Universal Design for Learning Policy in Tertiary Education in Ireland: Are We Ready to Commit?

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Abstract.

The demographics of Irish tertiary education are changing rapidly, with a growing diversity in the learner population bringing many opportunities and challenges for the sector to consider. Traditionally in Ireland, approaches to supporting diverse learners, such as those with disabilities, were predominantly through methods of differentiation and reasonable accommodation, arguably associated with the medical model of disability. Increased diversity, however, makes this approach alone unsustainable. The numbers of learners registered with support services, for example, has increased dramatically, with services now overstretched. In Ireland, focus is shifting to a greater emphasis on universal supports, synonymous with the social model of disability. There is growing interest in Universal Design for Learning (UDL) as a way in which to reduce barriers and give all learners equal opportunities. Despite this, little is known about the extent to which UDL is embedded in tertiary education policy and practice. The aim of this chapter is to examine the role of UDL in tertiary education in Ireland, focussing on three main areas: UDL within national tertiary education policy; institutional responses to UDL policy; and interest in UDL by educators.

Keywords: Higher education; Inclusive education; Ireland; Universal Design (for learning); Policy.

1. Introduction.

The changing profile of students in higher education (HE) is well recognised in research internationally (Claeys-Kulik et al., 2019). As the numbers attending university have risen overall, the homogenous cohorts of students have been replaced by non-traditional learners from diverse social, racial, religious, linguistic and learning backgrounds, personal





circumstances and abilities (Claeys-Kulik et al., 2019). In line with these broader demographic changes, there has been a dramatic increase in the numbers of students with disabilities in tertiary education (Costello-Harris, 2019). Changing student demographics has led, however, to an increased focus on the extent to which further and higher education institutions (HEIs) are inclusive (Aranka et al., 2021). Greater diversity among learners has led to greater demands for on-campus supports such as disabilities services with an increase in the number of students seeking individual educational 'accommodations' (Capp, 2017).

In Ireland, almost 40 per cent of the HE student body is made up of 'non-traditional' students (Quirke et al., 2018). In particular, there has been a notable increase in the percentage of students with disabilities enrolling in HE over the last decade (AHEAD, 2022). In response to increased student diversity and the recognition that the provision of individualised supports for students with disabilities is unsustainable (McCarthy et al., 2018), there is a shift in focus towards new innovative pedagogies, such as universal design for learning (UDL), which aim to remove barriers to learning and create equitable learning environments by design, rather than in response to student needs (Quirke & McCarthy, 2020). Internationally, the UDL framework is increasingly recognised as a way in which to achieve inclusive practice in education generally but has gained significant momentum in HE policy and practice in response to increased student diversity (Capp, 2017). In Ireland, however, there is little under- standing of the extent to which UDL is being used in tertiary education policy and practice. This chapter seeks to identify and analyse the emerging national and institutional strategies, policies and practices related to UDL in Irish tertiary education.

2. Further and Higher Education in Ireland.

The post-secondary, or tertiary sector of education in Ireland consists of the Further Education and Training (FET), and HE sectors. HE represents the traditional route of educational progression for post-secondary students seeking to attain an undergraduate degree or postgraduate qualification. It is provided by a combination of state and privately funded colleges, universities and technological universities.

FET, while also pertaining to post-secondary education, does not include the HE sector. It offers a wide variety of educational programmes to learners over the age of 16, including numeracy, literacy and digital skills programmes, and specific skills training, apprenticeships and traineeships (Euroguidance, 2022). Sixteen regional Education and Training Boards

(ETBs) across Ireland are responsible for overseeing the delivery of FET programmes, and delivery occurs in a wide variety of schools, organisations and institutions. Education and Training Boards Ireland (ETBI) is a representative body established to collectively represent the 16 regional ETBs at a national level.

The state agencies who are tasked with the strategic development and performance of the FET and HE sectors nationally are SOLAS (the Further Education and Training Authority) and the Higher Education Authority (HEA) respectively. Both agencies operate under the aegis of the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS).

Publicly funded HEIs in Ireland engage with the HEA through the Systems Performance Framework (HEA, 2018a), which details the national priorities and key objectives of Ireland's government for HE. This document is updated periodically, detailing government aims, objectives and priorities which are advanced through strategic dialogue between the macro (national) and meso (institutional) levels of the sector. Through this strategic dialogue process, institutions must agree to a performance plan spanning a number of years with the HEA, known under the framework as a 'compact'. This process aims to provide an opportunity for institutions to set out how they will contribute to regional, national and system objectives. A similar model is operated as part of the planning process regarding FET provision, with SOLAS engaging in strategic dialogue with each individual ETB, who outline how they will support national objectives in a Strategic Performance Agreement, a key mechanism to support delivery of the national FET Strategy (SOLAS, 2020).

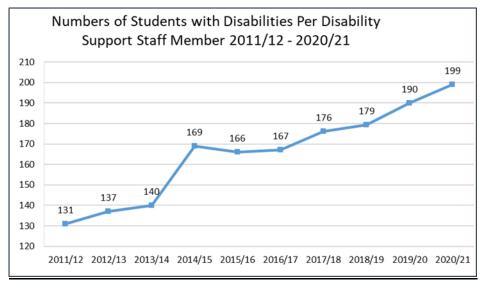
3. Increasing Learner Diversity in Tertiary Education.

There has been a notable change in the demographics of students attending FET and HE in Ireland over the past decade. Part of this change has been an increase in the numbers of students with disabilities in tertiary education which forms the primary focus of this chapter. AHEAD, a national independent, non-governmental organisation (NGO) focusses on creating inclusive environments in education and employment for people with disabilities, plays an important role in supporting practitioners across the tertiary education sector to implement UDL and other inclusive practices, and makes an important contribution to the policy debate. Each year it carries out research on participation rates of students with disabilities in HE by

analysing the number of students engaging with disability support services. Data from 2020-2021 shows there were 245,633 students in total accessing undergraduate and postgraduate programmes in publicly funded Irish HEIs (HEA, 2022). In FET, there were 151,630 students in programmes in Ireland (SOLAS, 2020), informing an overall estimate of approximately 400,000 students in Irish tertiary education, or one in twelve of the population.

There are currently 17,688 students with disabilities accessing disability support services in HE (6.6 per cent of the total student population), representative of a 268 per cent increase in students with disabilities engaging with HE support services over the last 12 years (AHEAD, 2022). However, this exponential rise has not been matched by a corresponding investment in support staff, with the number of students with disabilities per disability support staff member increasing by a more modest 52 per cent in the same period, thus highlighting the rising caseloads of support service staff (see Figure 1; AHEAD, 2022).

Figure 1. Number of students per disability support staff in HEIs from 2011 to 2021 (AHEAD, 2022.



With the rising numbers of students engaging with disability support services came a concurrent rise in the number of individualised accommodations, and the associated administrative and financial implications. The number of students with disabilities receiving one or more individualised examination accommodations (e.g., extra time, an alternative venue, use of technology, a scribe, a reader), for example, rose 192 per cent in the ten-year period between 2012 and 2021, with almost nine in ten registered students with disabilities now receiving this kind of support (AHEAD, 2022). The number of students with disabilities

participating in FET is 11,376, constituting 7.5 per cent of all learners enrolled (SOLAS, 2020). The true numbers in both sectors are most likely significantly higher given the literature which shows that some students choose not to disclose, due to factors including stigma, labelling and the desire for independence (Meeks et al., 2021). Moreover, further AHEAD research illustrates a notable disparity between the number of new entrants accessing HE disability support services and the much larger cohort who self-disclosed as having at least one disability through anonymous HEA data collection mechanisms (AHEAD, 2022). With the trend of rising diversity likely to increase, UDL is explored below as a more sustainable response than traditional inclusion practices, which focus largely on applying differentiated individual accommodations to ever-increasing numbers of students.

4. Universal Design for Learning.

Developed in the 1990s by the United States (US) non-profit organisation CAST (formerly the Center for Applied Special Technology), UDL provides a framework for educators to proactively plan their curriculum and pedagogy by anticipating student variability and making teaching and learning more universally accessible. Based on the social model of disability, it represents a shift away from a deficit understanding of learners to one where the "issue is not the exceptionality of the learner, but the design of the learning experience" (Fovet, 2021, p. 28). UDL proactively addresses those on the edges of the classroom, frequently the non-traditional student. In this way, it eschews the deficit-led medical model of disability and is more aligned with both the social and rights-based models (Capp, 2017). By incorporating UDL into normative teaching practice, many of the pressing issues and challenges that are engendered by rising diversity – facilitating greater student performance, well-being, higher retention rates and the promotion of greater equity of learning – can be alleviated, (Al-Azawei et al., 2016; Evmenova, 2021; Hall et al., 2015). With its emphasis on diversity, inclusion and technology, UDL also holds the potential to address some of HE's most urgent issues, including low rates of persistence, retention and degree completion (Davies et al., 2013).

Internationally, UDL implementation in tertiary education tends to come under broader institutional strategies seeking to create more inclusive educational environments (Dalton et al., 2019; Jwad et al., 2022; Tamtik & Guenter, 2019). The UDL framework is considered attractive to HEIs where differentiation is less applicable and there is increasing pressure on add-on support services such as disabilities services. Research suggests that UDL is

emerging in national- or macro level education policies (Evans et al., 2015; Flood & Banks, 2021; McKenzie & Dalton, 2020) but studies also highlight potential barriers to its implementation at the meso, or institutional level, and micro, or individual practitioner, level (Fovet, 2020; Hills et al., 2022; Scott, 2018). Scott (2018) shows the barriers to UDL implementation at the institutional and practitioner level can include a lack of general education teacher support for inclusion, a lack of administrative support, lack of general education teacher knowledge of UDL and a lack of preservice teacher placements or professional learning on UDL. Fovet (2020) also highlights the organisational dimensions of UDL implementation with reference to some of the difficulties including in "cross campus integration", "multi-layered organisational structures", staff coming from "varying backgrounds" and points to the fact that it is generally heavily unionised (Fovet, 2020, p. 164). For individual educators in HE seeking to implement UDL, studies show the issues faced can include time and resource constraints, a lack of institutional support and a lack of understanding within educational institutions (Hills et al., 2022). The findings of these studies suggest the need for both top-down and bottom-up initiatives to encourage broader implementation of UDL practices (Hills et al., 2022).

The next sections of this chapter examine UDL in: national policies for tertiary education (macro level) in Ireland; institutional strategies, compacts and projects in tertiary education (meso level); and the take-up of UDL professional learning in Ireland over time (micro level).

5. National Policy – Macro Level.

At the macro level, there is growing evidence that the implementation of UDL practices is viewed by national stakeholders in the tertiary education space as a quality and evidence-based response to an increasingly diverse student profile. This can be shown by the inclusion of aims and targets relating specifically to UDL in a range of national strategies and policy documents.

UDL first appeared in an Irish national tertiary education strategy in the National Plan for Equity of Access to Higher Education 2015-2019, which highlighted that while some targeted groups of students may require additional academic support, such supports should be delivered "in accordance with the principles of UDL and should not label them in any negative way" (HEA, 2015, p. 21). Despite this reference to UDL, it is arguable that few tangible priorities and actions were outlined in the plan to contextualise the statement and give it force.

In 2019, the impact of this plan was reviewed, with new priorities set by the HEA for the 2019-2021 period (HEA, 2018b). The review highlights that while some progress had been made in the drive to apply universal design (UD) principles and mainstream supports, it was "not a priority that is evident at the highest levels of planning in HEIs" (2018b, p. 47). It recommends further actions regarding the mainstreaming of equity of access, recommending that information on "universal design is communicated to higher education institutions" (2018b, p. 28).

In more recent years, however, the commitment of state bodies to a UDL approach in tertiary education appears to be strengthening, with more concrete objectives emerging in policy. One key example is the inclusion of UD and UDL as important features of the National Further Education and Training (FET) Strategy 2020-2024, (SOLAS, 2020). Placing inclusion as one of three key strategic pillars for the sector, this national strategy sets out a vision for the evolution of diverse regional FET facilities and provision into distinct integrated 'FET Colleges of the Future' for community-based learning. Its sets out nine key characteristics these colleges should have, including offering "Flexible Learning Opportunities", and providing "Consistent Learner Support", with a "universal design approach underpinning learning development and delivery" (p. 38). Furthermore, the strategy highlights that the FET sector can facilitate consistent learner support by "adopting a UDL approach in shaping its future provision" (p. 45), in-part driven by the "roll-out of good practice guidelines, including those in relation to universal design for learning" (p. 47). Interestingly, since their inclusion in main national strategy regarding the delivery of FET, both UD and UDL have featured prominently in subsequent FET-related strategies, such as the Adult Literacy for Life Strategy (Government of Ireland, 2021).

The release of the FET strategy was preceded by the release of a scoping document (Quirke & McCarthy, 2020) on the implementation of UDL in FET, and followed by the publication of national guidance (Heelan et al., 2021) and a supporting national resource hub (AHEAD, 2021) focussed on implementing UDL practice in FET (June 2021), in turn delivering on a key commitment in the strategy. Both of these documents were commissioned by SOLAS, and were developed by AHEAD, in line with the leadership and oversight provided by a national advisory committee on UDL¹. Furthermore, as part of the planning process regarding FET

^{1.} The National Advisory Committee on Universal Design for Learning (NAC UDL) was co-chaired by SOLAS and Education and Training Boards Ireland (ETBI), and featured representatives from a broad range of key national sectoral stakeholders such as Quality and Qualifications Ireland (QQI),

provision, the ETBs are asked to consider the UDL principles and implementation of the guidance in the context of their Strategic Performance Agreements (2022 to 2024) with SOLAS.

The notable increased engagement in UDL by national FET stakeholders has, more recently, been reflected in Ireland's HE sector. Arising from publishing the System Performance Framework 2018-2020 (part of the governance process for HEIs), was the requirement for HEIs to have a Student Success Strategy in place by 2020 which would aim to embed whole-of-HEI approaches to institutional access strategies (HEA, 2018b).

The National Forum for the Enhancement of Teaching and Learning (the Forum) was tasked by the HEA to develop a sectoral guiding framework for embedding student success (National Forum for the Enhancement of Teaching and Learning in Higher Education, 2020). The resulting framework released in 2020 contained three key pillars, looking at enabling capabilities, culture and practices. Under the "Enabling Institutional Practices" pillar, the framework states that a key enabling practice is when "teaching approaches and learning design ... are underpinned by the principles of universal design" (2020, p. 1).

Furthermore, the Forum also developed a toolkit (National Forum for the Enhancement of Teaching and Learning in Higher Education, 2021b) in consultation with key stakeholders including AHEAD, which supports institutions to build their Student Success Strategy. This toolkit makes a more overt inclusion of UDL in the statements listed to support the three key pillars of a quality student success strategy, referencing the importance of policy and strategy alignment with UDL, UDL in programme and service design, alignment of systems and processes with UDL, and importance of providing UD-related professional development. The final report of the Forum's Next Steps Project (National Forum for the Enhancement of Teaching and Learning in Higher Education, 2021a), which brought key stakeholders (including AHEAD) together to learn from pandemic provision, also makes recommendations to "enable UDL to become fully embedded for the benefit of all students" (2021a, p. 16).

The National Access Plan: A Strategic Action Plan for Equity of Access, Participation and Success in Higher Education: 2022-2028 (HEA, 2022a) is perhaps the most significant policy document on UDL implementation in Irish higher education to date. The plan is published and

the HEA, the Department of Further and Higher Education, Research Innovation and Science (DFHERIS), National Centre for Guidance in Education (NCGE), the National Association for Principals and Deputy Principals (NAPD) and the National Disability Authority (NDA).

revised periodically and is typically a key policy tool for advancing pathways into Irish higher education for under-represented cohorts (including disabled students). Its commitment to UD is situated within the vision of the plan, which states that its overarching ambition is:

"... that our higher education institutions are inclusive, universally designed environments which support and foster student success and outcomes, equity and diversity, and are responsive to the needs of students and wider communities" (HEA, 2022a, p. 28).

Previous iterations of the plan have tended to focus exclusively on increasing the access rates for students from a broad range of under-represented cohorts into HE. Informed by five goals, the current plan emphasises the holistic student experience of HE, with full participation and student success, as central aims. Its specific objective is to foster a whole institutional approach to access, student success and UD. To this end, the plan includes a range of key performance indicators, objectives and actions that combine to promote UDL practice. This subtle transition in the expansion of the plan's ethos is demonstrated in Objective 1.3, which seeks specifically "to embed a whole-of-institution approach to student success and universal design" which is measured by evidence of "accessible learning platforms, staff training, appointment of universal design champions, improved campus accessibility and qualitative review of universal design in HEIs", (HEA, 2022a, p. 57). This landmark policy document seeks to promote inclusivity, flexibility, sustainability and clarity, with UDL considered to be a key tool in realising this. It remains to be seen the impact of this plan on inclusion in HE.

One of the more significant policy developments in HE has been the announcement by the DFHERIS of a new one off 'Universal Design Fund', ringfencing €3 million for HEIs to "implement universal design and inclusive practices in their institutions" (para. 2), informed by aims to "complement existing student success measures in higher education" (DFHERIS, 2022, para. 27). This fund however is strongly linked to improving access and engagement for students with intellectual disabilities and autism, which strengthens the misconception that a UDL approach primarily supports students with disabilities, rather than promoting its evidenced benefits for all learners. This association comes with the risk that UDL becomes 'siloed' in the disability agenda, which may actively work against a 'whole of institution' approach to its implementation.

The national policy developments outlined highlight that overall, Ireland has a relatively robust macro-level commitment to UD and UDL in tertiary education. However, a complete analysis

of UDL implementation in post-secondary education requires an examination of this commitment at the meso or institutional level and micro level of Irish learning.

6. Institutional Buy-in – MESO Level.

This section examines the extent to which national policy commitments, and national stakeholder buy-in to a UDL approach, translates to clear targets and objectives set out in institutional strategic plans and performance agreements in HE, and visible inclusion in other institutional activities. This is achieved through an analysis of institutional strategic plans, performance compacts of institutions funded by the HEA and projects engaged in by these institutions. The findings from these analyses are varied.

6.1 Appearance in strategy and performance compacts.

In general, the majority of Irish HEIs set out their own overarching goals, aims and ambitions in a strategic plan which spans a specific period, typically three to five years. Strategic plans and performance compacts of 24 HEIs were reviewed ² by the authors. The findings show that 29 per cent of the strategic plans contain direct reference to UD and/or UDL, while 21 per cent contain specific targets related to the implementation of UD and/or UDL. The strength, nature and specificity of the statements and targets vary, and range from the broad ("embed Universal Design for Learning (UDL) across programmes") (Sligo, 2022), to the specific ("Apply UDL on a pilot basis in at least one programme per School") (WIT, 2018).

Universal Design/UDL is referenced to a greater degree however, within the institutional performance compacts, which all encompass 2018-2021. Forty-six per cent make direct reference to UD and/or UDL, with 38 per cent containing specific targets related to the implementation of UD/UDL. As with the strategies, the strength, nature and specificity of the

recent years, many smaller institutes of technology in Ireland have merged into new structures known as technological universities, but in some cases the strategic plans or compacts available were submitted by each individual institution before their merger, and so we have analysed them as individual institutions in this exercise. It is important for readers to understand that following results are therefore intended to be indicative, rather than a systematic reflection of the current state of play.

HEIs with whom the HEA works under statute or who are in receipt of core public funding. Finally, in

² When interpreting the following analysis, readers should note that only the latest available compacts and institutional strategic plans were considered. Where, for example, a strategic plan or compact officially expired in 2021, but no updated plan/compact had yet been published as of June 2022, the authors reviewed the most recent available plan. Equally, where no strategic plan or compact was readily available, the authors omitted said institutions from their review. The review was also limited to

statements and targets vary, but tend to be more specific and measurable than those in the strategic plans ("by 20/21, 75% staff will have under- standing of UDL"). (IT Sligo, 2019).

The greater visibility of UD/UDL in institutional compacts as opposed to strategic plans, is argued to be representative of the positive impact of national policy targets in influencing institutional practice. It should also be noted that 58 per cent of the strategic plans reviewed were due to conclude in 2022 or 2023, and with the increased level of UDL discourse nationally in recent years, one might speculate that a greater proportion of the updated plans to follow may make more tangible commitments concerning UD and/or UDL.

6.2 Appearance in institutional projects.

Despite relatively low levels of visibility for UDL in institutional strategies and compacts at the meso level, the majority of Irish HEIs are engaging in significant institutional projects relating to UD and/or UDL implementation. In 2021, the Irish government announced a €5.4 million fund to assist institutions to "support students with disabilities to access and engage with higher education" (DFHERIS, 2021, para. 1). The approved list of projects released with the announcement of this fund contains the titles of all 99 projects/initiatives funded across 23 HEIs under the fund. Sixty-one per cent (n=14) of the 23 institutions had at least one project whose title directly referenced 'universal design' or UDL. Of the 99 projects/initiatives funded, 22 per cent were UD/UDL related according to the project titles. The titles suggest the fund is supporting projects ranging in nature from strategic developments like 'UDL Audit', 'Developing a Universal Design Strategy' and 'Development Coordinator for UDL', to more practical supports and events to raise UDL awareness and understanding such as a 'UDL Symposium' and plans to 'Develop a UDL toolkit'. Once again, however, with this fund's aim being to assist institutions to "support students with disabilities to access and engage with higher education" (DFHERIS, 2021, para. 1), a strong association between disability and UDL is evident, which further highlights the risk that UDL may become 'siloed' in the disability agenda.

The high proportion of UD/UDL projects submitted is nonetheless evidence that staff operating at the meso level view UDL as a valuable approach to ensuring the increasingly diverse student population can equitably access HE. However, it is clear that this is not translating to the same extent into visible commitments in strategic plans and performance compacts, which along with the precarious nature of the once-off funding streams discussed, threatens the

long-term sustainability of UD and UDL implementation at the meso level.

7. Professional Development on the Ground – Micro Level.

This section examines the significant rise in engagement with UDL practice by educators in the tertiary education sector. In particular, we focus on the numbers of staff engaging with the UDL Badge, Ireland's leading UDL professional development programme for tertiary educators (Ryder, 2022). The UDL badge is a 10-week online course developed by AHEAD and University College Dublin, and delivered in partnership with the National Forum for the Enhancement of Teaching and Learning. In the first two years of the delivery of this programme, the numbers of participants who were awarded the badge annually were relatively low, but engagement rose dramatically in 2020 with the introduction of a new model of delivery and the onset of the Covid-19 pandemic (see Figure 28.2). As of March 2022, almost 2,000 UDL badges (1981) had been issued to professionals in FET and HE since its development. AHEAD understands anecdotally from working closely with facilitators of the programme and participants alike that the community approach taken to its delivery has helped to spark the formation of local networks and stimulated institutional projects and changes to practice too, such as the development of UDL communities of practice, and the incorporation of UDL into quality practices such as programmatic reviews (Ryder, 2022).

More and more national stakeholders are holding their own UDL events and symposiums for staff on the ground too, and increasingly, these events are going beyond typical introductions to the UDL framework, to more in-depth examinations of aspects of UDL, or specific events exploring the roles of different staff in supporting UDL implementation. Examples of events highlighting deeper enquiry into UDL application in 2021 and 2022 included specific events on UDL in guidance provision (NCGE, 2021), UDL in blended learning (QQI, 2022) and role based UDL events targeted at FET leaders and external authenticators (ETBI, 2021).

Total UDL Badges Issued Per Calendar Year 1200 1007 1000 800 664 600 400 94 95 200 0 2020 2019 2021 2018 -200

Figure 2. Total numbers of UDL badges issued per calendar year 2018-2021. (Ryder, 2022).

Data collected on the impact of UDL professional learning on staff suggests it can have a significant impact on practice. A recent participant evaluation of the UDL badge with 546 participants, found that 95 per cent "agreed" or "strongly agreed" that their participation had "a significant impact on their teaching and learning practices" (Ryder, 2022, UDL Badge 2021 Evaluation section) with some noting it: "completely changed my perspective", that they would "question structures and processes more", and that they would now "encourage a more collaborative approach with students" and felt able to "support a more inclusive and engaging educational experience" (Ryder, 2022, UDL Badge 2021 Evaluation section). Despite this information on the educator's perspective, there remains little understanding of the impact of UDL on the learner's educational experience and outcomes. This is arguably a result of the difficulties presented in evaluating UDL implementation through robust, large-scale, pre/post UDL research. The reflective and non-prescriptive nature of the framework, along with the different guises UDL practice takes when different practitioners implement it in their contexts, and the differing levels of prior experience with other forms of inclusive practice prior to a practitioner adopting a UDL approach, are all significant variables that make large-scale impact studies challenging to design. This issue could perhaps be addressed through the development of more human-centred and holistic indicators for evaluating the impact of UDL implementation.

8. Conclusion.

This chapter has examined the use of UDL in Irish tertiary education within the context of an increasingly diverse student population in the FET and HE sectors, with a particular focus on the increase of students with disabilities. It examines three key areas of policy implementation including: UDL in national tertiary education policy (macro level); UDL in institutional strategies, compacts and projects (meso level); and educator interest in UDL (micro level) in the tertiary sector. The findings suggest there is significant momentum in UDL implementation in Irish tertiary education in recent years across national, institutional and individual levels. Recent national level policy changes suggest an increased commitment to UDL as a pedagogical approach which responds to student diversity. In particular, a strong focus on a UDL approach embedded in the national FET strategy, and the recent introduction of the Universal Design Fund in HE, showcase a strengthening commitment to UDL on the national stage. Although UDL is intended to give every learner equal access to learning (including those with disabilities), government funding for UDL implementation in recent years has been strongly associated with supporting learners with disabilities.

Based on these policy developments, we conclude that there is scope to further strengthen the presence of UDL in national policy. Examples of this could include the explicit inclusion of UD and UDL as national system objectives within the HEA Systems Performance Framework, the provision of more sustainable, non-disability related funding mechanisms to support UD and UDL implementation, and the development of a national charter for the implementation of UD in tertiary education. Given the emergence of UDL in policy and the active stakeholder involvement in UDL implementation, policy decisions might also benefit from a UDL research pro- gramme examining evidence-based studies on UDL implementation, by exploring both teacher and learner perspectives and outcomes.

At the institutional level, the findings are mixed. The chapter demonstrates the clear practical 'buy-in' among HEIs which is evident in their engagement with institutional projects concerning UD and UDL; however, only a minority of institutions have specific commitments in their institutional compacts and strategic plans, suggesting a lack of commitment to UDL at the highest levels of planning in HEIs. This gap in strategy at the meso level, coupled with the precarious and short-term nature of funding for UDL, threatens the sustainability of the momentum which has been undoubtedly generated. In order to have long-lasting effects on student engagement and increase the level of buy-in from stakeholders and university staff,

the chapter suggests the need for greater strategic commitment at an institutional level.

Parallel to developments in UDL policy implementation at national and institutional levels, educators appear to have 'voted with their feet' regarding UDL implementation in response to increased diversity in the Irish tertiary student population. The chapter acknowledges the difficulties in measuring the effectiveness of UDL interventions on teacher or learner outcomes, but preliminary qualitative research shows a positive effect on teaching, learning and student engagement. The findings demonstrate a growing interest in UDL professional learning over time and the development of UDL communities of practice. To sustain the momentum, the chapter suggests research is required to develop more holistic and human-centred indicators to better evaluate the impact of UDL implementations, to better understand its effectiveness and support continued educator engagement.

Overall, the findings suggest Ireland is well placed to be a world leader in the implementation of UDL in tertiary education. There is clear evidence of strengthening commitment to UDL at the macro, meso and micro levels of the sector, high- lighting a progressive outlook to UDL in general. However, our findings also suggest a gap in institutional strategy at the meso level which, coupled with the precarious nature of funding for UDL, threatens the sustainability of the approach. Furthermore, this threat is accentuated with the continued association between disability and UDL practice, despite the evidenced benefits of UDL implementation for all learners. This siloing of UDL within the disability agenda, strengthened by evident links in national funding streams addressing UD, may explain its absence at the highest levels of HEI strategic planning.

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