reasonable adjustments under this part of the Act.

Part 3 of the Act also makes it unlawful to discriminate against a disabled person, both by way of disability-related discrimination and by failing to make reasonable adjustments in relation to the letting and management of most types of property. However, here the reasonable adjustments duty arises only when an adjustment is requested; it is not anticipatory. It covers providing, in certain circumstances, auxiliary aids and services, changing policies, practices and procedures and changing a term of the letting, but does not require a removal or alteration of a physical feature.

More information is contained in the **Part 3 Code of Practice**.

### *Systemic discrimination*

The DDA 2005 introduced a Disability Equality Duty on public bodies including universities (other than private ones), with the aim of building non-discriminatory services rather than putting the onus on individuals to enforce their rights. The provision of residential accommodation also needs to be considered in the light of this new approach.

Since 5 December 2006, universities have been under a General Equality Duty to have due regard to the need to:

- = eliminate discrimination that is unlawful under the act
- = eliminate harassment of disabled people that is related to their disabilities
- = promote equality of opportunity between disabled persons and other persons
- = take steps to take account of disabled persons' disabilities, even where that involves treating disabled person more favourably than other persons
- = promote positive attitudes towards disabled persons
- = encourage participation by disabled persons in public life.

In addition, universities are also subject to a Specific Equality Duty under which, since 4 December 2006, they must have in place a Disability Equality Scheme (DES) setting out how they intend to eliminate unlawful discrimination and harassment of disabled people and promote equality of opportunity. They must involve disabled people in the development of the DES. Within three years of publication of their DES, universities must take the actions to which they have committed, unless it is unreasonable or impracticable to do so.

### **Age: Employment Equality (Age) Regulations 2006**

These regulations protect people against discrimination on the grounds of age, but only in the workplace and in vocational training. Universities are covered by this legislation in relation to admissions, exclusions and access to benefits, including residential accommodation.

Under the regulations, it is unlawful to discriminate against someone by treating them unfavourably because of their age, without justification, or to harass or victimise them because of their age.

### **Race: Race Relations Act 1976**

**Statutory codes of practice** are available online.

#### *Discrimination against individuals*

This Act prohibits discrimination on racial grounds (which include race, colour, nationality or ethnic or national origins) in most areas, including employment, provision of goods, facilities and services, and provision of education.

Discrimination can be direct or indirect (in respect of which discrimination on the grounds of colour or nationality is treated differently from discrimination on the grounds of race or ethnic or national origins), or may amount to victimisation or harassment (the latter only in relation to race or ethnic or national origins).

#### *Systemic discrimination*

As with disability, there is a Race Equality Duty on public authorities, including universities, to promote race equality, which was introduced by the **Race Relations**

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### **(Amendment) Act 2000.**

Under the general duty, when carrying out their functions, public authorities must have due regard to the need to:

- = eliminate unlawful discrimination
- = promote equality of opportunity and good relations between persons of different racial groups.

Some public authorities, including universities, are subject to a specific duty. Universities have had to publish a race equality policy, the deadline in England and Wales being 31 May 2002. Such policies should set out how the university intends to prevent racial discrimination, promote equality of opportunity, and promote good relations across all areas of its activity, including residential accommodation.

### **Religion and Belief: Equality Act 2006**

Under Part 2 of the Equality Act 2006, which came into force on 30 April 2007, it is now, with some exceptions, unlawful to discriminate against someone on the grounds of religion or belief (or because someone has no religion or belief) in relation to the provision of goods, facilities and services, education, the using and disposing of premises, and in the exercise of public functions. The **Employment Equality (Religion or Belief) Regulations 2003** introduced this protection for the workplace and vocational training.

### **Gender: Sex Discrimination Act 1975** as amended

A **statutory code of practice and guidance** are available online.

#### *Discrimination against individuals*

This Act prohibits discrimination and harassment on the grounds of a person's gender by employers, providers of workplace training, education providers (although school are not covered by the harassment duty), and providers of goods, facilities and services. People are also protected from discrimination on the grounds of gender reassignment, but only in the workplace and when undertaking vocational training.

In the context of education, it is unlawful for a university to harass or discriminate directly or indirectly against students/prospective students on the grounds of gender in terms of admissions, exclusions, and the way in which the university provides any benefits, facilities or services, including residential accommodation.

The **Employment Equality (Sexual Orientation) Regulations 2003** introduced protection from discrimination and harassment on the grounds of sexual orientation in the workplace and in vocational training. The **Equality Act (Sexual Orientation) Regulations 2007** extend this protection to students and those seeking access to goods, facilities and services.

### *Systemic discrimination*

The Equality Act 2006 introduced the Gender Equality Duty (GED) on public authorities, including universities (other than private ones), to place responsibility on public authorities to act strategically in their thinking about gender equality rather than awaiting individual challenges to bad practice. This duty was extended to transsexual service users in December 2007.

The provision of residential accommodation also needs to be considered in light of this new approach.

Like the Race and Disability Equality Duties, the GED has two elements, the general and the specific duty, and universities are subject to both.

The general duty came into force in April 2007 and requires public authorities, including universities, to have due regard to the need to:

- = eliminate unlawful discrimination and harassment on the grounds of sex
- = promote equality of opportunity between women and men.

In addition, universities are subject to the specific equality duty. The duties are different for England, Wales and Scotland. In England, public authorities were required to publish a Gender Equality Scheme by 30 April 2007, setting out how they will meet their general and specific duties, and detailing their general equality objectives. The actions set out in the scheme must be implemented within three years unless it is unreasonable or impracticable to do so.

### *Planning regulations*

Local authority planning regulations have to be consulted for any changes to estates, and these will vary across the country. Local planning strategies will be bound by equalities legislation and guidance, and will insist on access, sustainability and multicultural requirements being adhered to.

Many local authorities welcome working with universities to extend facilities, and some universities, such as the University of Worcester, are developing with their local councils shared facilities such as library and arts facilities and social spaces for the use of students and local people.

### *Housing Act 2004*

The **Housing Act 2004** introduced licensing of houses in multiple occupation to ensure certain standards are met, but HEIs are exempted from licensing provided they sign up to one of the codes of practice approved by Parliament in April 2006 (see next paragraph). Registered Social Landlords and housing associations are also exempted from this regulation if they comply with the codes.

### *Codes of practice*

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There are currently three codes of practice approved by Parliament in April 2006, intended to assist anyone involved in the management of student accommodation:

- = **Universities UK Code of Practice for University Managed Student Accommodation**
- = **Accreditation Network UK (ANUK) Code of Standards for Larger Developments for student accommodation managed and controlled by educational establishments**
- = **ANUK Code of Standards for Larger Developments for student accommodation not managed and controlled by educational establishments**

These codes cover issues such as the amenities that should be available to students, health and safety, maintenance and repair, and relationships between managers and student tenants. They are also intended to assist students in understanding both the standards and procedures applying to their accommodation, and their obligations as tenants or licensees.

These codes are voluntary, but they have been widely adopted, and many HEIs will not appoint providers who are not signed up to one of the codes. If providers do not sign up to the codes, they will be liable for licensing under Houses in Multiple Occupation. Convergence of the three current codes will be considered after three operational years.

The codes assume compliance with equalities legislation and other statutory requirements, and also require that student representatives are fully involved in review, complaints and other procedures integral to administration of the codes.

Terence Treadwell (ASRA) reported that there had been relatively good compliance with the codes in new-build accommodation in the sector, but that there was much more difficulty with compliance in old buildings, which would take time and resources to resolve. Many institutions had action plans and had set priorities to bring older buildings in line with the codes or to demolish and replace the accommodation.

### **1.3 The social and business case**

Aside from the need to conform to legislative requirements, there are strong social and business arguments for investing in an inclusive campus environment. The quality of the environment can do more than cater for needs, it can encourage forms of social interaction and enrich the whole student experience. There is also a socio-economic advantage for people, whatever their race, disability or sexual orientation, to be educated to achieve their full potential and bring higher skills and knowledge to the workplace. Providing quality and accessible accommodation for a wide range of people contributes to the widening participation process.

Forward planning to create an inclusive environment can also minimise the number of individual adjustments that need to be made, saving time and money in the long term.

The quality of an institution's physical facilities is increasingly regarded as an important marketing asset. The majority of students are now paying for their education as well as their accommodation, and have increasingly higher expectations around lifestyle.

## 2 Residential development

### 2.1 National context

Enrolments in HEIs increased by 33% in the 10-year period from 1996/97 to 2005/06 (Ramsden, 2007). Some of these increases arose as a result of Government pressure to increase student numbers among under-30s towards a 50% participation rate. However, the greatest recent increases have been at postgraduate level and in part-time undergraduate enrolments.

According to the recent Universities UK report (Ramsden, 2007), student populations are becoming increasingly diverse, with higher proportions of mature students and students from ethnic minority and lower socio-economic groups. In 2007, UCAS has seen an increase in acceptances from applicants domiciled in the Far East, with China up 12.4%, Malaysia 14.1% and Hong Kong 7.6%. Acceptances from applicants domiciled in the 'new' EU member countries have increased by 31.7%, with acceptances from Cyprus up 27.4% and from Poland 26.7%. The number of institutions with large numbers of students from outside the UK has grown significantly, and there are now 14 institutions with more than 5000 students from outside the UK. Female students are in the majority at all modes and levels, except among full-time postgraduate students, who are dominated by non-UK students, where they approach parity (Ramsden, 2007). In terms of the total population, UCAS reported that by September 2007 almost 31,000 students had secured a place through the clearing system, up 1.2% on the same point last year, and up 4.3% on 2005. The current cycle has seen 393,595 accepted applicants placed so far this year, up 5.8% on the same point last year.

The numbers of students from different groups vary between institutions, and it is clear that the campus environment and services on offer can attract or deter certain groups. For example, some campuses have mainly single-storey buildings and supportive equality and diversity officers, which will draw some disabled students. Students are often attracted to an institution if other students with similar backgrounds or experiences report favourable experiences.

There are also large variations in the numbers of black and minority ethnic students in institutions. This appears to have more to do with geography than type of institution, with 17 out of 20 institutions with the highest percentages of black and minority ethnic students being in London (Ramsden, 2007). But overall, minority ethnic groups, with the exception of students from Chinese backgrounds, are more likely to be at 'new' institutions. For example, there are more students of black Caribbean origin at London Metropolitan University than at all the Russell Group universities put together (Sims, 2007).

The latest figures estimate that 23% of full-time students live either in halls of residence provided by the university, or in purpose-built accommodation from corporate providers. About 22% of students live with their parents, 45% of full-time students rent privately, and 10% own their own homes or are purchasing with a mortgage (NUS/UNIPOL, 2007). In 2007–08, the provision of bed spaces is expected to increase by 3%. Of these, 55% will be supplied directly through private providers, 27% through university- or college-managed allocations, and 18% through nomination arrangements, in which institutions work with private companies, often major national companies, to construct and manage student complexes and provide the institution with an allocated number of rooms.

Although it is difficult to predict future student populations, in the short-to-medium term it is not expected that any institution is likely to experience a significant reduction in overall space needs (Institute of Education, 2006, p. 4). However, in the medium-to-longer term, for estates planning purposes the impact of widening participation, distance learning, e-learning and self-directed learning could decrease demand for accommodation. There is some speculation about whether the traditional campus will become a decreasing part of a 'total virtual estate' as HEIs become more embedded in a range of other public and private institutions.

Meanwhile, for accommodation provision to work effectively for all students, a shared vision to promote an inclusive approach needs to be developed between the various functional areas and organisations that provide services to students. Good communication between estates development and information about student requirements and trends that is held by residential services need to be in place, and preferably sound partnership agreements that address equality and diversity issues should be made with private companies supplying accommodation.

At the University of Worcester, staff from Estates, Student Accommodation, Security, Cleaning, Grounds and Campus Services are all part of a Facilities Team in a single department under one director. This team holds monthly meetings of senior staff, allowing them to share information about student welfare issues and to progress work to improve experiences in a coordinated manner.

Many HEIs are rationalising their stock of accommodation and social environments by demolishing older buildings and replacing them with new ones. In newer buildings, the trend is to provide high-level amenities such as en suite rooms, broadband internet and overnight security with full reception facilities. Adjacent

## Residential development

social amenities can include fitness centres and even swimming pools. In terms of affordability, the question is how these additional facilities are funded – whether costs are reflected in an inclusive rent or as additional charges.

A crucial equality question is whether all students will have access to newer accommodation and amenities, or whether they are only likely to be available for certain groups and better-off students. For example, en suite facilities currently cost, on average, 27–28% more than non-en suite accommodation. So university accommodation providers may need to ask the question, in terms of appropriate allocation of resources, as to whether to provide students with flashier fittings in keeping with some of the new private providers, or cheaper accommodation with good provision of practical comforts such as laundry or storage facilities.

Few HEIs now appear to offer staff accommodation either on or off campus. Some offer accommodation on campus for visiting lecturers, but institutions often find this is hard to cater for because it is intermittent. However, many HEIs accommodate senior students or postgraduates in halls of residence and pay them, for a set number of hours per week, as wardens.

Senior students are usually allocated a room in one of the sites operating the scheme. Sometimes they may be placed with other senior students, but more often they are scattered among the residences and may have to assist at other halls of residence nearby.

### 2.2 Impact of private contractors

Most reports received by ECU indicate that private provision of student accommodation is likely to expand. It is anticipated that by 2010, private providers and public–private sector partnerships will account for 50% of what are now thought of as ‘university halls of residence’. **Unite**, a private company and one of the largest private sector providers, now has 30,000 bed spaces all over the country.

Private student accommodation can be provided on campus or in the local area. There are many different patterns of provision. For example, in Coventry the campus is hemmed in by the town centre, so accommodation is provided on large out-of-town sites, whereas in Reading accommodation has developed on campus.

For an HEI, a major positive element of private providers is that there is no financial impact of the development of student accommodation at the outset. However, leasing arrangements can mean that the university is obliged to pay rents for an agreed number of years, sometimes as much as 25–50 years, so they can face financial losses if demand changes. Also, private providers are rarely interested in building new developments that house fewer than 500 students, and they may be less adjustable or flexible in providing for different student needs. For example, many build to a set format, such as six pod accommodation units.

One private contractor, currently operating in London, **NIDO**, provides a flexible accommodation model that allows for different configurations of rooms and facilities. But this accommodation is far more costly than in most halls of residences.

If disabled students are provided with off-site accommodation, universities need to ensure that the quality of accommodation and the terms on which it is offered are the same as would be offered on-site, and travel expenses may have to be paid for. Bearing in mind that travel arrangements to and from a university can be complicated, universities may need to consider providing on-site or easily accessible accommodation for disabled students. In London, this can be particularly complicated when even university-provided accommodation is located remotely from the teaching campus, and public transport is still only partially accessible.

Under the DDA 1995 as amended, universities are responsible for the acts of agents, such as contractors, if done with their implied or express authority. Contractors can also be liable for aiding an unlawful act. Private providers of student accommodation could be agents of the university, in which case the university will need to ensure that the agent does not discriminate against a disabled student in any of the ways described in Section 1.2. Alternatively, a private provider of accommodation may be classed as a third party, in which case a disability discrimination claim could be brought against them by the disabled student under Part 3 of the Act, and the university could face a claim under Part 4 of the Act if they did not prevent any discrimination from continuing or recurring.

Another difficulty for residential managers is that private providers will often enter into leasing/partnership agreements for the bedroom, but do not usually provide many of the other services that a student in halls would have, for example, catering or cleaning. If additional services are provided, these often have to be paid for by the HEI. Space for social interaction is also likely to be limited in new developments if it cannot be justified economically. As a result, the impact on students who are already at risk of becoming isolated could be exacerbated.

Private providers also usually charge for a greater number of weeks of the year, which can impact detrimentally on students from poorer backgrounds or those wishing to take shorter courses. The time at which students are required to pay for accommodation can vary. Some providers charge at the beginning of the term, or before student loans have come through. Others ask for a year's rent in advance unless a UK guarantor is available, which can disadvantage international students.

This issue of private contractors increasingly providing student accommodation clearly connects to wider national debates on the advantages and disadvantages of private finance initiatives (PFIs). Many PFI schemes have now been used by

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the public sector, for example by the NHS for hospitals, and for secondary school education. For many of these schemes, the quality of provision and their cost-effectiveness in the longer term has been questioned. Also, in recent years a number of property and investment companies connected to private equity funding have entered the market of student accommodation. This may mean that their concerns are geared more towards making short-term profits than towards the needs of university partners, students and the provision of inclusive environments.

In ensuring that students' experiences are safeguarded in arrangements with private developers, a great deal will depend on the quality of the contractors' work, the type of leasing contract entered into, and whether partnership agreements can be negotiated with regard to some of the equality and diversity issues covered in this guidance. Partnership agreements are covered in more detail below.

### 2.3 Management models

HEIs themselves can own and manage the accommodation and provide services to students, which will need to be fully compliant with the public sector duties. Alternatively, they can enter into different partnership agreements with private providers. Some have different arrangements with different providers.

#### *Full nomination agreements*

A private company builds new accommodation and enters into an agreement with the HEI to let all the accommodation to them for a set number of years. The building will be either managed or part-managed by the private company, and after a fixed number of years (sometimes 25–50), the buildings revert to the university.

#### *Public–private partnerships (PPP)*

Some private companies build and manage the buildings, but the university manages the allocation process. This model will need to be compliant with the public sector duties, but it is losing out to full nomination.

**Sanctuary Housing Group** (Sanctuary Management Services) is an example of this type of model – in London it works in partnership with several universities to supply student accommodation and services, but the universities mainly manage the allocation process.

### *Private finance initiatives (PFIs)*

A private company constructs the building, recruits students and manages services independently of the university. Some companies will keep an allocated number of rooms reserved for a university at a prearranged price.

**NIDO**, in London, targets postgraduates and international second- and third-year students for several HEIs in the locality.

All private companies have legal obligations regarding equality and access, even if they do not have a relationship with an HEI. However, they will not be subject to the public sector duties, although the institution's public sector duties will need to consider these arrangements.

In the future, the larger, older universities are more likely to maintain and defend their housing portfolio. However, ex-polytechnics, newer universities and others with tight financial restrictions are more likely to go for full nomination.

Regional variations, and variations from town to town, are likely to affect the quality of private provision. In some areas, for example Liverpool, Lincoln and Nottingham, where there is competition for students, the quality of provision may benefit students as providers compete for custom. In other areas, where demand outstrips supply, standards may be lower.

This issue of private contractors increasingly providing student accommodation clearly connects to wider national debates on the advantages and disadvantages of PFIs. Many PFI schemes have now been used by the public sector (e.g. hospitals and secondary schools). For many of these schemes, the quality of provision and their cost-effectiveness in the long term have been questioned. A great deal depends on the type of leasing contract entered into, and whether partnership agreements can be negotiated to safeguard students' experiences with regard to some of the equality and diversity issues covered in this guidance. An institution should maintain responsibility for ensuring that students are not discriminated against if residential accommodation is directly contracted out to a third party, although a student may have a separate right of action against the third party in the event of discriminatory practices. Therefore, those responsible for contracts should aim to ensure the following.

- = Contracts need to be specific about the level of anticipatory adjustments that should be made. In other words, providers should be aware of their own duties under the DDA (see Section 1.2), anticipate any parts of the premises that might put disabled people at a substantial disadvantage, and take reasonable steps to eliminate them.

- = Individual adjustments must be made for students who need them, upon notification of needs and in a timely manner. It should be noted that not all types of building can easily be adapted – for example, wooden-framed buildings need structural supports in the walls to which grab bars, etc., can be fixed.
- = Allocation procedures and charging policies must not be discriminatory.
- = Committees must be in place to discuss/pass appropriate provision, and to ensure that internal and external fixtures and shared facilities are all covered in the considerations and that there are no anomalies in the allocation of responsibility.

Liverpool John Moores University has been one of the forerunners of institutions moving to almost total private partnership arrangements for accommodation. To assist this process and guarantee a positive result for students and providers, the university has produced a partnership manual intended to support partners in the management and treatment of students. The code includes sections on disabled students, confidentiality and data protection, child protection, and terms and conditions for senior students (residential assistants) (LJMU, 2008).

## 3 Equality and diversity issues and recommendations

From the desk research, interviews and survey findings undertaken in this study, the following issues and recommendations have been highlighted.

### 3.1 Publicity and marketing

- ⇒ If there is under-representation in the number of students from any social group applying to a course or university, then publicity and marketing strategies could be examined to see if positive encouragement is provided to particular groups. This could include the way that accommodation brochures and information and images are presented so that different groups feel included and are attracted to the HEI.
- ⇒ Publicity and marketing materials are best informed by housing managers and accommodation staff, who understand what information students are seeking, and through student involvement.
- ⇒ Bearing in mind the reasonable adjustment duty under the DDA, information about all residential accommodation, including contracts, inventories, explanation of how to use the washing machines, notices on noticeboards and lists of emergency phone numbers, should be made available in alternative formats (for example electronically, in Braille or in large print).
- ⇒ Web-based material should be accessible to those using assistive technology, such as screen-reading software, or those not using a mouse. Interactive tours and Google-style maps of the campus can aid some students to orientate themselves as to the location of facilities and accommodation. Information needs to be provided about accommodation for those students unable to see photos or 360° tours. This could include an audio or written description of the room and facilities, information about room sizes, etc.
- ⇒ Information about accommodation should make clear what adjustments are available and might be possible in different buildings, possible social grouping arrangements, and how accommodation, social spaces and other amenities relate in terms of accessibility and distance.
- ⇒ It should be made clear to disabled students that additional adjustments can be made on an individual basis without additional charge (for example, en suite rooms or flashing-light doorbells).
- ⇒ Wherever possible, providers should install doorbells and fire alarms that are compatible with radio pagers for hearing-impaired people. If the basic system is compatible, the individual student will only need the pager itself.

## Equality and diversity issues and recommendations

- = If a disabled student needs to be housed in more expensive accommodation simply because of a disability, they should only be charged a standard rate (DRC, 2007a, section 9.44).
- = If a disabled student requires accommodation for a carer, responsibility for funding the carer's accommodation will depend on the social services package (and any other funding) given to the particular student. Dependent on this, the university will have to consider whether paying for the carer's accommodation would be a reasonable adjustment for the university to make, bearing in mind all the points the guidance lists as relevant factors for a university to take into account when determining what is reasonable (DRC, 2007a, pp. 61–102).

### 3.2 Applications and allocations

There is often a shortfall of university-controlled accommodation, even for first-year students in many universities. Priority is usually given to students with specific additional requirements, such as some disabled students, students with children, etc., then distance from home to campus. Some priority may also be given to international students, but this is balanced against demand from home students. In 2006–07, 85% of international student undergraduates were offered university housing at the beginning of their stay, and increasingly the sector is looking to provide guaranteed accommodation for international students as a way of encouraging them to apply for courses.

Under-18s have to be provided with accommodation, but currently this is not always allocated on campus (see Section 4.2, page 28).

Accommodation application forms usually ask people whether they have a disability or any particular needs regarding accommodation, but do not always make it clear enough why this information is being requested, what positive support might be provided, and how confidentiality will be maintained if required. Providing this information could help to increase the disclosure of individual requirements. If needs are not clearly stated on the application form, vulnerable students may miss out.

In most HEIs, student accommodation has to be self-financing, so it is difficult to leave unoccupied accommodation. Staff may rely on some students not showing up to occupy rooms, to provide some flexibility for students who belatedly declare specific needs, but this does not always work out satisfactorily.

Students have diverse needs and preferences regarding their living accommodation. Some universities have developed allocations policies that try to create a balance between mixing students up in terms of age, gender, nationality and course attendance, and allowing individual choice. This is a difficult area for staff to negotiate, because while it is important for students

not to feel isolated, therefore some grouping may be helpful, most institutions recognise there are enormous social and learning advantages to be gained from integration. Accommodation officers have reported that many students tend to stay with their own cultural group for socialising, cooking and eating unless wider social interaction is actively promoted. It seems likely that attempts to integrate students through accommodation allocation are more likely to be successful if supplemented by wider strategies to promote integration, particularly during the first weeks at university.

In an attempt to avoid possibly discriminatory subjective allocation, IT software is being produced that can randomly select and allocate accommodation for non-prioritised students. Although this may help to eliminate subjective decision-making about grouping students, it is likely to have other disadvantages, for example failing to pick up signs that some students need additional support if this is not obviously identified on the forms. Random allocation may result in more students becoming lonely and isolated, as they may be placed in accommodation with other students who have no connection with their course focus or their social background.

Traditionally, postgraduates and undergraduates are often separated because they are perceived to have different lifestyle requirements, such as levels of noise toleration. This type of separation is often popular, but some institutions are offering options to students themselves rather than making lifestyle assumptions according to course level or age. Restrictions on noise levels are then imposed for those who would prefer quiet study space, rather than for those segregated by age or course level. Quiet zones are now often offered by institutions for students wishing to avoid high levels of noise, as individual quiet flats are not found to be effective in segregating noise levels.

Some universities have had incidents of international students arriving without any accommodation booked in advance. This places those students at risk and requires staff to try to find them accommodation at short notice, which can be difficult.

Liverpool John Moores University provides a safe house as a last resort, where students can be directed at short notice and where they can move in without any prepayment or other documentation. The accommodation is available only at the beginning of the academic year, for a month. Bedding packs are provided, and students are billed at the end of their stay. Initially, students can only stay for two nights without the agreement of the accommodation manager, who will support the student in finding more permanent accommodation.

## Equality and diversity issues and recommendations

Once students have been allocated accommodation, welcome packs that provide information about the code and welfare matters, communal living, and health and safety (including fire evacuation procedures) are often provided and should be available in alternative formats. These, alongside opportunities for face-to-face induction sessions and opportunities to raise questions as they arise, are perceived by some residential managers to help students settle into new accommodation and avoid difficulties arising further down the line.

### *Support services*

Support services to students in accommodation are currently provided by a whole range of staff, including:

- = wardens and assistants
- = housing managers and assistants
- = security staff
- = housekeepers
- = cleaning staff
- = student services
- = chaplains
- = counselling services.

All staff should be recruited on a basis of understanding and wishing to provide support to a diverse range of students. They will also need to be trained sufficiently in equality and diversity issues to minimise the risk of discriminatory practices or actions (see Section 1.2), risk assessment and crisis management.

In many universities Criminal Records Bureau (**CRB**) checks are already being made on all staff, and some universities check on all new and most recent staff (fewer than five years).

Having regular staff, who students can get to know and who are easy to communicate with, is cited as important to meet the needs of vulnerable students, and is not always possible when agency staff are employed. Staff also need easy channels via which to communicate issues among themselves and join up issues of concern. Some senior students are employed to live with new students and be their first point of contact for problems during out-of-hours periods on a rota basis. They may provide drop-in sessions and a telephone service.

Some institutions, such as the London School of Economics, insist on university-paid wardens in all accommodation, including privately provided accommodation. This can prevent disabled students from feeling isolated if they are away from the main campus facilities.

At Liverpool John Moores University, senior students or resident assistants are usually second-year or higher-level students who are employed as members of staff and live within the various accommodations offered to new students. They provide a form of peer support, and are often the first point of contact for new students who have concerns about their accommodation or any other aspects of their lives. The senior students help new students settle in to their new home and to feel comfortable in the locality and at the university.

Senior students act as signposts for the various university, student union and external services that are available to help students address any difficulties they may face. In order to do this effectively, they need to be aware of the policies and procedures of the university and of the accommodation in which they are based.

Senior students are not required to take on a security function within the accommodation, and do not assume an active role in disciplining students, although on occasion senior students may be asked to remind students of the university's code of behaviour.

Disability legislation stipulates that disabled students and staff should be involved in developing policies and practices (see Section 1.2, page 7). Student unions usually undertake surveys and reviews of accommodation services provided by HEIs, and the **Office of the Independent Adjudicator for Higher Education** mitigates complaints about accommodation that cannot to be dealt with by the institution.

Staff training in relation to the equalities legislation will need to be assessed, as all staff connected to providing accommodation services (including part-timers, temporary and contract workers) need to know their legal responsibilities. Also, and most importantly, they need to know how to react and communicate with others in the situations they are likely to encounter in their job roles. Training needs to be specially targeted to address this. One of the most practical and efficient mechanisms for ensuring staff involvement and understanding of equality issues, and also ensuring that equality is embedded and mainstreamed into policies and practices connected to accommodation and social space, is through undertaking equality impact assessments. ECU has produced guidance on **Conducting equality impact assessments in higher education**.

## 4 Issues for specific groups

### 4.1 Disability

#### *Mental health*

- = Mental health issues, and knowing how to respond, are a cause of key concern to residential staff in many institutions. Students often underestimate the impact of moving away from home and the additional stress this may cause. In addition, some significant mental illnesses, such as schizophrenia and bipolar disorder, first manifest themselves during the late teens and early 20s. Mental health policies, robust early intervention strategies, and support mechanisms connected to halls of residence will help staff respond appropriately to the first sign of problems and, if necessary, to contact out-of-hours services, GP services and emergency services. These policies can also help other students and their families know what support services are in place to help students experiencing distress and ensure that their own needs are met.

De Montfort University (2006) has produced a guide for staff, *Supporting students with learning differences and disabilities*, which contains useful information on mental health and dealing with students in distress.

- = Hall wardens, cleaners and others will need to know how to respond if a disabled student discloses a disability to them, and therefore will require training on disability issues and on confidentiality and disclosure. They will also need to know to whom, with the student's consent, information should be passed (DRC, 2007b).
- = Procedures are required to ensure that information is kept confidential to relevant staff, or completely confidential if the student requests this.
- = Sometimes students can 'disappear' in the system without it being noticed, and better liaison between tutors and housing staff can help prevent this occurring.
- = When applying to university, some students may understandably want to distance themselves from a former impairment as they see themselves as entering a new phase in their lives. However, if problems reoccur they might find themselves in accommodation where they are not receiving enough support, and allocations officers will need to make contingency plans that anticipate this.
- = Issues around students' mental health appear to be increasing and may cause particular problems for students in private accommodation who can become isolated and not receive support or attention when it is needed.

To assist the integration of students with seen and unseen disabilities, Plymouth University has appointed assistant wardens with a disability or a history of mental illness.

- = Shared rooms may not be appropriate for some disabled students or for students with mental illness.

### *Students with physical impairments and health conditions*

- = An adequate number of adapted rooms will be required for students with physical impairments. If these are designed flexibly, and the building is sufficiently structurally robust, these rooms should be able to accommodate different needs, for example allowing additional fixtures for fittings to be installed if required. Rooms with additional space are nearly always welcomed by students if they are not needed for students with special requirements, so it should not be a problem if these rooms are not all used by disabled students.
- = Disabled students should be given priority for accessible rooms, en suite rooms, or rooms near teaching buildings if this is their preference, depending on the nature of their disability and its effects. If a non-disabled student is allocated to an accessible room to maximise the number of units let, it should be made clear that they may need to move out if a disabled person should need the room.
- = Accessible rooms should not all be grouped together, but integrated throughout to prevent marginalisation and isolation of disabled students. This allows students to choose the style of accommodation they prefer, and to live near their friends. Attention needs to be given to safe fire evacuation, and students' safety should not be compromised.
- = Kitchens and other shared communal space need to be adequate to comfortably accommodate wheelchair-users and other students, particularly if there is more than one wheelchair-user sharing a kitchen, as lack of space can create tensions between students.
- = Larger rooms and extra power points may be needed for disabled students using additional technology. Some students may need to recharge an electric wheelchair in their room, or have charging facilities close to their room.
- = Intercom systems between students' and support services or carers' rooms should be an optional provision. Not all HEIs have 24-hour support services that are appropriate, but some charities offer 24-hour assistance, for example for people who may have epileptic seizures. Monitoring and alarm equipment can be installed via the room's phone line.
- = A mixture of walk-in showers and/or baths should be supplied in accessible rooms, as disabled students are likely to have different needs. Equipment such

## Issues for specific groups

as bath hoists should be supplied in some bathrooms; designs for new-build accommodation should ensure that ceilings are strong enough to support hoists.

- = Fridges for storage of medication and special diets should be supplied in rooms if required.
- = The UUK/Guild HE Code of Practice suggests that students with disabilities make themselves known at the beginning of the first term or as soon after as possible, so that they can be advised of any special arrangements, such as personal evacuation plans. There is also a duty on the HEI to provide opportunities for disclosure and to work actively to identify students who may have additional requirements, for example through information disclosed on application forms.
- = Estates staff in HEIs now need to make detailed plans for the evacuation of individual disabled staff and students. Recent legislative changes – the **Regulatory Reform (Fire Safety) Order 2005** – require institutions to take responsibility for ensuring that all people can leave buildings safely in the event of a fire; and the new Disability Equality Duty requires HEIs to be proactive about taking steps to take account of people's disabilities, such as by ensuring that disabled people are not placed at a disadvantage in emergency situations. Fire regulations need to consider different ways to alert students with hearing impairments. Strobe lighting and other alert systems are now being fitted into many rooms and communal areas. The Department for Communities and Local Government has produced detailed and practical guidance on emergency evacuation for disabled people (DCLG, 2007). Also, fire alarms should come with flashing lights as standard, so no adaptations are necessarily required for hearing-impaired students, staff or visitors.
- = Materials used in rooms, including carpets, curtains, mattresses and certain types of paint, can affect students with asthma and other allergic conditions, so these should be considered during the procurement stages. Even if the whole campus is not toxin-free, it is important for students to have a toxin-free environment where they sleep.

The University of Worcester has a policy of purchasing low-allergenic materials on its campus wherever possible. This initiative has been prompted by work conducted by the University's specialist research centre, the **National Pollen and Aerobiology Unit**, on allergenic substances and the treatment of allergic conditions.

- = Students with mobility impairments frequently point out that the ability to visit other students in their rooms and have access to kitchen areas is vital to achieve an inclusive environment. All new builds and refurbishments should anticipate

a wheelchair-user visiting rooms, and social areas should provide adequate internal space, corridor widths and door widths to enable this.

- = Automatic doors with vicinity sensors are important, and sensors need to be located at an appropriate distance to open in time before students in wheelchairs reach them. Smart door-opening devices can be used in conjunction with the above to provide security where required.

The University of Worcester is providing all new-build residences with accessible doors and room sizes of 15 m<sup>2</sup>.

- = Larger kitchen groups (nine to 12 sharing) are sometimes preferred by disabled students, so that they are not so isolated if they are not able to leave the residence for any reason. This can be particularly important if there are problems in accessing other social venues on campus or in the locality
- = Full access to equipment in shared facilities is needed, for example, adjustable-height work surfaces in kitchens, accessible cooker controls and laundry facilities.

The University of Northumbria has an arrangement with several suppliers to adapt equipment to ensure it is accessible: examples include adaptations to washing machine and dryer controls and coin slots to make them accessible to wheelchair-users.

- = Televisions in common rooms should have Teletext to assist students who are deaf or have a hearing impairment.
- = Contrasting paint colours for doors and corridors assist visually impaired students.
- = Provision for guide dogs and hearing dogs needs to be considered, and 'spend pens' or bins close to residences should be provided for hygienic purposes. The responsibility for regular cleaning of these will need to be considered. Some students may object to sharing a residence with a dog due to anxiety, allergy or for religious reasons, and this will need to be negotiated with other students on allocation of accommodation.
- = Parking is often an issue for disabled students. Many universities are now discouraging student parking by asking students to pay for permits, and providing transport such as shuttle services. Disabled students who require a car because of their impairment should be entitled to a free space. Institutions will need to be clear on the evidence required to allocate spaces, as some disabled students who do not have a physical impairment, but have another condition

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such as mental health issues or chronic fatigue syndrome (ME) may benefit from a parking space.

- = The distance of rooms from the main campus and accessibility of routes to key social spaces need to be considered. Accessibility audits by disabled people with a range of impairments should be conducted to ensure that as much as possible is being done to ensure places are accessible.
- = Students with some cognitive conditions may have a diminished sense of danger and should not be housed in less-safe areas.

The University of Worcester links its student services support team with security staff through sharing a joint office based in the halls of residence, and by patrolling and being on duty all night.

- = Buddying systems operated by the students' union have helped some disabled students to integrate socially.

### 4.2 Age

- = Universities have an enhanced duty of care to those aged under 18. Usually the university will draw up an agreement with parents or guardians about their care.
- = Students aged under 18 must be provided with residential accommodation. The number of younger students under 18 is rising for many universities and particularly for some courses, nursing being an example.
- = All partners providing accommodation for under-18s should have their own child protection policy in place, with a senior staff member named as child protection officer.
- = Some HEIs are accommodating younger students on campus but some providers, including private and independent providers, are excluding younger students from halls on campus and instead offering contractual housing providers or homestay host families.
- = The reason sometimes given is that support needs are greater for this group of students. It should be questioned whether this is in the interest of younger students, as there may be less security off-campus. There are probably a number of vulnerable older students who also need additional support.

At the University of Northumbria, guidance tutors for under-18s are given additional responsibilities, including being the central contact point for any communications that need to be made by staff about a student and, if required, from the institution to the student's parents/guardians.

- = Certain safeguards are needed to ensure under-18s are in a safe environment. For example, legal advice received by ECU recommends that all staff connected with halls of residence where younger students are accommodated, including cleaners, should be **CRB**-checked (although cleaners of other parts of the estate will not necessarily need to be CRB-checked).
- = Child protection policies should also be in place.
- = Senior students can offer important peer support, and may be given a brief to look after young students with welfare advisor support.
- = Students from care may not have a family to go back to in the holidays, so may need to be grouped with other students who stay on campus. They may need different or additional social facilities to compensate, such as a games room or TV room.
- = The Government's move to attract lifelong learners, and certain courses that lead to more flexible forms of employment, are beginning to attract older students (over-40s) to undergraduate courses. Some of these students may wish to move away from their existing accommodation into halls for personal reasons. No student should be refused accommodation on campus or in halls because of their age (Section 1.2, page 7).

At Thames Valley University, a woman who was living at home with children over 20 wanted to ensure her family took her studying seriously, so wanted to take up residence in halls. She was able to be accommodated in a small block for mature students, enabling her to study away from her usual domestic responsibilities.

- = Many universities have reported poor facilities for families. This is likely particularly to affect some older, postgraduate students and single parents. It will also affect students with disabled dependents.
- = Part-time students are often unable to live in halls because they are eligible to pay council tax, whereas full-time students are exempt. Council tax can also be an issue for part-time students sharing private accommodation with other students. Some councils have put in place mechanisms to deal with this.

## Issues for specific groups

- = Part-time students with dependents may need opportunities for social space, crèches and other play facilities for children on campus, for example if they need to make a short visit to the library or to see a tutor.

### 4.3 Race, religion and belief

Those in charge of accommodation services should bear in mind their university's Race Equality Policy (Section 1.2, pages 7–8) when planning services.

There is evidence that more black and minority ethnic students opt to travel less distance to university than white students, a greater number opting to live at home (Sims, 2007). This report also cites examples of students experiencing racism in halls of residence, which resulted in one student moving back to his parent's home. This example clearly indicates that strategies for tackling racism and all other forms of abusive conduct, including bullying and harassment, need to be in place and acted upon swiftly.

Another student was recorded as saying she was concerned about offending other people in halls, as she did not know enough about some religions, and that not enough was done by the administration to promote good relations on campus, which they are legally required to do (Race Relations Amendment Act 2000). This indicates that the presence of diversity on campus does not always indicate a high level of engagement between different groups.

A general conclusion from the *International Student Barometer* is that many students internalise their socialisation by keeping to their original cultural/national groups, and efforts need to be made to facilitate integration (I-Graduate, 2006; ECU, 2007b).

The University of Northumbria offers a long induction period for international students, incorporating visits and trips to local amenities. The induction starts with a meet-and-greet session in which students are met from their arrival point, brought to the campus and introduced to their resident assistants, who then take responsibility for settling them into their accommodation. Northumbria found that a high proportion of international students were volunteering to become residential assistants in their second year, partly because they wanted to pass on the support they had received to other international students.

Another important equality issue currently being debated is whether gender-separated accommodation should be provided for female Muslim students. Some universities provide this, while others think it reinforces segregation. Currently most student accommodation is offered as mixed flats. Where single-gender flats are

available, institutions often require sufficient notification to ensure that students are allocated this accommodation.

The University of Plymouth strives to provide appropriate accommodation, such as single-gender, single-faith accommodation. When insufficient numbers request this type of shared accommodation, the university has found that one-person studio flats have been helpful in meeting individual needs.

Care needs to be taken about arrangements for male visitors when allocating students to female-only flats. Unless there are clear agreements about this, students can become dissatisfied that the accommodation does not meet their needs. Options of flats where male visitors are and are not allowed may offer a solution.

At one university included in this study, a female Muslim student was sharing a ground-floor flat in halls with two non-Muslim females. She requested the kitchen curtains be kept closed at all times so that she could enter and use the kitchen without her head being covered, as she did not wish to be seen by passers-by. The other two students cooperated initially, but then raised the matter with the student accommodation office, as they found the lack of light in the kitchen oppressive.

After discussion with all the students, the solution was to provide window screening in all kitchens so that light could enter, but people could not see in. This also meant that curtains were no longer necessary, reducing the fire risk. This screening is now a standard provision on all new ground-floor developments.

- Some institutions have shared residential rooms. When applying for accommodation, students may be asked if there are any reasons why sharing a room would be inappropriate. Some students cite religious reasons for not wanting to share rooms, because of requiring privacy during prayer sessions. If shared rooms are a necessity, a separate prayer room may be an acceptable alternative provision.
- Sometimes food storage can be an issue for students concerned with the separation of different foods, for example meat and vegetarian or dairy. Self-catering, secured storage, sealed containers, separate shelves or fridges in individual rooms can provide solutions.

- = Shops and catering facilities on campus should consult with staff and students about how to stock and supply foods appropriate for different dietary requirements.

Bath University has an Asian food shop on campus, and holds social evenings for different national groups, held in one of the main café areas, featuring television channels, food and games relating to that national group. These events are open to all.

- = Some students and staff will not use social spaces that are used for alcohol consumption, and alternative social areas should be available that are alcohol-free. This can also be an issue with students sharing kitchen/dining/social space, but care needs to be taken that this issue does not lead to segregation of certain students. It should also be remembered that students can have multiple identities that shape their requirements; there may be disabled students requiring adapted rooms who also seek alcohol-free zones for religious reasons, so more complex needs should be anticipated and planned for.

The Exeter Guild (students' union) is aware of its need to provide inclusive services, and has done work recently in relation to international students, for example providing alcohol-free zones and making available a range of international foods.

- = An introduction to the use of various pieces of kitchen and laundry equipment, such as microwaves, may be required for students who are unused to using these forms of equipment. This may apply to students from countries where the same appliances are not common, or for any student unused to operating the equipment.

## 5 Towards an inclusive campus

### 5.1 General recommendations

The following recommendations and conclusions have been suggested by those interviewed and surveyed in connection with this study to support the development of inclusive accommodation and social space on campus.

- = Senior-level commitment and vision for providing an inclusive environment is essential to provide support to residential staff in frontline positions.
- = Full engagement of staff is needed with equality impact assessments of all estates and accommodation policies and practices, and procurement and development contracts. This involves considering which committees are required to discuss/pass and review equality interventions. It also requires the involvement of users representing different equality interests.
- = Policies for procurement of standard fittings and equipment that incorporate inclusive design features and that are sustainable should always be considered.
- = Bespoke staff training on equality and diversity legislation, and dealing with equality issues that are pertinent to the roles of individual staff, should be provided – a university is liable for the actions of all its staff.
- = Students need to be made aware of the need for tolerance and consideration of others through the induction process and generally through their contact with support staff.
- = Staff and agents' contracts need to make clear what is expected with regard to providing a service to a diverse range of students, and to ensure they are not discriminating against any group or individual.
- = Management manuals incorporating equality and diversity issues should be provided for use with both university and private providers.
- = Procedures need to be in place to ensure that discriminatory treatment is identified and dealt with appropriately.
- = Departments need to have the funds to provide staff with the necessary training to identify and implement reasonable adjustments in conjunction with disability officers.
- = Staff should be encouraged to develop innovative practice and provide high-quality service in this area, and rewarded appropriately.
- = Institutions should sign up to codes of practice to ensure a core standard of quality and equality is provided.
- = Mental health policies should be readily available to ensure that appropriate levels of support are provided as required.

- = Maximum flexibility and forethought are needed in planning any new build or refurbishment, to include adjustments and access strategies.
- = Access standards and plans should be audited before and following occupation by trained disability auditors.
- = Financial resources should be made available to make necessary adjustments and maintain high standards.
- = A variety of social facilities, shared kitchens and common rooms will support the integration and quality of experience of students in halls of residence.

## **5.2 Conclusions**

The findings of this study indicate that many institutions are still focusing on accommodating home students in the 18–21 age group, and are not giving sufficient attention to the needs of a wider profile of students. Anticipating the necessary changes would provide a better experience for existing students who do not fit the majority profile and for future intakes of students who are likely to be more diverse.

Alongside the need to make sure there is an accessible and safe environment for disabled people, there is a need for increased provision for students with young families, particularly single parents. There also appears to be confusion about the best approach to accommodating under-18s, which ECU will investigate further. An equality and diversity checklist for architects who have been commissioned to design new student housing will be considered for production in consultation with the AUDE.

There is an urgent need to safeguard the welfare of all students through management agreements, and ECU intends to work with professional groups to develop a model for these agreements.

Universities need to benchmark their intake and consider why some groups are underrepresented. Students will be attracted by courses, but also by reputation and by marketing information that assures them of a welcoming, accessible environment. Flexible, good quality accommodation that works for a diverse range of students is an important factor in this process.

There is particular need to consider strategies to improve the integration and inclusion of all students, and ECU will be working with relevant groups such as student services and students' unions to support appropriate practices.

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## **Codes of practice**

### **Universities UK Codes of Practice**

**Accreditation Network UK Code of Standards for Larger Developments for student accommodation managed and controlled by educational establishments**

**Accreditation Network UK Code of Standards for Larger Developments for student accommodation not managed and controlled by educational establishments**

## **Access audits**

National Register of Access Consultants (**NRAC**) – an independent register of accredited access auditors and access consultants who meet professional standards and criteria established by a peer-review system. It is a UK-wide accreditation service for individuals who undertake access auditing and access consultancy. The website contains links to design guides and access training.

**DisabledGo** will check physical and sensory access to HEIs in a range of venues, including halls of residence, main campus venues and routes to the nearest train station. Venues are assessed independently on-site and in person by trained researchers.





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