



# **Call for Strengthening Implementation of Inclusive Education Guidelines**

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A Submission by Inclusive University Alliance

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# Introduction

There is a critical need for issuing supplementary schemes and guidelines to implement the existing government guidelines for Inclusive Higher Education for students with disabilities at HEIs. Presented below are the key challenges and recommendations that the Inclusive University Alliance would like to work with the Ministry of Education on, to ensure delivery of the government's guidelines and NEP mandate on inclusion on the ground.

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# **1. Challenges Faced by Higher Education Institutes in implementing government-mandated guidelines for inclusive education**

As higher education institutes, some of the most challenging areas to implement existing government guidelines on inclusive education are around the following:

## **1.1 Absence of specificity of implementation expectations and disability and inclusion-linked know-how in higher education institutes:**

Whilst the existing guidelines give broad frameworks, there is no clarity on how we can implement the same. The absence of professional know-how in the space of disability inclusion within the HEIs makes it difficult to translate them into reality. This, coupled with societal misconceptions and a lack of awareness, becomes a major roadblock.

## **1.2 Absence of a clear scheme to run a functioning disability support office:**

Whilst the HEPSN scheme has enabled the setting up of resource centres, and other circulars have mandated the setting up of Equal Opportunity Cells/Equity Committees, the same is not sufficient to implement Reasonable Accommodation within higher education. This requires both a dedicated staff team with relevant qualifications and an earmarked budget. Typically, Equal Opportunity Cells have been run by faculty with multiple responsibilities who do not have the necessary time or skill set to run a Reasonable Accommodation system. Resource centres and equal opportunity cells have often been reduced to technology rooms with no associated services or training support required to integrate the use of technology for inclusive education.

### **1.3 Absence of harmony between the inclusion guidelines and the NAAC and NIRF evaluation criteria:**

As HEIs that are evaluated regularly through NAAC and NIRF frameworks, their inclusive education criteria do not do justice to the Inclusive Education Guidelines of the department. This makes it extremely complicated for HEIs who get caught between sometimes opposing frameworks. One needs to have more holistic and comprehensive evaluation criteria to ensure the implementation of inclusive higher education.

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## **2. Recommendations to address the challenges listed above**

### **2.1 Scheme for setting up the Offices of Disability and Inclusion in each college/institute/university**

- a. There is a need for a well-functioning office of Disability and Inclusion in HEIs to translate reasonable accommodations into practice.
- b. It is therefore recommended that a comprehensive scheme to set up Disability and Inclusion Delivery Framework, which includes both an Office of Disability and Inclusion and a decision-making committee, not just a resource centre or an Equal Opportunity Cell, be considered.
- c. This scheme should have clear specifications on the role and constitution of such an office, along with the role and qualifications of the staff of such an office, and the budgetary allocation.
- d. A tiered scheme for colleges and universities can be created with a varying number of staff and structure.
- e. Such a scheme needs to apply to all Higher Education Institutes, including professional institutes related to Medicine, Engineering, Law and others. It also needs to apply equally to the government-aided and private institutions.
- f. A clear budgetary allocation for the setting up and running of the Offices of Disability and Inclusion needs to be created, and the colleges/ universities need to be asked to provide annual utilisation of the same. It is critical to ensure that the budget for running the said office is considered on the same framework as providing teachers and staff of the college. The budget needs to account for both staff salaries as well as Assistive Technology funding and the running of training and awareness programs.
- g. The department can explore a Public-Private Partnership (PPP) model for supporting such a scheme and shared ownership with the college, but the budgetary allocation for inclusion delivery needs to be part of the government grants to the college. Such a scheme can also be run in partnership between the Department of Higher Education and the Department of Disability Affairs.
- h. It is imperative that such a scheme also have an inbuilt monitoring mechanism for its implementation.

- i. Such an office should also have additional well-defined schemes for:
- Providing Assistive Technology devices along with training to students studying in higher education.
  - Allocating funds to implement reasonable accommodations required by individuals with disabilities. In addition to AT tools and training, these funds could include the preparation of instructional materials in an accessible format and other Reasonable Accommodations.
  - Systems and financial allocation for implementation of the scribe guidelines and examination guidelines of the Ministry of Social Justice and Empowerment.
- j. Below is the proposed framework, along with the staff role and qualification table

**Table 1:** Proposed Structure of the Disability and Inclusion Delivery Framework at a University/College

<p><b>Office of Disability and Inclusion</b></p>	<p><b>Role:</b></p> <ol style="list-style-type: none"> <li>Ensure the implementation and delivery of Reasonable Accommodations to students and staff with disabilities on campus throughout the student's life cycle—from admissions through the course of study, graduation, and placements.</li> <li>Ensure the institute is implementing all mandated guidelines on inclusive higher education.</li> <li>Promote a culture of inclusion and diversity on campus.</li> </ol> <p><b>Constitution:</b></p> <ol style="list-style-type: none"> <li>1 Full-time Officer/Manager/Coordinator of the Office of Disability and Inclusion</li> <li>Assistive Technology Assistant (Full/Part-time)</li> <li>Administrative Assistant (Full/Part Time)</li> </ol>
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<p><b>Enabling Committee/Inclusion Committee</b></p>	<p><b>Role:</b></p> <ul style="list-style-type: none"> <li>a. Overseeing the work of the Office of Disability and Inclusion.</li> <li>b. Decision-making authority for creating the necessary internal policies and processes required to promote inclusive education practices.</li> </ul> <p><b>Constitution:</b></p> <ul style="list-style-type: none"> <li>a. Head of the institute (Principal/VC)</li> <li>b. Other administrative heads as applicable to the college/institute</li> <li>c. Senior faculty members</li> <li>d. Office of disability and Inclusion staff</li> <li>e. Students with disabilities on campus</li> </ul>
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**Table 2:** Proposed Staff Structure for the Office of Disability and Inclusion

<p><b>1 Full-time Officer/Manager/ Coordinator of the Office of Disability Inclusion</b></p>	<p><b>Role &amp; Responsibility:</b></p> <ul style="list-style-type: none"> <li>a. Coordinate and implement all Inclusive education and inclusion-related activities and services for students and staff with disabilities on campus.</li> <li>b. Be in charge of the Reasonable Accommodation policy, meetings and delivery of services under the same.</li> <li>c. Be in charge of grievance redressal for inclusive education related concerns.</li> <li>d. Coordinate Assistive Technology availability and training for students and staff with disabilities on campus (seeking additional support as the need be)</li> <li>e. Plan and conduct training and awareness programs for various stakeholders on campus on inclusion and accessibility to ensure effective implementation of Reasonable Accommodations through diverse stakeholders on campus. (E.g. Examination committees/ Faculty for conducting inclusive assessments; Library/Faculty for ensuring accessible content and inclusive classroom teaching methodology; Student groups for making campus extracurricular activities inclusive; Hostel Wardens to ensure accessible stay, etc.)</li> <li>f. Collaborate with other HEIs and networks to document, share and build commonly available resources for inclusive higher education.</li> <li>g. Undertake such other activities that will foster a climate of inclusion within the campus and beyond.</li> </ul>
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	<p><b>Qualification:</b></p> <ul style="list-style-type: none"> <li>a. Adequate knowledge of Inclusion and Disability studies</li> <li>b. Interest and passion for inclusion and diversity.</li> <li>c. Preferred degrees –Master's in Disability Studies/Psychology/Social Work/Sociology/Education, Rehabilitation Sciences/B.Ed. or M.Ed. in Special Education</li> </ul>
<p><b>Assistive Technology Assistant (Full/Part-time)</b></p>	<p><b>Role:</b></p> <ul style="list-style-type: none"> <li>a. Be responsible for the technical maintenance of assistive technologies and devices, and all technologies.</li> <li>b. Support the day-to-day running of the office.</li> <li>c. Be responsible for managing assistive technology training programs.</li> <li>d. Be responsible for managing accessible content creation services.</li> <li>e. Coordinate AT training programs with external partners and, with time, self-train to run the programs in-house.</li> <li>f. Undertake such other activities as are required to run inclusive education services at the institute.</li> </ul> <p><b>Qualification:</b></p> <ul style="list-style-type: none"> <li>a. Proficient in the use of computers and MS Applications</li> <li>b. Technical knowledge of hardware and repairs would be desirable</li> <li>c. Good typing skills</li> <li>d. Fluency in English</li> <li>e. Comfort with STEM reading</li> <li>f. Preferred Degrees – BSc or Diploma in IT/Computers</li> </ul>

<p><b>Administrative Assistant (Full/Part-time)</b></p>	<p><b>Role:</b></p> <ul style="list-style-type: none"> <li>a. Support with student Reasonable Accommodation paperwork and other associate administrative work in the office.</li> </ul> <p><b>Qualification:</b></p> <ul style="list-style-type: none"> <li>a. Proficient in the use of computers and MS Applications</li> <li>b. Good typing skills</li> <li>c. Fluency in English</li> <li>d. Knowledge of administrative tasks and management</li> <li>e. Preferred Degrees – Any Graduation</li> </ul>
<p><b>Note</b></p>	<p>The Salary Band for the above roles should be equivalent to the university pay roles for parallel roles in other departments</p> <ul style="list-style-type: none"> <li>a. 1 Full-time Officer/Manager/ Coordinator of the Office of equivalent to head of counselling services/wellness centre/student services</li> <li>b. Assistive Technology Assistant equivalent to the IT and Technical Office Assistant</li> <li>c. Administrative Assistant equivalent to an administrative assistant in the academic/registrar offices</li> </ul>

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## **2.2 Supplementary circular for Reasonable Accommodation Implementation – enlisting the RAs and RA implementation process**

- a. The existing guidelines of UGC mandate HEIs to ensure Reasonable Accommodations. However, there is a lack of clarity on the specific RAs applicable to different disabilities. This prevents colleges from actually implementing them.
- b. It is therefore recommended that supplementary standards documents that enlist the specific RAs, tools and formats for implementation of the same be released by the ministry to facilitate effective implementation on the ground.
- c. As a network of HEIs with some of us implementing these services, we will be happy to partner with the department to build these supplementary standards and tools as emanating from industry best practices and ground-level experiences. The same are already available on our network webpage as we keep refining them based on collective experiences.

## **2.3 Revision of NAAC and NIRF criteria on Inclusive Education to match the inclusive education guidelines of the UGC**

- a. While both NAAC and NIRF frameworks acknowledge the importance of inclusivity, they do not reflect the comprehensive nature of inclusive education as reflected in UGC and other guidelines.
- b. It is critical to upgrade the NAAC and NIRF frameworks and align them with the UGC and other guidelines to ensure effective implementation.
- c. Currently, both the NAAC and NIRF frameworks tend to over-focus on physical and digital accessibility quantifiable indicators as against holistic Reasonable Accommodation and inclusive pedagogy factors.
- d. The network will again be happy and willing to work with the department to suggest these criteria.

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## **2.4 Making Inclusive Higher Education training mandatory for teachers and other staff of higher education institutes**

- a. The effective implementation of inclusive higher education depends on all stakeholders of the college/institute ensuring their respective services are accessible to persons with disabilities. Setting up an Office of Disability and Inclusion is to supplement the Reasonable Accommodation delivery and not replace the educational experience within classrooms and on-campus activities. It is therefore critical and essential that all stakeholders of the institution are regularly trained and made aware of inclusion and accessibility specific to their domain.
- b. The current lack of awareness and training amongst the diverse stakeholders is a critical factor for inclusion not being able to be effectively implemented.
- c. There is a need to build training courses on existing training portals such as Swayam and Diksha for diverse stakeholders of inclusive higher education. Some suggested areas of training are the following:
  - Making classrooms inclusive for faculty,
  - Conducting Inclusive Examinations for Exam Committees/ Faculty,
  - Accessible Content for Library Staff/Faculty,
  - Student groups for making campus extracurricular activities inclusive,
  - Hostel Wardens to ensure an accessible stay,
  - Infrastructure teams in physical accessibility,
  - IT teams in digital accessibility.
- d. It is also crucial to make it mandatory for stakeholder to get training on inclusion and accessibility at least once every 2 years, similar to a refresher course, and have the same made mandatory criteria within their regular appraisal and promotion systems.

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## 2.5 Forming a Department of Higher Education Working Group on Inclusive Higher Education

- a. Inclusive higher education is a continuously evolving field from the perspective of assistive technologies, best practices and much more. A regular review and updating of standards, circulars and guidelines is required. It is strongly recommended that *a dedicated working group/committee for inclusive higher education be formed within the Department of Higher Education that can assist the department in the same*. Such a group/committee should have a mix of Higher Education Institutes with a known track record in inclusive education, practitioners in the space and students with disabilities currently in the higher education system. The IUA would be very happy to be part of such a working group and work closely with the department.

# Way Forward

As a network of HEIs and associated organisations that have been involved in the implementation of existing guidelines in the field, we do have resources that are documented that can be shared with the department and we will be eager and happy to work with the department to facilitate the implementation of the above recommendations. We are willing to share our experiences and expertise to build a sustainable relationship with the department to ensure that the collective broader goal of ensuring inclusive higher education for every student with disability in India is realised. We cannot achieve this without the support of the government, and hence eagerly seek a positive response to take things forward

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# Prepared By

**Inclusive University Alliance** | <https://inclusiveunivs.in/>

Inclusive University Alliance is a dynamic network of leading higher education institutions, associated organisations and higher education professionals in India that feel strongly about enhancing the quality of Inclusive higher education in India.

A group of HEIs and other organisations had come together in 2019 to share best practices in inclusive higher education amongst themselves. Over the past five years, the group has been involved in collectively supporting each other's practices, sharing knowledge through webinars and conferences and supporting other institutions in starting their inclusion journey. This work has enabled the group to expand and build IUA into a national network.

The Mission of IUA is to transform the Indian higher education space to make it inclusive and accessible for students with disabilities. To ensure that the country's inclusive higher education guidelines are in line with the ground needs and are translated into action for the last student with disabilities.

IUA works in the spirit of collaboration and knowledge sharing through open-source publications of its collective work.

## Contact Us

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## **Annexure A - List of Members of Inclusive University Alliance**

<b>Sr. No.</b>	<b>Name of Member</b>
1.	Ashoka University - Sonipat
2.	Azim Premji University - Bengaluru
3.	Indian Institute of Management - Bengaluru
4.	International Institute of Information Technology - Bengaluru
5.	St. Xavier's College - Mumbai
6.	Krea University - Sri City
7.	Plaksha University - Mohali
8.	Indian Institute of Technology - Madras
9.	Assistech Lab, IIT Delhi
10.	Saksham
11.	Spandan, Inclusion and Accessibility Consultancy
12.	Inclusive Science, Technology, Engineering, and Mathematics Foundation (I-Stem)
13.	Evoluer Solutions

14.	v-shesh Learning Services Private Limited
15.	Indic AI
16.	Diversity and Equal Opportunity Centre (DEOC)
17.	Benetech
18.	Deepa Palaniappan - Azim Premji University
19.	Kade Finnoff - Azim Premji University
20.	Dr. Anubha Goel - IIT Kanpur
21.	Dr. Someshwar Sati - Centre for Disability Research and Training (CDRT), Kirori Mal College, University of Delhi
22.	Ashutoshsinghal -Alumni of Hindu College, Delhi University
23.	Dr. Nishtha Thaker -IIM Ahmedabad
24.	Shashikant Pawar- Plaksha University
25.	Dipendra Manocha- Saksham
26.	Homiyar Mobedji - Benetech
27.	Dr. Sheelu Kachhap - Banaras Hindu University
28.	Shruti Pandey - Banaras Hindu University





Building Inclusion in Higher Education

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