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# Policy and Practice on Inclusive Higher Education in the UK and Kenya: A Theoretical Framework and Recommendations

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Abstract: This article presents a study that was undertaken as part of a collaborative project between a UK university and a university in Kenya. The study aimed to investigate policies and practices of Inclusion and Inclusive Education in the two universities. Here, we present how Inclusion and Inclusive Education are conceptualized in the two geographical contexts, and review literature on Inclusion, Inclusive Education, disability, race and international/refugee students to develop a theoretical framework that we use to analyze the policies and practices of the two universities in two case studies. Our preliminary findings of this analysis show that Inclusion and Inclusive Education definitions in the two contexts need to be augmented with considerations of identity. We also make recommendations for the two institutions on how they can improve their policies and practices of inclusion, generate new strategies where they are missing or review existing tools and services to evaluate. These recommendations can benefit higher education institutions in the Global North and South.

**Keywords:** inclusion; Inclusive Education; disability; international students; race; refugee students; university policies



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# 1. Introduction

Education is a fundamental right for everyone in order to live a fulfilled life. This is reflected in the primary safeguards for the right to education, which are the 1966 International Covenant on Economic, Social and Cultural Rights [1] and the 1989 Convention on the Rights of the Child [2]. Sustainability, on the other hand, is a necessity in order to safeguard our planet, the life it nurtures as well as humanity, and governments around the world have agreed on a common roadmap of goals and targets to achieve it, known as the UN Sustainable Development Goals (SDGs) [3].

Higher education can be a powerful tool by which we can achieve sustainability in society [4]. The role of sustainability in education is central, but it also involves a crucial commitment to social transformation [5]. Education can promote inclusion and social change, but it can equally widen the social and economic divides [6]. Universities therefore ought to develop and implement policies that make them more inclusive and diverse.

Although many countries have been working towards Inclusive Education since the Dakar Declaration in 2000, which reiterated the goals outlined in the 1990 World Declaration on Education for All signed in Jomtien, significant differences in access and completion, particularly by background, are still a distinguishing feature of most higher education systems.

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To date, education, at all levels, is not at pace with our expectations for it. Without programs to support disadvantaged learners, the inequities are exacerbated. Inclusive Education involves restructuring educational institutions to better serve all students [7]. Inclusive Education recognizes and responds to the diverse needs of learners in order to achieve the Education for All (EFA) goals. Sustainable Development Goal 4 calls for inclusive and equitable quality education for all, making education accessible and affordable and leaving no one behind [8]. Inclusion is pertinent to the achievement of Sustainable Development Goals (SDGs); otherwise, the goals will continue to fall further out of reach [8].

A higher education system should embrace Inclusive Education to ensure that learning institutions avoid exclusion or discrimination based on gender, disability, culture, ethnicity, religion, or any other differences [9]. Hence, access to inclusive mainstream classrooms, which accommodate diverse students, could translate to efficacy and attitudinal changes, thus enhancing student learning [10].

Inclusive Education as defined in the Salamanca Statement (1994, [11] embodies a "schools for all" approach; institutions "which include everybody, celebrate differences, support learning, and respond to individual needs", while taking into cognizance the buildings, curricula, educational resources and other facilities that accommodate the needs of all students, including those with disabilities [10].

Morina [12] says that inclusion brings learners, families, educators, and the rest of the community together to construct educational institutions and other social institutions that are founded on acceptance and belonging. Theoretically, inclusion should produce collaborative, supportive, and nurturing environments where personalized services are provided, and diverse needs are satisfied. Inclusion can target learners with disabilities but also tackle other layers of diversity such as gender, language, and ethnicity [13]. It is important to note that multiple layers of diversity can overlap, and this leads to the need for intersectionality in higher education to avoid systemic discrimination [14]. Effective implementation of Inclusive Education means the accommodation of and response to the manifold needs of all learners [15,16].

International Conventions and covenants commit to the provision of quality education for all; concentrating on the rights of specific people that are marginalized. For instance, UNESCO's Convention against Discrimination in Education (1960) calls upon countries to address barriers to inclusion in education. The International Covenant on Economic, Social, and Cultural Rights (1966) pronounces the right to education without discrimination. The Convention on the Elimination of All forms of Discrimination Against Women (1979) advocates for non-discrimination against women and equal opportunities for men and women. Article 1 of The World Declaration on Education for All (1990) states that the learning needs of each individual should be met by the provision of equal education opportunities. The Conference on Special Needs in Salamanca (1994) [11] states that all learners should be accommodated in institutions without discrimination based on their characteristics. The United Nations Convention on the Rights of Persons with Disabilities indicates that all children with disabilities have a right to education, and by 2015, 167 countries agreed with this. So, diversity and inclusion are considered fundamental in education, but how far are they implemented in HE policy?

The Agenda 2030 for Sustainable Development was approved in 2015 [8]; it has inclusion at its heart, and shares some guidelines on its implementation. It is encompassed under specific SDGs; No poverty (SDG 1), Quality education (SDG4), Gender equality (SDG 5), Water and sanitation (SDG 6), and Reduced inequalities (SDG10) [8]. The SDGs clearly address exclusion and call on countries to tackle it effectively (target 1.3), through the implementation of appropriate social protection systems for all, making educational facilities disability- and gender-sensitive and accommodative to all (target 4a), equal access to education for all by 2030, including university education (target 4.3), achieving gender parity in education by 2030, ensuring equal access for all, including the vulnerable, to all levels of education (target 4.5), ending discrimination for girls and women (target 5.1),

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equitable sanitation to all with special attention to girls (target 6.2) and the elimination of discriminatory policies (target 10.3) by 2030.

The Constitution of Kenya 2010 [17] specifies that men and women should be treated equally and given equal opportunity, and that disability issues should be mainstreamed in all areas of governance and public affairs [18]. The Kenya National Education Sector Strategic Plan (NESSP) 2018–2022 [19] policy priorities in university education included enhancing equity and inclusion. These laid the groundwork for the establishment of "The University of Nairobi disability policy". The policy is a basis for non-discrimination and inclusion in all university activities.

An analysis done by Schools2030 in 2022 to analyze learning differences in Kenya indicates that despite policies being put in place, efforts towards direct implementation appear to be rather ineffective, which means that policy goals are not being met in practice (Schools2030, 2023) [20]. In addition to that, it has been challenging to analyze present practice because of a lack of monitoring and evaluation, which would help in creating action plans based on evidence.

In Kenya, most universities lag in the promotion and implementation of Inclusive Education. A study conducted by Karanza et al. [21] reported limitations in university curriculum, poor infrastructure and poor pedagogical skills to adapt to the needs of Students with Disabilities (SWD) in Kenya. The blended learning model encompassing face-to-face and online teaching has been reported to be flexible, and to ease communication when coupled with the asynchronous model, hence it could be an important tool to promote efficacy in Inclusive Education among SWD.

An appropriate adaptation of the university curriculum has not been fully made to respond to the diverse academic needs of all learners with various disabilities [22]. This should also be buttressed with proper infrastructure adjustments, which is an integral component of promoting inclusivity and accessibility for all learners [23]. There is a limit to the pedagogical adaptations seen to suit inclusive learning and teaching processes. Failure to adapt the Universal Design for Learning (UDL) denies SWDs an equal opportunity to academic participation and success.

The UDL is a set of principles for curriculum development that give all students an equal opportunity to learn. UDL principles should be applied when it comes to course delivery. Very little evidence regarding the application and impact of UDL is available in low- and middle-income countries [24]. Access and attendance are given more attention in low- and middle-income countries over what kind of learning occurs in the classroom, and so evaluating the quality of education in low- and middle-income nations is a daunting task [25]. UDL promotes multiple ways of engaging with learning, presenting content and acting and expressing learning. With the use of numerous knowledge-acquisition opportunities, alternate knowledge-demonstration strategies, and multiple engagement opportunities, UDL aims to accommodate a variety of learning styles and abilities and give everyone an equal opportunity to learn.

The Equality Act 2010 [26] is a law that protects people in the UK from discrimination in the workplace and in wider society. It means that discrimination or unfair treatment based on certain personal characteristics, such as age, gender, disability, and race, among others, is now against the law in all cases. UCL has developed an equality, diversity, and inclusion (EDI) plan that includes policies, services, data monitoring, and funding to make sure it advances equality in its community [27]. Central to this plan is the duty to make reasonable adjustments for students, which are both anticipatory and in response to individuals. Inclusive practice can help towards fulfilling these anticipatory duties and can go some way towards meeting an individual student's needs. It is important, however, to be aware that the duties under the Equality Act 2010 (EA) require adjustments to all university provisions, including, for example, assessment and curriculum design, and that approaches need to go beyond making reactive changes when individuals encounter barriers [28].

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A recent study into the inclusion policies of Russel Group universities in the UK [29] found that ambiguities, debates, and tensions were largely ignored within the policy documents of the 24 institutions that were examined, and inclusion was presented as a "selling point" for universities to attract high-caliber students and staff from across the world. This seems to reinforce concerns that talk of inclusion often lacks substance and does not translate into social and educational reform.

The crucial areas for inclusive education in the two contexts we are examining have to do on the one hand with the conceptualizations of inclusion and how this translates into policies in HE, and how it is operationalized in teaching and learning. In addition, the focus is on how these are influencing practice and cultural change in the HE institutions and how this is monitored.

We investigated the conceptualizations of inclusion and the policies/practices of Inclusive Education at UCL and UoN. We identified areas of good practice but also gaps in its provision. We are presenting and analyzing two case studies of Inclusive Education provision, identifying barriers and providing recommendations, but also considering what are the bigger questions and requirements for Inclusive Education to be implemented in higher education.

This study is part of an ongoing knowledge-sharing and learning project between UCL and the University of Nairobi (UoN).

#### 2. Materials and Methods

This study attempted to enable exploratory research into the policies and practices of Inclusion and Inclusive Education at UCL and UoN to facilitate knowledge and practice exchange between the two institutions. The methodology was based on literature reviews of relevant terms and concepts to design a framework that could be applied to two case studies of policy and practice analysis for the two institutions.

# 2.1. Literature Search for Framework Building and Case Study Approach

A literature search was used with the aim of identifying definitions of Inclusion and Inclusive Education in the Kenyan and UK contexts to check for alignment and gaps in the definitions of the two universities. The review was also used to identify research related to disability and international/refugee student status in Kenya and the UK, which is the primary focus of this paper. The existing policies and strategies, which assist the UoN and UCL in monitoring their activities and implementation of Inclusion and Inclusive Education, were also identified. To augment the data, institutional websites including the strategic plans/vision/practice for the UoN and UCL were also studied [30].

These literature searches were used to develop a theoretical framework of concepts crucial to understanding how Inclusion and Inclusive Education are conceptualized and practiced at higher education institutions, which we then applied to the UCL and UoN case studies to understand policy and practice and identify gaps.

We selected the case study approach as it was the most appropriate for the first phase of our research project. This is a qualitative approach that allowed us to analyze primary and secondary sources (e.g., published articles, policy documents, institutional websites, and official records) [31] in both universities using concepts from our theoretical framework. Specifically, it provided us with a lens for looking into specific areas of student diversity, such as disability and refugee/international student support and experience, in more detail, as these were meaningful in the two contexts we analyzed. To do that, we analyzed policies of inclusion and practices of Inclusive Education to understand how they interact with student diversity.

The remaining areas of the framework were utilized in the second phase of the project, which engages with student and staff diversity and its interaction with institutional infrastructure, culture and community. Furthermore, the framework applied in a case study approach allowed the two teams in the two universities to have meetings, and to exchange ideas and discuss findings from the review of the policies and practices of the two institu-

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tions, to allow for deeper connections and recommendations to be formed that can benefit both universities.

Below we present the questions that guided our literature search that led to the framework we developed to analyze the Inclusion and Inclusive Education policies we identified in both universities.

# 2.2. What Do We Mean by Inclusion in Higher Education?

The 2018 Sector Policy for Learners and Trainees with Disabilities [32] defines Inclusive Education in the Kenyan context as an approach according to which "learners and trainees with disabilities are provided with appropriate educational interventions within regular institutions of learning with reasonable accommodations and support". Inclusion is conceptualized as a "philosophy which focuses on the process of adjusting home, school, and society so that all the individuals, regardless of their differences, can have the opportunity to interact, play, learn, work and experience the feeling of belonging, and experiment to develop in accordance with their potentials and difficulties".

Advanced HE in the UK [33] has developed a definition of the Inclusive Education approach based on [34] "necessitates a shift away from supporting specific student groups through a discrete set of policies or time-bound interventions, towards equity considerations being embedded within all functions of the institution and treated as an ongoing process of quality enhancement". Making a shift of such magnitude requires cultural and systemic change at both the policy and practice levels. Inclusion in HE is thus seen as "widening participation, equality and diversity, and improving student retention and success through a series of change programmes and associated research, publications and events".

While both definitions focus on interventions and support mechanisms to help students succeed while their individual needs are met, there is a deeper level of consideration of inclusion as a fundamental value. Inclusion as a philosophy or a mindset has to do with adjusting the system with which a learner interacts so as to enable transformation, which will benefit not only the learner but also transform the culture of the institutions involved so they are geared towards equity, belonging, and personal growth and development.

Inclusive Education is a process and not a one-time activity [35], and can be largely thought of as the operationalization of inclusion into teaching and learning. However, inclusion is not something that just happens; it involves deliberate planning, implementation, and adoption of the appropriate attitudes, accommodations, and adjustments [36]. It should be constantly evolving to respond to the changing needs of the educational community. The differences between learners ought to be respected as well as their identities, cultural backgrounds, and personal protected characteristics, and the barriers within the education system identified to combat exclusion. Adaptability to the specific needs of the learner, and accessibility to all learners without discrimination based on personal attributes, such as disability, availability of safe learning facilities, and acceptability of diversity in the form of relevant and quality education, are the important components of Inclusive Education [37].

Moving away from the medical model of Inclusive Education, which has been prevalent over time and focused on testing and developing the learner, is a way of promoting inclusion. Viewing the education system or the institutional culture as a problem and making reforms to accommodate all learners with their unique identities and characteristics is what should be done instead. This necessitates improving the ability of educational institutions to respond to the diversity of students [38] and the overhaul of the educational system [39]. For instance, those who have physical disabilities are not hindered by their disabilities, but rather by environmental restrictions [40], thus theory further asserts that by removing physical, economic or social barriers, everybody will have access to the kind of education that suits their inherent capacity.

The attitude of educators towards inclusion is crucial to the implementation of Inclusive Education [41]. Studies conducted in Zambia revealed that educators' attitudes towards inclusion were influenced by level and type of training, nature and severity of

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student disability, exposure to students with special needs and school support systems [42]. Research showed that teachers who had completed training in special education showed a positive attitude towards inclusion compared to those who had no training [42]. In Kenya, teachers believe that learners with special needs can do well given adequate attention [43]. Compared to educators who use the "medical model", "social model" educators frequently educate more successfully and inclusively [44].

Bowman [45], in her 14-nation UNESCO study, reported a significant gap between the views of educators on inclusion held by administrators and instructors. The nations surveyed were Italy, Australia, Mexico, Senegal, Venezuela, Norway, Zambia, Botswana, Jordan, Czechoslovakia, Columbia, Egypt, Thailand, and Portugal. It was discovered that the teachers preferred particular kinds of students to be included in regular classrooms. One-third of persons with disabilities undergo discrimination [46]. The discrimination comes from assumptions, as there are many misconceptions of disabilities. Anger, irritation, and unfavorable attitudes toward Inclusive Education are common among ordinary teachers who feel unprepared to deal with students with disabilities in regular classes [47]. Most educators believe that they do not have adequate skills to handle diversity [48]. Research indicates that teacher training on inclusion is a predominant factor in the determination of teacher attitudes towards inclusion [49].

In this paper, we are focusing on learners with disabilities and international/refugee backgrounds, as this is pertinent to both universities' policies and practices and convenient from a knowledge exchange perspective. The reason we selected to focus on those two categories is because Inclusive Education has been historically linked with disability and the engagement of learners with disabilities in the learning process, and both universities have policies in place to support the students with disabilities [50].

International student status is important in the UK context as most UK universities welcome students from many different countries, and 48% of UCL's student cohort comes from 150 countries [51]. Kenya receives large numbers of refugee students and asylumseekers from Somalia, South Sudan, DCR, Sudan, and Ethiopia [52]; most are women and children in need of pre-primary, primary, and secondary education, but a small minority are adults who are admitted to study in universities in refugee camps and settlements, and even fewer in private universities in Kenya.

## 2.3. How Is Disability Viewed as an Aspect of Student Diversity?

Education is an equalizer and a social lever to a society's well-being and advancement. Historically, schools were founded based on "survival of the fittest" [53], hence giving a negative connotation to the Students with Disabilities (SWD).

Disability may not arise from impairment, but the devaluation of such individuals could marginalize them into oblivion and perpetual poverty [21,54]. Significant prejudice and stigma accompanies disability. Students with Disabilities (SWD) are entitled to equal rights as enshrined in the constitution, thus Inclusive Education should endeavor to identify and deconstruct all barriers that limit equal access, especially within the mainstream higher education institutions. The United Nations Convention on the Rights of Persons with Disabilities (CRPD), 2006; Article 24 emphasizes the need to "ensure an Inclusive Education system at all levels", and offers a guiding principle within the labor market and society at large [55,56]). The UNESCO Salamanca Statement and Framework for Action on Special Needs Education (1994) implores governments to embed Inclusive Education. These laws reiterate the need for Inclusive Education in the face of emergent educational priorities, policies, and practices [55]. Different countries have enacted legislation to promote Inclusive Education, namely, the Higher Education Opportunity Act (2008) in the USA, the Disability Standards for Education (2005) in Australia and the Equality Act (2010) in the UK, among others [56].

Disability, which is an evolving concept, delineates the interaction of impairments with both attitudes and environmental barriers at the level of the HEIs and their influence on the participation of SWD within society [54]. The negative attitude towards and stigma

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surrounding SWD in HEIs have been cited as environmental barriers, and include a lack of empathy from both staff and students in terms of the provision of the necessary supporting educational resources [57]. However, a successful Inclusive Education system is also two-pronged, with empowered teachers with regard to access to capital and education resource materials.

Inclusive Education encompasses promoting human potential, dignity, and self-worth, while upholding human rights, freedom, and diversity; exploring to full capacity the personality, talents and creativity, and mental well-being of SWD; and enhancing their fruitful contribution to societal welfare [55]. The use of the right approach in Inclusive Education has had profound positive effects in the USA where the HEI have experienced enrichment in their academic programs, and the efficient competency-based learning, knowledge, personalities, and identities (KPI) of SWD has been positively influenced, hence contributing to individual and societal social welfare and employability within the labor market [56].

Previous studies have identified faculty members as less empathetic and antagonistic in enabling Inclusive Education [57,58]. Thus, in most HEIs, the low enrollment and or high dropout of SWD has been attributed to the lack of social support, which is a critical barrier. Having an inclusive pedagogy could also enhance course delivery and promote autonomy, coupled with integrating information technology among the staff. In the UK, the government posits that disability should be seen as another form of diversity in the student body [28].

In the COVID-19 era, the switch to online platforms negatively affected the learning processes globally. Remote teaching and assignment schedules implied that some students experienced limited access to recorded notes/audios, scripting among other models leading to further marginalization coupled with non-inclusive classrooms with students with disabilities. Most HEIs in the developing countries lack the Universal Design for Learning (UDL)—a tool for engagement, representation, actions and expressions for Inclusive Education [54,57,58].

A UK government research report into "Disabled Students and Higher Education" [59] estimated that disabled people are considerably less likely to be in HEIs by the age of 19 than people without disabilities are. This might indicate that there is a pool of potential students not yet accessing HE. Disabled students are slightly less likely to attain a good degree (first or upper second class) than those who do not report a disability, and there is evidence to suggest that this persists even after controlling for a range of other factors. So, closing this attainment gap would raise overall attainment and enhance the profile of the HE institution.

Disabled students tend to be slightly less positive about the quality of their course, even after controlling for a range of other factors. There is therefore a risk of unfavorable effects on National Student Survey data. The labor market outcomes for disabled graduates appear to be slightly worse than for those without disabilities. However, differences between those with different types of disability appear to be more substantial. Thus, work to improve the employability of disabled graduates could positively influence HEIs' employability rates, at least for young people. The participation rates of disabled people are markedly below those of non-disabled people. However, the analysis also suggests that these gaps in participation are closely related to differences in prior attainment.

# 2.4. How Is Refugee/International Student Status Viewed as Another Aspect of Student Diversity?

The UoN hosts a number of refugee students as previously mentioned, and their HE experiences and policies of inclusivity are significant for this research. The 1951 Refugee Convention protects the right to education for refugees. Higher education also prevents the mistreatment and marginalization of refugees [60]. In 2019, the UNHCR, in coalition with partners, set out a target to have 15% of refugees worldwide enrolled in HEIs by 2030.

The 2018 global compact on refugees calls for inclusive, quality and equitable education for refugees, internally displaced people and asylum seekers. The Right to Education

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in Emergencies is the focus of the 2010, 64/290 General Assembly Resolution, and is a crucial component of crisis or conflict response [61].

As much as data on access to HE by refugees is imprecise and scanty, available data indicate that as of 2021, only 3% of refugees had access to higher education worldwide [52]. They are prevented by countless institutionalized, cultural, social, and political barriers. Refugees need mental health and psychosocial support, as well as opportunities to participate in socio-emotional learning, because of trauma, especially if they fled from their countries due to conflict. Refugee experiences are difficult, filled with challenges and even horror, and are places where mental health disorders may appear [62]. Universities therefore ought to respond to the emotional needs of refugee students.

People seeking refuge in the UK do not have equal access to university; most are classed as international students, which means they are charged higher fees [63]. Many cannot get student loans and do not have the right to work to earn money to pay their fees and living costs. Apart from tuition fee status, other common barriers refugee students are facing in the UK are rising tuition fees, delayed eligibility for student support, immigration controls, inadequate, inaccessible, and inaccurate advice, and lower-level English language ability [64].

To address some of these barriers, STAR (Student Action for Refugees) launched its Equal Access campaign more than a decade ago, aiming to ensure those seeking international protection in the UK can join universities as equals, primarily through new creating scholarships. The campaign is bearing fruit. Over 70 UK universities now offer scholarships or bursaries to help refugees and asylum-seekers access higher education. UCL offers support to forced migrant students either through widening participation activities or through financial support schemes for applicants with refugee status. In this study, we are focusing on the international students' experiences of inclusivity at UCL, as UCL is home to 18,000 of those and does not disclose data on forced migrants, which are treated with confidentiality [65].

The UK government claims that international students enrich the university experience for all students, including those from the UK themselves [66]. They bring greater diversity to university and college campuses, adding an international dimension. For both international and domestic students, this cultural exchange helps build life-long friendships, future networks, and important business, political and diplomatic bridges.

To show its commitment to welcoming international students, the UK government set out the International Education Strategy, which has the ambition of hosting at least 600,000 international education students in the UK each year by 2030. There were 605,130 international students in the UK in 2020/21. Of these, 152,905 were from the EU (25%) and 452,225 were from outside the EU (75%). This compares with the total of 2,146,475 UK domestic students. International students make up around 22% of the student population. These students usually apply for a university course that interests them through the University and College Admission Service (UCAS), similar to domestic students, or by applying directly to the university through agencies. Their chosen university will look at their application and decide whether to make a conditional offer (where the applicant will have to achieve certain grades) or an unconditional offer (where the place is guaranteed).

Most UK-based students will get a student loan to help pay for their tuition fees and other expenses, but the majority of international students must prove they have enough money to pay for their courses and support themselves in the UK before being granted a visa to study in the UK. Some students might access loan systems through their home countries to support their studies, and some may apply for partial scholarships or bursaries from their selected institutions or external organizations.

Alongside the financial requirements of studying in the UK, there are other steps students need to comply with to be granted a student visa and be able to come to the country to study. This includes holding a certain level of English.

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While international students contribute a net economic benefit of GBP 25.9 billion across the UK [67], research into their experiences of the UK higher education system is limited. Student Minds (the UK student mental health charity) found that international students responding to their study were much more likely than UK-domiciled respondents to be concerned about issues related to community, relationships, and belonging [68].

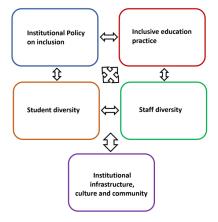
International students were often profoundly affected by the coronavirus pandemic and the associated restrictions. The issues they have faced include not being able to return to their home countries, the loss of part-time work during lockdowns, and having to quarantine on arrival in the UK. In addition, the move to online learning has often meant studying in isolating conditions, with few opportunities for social contact and peer support [69,70].

Because of the above concerns, there is a need to look into the inclusivity of higher education programs in the UK, and specifically to examine international students' experiences at UCL.

# 2.5. Theoretical Framework: How Is Inclusion Operationalised at UCL and UoN?

Here we provide a framework of terms (Figure 1) that guided our analysis of policies and practices in UCL and UoN. This includes the dimensions that emerged from our literature search, and which we took into account to analyze our case studies. Below are the important areas on which we are focusing on in our case studies, and some which will be utilized in the second phase of the project:

- Institutional policy on inclusion or EDI (equality, diversity and inclusion) (disability, and refugee/international student policies) and Inclusive Education practice (teaching and learning responsive to educator and learner needs, online education provision);
- Student diversity (circumstantial; disability/refugee/international student status, cultural; ethnicity) [33];
- Staff/educator diversity [33] (circumstantial—disability/refugee/international student status; cultural—ethnicity; professional development—EDI, Inclusive Education).
  In this paper, we are focusing on students, but educator diversity is a central part of our framework;
- Institutional infrastructure, culture, and community—university facilities, accessibility, educator/student population, participation in social events, feeling of belonging, available EDI tools and services, professional development for educators, mechanisms for reporting barriers to access and participation, enablers/leverage points such as monitoring and evaluation of policies, participation in decision-making and ability to effect change, educator views, attitudes towards diversity and previous training are all defining factors determining how Inclusion and Inclusive Education are perceived and practiced.



**Figure 1.** The multiple and interacting dimensions of how Inclusion and Inclusive Education are operationalized in a higher education context.

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#### 3. Results

Below we present the results of the analysis of the two university case studies.

## 3.1. Case Study 1: The University of Nairobi Case Study

The University of Nairobi was the first university to be established in Kenya, and it is the biggest university in East and Central Africa. The University of Nairobi in its 2005 strategic plan [71] committed to effect policies made by the government and International Conventions, and to guidelines on gender, disability, and marginalization, as well as to make the learning environment conducive for all (Objective 13 and 18). However, the fulfillment of the commitment is frequently hampered by constraints.

The Organization for Economic Co-Operation and Development (OECD) [72] states that the only hindrance to an individual's participation and achievement in higher education should be his/her natural ability to learn and effort made, and not personal attributes beyond one's control such as gender, disability and socio-economic background. To close this gap, the University of Nairobi has consequently made conscious strategic initiatives, that is, by having policies on Inclusive Education issues, but refugees have not been considered in these. The Disability Mainstreaming Policy provides the institutional commitment and measures for mainstreaming inclusivity issues in all university processes and operations [18].

The Constitution of Kenya 2010 [17] directs that disability issues be mainstreamed in all spheres of governance and public affairs, and men and women should receive equal treatment and be granted equal opportunities. This sets the basis for the development of The University of Nairobi's disability mainstreaming policy.

The Disability Mainstreaming strategic plan (2023–2028) [73] has several objectives:

- Ensuring all university processes are accessible to Persons With Disabilities (PWD);
- Enhancing the current physical facilities to make them more accessible and disability-friendly;
- Making digital platforms accessible by aligning them to international standards;
- Sensitization campaigns on disability;
- Undertaking research on disability inclusion;
- Increasing the participation of learners with disabilities in leadership and governance.

While this is an ambitious strategy, there are still challenges to be addressed, such as the lack of a system to track data on PWDs and finances. The data available are limited and the funding available is not adequate to meet all of the strategic policy objectives. The lack of awareness of disability issues is also a barrier. Inclusive Education will remain a long way off without large and sustained improvements to education financial flows and data systems. Inclusion is still a theory, and not being met in practice, because it cannot be guaranteed by simply establishing educational policies, and so there is a need to develop structures and systems to support the policies so that the pledge of reaching those left behind and marginalized is kept.

The University of Nairobi has 16 policies related to its education provision, but none of them addresses the well-being of refugee and migrant students. Even though refugees and migrant students are distinct student bodies that are at risk of marginalization, they have not yet been included in bespoke inclusion policies. The Education 2030 Incheon Declaration and framework for action for the implementation of SDG 4 [74] suggests that in order to react to the diversity and needs of students and to address the numerous types of discrimination that prevent the realization of the right to education, transformative public policies should be designed and put into place. The barriers for migrant students are amplified by gender and disability. It is important to document the experiences and challenges the refugee students are facing for purposes of policy formulation and restructuring. Without evidence on what works, the disadvantage gap will continue to widen and inequalities will keep increasing.

Inadequate policy frameworks and access support mechanisms to HEIs for refugee students originate from the lack of research, literature, and theory on refugee students [75].

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Several researchers have acknowledged the necessity for additional qualitative studies that will include an investigation into refugee experiences, with an emphasis on the evaluation of the kind of assistance that is effective in addressing their unique needs [76,77].

## Reflections from Case Study 1

How can marginalized groups take the initiative and lead discussions on education, training, and learning? How can the current trend of increasing inequalities be changed? How can the current trajectory of inequalities be reversed? The pace towards the achievement of SDG 4 is either slow or reversing, yet we are already at the midpoint to the 2030 deadline. The pandemic worsened the existing cracks in the education system, such as widening the inequalities in the participation of women and girls in education. However, emergencies test the preparedness and resilience of education systems and are often opportunities for building back better, more equally, and more resilient. It is a fact that humanitarian efforts continue to overlook higher education [78].

According to the 2023–2028 Disability Mainstreaming strategic plan at the UoN, a SWOT analysis indicates that one of the weaknesses/barriers to the inclusion of students with disabilities is the lack of training for staff on how to handle the students with disabilities. Another, according to research, is the language barrier, which can significantly affect students' abilities to attend HEIs and leads to high dropout rates [79]. Less than thirty percent of low- and middle-income countries have designed learning materials for speakers of non-dominant languages [80]. In Kenya, the approved languages for instruction are English and Kiswahili. The country hosts refugees from different countries—Somalia, Democratic Republic of Congo (DRC) and South Sudan—and some may struggle with the languages of instruction used in Kenya. There should therefore be individualized support or an alternative for such learners; that is what Inclusive Education is about. The paucity of support services is inadequately adapted to the needs of this population.

The lack of belief that inclusion in education is possible and desired is a major barrier to inclusion. There is an increased sense of urgency for precise data on the institutionalized factors of marginalization, a constant evaluation of how the disability policy is being implemented (this calls for target setting), and the establishment of a policy covering refugee students. The COVID-19 pandemic revealed the fragility of our education system and how progress towards the SDGs can be easily reversed, and therefore systems should be strengthened at the UoN, which, as a high-profile university, plays an important role in shaping local and international synergies with updated viewpoints.

# 3.2. Case Study 2: Exploring Physical Disability and Race Dimensions of Inclusivity; a Case at the University College London

University College London (UCL) is in London, a cosmopolitan megacity. The UK is also one of the top education destinations globally. Unsurprisingly, the UCL community comprises differentially abled students and staff from multiple nationalities and ethnicities from the city and beyond. The diverse community at UCL has contributed to the university's consistently excellent academic performance globally. A few studies suggest that diversity stimulates creativity and innovation critical for economic and intellectual progress [81]. However, diversity is not always celebrated, partly because past eugenic studies [82] manipulated people to reject differences, triggering discriminatory acts against those deemed different from the dominant white majority or mentally or physically abled majority. The spectrum of different "others", or the minority, is broad, and includes those with different physical abilities (physical impairments), mental abilities (neurodivergent), and ethnicities (Black, Asian, Mixed).

The UK government enacted the Equality Act 2010 to protect diverse characteristics at considerable risk of discrimination, including vulnerable groups. The 2010 Act protects age, disability, gender reassignment, marriage and civil partnership, race, religion, sex, and sexual orientation [26] to promote tolerance and social cohesion. UCL is obliged to protect those defined in the Act. In coordination with various departments, UCL's equality,

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diversity, and inclusion (EDI) team is responsible for this role. The EDI plays an integral role in creating a diverse, equitable, and inclusive community by celebrating and leveraging the differences that characterize the UCL community.

Various programs established demonstrate EDI's commitment. Herein, we focus on the physical disability and race/international student dimensions of diversity. Although inclusivity exists in a continuum, the extent to which the EDI program meets the university community's needs determines its position on the continuum. Furthermore, some aspects of these dimensions of inclusivity at UCL can be transferred to augment those of the partner organizations, and vice versa. Regardless, UCL's inclusive programs could identify areas of improvement, as this is critical for progress. Some potential areas of weak links may be those where there might be a mismatch between what the UCL program says and what it offers, at the cost of students' time, mental health, and finance. A continuous iteration might improve staff and students' experiences with trickle-down benefits on the university's performance.

# 3.2.1. Physical Disability and Inclusive Policies

The Disability Act (1995) [83] protects the rights of all people with disabilities in the UK, but it does not address students' needs. The Special Educational Needs and Disability Act (2001) [84] was established to augment the Disability Act, as it emphasized the needs of students, which are disparate from non-students. The Special Educational Needs and Disability Act (2001) obliges education institutions to provide adjustments (through extra support) in response to the specific needs of disabled students. The provision of needs was deemed inadequate for a truly Inclusive Education that enhanced a sense of belonging.

Through the Disability Equality Duty Act (2006) [85], institutions were obliged to create equality and equity for disabled students proactively instead of reactively. Universities are taking a proactive role in advocating the needs of the students. Some students might have multiple levels of vulnerability. They might be disabled and of a racial minority. The Equality Act (2010) [26] is comprehensive in that it obliges the universities to protect those with protected characteristics, which include those with multiple forms of vulnerability. The overarching theme of these policies is to prevent or minimize acts of discrimination and remove barriers, thereby leveling the grounds for students with disabilities to excel academically. Yet despite reforms in disability legislation, discrimination is still prevalent in some UK educational institutions.

## 3.2.2. Physical Disability Inclusivity at the UCL

UCL's EDI program drives equality, equity, and inclusion programs for physically disabled students and staff. The EDI embeds legal disability and medical treaties in its programs by removing barriers for the physically disabled within its community. There is no one-size-fits-all solution when it comes to the needs of physically disabled students. Physical disability needs are contextual and require a tailored solution. In compliance with the Special Educational Needs and Disability Act (2001) [84], the EDI has a Summary for Reasonable Adjustment (SoRA) tool to evaluate the needs and provide timely and reasonable adjustments as seen fit.

The adjustments or extra support are provided at no additional cost and range from access to learning material, buildings, and social areas within and outside the university. Disabled students are provided additional financial assistance to offset logistic costs not included in the SoRA. These are the disability funds, the Snowdon Award Scheme, and the Student Enablement Fund. Financial support allows students to pay for logistics, interpreters, and sign language, thus alleviating the student's financial burden.

# 3.2.3. UCL SoRA and Disability Program

The SoRA is arguably robust to the diverse needs of physically disabled students in the university. The tools give the impression that the university cares, listens to, and responds to the specific needs of the students. Caring is integral to building an inclusive

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environment. However, one major flaw with this tool is that it assumes the student's accessibility boundary is within the department or the accommodation area. Physically disabled students, like any other students, want to experience the university in its entirety. Still, if adjustments are made in only certain areas, they invariably exclude students from participating in other areas not defined in the SoRA, which are therefore not adjusted. For instance, a department might host an interesting workshop, but the building may not be adjusted for deaf students in another department. This deaf student will be excluded from participating in cross-departmental activities. Besides this, new students need more knowledge of the university experience to know which places they might frequent. In addition, some structural adjustments take a longer time. Although the SoRA mentions that it welcomes iteration during study time, it might be impractical for those on a one-year studentship, meaning suboptimal participation for the student. Finally, it is essential to recognize that there will always be physically disabled students within the UCL community.

#### 3.2.4. International Students, Race and UCL

Race is stipulated here as the categorization of people based on skin and region of origin. The influx of students from various nationalities has seen UCL increase its racial diversity. The spectrum of races at UCL is White, Black, Asian, and Mixed. These races are broadly subclassified into minority and majority races; the latter is White, and the former is Black, Asian, and Mixed (BAM). The BAME group is underrepresented in education partly due to historical injustices precipitated by eugenic science. The bias against BAM is a deeply systematic and social construct, implying the solution is also social. Higher education mandates institutions of higher learning close the gaps by actively engaging BAME students and staff. Race is protected in the Equality Act (2010) [26], which means the university is obliged to protect those who fall under the BAME umbrella from any form of discrimination. This move has resulted in more BAME students and staff.

Racial inclusion is now a core agenda for universities, and is also enforced by funding bodies. To fulfill funders' racial requirements, the universities are increasing the number of BAME. Race, however, is more than just numbers. Race is people's permanent identity; it is lived experience and their core need. The numbers, however, do not depict the discrimination those BAME students face, their average rate of passing with a first class degree, their engagement level, and the likelihood of graduating.

UCL's EDI team acknowledges there are outstanding racial gaps for students and staff, and has set tools to address them. For instance, the Fair Recruitment Tool was created to aid in removing unconscious bias during recruitment that might disadvantage BAME people. This tool, however, is run by a team of volunteers, but the on-demand capacity is unavailable. There is a higher chance that most recruitment might proceed without a representative of the Fair Recruitment Specialist Toll, triggering a negative feedback loop. This is evident in the recently submitted Equality Charter report of 2020 [86], which reported a lower representation of BAME in senior positions but an over-representation in junior positions. When BAME people are under-represented in senior positions, they cannot advocate for themselves, which undercuts equity and equality in recruitment and UCL employment.

Another major challenge is funding, especially for international BAME students. BAME international students pay a higher tuition rate, but the funding option is also limited. UCL has set up scholarships for minority groups to improve their representation [87], which, according to the submitted equality charter report, dropped by up to 18%. This dropout could be partly attributed to inadequate financial support from families, so some must pay for themselves by taking part-time jobs. However, dropout is highly likely when part-time jobs cannot cover personal and tuition costs.

Other than material support, psychological support is also vital in promoting inclusive learning for BAME people. According to the Equality Charter, most Black students do not feel a lack of sense of belonging within the UCL community. Some students' claims reveal psychological influences underpinning suboptimal engagement. For instance, minority

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groups are more likely to receive pernicious microaggressions from staff, but these are under-reported due to fears of victimization, according to the Equality Charter report of 2020.

There are also a few cases of racial stereotyping among staff, including senior staff. Some students reported, "At the beginning of the year, the whole course was told that BAME (black minority) students always do worse in the practical exam". This was announced as a fact to everyone. Such expectations from staff, according to psychology, often trigger a negative self-fulfilling behavioral response (also known as the Pygmalion effect). Staff are custodians of students, and it is crucial that they are conscious of the effects of their language on the engagement level of minority groups and show an awareness of the gap that needs addressing.

When staff are not racially aware, it spills over into the student's performance. For instance, during the 2017/2018 academic year at the Institute of Education in UCL, only 9% of Black minorities graduated with a first-class, compared to 77% of white students [86] (p. 12). In addition, the EDI team must be aware that even with minority groups, there are different and hierarchical variations of discrimination, with Black non-UK experiencing the highest discrimination. For instance, Black non-UK students are less likely to be hired and offered part-time jobs.

# 3.2.5. Reflections from Case Study 2

The world is highly diverse, and every individual in a society has a right to education; at least in the UK, diversity is not only welcomed, but also sought after. Inclusivity is at the core of the right to education, which engenders individual and institutional excellence. The Equality Act 2010 [26] enforces inclusivity in higher education by obliging universities to accept diverse people. However, accepting diverse people in an institution such as a university, without creating an environment that fosters diversity, can generate many challenges. The main is how to stimulate learning and make sure everyone can thrive. The responsibility lies with institutions of higher learning, such as universities, and obliges them to develop their policies and embed Inclusive Education at the heart of their educational offerings. Universities have been actively recruiting diverse groups of students and staff to meet various awards criteria, such as Race Equality Charter or the Athena Swan Charter. However, there is asymmetry with respect to creating an inclusive environment, which undercuts the much sought-after "excellence", and this needs to be considered thoroughly so that real inclusion can be achieved.

# 4. Discussion

From the case study analyses in the two universities, we can see that there are unique, as well as common, aspects and gaps in Inclusion and Inclusive Education to be addressed. Both institutions need to go deeper in their commitments to Inclusion and Inclusive Education, as they need definitions that are more comprehensive, policies, and better monitoring data systems to understand what is happening in practice, and to make cultural and systemic changes.

To take the first step, the definition of Inclusion and Inclusive Education needs to be augmented. When referring to inclusion, it is important to embrace the whole identity of a person and not only their gender, ethnicity, or disability status. Diversity and inclusion should go hand in hand with respect and treating everyone with dignity [88]. But to achieve that, the two HEIs should make an effort to understand student and staff diversity, and how this interacts with participation in the university. On the one hand, they bring their own identities to the institutional environment, but at the same time, they interact with multiple groups that offer them opportunities to shape new identities.

As for Inclusive Education, focusing only on the right to access and full enjoyment of education at the tertiary level can be a limiting factor, since the focus can be on interventions that lift barriers to allow students to learn, but it should also take into account the community aspect of inclusion. By this, we mean that not only staff but also the students

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should participate fully in the decisions made around the education they receive (e.g., shaping curriculum development), as well as have a say in the support mechanisms around equality, diversity, and inclusion by being given the opportunity to provide feedback, and to co-design and co-produce tools and services.

As stated above, students and staff will bring their own unique and authentic identities to the HEIs, which need to be respected by allowing them to participate fully in the life of the institution. They will also form new identities as part of university groups they interact with and they belong to, and this is equally important for shaping policies and strategies for Inclusion and Inclusive Education [89]. Thus, a definition of Inclusion and Inclusive Education that acknowledges the unique identity of individuals, which is related to their characteristics, such as disability and ethnicity, as well as encourages them to develop their new identities as an outcome of the interaction of each individual with the university community, would be desirable. Inclusive Education should be sensitive to these existing cultural identities and encourage the students to enact them during their studies, while providing enabling learning environments that also support them to develop new identities, such as professional, research, social, and other forms that are linked with university education.

# 4.1. Recommendations for University of Nairobi

Based on the discussion of case study 1, the UoN operates in a distinct environment with its own unique characteristics and challenges. There is a gap in the provision of support for refugee students, and thus the UoN should come up with a policy or strategic plan that covers refugee students because they are a distinct student body that is at risk of marginalization. Targeted policy and systemic support are needed for issues connected to refugee education, and especially the language barrier that prevents them from enjoying a fulfilling education and leads them to drop out of their studies at UoN.

A policy will aid in planning and improving the efficiency of the existing system and creating coherence with international conventions on the rights of the refugees. An educational program and/or a dedicated academic center that supports refugees to learn the official languages of instruction at UoN, offers online education opportunities to watch lectures with subtitles, or translates them so they can fully understand what is taught in their own language and build their capacity in English, would be another way to support refugee students.

A student friend program for refugee students, especially those who have not been refugees in Kenya for a long time, would help them progress and boost their sense of belonging. Students from Kenya could support refugee students with language barriers as well as cultural barriers, and help them develop their own voice in matters that affect them. Refugees encounter many challenges, and since they have experienced and are experiencing severe crises, they need a lot of support.

Regarding the new strategy for disabled students at the UoN, there is a need for developing specific policies with appropriate targets and data collection and analysis systems. The EFA (2015) [90] monitoring report prescribes that there should be specific, measurable, and relevant education goals, and thus Inclusive Education should be prioritized in this strategy, and its aims and goal achievement should be monitored for restructuring purposes.

Strengthening partnerships with Non-Governmental Organizations and private agencies that are interested in the implementation of Inclusive Education for refugee students and Learners with Disabilities (LWDs) in higher education institutions and those Non-Governmental Organizations behind national and global efforts are important to boost efforts and to ensure no one is left behind. These organizations often provide financial support for refugee student fees, and may be able to offer language training and other types of upskilling courses to these students so they have a smooth transition into university education [91].

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The large class sizes of UoN is something that needs to be re-considered for undergraduate courses, as the burden is on the tutor/lecturer to manage the diversity of students, and they are often not trained for doing this. Lastly, large class sizes are demoralizing and have a significant effect on students' learning experience [92]. Thus smaller cohort sizes, better student/lecture ratio, and professional development would support lecturers in providing personalized learning to the students, and taking into account their diversity and responding to it.

# 4.2. Recommendations for University College London

Based on the discussion and insights of case study 2, UCL is planning an educational and student experience reform as part of its ambitious strategic plan for 2022–2027 [93]. This will include, among others, sustainability education for every student at UCL to be able to tackle the grand challenges the world is facing, it should consider the implementation of Inclusive Education as a core part of this education provision, as it will significantly improve the student experience as well. What is more, as part of this plan, there is significant investment in a data collection and monitoring strategy to support the achievement of goals and objectives, and thus data collection in the implementation of Inclusion and Inclusive Education policies and practices would benefit the entire university community.

UCL is part of the Academic Health Science Network (AHSN) that empowers and supports staff to be positive role models for equality and diversity, helps us to understand the impact of work on all members of its community, and enables its work to reflect the equality and diversity within these communities. There are various schemes that support partnerships and inclusion, but still, UCL should strengthen collaborations with universities and organizations who are promoting SDG4, and are involved in the areas of inclusion, Inclusive Education, disability, and international/refugee students' support for knowledge and practice exchange. This project has received funding from UCL MAPS and UCL IOE to explore this opportunity and establish collaborations with UoN toward the development of inclusive teaching and learning environments.

Refugee students applying for admission to UCL, although sharing a lot of similarities with refugee students in Kenya, also face some distinct challenges compared to the UoN case. In the UK, refugee students are largely treated as international students, and because of their unique circumstances explained earlier, they should be treated according to these to achieve equity. UCL has developed a Forced Migrant Student policy [65] addressing this need. Part of the strategy is to issue scholarships covering tuition fees and a living allowance as part of financial support given to refugee/asylum seeker students. This is for students who are aware of and applying to get this support. This means that initially, these students are treated as international students who are applying to UCL to get a place in one of its educational programs, and are associated with a specific international student fee. A general policy of fee waivers for the refugee students' could be considered, since there are no comprehensive data publicly available on the percentage of refugee students that apply and receive the scholarship and financial support.

Moreover, the experiences of people who study at the university need to be investigated to evaluate the effectiveness of the EDI strategy and its applied policies. Annual reports are published, such as the Inclusive Environment from Sustainable UCL [94] working towards improving the accessibility of the built environment of the campus so as to make it a more attractive and less stressful place to work and study for disabled staff and students. There is also the Bullying, Harassment, and Sexual Misconduct annual report [95], wherein data were recorded in detail regarding the nature of the incidents that students and staff face. The clear communication of the data related to the feedback of students or staff that have been through the process of Report and Support [96], asking for support regarding these incidents from UCL EDI services, should be a core element to further evaluate and develop the functionality of the relevant services.

The SoRA [97] is another great tool offered by UCL to support students with disabilities and relates to EDI services, and the university can further advance its approach by

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anticipating the needs of students and restructuring existing infrastructure to accommodate the most common forms of physical disabilities. That way, students who, for some reason, might not be comfortable with declaring their disability status are not disadvantaged, since the university is certified as disability co-designed. A proactive approach such as this would lead to infrastructural reconstruction based on the previous students' feedback, which can then be complemented using the SoRA tool to enhance students' overall satisfaction. There should also be equally comprehensive tools for the UCL staff so that they can be offered opportunities to participate fully in an inclusive environment.

Regarding international students, a buddy system could allow international students at UCL, similarly to UoN, to make friends and improve their social life and sense of belonging at the university similarly to what is suggested for UoN. Another way to support international students could be through a culturally sensitive curriculum. Groups of international students from different ethnic backgrounds could be involved in reviewing what kinds of inclusive language should be in the teaching, or what language can be considered insensitive in other cultures. In order to adjust their teaching materials to foster inclusive learning and increase racial awareness, module and departmental tutors would then discuss this.

UCL is already offering Black internship programs to widen the participation of the BAME communities, and these mainly target Black UK students. The EDI needs to address the challenges of Black non-UK students by setting up relevant funding schemes. Further, efforts made to mainstream racial discussions at UCL are laudable. However, some interventions, such as setting up a racial group headed by a racial minority, such as Fair Recruitment Specialist [98], seem not to be optimal, as reflected by the number of minorities hired in the 2020 report. This is challenging minorities to advocate for themselves in a White-majority community. Perhaps the active engagement of the White majority might improve racial inclusion. For instance, creating a White-minority protégé project might allow the majority to learn and advocate for minority groups. Nonetheless, establishing a racially equal UCL will require bold, sensitive, and honest interventions, which the EDI staff is already considering.

Building staff competence is a key part of the strategy's solution to promote its core agenda. The introduction to equality, diversity, and inclusion training has been made mandatory for new staff, with the senior team required to take mandatory updates as needed. This ensures that staff are aware of complexity across the different spectra, and promotes diversity, inclusion, and equality in their teaching. Other forms of training in which staff are required to build their competence includes deaf awareness, which improves staff skills when engaging with deaf students and staff. There are also non-mandatory courses offered by the UCL arena team on how to develop inclusive curricula. These courses are essential for the UCL community, and could be targeted at both staff and students so they can co-produce content, pedagogy, and assessment.

# 4.3. General Recommendations

Both universities could benefit from the use of the UDL [24] to develop Inclusive Education opportunities, and to increase the inclusivity of education curricula and teaching and learning activities. UDL [24] is a flexible tool for addressing the learning needs of all students, including those with disability and international/refugee status, as it will enable them to express their identities as well as form new ones in alignment with the reform made to the definition of Inclusion and Inclusive Education that was suggested earlier. It seems that Inclusion and Inclusive Education are important priorities for both universities, and this is reflected in strategic plans and policies; however, the aim of all these is to generate systemic cultural change, which is sustainable and supported by the entire community in UCL and UoN. This will not only help tackle injustices and gaps in how plans and policies are implemented, but will also boost the sense of belonging and the development of positive interactions between students and staff, as well as creating an enabling environment for all to thrive.

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