



Disability Act 2005

Annual Report

2011-2012

This document is available in alternative format upon request and is on the College Disability Service webpage at: <http://www.tcd.ie/disability/Banner/Useful-Links/Annual-reports-stats/index.php>

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Introduction

Trinity College Dublin Disability Service (DS) has been proactive in its response to ensuring we are meeting our commitment to making the College services, facilities, buildings and information accessible to all customers, students and staff. This first Disability Act 2005 Annual report (2011-12) outlines actions and activities taken within College by a variety of services and departments to ensuring compliance and good practice in making Trinity a more inclusive environment.

The College Disability Service (DS) promotes the needs of students and staff with disabilities in the college setting by providing advice, support, and academic/work accommodations in partnership with students/staff and academic departments/work units. The DS also provides advice and information to applicants, makes referrals, and advises academic and administrative staff on issues pertaining to barrier-free access and disability-related issues.

DS advocates for the basic rights and responsibilities set out in; the Code of Practice for students with disabilities; the Code of Practice relating to the employment of staff with disabilities; the University's Access Policy and all related national legislation including the Equal Status Acts 2000-2004, The University Act 1997 and the Disability Act 2005.

Arising from the requirements of the Disability Act 2005, responsibility for identifying reasonable accommodations and supports for staff with disabilities became part of Disability Service brief in 2007. In addition, College has adopted an Accessible Information Policy and the DS have developed an implementation plan to ensure all areas of College work towards compliance with this requirement of the Disability Act 2005. Physical access improvements are also a priority with a deadline of 2015 approaching, there is an expectation that all strategic services are required to be accessible to all customers. A programme of access works is on-going based on an access audit carried out in 2008.

College is primarily responsible for ensuring compliancy with Part 3 of the Act: Access to Buildings and Services, Part 5: Public Service Employment and having a complaints procedure in place.

Part 3 of the Act places an obligation on public bodies to make their buildings and services accessible and requires the preparation of Sectoral Plans to support continued improvements in six key areas of public service provision. There are complaints procedures with a right of appeal to the Ombudsman. Part 5 deals with the provision of Public Service Employment. This refers to the 3% employment quota that is now on a statutory footing. The requirement is that the public bodies ensure that unless there is good reason to the contrary, that at least 3% of staff should be people with disabilities.

Executive Summary

This annual report covers the academic year 2011-2012. Information was gathered from a variety of sources including the Director of Buildings Estates papers and the Equality Officer staff with disability report. The appendices include detailed Accessible Information Implementation report with key statistics.

Key highlights

- Highlights include an 11% increase in students registering with the Disability Service (DS) during the past academic year resulting in an increased workload for the Service. In May 2012, there were 915 students with disabilities studying in College
- Number of employees with a disability under the definition in the Disability Act 2005 is 75 (2.3% of total)
- The Built environment remains a priority with 23% of buildings compliant with Accessibility Legislation (Disability Act 2005), 40% accessible at entrance level only and 37% inaccessible
- €1, 950,000 spent over the last two years on numerous physical access works including accessible paths in Front Square, making the Pavilion accessible and an additional €295,000 set aside for priority works in Moyne and Fitzgerald building
- Significant improvements in egress strategies in strategic buildings are underway with the Arts Building being the first to have a full egress plan. An additional 15 evac-

chairs are being purchased for other strategic academic buildings and plans will be developed to ensure egress systems are in place

- College Events are not always accessible leading to some complaints from disabled guests that accessibility was not considered
- Accessible Information Policy was reviewed and updated following feedback from service areas this was forwarded to the Equality Committee in May 2012
- Compliance with College Accessible Information policy varies throughout administrative areas in College
- Procurement of strategic College information systems and awareness of the policy remains low
- College Branding – some discrepancies were found in the accessibility (inaccessible fonts used in College logo) of current College branding in print and electronic formats
- There were 3 complaints under the Disability Act 2005 investigated and all upheld
- Complaints monitoring procedures put in place to ensure recommendations were acted upon in a timely manner
- Complaints procedures were reviewed and updated with training provided to Inquiry Officers in dealing with complaints at the informal stage

Disability Act 2005 Report 2011-12

1. Access to Public Buildings (Section 25) 7 Access to Heritage Sites (Section 29)

College Policy on Universal Access

College, in its current Development Plan has adopted the following policy statement with regard to Universal Access:

Safety and Universal Access

- All new buildings and existing buildings that undergo extension, refurbishment or material change of use must comply with; inter alia, the current Building Regulations, Fire Safety Legislation and Safety, Health and Welfare at Work Legislation.
- College is committed to achieving, where practicable, Universal Accessibility throughout its entire operation. This will contribute towards the highest standards of accessibility, environmental quality and sustainable development.
- Universal Accessibility is an integral function of College's administration, operation, servicing and construction-related activities. Universal Design guidelines in compliance with Part M of the Buildings Regulations 1997-2009 together with The Disability Act 2005 and the TCD Universal Design Guidelines (Document U) detail the manner in which College is developing, promoting and implementing Universal Accessibility. It should be noted Universal Access facilities for the Historic and Protected buildings might not be possible in all cases.
- Designs should recognise the need for Universal Egress as well as Universal Access and appropriate facilities for the alerting and evacuation of hearing/mobility-impaired persons in the event of an emergency should be designed into the project.

Level of accessibility of Buildings on Campus

The Director of Buildings at the last Estates Committee (14th March, 2012 - EC/11-12/081) have given the following percentages for accessibility of College buildings:

- 23% compliant with Accessibility Legislation (Disability Act 2005)
- 40% accessible at entrance level only
- 37% inaccessible.

A distinction is required between strategic buildings (academic teaching spaces and places where people need to do essential business) and the full suite of buildings that College has is required. Clarification is being sought as to the percentage of strategic buildings that are accessible.

Progress to date

Following the Access Audit of all College buildings in 2008, an implementation plan was agreed by the Director of Buildings and the Director of the Disability Service. The focus to date has been largely on improving physical accessibility of academic and strategic service areas.

The following is a list of universal access projects completed in the last 5 years:

- Pavilion made fully accessible (lift and enabled toilets, €125,000);
- Ground floor of Front Sq. buildings now accessible for strategic services (semi-automation of doors, ramps);
- Accessible pathways through Front Square (€450,000);
- Automated entrances to buildings – College Green, Hamilton, Luce Hall, buildings in Front Sq.; Science Gallery, Health Centre, Arts Building and Law School;
- semi automated doors to the Lecture theatres in the Arts Building (€57,402)
- Hamilton Library semi-automaton of entrance (€11,905)
- Enabled toilet improvements – Arts building and East end;

- New Square Residences - ground floor made accessible (Accommodation Office);
- House 39 – new ramped entrance and automated door (DoB minor works for ramp, automation by DS);
- Egress works Arts Building – Evacuation chairs and procedures (€100,000);
- Science Office redesign – Hamilton Building (Faculty budget);
- Portable audio loops in main service areas (€2,000);
- a platform lift at 7-9 South Leinster Street (DoB);
- Student Union – House 6, make office accessible at ground floor(€4,000);
- Moyne Building Accessibility Study and Upgrade Works (€1,875)
- Hamilton Library ATIC and Group Study Room Refurbishment Works (€32,490)
- Ramp and semi automated door access to 200 Pearse Street;
- Ussher Library Orientation Space Door Contrasting & Warning Strip/Signage Throughout (€3,260);
- Berkeley & Ussher Libraries/ATIC Area Visual Alarms (€3,379).

Work in Progress 2012 (summer works)

Location	Nature of Work	Status	Cost
Arts Building-lecture theatres	Upgrade seating, crash rails	Summer 2012	€55k
Arts Building-lecture theatres	Audio loop systems	Summer 2012	€29,820
Arts Building	Improvement works to enabled wc's	Planning stage	€40k
Various Libraries	Door automation	Planning stage	€45k
Various Libraries	Audio loop systems	Planning stage	€50k

Future Works 2012-13

Location	Nature of Work	Status	Estimated Cost
Fellows Square	Extend accessible path to Arts building ramp and Berkeley Library	Work due to take place in October 2012	€120k Estimated – committed
Physics Building	Access ramp/platform lift, internal lift, enabled wc	Detailed Design required	€160k (needs revision once full cost known)
New Square Residences – East side	Access Ramps	Detailed Design required	€40k (Accommodation Office cost)
Chemistry Building	Ramp, internal lift, enable wc	Detailed Design required	€140k
Moyne	Platform lift/Internal stair lifts +enabled wc	Detailed Design required	€140k
Physiology – Loyola Institute	Access ramp/platform lift, internal lift, enabled wc	Detailed Design required	€200k

Funding for Physical Access works

The Disability Service has over the last ten years paid for most major accessibility improvements in College by using non-pay allocated funds either Strategic Initiative or core funds allocated to access initiatives in College €950,000 was transferred in 2010/11 to cover costs of the pathways in Front Square and work on-going at present.

Additional funds of approximately €295,000 in 2011/2012 are set aside to cover future work proposed; the COO and the Bursar have confirmed this money has been ring fenced to allow College to be compliant with the 2015 deadline set in the Disability Act 2005 that states all public buildings should be accessible.

Public information on Physical access was improved in 2011-12 with the introduction of podcasts by students doing specific tours through the campus (key journeys all students & staff would take) these will assist people in understanding the College and outline shortcuts, this webpage is linked: <http://www.tcd.ie/disability/banner/Physical/index.php>

College Interactive Web map were greatly enhanced with disability specific icons outlining where enabled toilets , parking, entrances and hearing loop systems are on campus. This will assist visitors to College and this can be viewed at: <http://www.tcd.ie/Maps/map.php>. In addition, an accessibility building information finder was added to the maps page, when a person clicks on a building they will be given accessibility information along with opening times and history of building. This can be viewed here: <http://www.tcd.ie/disability/accessibility/Building-check/Old-Library.php>

Egress in College

Since 2010, the College has made improvements in egress in the Arts Building with the purchasing of 2 Evacuation Chairs (evac - chairs) and 2 Stairmates. This equipment allows wheelchair users to be quickly and safely evacuated from the building in any emergency or situation where the lift is not available. Refuge areas have been set up throughout the building and a communication system has been installed. The development of this infrastructure allows effective Personal Emergency Evacuation Plans (PEEPs) to be arranged on an individual basis with students who need them.

A memo was sent to the College Safety Committee in Michaelmas Term outlining the egress strategy required in College. With disabled student/staff numbers rising and College having significant visitor numbers, it can be anticipated some will either be wheelchair users or will have mobility impairments. The current provision of two evac chairs, one in the Arts Building and one in the Safety Office or 200 Pearse Street is clearly insufficient to cover the risks involved throughout the whole of College.

The Disability Service and the Safety Office are jointly funding the purchase of more evac chairs. PEEPs are only feasible if the appropriate equipment is available in all the accessible buildings in College. A list of buildings in order of priority on Campus that meet the following criteria has been established:

- A. Designated as accessible by College (2010/11 Accessible Map)

- B. Have lift access to upper or lower floors where return to ground floor is required for exit
- C. Are likely to have large numbers of staff, students and visitors on a regular basis

1. Aras An Phiarsaigh (purchased and funded by School of Business)
2. Dining Hall
3. 7 to 9 St Leinster Street (funded by Safety Committee)
4. Sports Centre (in addition to evac. chair - a powered Stairmate is required for Swimming pool - lower level)
5. Goldsmith Hall
6. SNIAM
7. College Green
8. Lloyd
9. Hamilton Building
10. O'Reilly Institute
11. School of Nursing & Midwifery
12. Long room hub
13. Biosciences (1 or 2 chairs)
14. BLU Complex - (1 or 2 chairs) Ussher and/or Berkeley Library
15. Parsons/Crann
16. 2nd Chair for Arts Building – stairwell A.

Actions: 15 chairs have been ordered by the Fire Officer and all areas listed above will have an evac-chair installed in a designated refuge area. An egress programme and training of personnel will be introduced in all areas. Cost will be €24,750

2. Access to Services (Section 26)

"Service" means a service or facility of any kind provided by a public body which is available to or accessible by the public generally or a section of the public and, without prejudice to the generality of the foregoing, includes-

(a) "Where practical and appropriate", ensure that the provision of access to the service by persons with disabilities is integrated,

(b) "Where practical and appropriate", provide assistance, if requested, to persons with disabilities in assessing the services if it is satisfied that this is necessary to comply with (a) above, and

(c) "Where appropriate", ensure the availability of persons with appropriate expertise and skills to give advice to the body about how to ensure that its services are accessible to persons with disabilities.

Key activities

College has recently undergone a significant administrative review called START and the key recommendation (9) is College will initiate immediate planning for the creation of a dedicated Central Services Building (CSB) on the Luce Hall site. In addition, the Taskforce recommends (10) a complete re-definition of College services based on detailed business process analyses and leading to an integrated business process approach which is focused on the removal of complexity and duplication and the delivery of effective and efficient solutions to end users. It is expected that a one-stop-shop service will be developed as part of these recommendations. It is recognized that this will take a number of years to develop so temporary solutions are being worked upon for strategic services. For example, the Registry will be based in a temporary space in the disused Biotechnology Building in the east end of the campus. All central administrative services that students interact with such as admissions, examinations, fees etc will be based here. Plans are being developed at present and a Disability Access Statement will be drawn up as part of the planning process thus ensuring accessibility is featured. Lifts are available and toilet facilities will be improved as part of this work and it is expected to be in operation in the next academic year.

Issues and future work

College Events

The Accessible Information policy provides clear guidance for all College organizers of events to ensure accessibility is taken in to account as part of the planning of such events. These guidelines have been included in the Communication Office guide on organizing events, see: <https://www.tcd.ie/Communications/local/event-management/> which also links to the Accessible Information policy: <http://www.tcd.ie/about/policies/accessible-info-policy.php>

Due to the high number of events and multiple organizers these guidelines are not always adhered to leading to some complaints from disabled guests that accessibility was not considered. Awareness raising with organizers as to the importance of ensuring accessibility is required. A checklist for all events in addition to web information offered may assist people.

The cost of providing Irish Sign Language Interpreters is still an issue in College, who pays? etc., is perplexing organizers. Information on provision is detailed in the policy mentioned but with an increased number of Deaf Academics, students and increased number of visitors (due to the Centre for Deaf Studies being present in College) there is a likeliness that Deaf customers will want to attend College organized events.

The inaccessibility of Staff Office training room needs to be prioritized when appropriate space becomes available. Discussions are ongoing with relevant stakeholders to identify a space.

3. Accessibility of Services Supplied to a Public Body (Section 27)

This section of the Act requires that, with effect from 31 December 2005, where a service is provided to a public body, it shall ensure that the service is accessible to persons with disabilities. Services provided to a public body might include, for example, a scheme which

is administered, under a contract, on behalf of a public body by another agency or a private company.

Key activities

The College Procurement procedures were amended in 2010-11 to ensure that all procured goods are compliant with the Disability Act 2005 (and the College Accessible Information Policy). Guidelines were developed in addition to being included in the Accessible Information Policy stating: Request for goods or services should demonstrate relevant experience of applying Universal Design principles and providing solutions that are accessible to the widest user audience, including older users and users with disabilities.

It is essential that the goods or service fulfill the following criteria:

- Be technically accessible, in that it is possible for all users to access all information and functionality;
- Be equally usable, in that it is not prohibitively difficult or time consuming for users with disabilities to carry out normal tasks;
- Be capable of being adapted or configured by individual users to meet their specific needs and preferences;
- Be capable of interfacing with appropriate, widely available assistive technologies employed by users.

Further guidance is available at:

<http://www.tcd.ie/disability/banner/Policies/Procurement.php>

Issues and future work

A lack of awareness of these guidelines in College maybe an issue as is the question of how to ensure purchasers of goods/services take accessibility into account is a serious concern.

There are many examples of goods and services being purchased that have ignored

compliance with DA 2005. Work will continue with the Procurement Office to raise awareness and scope monitoring mechanisms to ensure compliance.

4. Access to Information (Section 28)

This section requires public bodies to, "as far as practicable", have in place arrangements for events for the communication of information in Braille, sign language or audio format or in a format requested by an aurally or visually impaired person. This section also requires public bodies who, for example, communicate by e-mail or publish information on the web, to ensure that, "as far as practicable", such information is transmitted or published in a format that is compatible with adaptive technologies used by visually impaired people.

Key activities

The Accessible Information Implementation Report for Year 3 (2011-12) main findings are:

1. Compliance with College Accessible Information policy varies throughout administrative areas in College. This is due to a number of factors including a lack commitment at a senior level for implementation and a lack of resources to allow for modifications of online & printed material.

Action: Director of Disability Service to raise issue at Senior Administration Group to raise awareness and to ask for senior delegation of responsibility for implementation in year 4.

2. Procurement of strategic College information systems and awareness of the policy is low. Procurement procedures outline the necessity to be compliant with this policy and the DA 2005 Act. If staff are unaware of such procedures it becomes more difficult to implement adjustments to a system or product once procured and purchased.

Action: The National Disability Authority Procurement Guidelines (www.tcd.ie/disability/banner/Policies/Procurement.php) will be promoted via the College Procurement Office & the Senior Administrative Group to ensure feedback on the level of accessibility a system or product reaches and how it is received at the procurement process.

3. Online Help Resources need to be further promoted within departments as the first line of contact in resolving queries on compliance with the Accessible Information Policy. Less reliance on a human based support to fix queries can be achieved with use of such online help.

Action: The Disability Service to contact IS Services to ensure College IT User support are aware of resources (<http://www.tcd.ie/CAPSL/TIC/accessible-info/>) and promote their use when troubleshooting with staff. Further awareness to be promoted by delegated department members.

4. College Branding – some discrepancies were found in the accessibility (inaccessible fonts used in College logo) of current college branding in print and electronic formats.

Action: The Communication Office is the process of appointing a Branding Manager, awareness raising of the Accessible Information policy will take place to ensure both areas of communication (print & electronic) comply with College policy.

Future actions and activities

Print Communication:

- All documents sent to Board continue to be monitored for their compliance with the policy.
- Monitor progression by all areas (Academic & admin) to ensure all online documentation created is fully accessible in their design & layout.
- Ensure College branding is fully compliant with the College Accessible Information policy.

College Websites

Ensure all College Services websites adhere to College Web Design Policy and use of online resources in the creation of accessible online content. Monitoring of a selection of websites will take place to measure adherence with web design policy.

E-Learning

To continue to encourage the use of alternative formats audio/ multimedia for use in service websites and use for iTunes. The use of such formats makes sites more usable and accessible for many students with disabilities. Connections will be made with CAPSL and ISS who are introducing 'Blackboard' to ensure multi-media is used.

Person to Person communication:

As part of the on-going physical access works permanent loop systems will be fitted in essential service area offices and correct signage put in place to make the public aware of such devices.

Information Technology

Continue to monitor major Information technology projects and ensure that accessibility is incorporated into procurement & end-user design.

College Organized events

Monitor feedback for customers with disabilities to ensure these 'College Events' guidelines are adhered too. Clear information available on the Communication Office web pages on ensuring all events are accessible is provided at:

<https://www.tcd.ie/Communications/local/event-management/>.

5. Disability Act 2005 - PART 5: Public Service Employment

The Disability Act 2005 makes additional requirements on public bodies to promote the employment of people with disabilities and to employ at least 3 % of staff with a disability. Part 5 of the Disability Act 2005 provides for a statutory report on employment of people with disabilities in the public sector. Accordingly the following data is provided annually to the HEA by the Equality Officer via the Disability Act 2005 Census of Staff report:

- Total number of employees 3,296;
- Number of employees with a disability under the definition in the Disability Act 2005 is 75;
- Percentage of employees with a disability under the definition in the Disability Act 2005 2.3%;
- 32 staff on disability leave;
- We completed an all staff census in 2009 with a 31% response rate (1094 staff), this report has been updated annually but we are far from reaching 100% return on this census.

Supports for staff in College included:

- There are supports in place for staff with disabilities via the College Disability Service and Staff Office and clear processes for the provision of reasonable accommodation outlined in the Code of Practice Applying to the Employment of People with Disabilities;
- Reasonable accommodation requests are being processed in a timely fashion and are centrally funded as provided for in the Code of Practice. Numbers seeking support is low, reasons unknown;
- The Staff Office follow-up on individual cases on staff on long term sick leave with acquired disability;
- Disability Awareness is offered to managers on an individual basis and via the web at: <http://www.tcd.ie/disability/staff/Staff/index.php>;

- Assistive technology and ergonomic supports offered as part of needs assessment along with Occupational Therapy support is required.

Policy development:

- Continued to monitor and update the implementation of the Accessible Information Policy <http://www.tcd.ie/about/policies/accessible-info-policy.php> and Code of Practice Applying to the Employment of People with Disabilities; http://www.tcd.ie/about/policies/employment_of_people_with_disabilities.php
- The new College Equality Policy was launched in 2011;
- Accessible Information Policy reviewed, revised and forwarded to Equality Committee for approval in Trinity Term 2012;
- Disability Service launched their Strategic Plan that now includes a student journey approach to providing transitional supports through 3 phases as students prepare to enter College, progress through their course and begin the transition to employment. The 3rd phase will develop expertise for supporting disabled graduates and allow for improvements for potential employee's thinking of College as a possible employment source.

Training

- Mental Health training offered to all managers , approximately 65 participants;
- System in place for uploading disability census information to a secure screen in Core HR with limited access by nominated staff (The Staff Office Business Analyst and the Equality Officer). Confidentiality agreement and securities in place as suggested by NDA guidelines;
- Recruitment monitoring in relation to the nine grounds under the Employment Equality Act, including disability, in place since 2008 (anonymous monitoring). This provides an indication of the profile of applicants and is included in the Equality Officer's Annual Report. Currently diversity monitoring is being mainstreamed in the

e-recruitment system.

Issues and future work

- Continue to raise awareness of the supports available to staff with disabilities in College amongst staff and manager;
- Improve the culture of disclosure in College;
- Return to work strategies need to be developed to encourage staff out on disability leave to return in a more systematic way including assessment of needs;
- Redeployment strategy required and should include opportunities for disabled staff to be moved if circumstances change;
- Improve data collection and monitoring –the collection of disability and other equality data is currently being streamlined in the e-recruitment module;
- Continue to implement physical access improvements outlined above;

6. Disability Act Complaints

DA Complaints Procedures were reviewed in 2011-12 with Inquiry Officers to ensure procedures were fit for purpose, clear to complainants and information on website was easily understood. The Complaints form was updated to include a checklist which makes it easier for people to understand what information is required when making a complaint.

Improved information - a direct link to the information on Disability Act 2005 and contacting the College Access Officer via the TCD homepage of the Website is now possible by opening the 'Accessibility' link at bottom right of the homepage

<http://www.tcd.ie/disability/banner/Links/Access-officers.php>.

Training was organised by the Secretary's Office, the Disability and Staff Office for Inquiry Officers and other staff in College who deal with the informal stage of making a complaint in College. Procedures and guidelines will be developed by the Staff Office so that staff will find it easier to resolve matters at an informal stage.

DA 2005 Complaints 2011-12 three complaints were dealt with in 2011-12, the complaints were in relation of the failure of the College to comply with section 25 (physical accessibility) and 26, Access to Services.

Two complaints were from staff and both related to physical access and egress issues in a Service area and one from a student in an academic school complaining about access to classes in an academic school. All complaints were investigated as a *prima facie* case existed. The time-line outlined in the DA 2005 Complaints procedure linked here:

<http://www.tcd.ie/disability/banner/Policies/Complaints.php#prodecures> was adhered to in all cases. The outcomes of the complaints are listed below:

DA Complaint	Outcome and Conclusions	Recommendations
Service area 1	Upheld - The Service and the services it provided during specified period to complainant were inaccessible to her for periods of time owing to the passenger lift being out of order.	A review of the service plan with the Lift contractor should be undertaken with the aim of reducing any time delay between reporting and resolution of any issues and recording of same. Egress signage should be added in Service area for users with a disability to assemble in case of emergency.
Service area 2	Upheld - services provided by the Service area during the period to the complainant were inaccessible owing to the specific hydraulic lift being out of order.	A refund of subscription and that complainant be advised by the Service area when the hydraulic lift is functional again so that he/she may re-use the facilities offered should complainant so wish. It is also recommended that (i) every effort should be made by the Service area, in conjunction with the Buildings Office, to achieve a solution to this issue, including such measures as are needed to permit sufficient time for this work to be undertaken; (ii) a reasonable completion date should be set for this work; (iii) when the work is completed the Access Officer should be informed.
Academic	Upheld – inaccessible	The complainants’ seminars are relocated to an

School	teaching and meeting space in School	<p>accessible venue immediately.</p> <p>The School should ensure that accessible venues are used for all classes which are part of the courses on offer by the School and the School needs to anticipate that there is likelihood that there will be students/visitors who will find it difficult to access classes in inaccessible parts of the School.</p>
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Monitoring Complaints

Whilst the number of complaints remains low and there is no national data on the number of complaints under this legislation it is important to log all complaints to ensure that emerging issues out of formal complaints are recorded. The Access Officer established A DA 2005 Complaint monitoring procedure to ensure recommendations were acted upon in a timely manner. This annual report will outline all complaints and comment on recommendations and actions taken annually to ensure these issues are responded to and do not arise again.

Appendix 1: Accessible Information Implementation Report– Year 2011-12

In year three of the implementation the main objective/activities were:

1. To review progress on administrative areas on compliance with the policy -

Following on from work completed in year 2, each administrative area representative agreed to start work on ensuring agreed objectives and goals are implemented within their specific area. Each area was met/ contacted to give an update on the goals set and to raise issues they may have encountered to date.

2. Engage with Strategic College projects (FIS, GeneSIS & HR) - Three major strategic college systems are in the process of design and implementation. The aim of this task was to ensure the respective project teams were made aware of their responsibilities to the policy and tendering process for such strategic IT systems.

3. Accessible Procurement – To gain feedback from the College Procurement office on compliance by the preferred print supplier *Custodian* with the policy. To also raise the issue of a future tender for college print design work.

4. College Branding – To query with the college communication office on present print & I.T branding layouts to ensure its compliance with the policy (online & printed).

5. Support and promotion accessible information resources – Further promotion of online resources as a first point of reference for all issues relating to creating accessible information - (<http://www.tcd.ie/CAPSL/TIC/accessible-info/>)

6. Accessible Web policy & Accessible Information policy update – To update of both relative policies to ensure ease of use and contain the relative links to support on creating accessible information.

7. Person to person communication – All departmental portable loop systems tested and clear guidelines on booking an ISL interpreter for college events made available from the Disability website –

<http://www.tcd.ie/disability/banner/Physical/event-access.php>

1. Progress on Administrative Areas: Year 3

The table below gives a brief overview of the topics reviewed under each administration areas that engaged in year 3 of the plan.

The × symbol against the topic shows work on this is still outstanding or in progress for the summer work plan 2012.

The ✓ symbol indicated the work is on-going or been completed under this topic.

	Online application tool	Format of current online & printed documentation	Training & introduction of TIC tool	Web policy accessibility compliance
Staff Office	✓	×	✓	✓
Sports & Recreation	No online application	✓	✓	✓
I.S Services	×	✓	✓	✓
Accommodation Service	×	✓	✓	✓
Careers Service	✓	×	✓	✓
Office of the Vice Provost	No online application	✓	✓	✓
Treasurer's Office	×	×	✓	✓
Student Counselling	×	×	✓	✓
Secretaries Office	✓	✓	✓	✓

Office of the C.O.O.	No online application	☑	☑	☑
College Health service	No online application	×	☑	☑
Directors of Buildings office	No online application	×	☑	×
International office	No online application	☑	☑	☑

Additional feedback on progress to date:

The table above shows the progress of administrative departments in compliance with the policy. From meeting and gaining feedback from each department area representative on a yearly base, we see compliance on ensuring online documentation in an accessible format is slow. This is despite online resources currently available for all staff and the offer of further departmental training on request.

Slowness with compliance in larger administrative areas is more prominent i.e. Staff Office / Treasurers Office. Slow compliance in these areas is due to a lack of internal departmental planning to implement agreed items received from the year one audit carried out with the department representative. Examples of this issue include; the Director of Building Office website who agreed to a redesign over 12 months ago but on querying this was advised they are awaiting the Web Office to allow resources for such work and the Staff Office where the volume of public available documentation (policies & procedures) is vast for one staff member to monitor and report on compliance.

It is felt in these cases that although feedback is received from the appointed staff member from the area in question, they do not have the time or resources to cover the entire department. As a result it is difficult to ensure a full audit has been done of the area

although the department representative reports their information is compliant with the policy and all staff made aware of their obligations.

Positive actions to combat such issues are checks on information going to board or information posted to the department's website (reliant on the departmental web author or EO). In these cases, if the information is not compliant with the policy it forces the author to modify its design and familiarise themselves with the online tools. Further work such as the TIL project (Trinity Inclusive Library) has seen improvements in information and training accelerate at a greater pace due to agreed objectives and greater staff co-operation.

2. Engage with Strategic College projects (FIS, GeneSIS & HR)

The coming year will see the roll out and introduction of three major strategic college systems to help improve college efficiency and administration:

- FIS – Financial Information System
- GeneSIS – Student Information system
- HR – Human Resources system

To ensure such vital systems are inclusive for all staff and students each project team was contacted and met to ensure they were aware of their obligations to the policy. This is vital in relation to information technology principal of the guidelines which states "College should ensure, as far as practicable, that information systems are usable and accessible to all users" (IPC Guiding Principal 2007-2008).

With regard to the FIS project the Project Manager agreed to include the below questions in the competitive dialogue process in ensuring accessibility is covered by all tender applicants and to feedback to the Disability Service on responses when received:

Q1. In relation to your product can you tell me if the design conforms to Universal design principles?

Q2. The college has in place 2 policies ensuring information is accessible to all users - the college web policy and colleges Accessible info policy – can you tell me if your product validates against any WCAG guideline and if so what level?

Q3. Does your product come with an accessibility statement?

GeneSIS is now at the 1st stage of implementation and has confirmed they have been in dialogue with the web office to ensure the tool meets web accessibility guidelines and usable as per ICT guidelines.

3. Accessible procurement:

As a further measure to ensure successful implementation of the policy the Procurement Office was contacted in year 2 to raise the need for all tender processes to include accessibility and access questions for each applicant to address –

<http://www.tcd.ie/disability/banner/Policies/Procurement.php>

Year 3 work gained feedback from administrative areas on how they presently print and design documents. This has a major impact on the accessible nature of such information (booklets, guides, service reports etc.) if the design supplier in question does not have an understanding to their obligations with regard the policy. It was gained from the feedback that many areas have agreements with design companies who also carry out the print task as part of the job. This goes against the College procurement policy and leads to completed work been made public in an inaccessible format.

As a result of this dialogue the Procurement Office has agreed to start a tendering process for print design to sit alongside the print supplier Custodian to ensure a common agreed service level and familiarity of college policies.

The College preferred print supplier ‘Custodian’ was also met to give feedback on any issues staff have raised over the year. The following are standard for TCD works that goes through Custodian:

- All work complies with print communication guidelines
- All quotes include a price for creating a digital format that is accessible ready (i.e. tagged and image description in place)
- All work in taken in from other design companies are asked about the knowledge of understanding of accessibility guidelines and ask to contact the Disability service if they are unsure of their obligations.

4. College Branding

From examining College publications discrepancies arose in the current College branding – (paper and on-line). For example the College logo currently printed on the College prospectus and headed paper is in an inaccessible serif font. This has an impact on all college material printed and produced online for public use. This has been raised by academics in a number of Schools when asked to comply with the accessible font point raised in the policy.

The College Communication office was contacted and met with view to ensuring all College logos were addressed and updated as needed.

The Communication Officer is aware of this issue in non-compliance with the policy. They are presently advertising for a position of Branding Manager who will have responsibility for a full review of all college branding to ensure online and printed reflect the same design and comply with all guidelines. This work is due to be reviewed again in year 4.

5. Support and promotion of accessible information resources

The promotion of the online resources (<http://www.tcd.ie/CAPSL/TIC/accessible-info/>) to all staff was covered in each departmental follow up meeting. The resources give clear explanations on the basics of ensuring information is created in an accessible format. Work in year 3 ensured these resources were kept up to date with help on Microsoft office 2010

which is the preferred choice of word processing package for creating information. The areas covered online include:

- Microsoft Word 2007 / 2010
- Microsoft PowerPoint 2007/2010
- Adobe Acrobat Reader & Adobe Acrobat Professional
- Web accessibility via Dreamweaver
- Accessible e-mail formats
- Creating resources for students e.g. Hand-outs/ Reading lists/

A full list of the resources can be found at:

<http://www.tcd.ie/CAPSL/TIC/accessible-info/>

6. Accessible Web statement & Accessible information policy update

A review of the Accessible Information and Web Accessibility Statement was carried out in this academic year.

Web accessible statement (<http://www.tcd.ie/accessibility/>):

Following discussions with the National Disability Authority who suggested that information on the Disability Act and who to contact should be on the College web front page, a redesign of this statement took place. This ensures that links to creating accessible information are easily found off all Trinity hosted web pages. From clicking the accessible statement links are provided to:

- Accessible information resources
- Accessible procurement of goods & services
- Ensuring a college event/function is accessible
- Information on the accessibility of the built environment

Accessible Information policy update:

From feedback gathered from meeting administrative areas on the readability & layout of the present online policy work was carried out on updating the policy. The main points behind this work was:

- To ensure users could follow & understand the policy.
- Remove un-needed jargon and overlap of information.
- Update the relative hyperlinks within the policy to tie to the online support resources.
- Add information regarding to the TIC tool - <http://www.tcd.ie/CAPSL/TIC/evaluation/>

7. Person to person communication

All portable loop systems within all administrative areas were serviced and checked for use. These devices provide a vital link for staff and students who are hard of hearing. The devices allow a conversation to be amplified via the loop system to the user's hearing aid. Locations of such devices have been added to the College maps at <http://www.tcd.ie/Maps/map.php> and are also found at: www.tcd.ie/disability/banner/Physical/loop.php

Guidelines for booking an ISL interpreter for college event/meetings were published at:

<http://www.tcd.ie/disability/banner/Physical/event-access.php>