



COMSATS University Islamabad
Registrar Secretariat, Principal Seat, Islamabad

No. CUI-Reg/Synd-05(5)/21/1337

November 30, 2021

Subject: **Actionable Decision made by the Syndicate in its 5th Meeting under Agenda Item - 16**

I have been directed to convey that the Syndicate of COMSATS University Islamabad (CUI) in its 5th meeting held on 21st October 2021, while deliberating upon the Agenda Item – 16 titled “*Approval of the Revised Policy for Students with Disabilities at Higher Education Institutions in Pakistan – 2021 issued by the Higher Education Commission (HEC)*” made the following decision:

“The Syndicate approved the revised policy for Students with Disabilities at Higher Education Institutions in Pakistan - 2021 issued by the Higher Education Commission (HEC), for compliance across COMSATS University Islamabad (CUI).” (Copy enclosed)

2. After authentication of the draft minutes of 5th meeting of Syndicate, the above decision is being forwarded, for information and further necessary action as deemed appropriate.

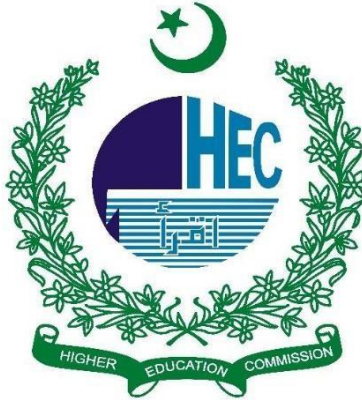
(Shahzad Ahmed)
Manager

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HIGHER EDUCATION COMMISSION

Policy for Students with Disabilities at Higher Education Institutions in Pakistan

2021

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POLICY FOR STUDENTS WITH DISABILITIES AT HIGHER EDUCATION INSTITUTIONS IN PAKISTAN

1. PURPOSES AND PRINCIPLES OF THE POLICY

- 1.1. The Higher Education Commission (“HEC”) is committed to the objective that no one should be denied access to higher education in Pakistan, which includes ensuring that people with disabilities have equal opportunities to access and attain higher education.
- 1.2. This policy for students with disabilities at Higher Education Institutions (“HEIs”) aims to create an enabling environment for inclusive education in colleges and universities and facilitate the participation of students with disabilities in all academic and extra-curricular aspects of college and university education.
- 1.3. The policy recognizes that disability covers a wide range of impairments and different disabilities can have varying impacts on study, work, and other aspects of life, warranting special considerations by HEIs.
- 1.4. This policy affirms that persons with disabilities are valuable members of society and the HEC and all HEIs have an obligation to undertake all reasonable actions to enable persons with disabilities to avail the opportunities for higher education available to other students. Through this policy, the HEC endeavors to eliminate regulatory, physical, organizational, academic and social obstacles at HEIs that might hamper the academic and career pursuits of persons with disabilities and provide people with disabilities with equal educational opportunities, recognition of their inherent dignity, and protection of their rights.
- 1.5. This policy has been made pursuant to the powers granted to the HEC under the Higher Education Commission Ordinance, 2002, and is binding on all HEIs in the country, whether operating in the public or private sectors, in accordance with the prescribed phased execution plan.
- 1.6. This policy complements relevant national and provincial legislation for persons with disabilities. HEIs are advised to strictly follow the provisions of applicable law and the comply with the regulatory framework prescribed under the legislation and through this policy.
- 1.7. Pakistan is a partner in the global movement for the socio-economic well-being of persons with disabilities having signed and ratified the UN Convention on the Rights of Persons with Disabilities and adopted the Sustainable Development Goals 2030 agenda. This policy is also intended to further advance the objectives of these international commitments. Sustainable Development Goal 10, *Reduce inequality within and among countries*, includes empowerment and promotion of social, economic and political inclusion of all irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
- 1.8. This policy sets forth the HEC’s minimum standards with respect to students with disabilities at HEIs. It is mandated that no student shall be subjected to discrimination at any stage during their academic or professional pursuits on the basis of any disability.

- 1.9. This policy supersedes all previous HEC policies on matters covered under this policy, which shall stand repealed from the date of notification of this policy.

2. SCOPE OF THE POLICY

- 2.1. This policy is applicable to all students with disabilities at HEIs, including enrolled students, prospective students and students that acquire disabilities during their studies.
- 2.2. For the purposes of this policy, the term “disability” shall mean any long-term physical, mental, intellectual, or sensory impairments which may hinder a student’s ability to effectively participate in normal day-to-day activities on an equal basis with others; *provided, that* the definition will also include any additional conditions covered under the applicable disability-focused laws of the jurisdiction in which the HEI is located.
- 2.3. The term “Disability Certificate” as used in this policy shall mean the disability certificate issued for persons with disabilities from the National/Provincial Council for the Rehabilitation of Disabled Persons or a CNIC with a disability logo or proof of registration in NADRA’s database as a ‘special person’.

3. THE ACCESSIBILITY COMMITTEE AND DISABILITY COORDINATORS

- 3.1. The Accessibility Committee: HEIs shall establish a standing Accessibility Committee comprising of five (05) members to be appointed by the Vice Chancellor/Rector of the HEI, which shall include:
 - a. Director Student Affairs or senior university officer / faculty designated as Chair of the accessibility committee.
 - b. two members from the faculty (one male and one female, both female in case of all women university)
 - c. at least one member from the student body as detailed subsection 3.2 (e)
 - d. one representative of psychological wellbeing committee / university’s medical center / planning & development department
 - e. one staff member deputed as secretary to the accessibility committee.
- 3.1(a) General Provisions for work of the Accessibility Committee:
 - a. in absence of the Chair, the senior most member shall act as Chair of the meeting.
 - b. the Chair and the members shall hold office for the period of three years and shall in no case be eligible for re-appointment for more than one similar term.
 - c. the Vice Chancellor shall appoint all members of the accessibility committee except the ex-officio members and the representative of the student body
 - d. the disabled students shall nominate their representative on the accessibility committee.

3.2. Roles and Responsibilities of the Accessibility Committee: The Accessibility Committee shall be responsible for the following:

- a. determining what accommodations are needed for students with disabilities at the HEI including, where necessary, arranging for disability assessment by a professional;
- b. arranging and overseeing the provision of reasonable accommodations in accordance with this policy;
- c. arranging for counseling by a psychiatrist for students with disabilities if a student requests or whenever substantial need is established;
- d. providing information and advice to students and parents on the facilities and support available at the HEI for persons with disabilities;
- e. advising the faculty on the policies and procedures relevant to students with disabilities and how best to include and accommodate these students;
- f. advising the HEI on ways to improve access for students with disabilities vis-à-vis admissions, examinations, dissertations and other affairs of the institution and on the implementation of all relevant disability-related legislation;
- g. raising funds for the provision or development of facilities for students with disabilities at the HEI whenever needed;
- h. promoting awareness on different disabilities and disability related issues and the need to protect and promote the rights of persons with disabilities at the HEI through dedicated seminars, fundraising events, discussions, workshops and community engagement activities and communicating the role of the Disability Coordinators to students, staff and faculty; and
- i. liaising with philanthropic organizations working for persons with disabilities to enhance the capacities of their institutions to engage with persons with disabilities and to improve the facilities available for them at the HEI.

3.3. Decisions of the Accessibility Committee: The quorum requirement for meetings of the Accessibility Committee shall be at least three members of the committee. Decisions shall be made by a majority of the members present.

3.4. The Disability Coordinators: The Vice Chancellor/Rector of the HEI shall designate two (02) non-student members of the Accessibility Committee to be the Disability Coordinators for students with disabilities at the HEI, *provided that* in the case of coeducational or all-women HEIs, at least one of the Disability Coordinators shall be a woman. The name and contact details of the Disability Coordinators will be displayed on the website, prospectus,

brochures, and student handbooks of the HEI and outside the Offices of Vice Chancellor/Rector and Registrar.

3.5. Roles and Responsibilities of the Disability Coordinators: The Disability Coordinators shall be responsible for the following:

- a. to be a point of liaison between the Accessibility Committee and students with disabilities including connecting students with disabilities to the Accessibility Committee for determination of their accommodation requirements;
- b. guide and advise students with disabilities interested in seeking admission and enrollment at the HEI on the facilities and accommodations available and arrangeable at the HEI for persons with disabilities;
- c. have regular, periodic meetings with enrolled students with disabilities and maintain records of these interactions. This practice should be used to assess any emerging needs the students may have and to decide the appropriate course of action to facilitate the student;
- d. advise and facilitate enrolled students with disabilities during their studies on how to fulfill the administrative requirements of the institution and benefit from other services provided at the HEI such as accommodations, library, career counselling, extra-curricular opportunities etc.
- e. refer students with disabilities to the Accessibility Committee for arrangement of psychiatric counseling if a student requests or academic coaching whenever needed;
- f. ensure that the students' access requirements are identified and made known to relevant faculty well ahead of commencement of classes;
- g. advise students with disabilities before the commencement of each semester or academic year on their course selection and learning activities entailed; and
- h. seek and record information on access requirements of individual student with disability enrolled at the HEI.

4. ADMISSIONS-RELATED MATTERS

4.1. Application Process: Before applying for admission, students with disabilities should be encouraged to visit the HEI and the HEI's website to assess the suitability of the premises and its surroundings. The HEI shall ensure that applicants have full information about the support available and can request additional accommodations as needed. The following are the details of the process that must be followed with respect to HEI admissions:

- a. Admission application forms will include a section where students can convey information on their disability. In certain circumstances, such as to avail the accommodations under Section 4.2 of this policy, applicants shall be required to provide attested copies of a Disability Certificate (as defined in Section 2.3 of this

policy). The admission application form shall also include a questionnaire for students with disabilities to explain their need for accommodations related to any entrance exams. Moreover, the universities shall take steps to improve accessibility of the admission forms / prospectus and all other additional details that might be required or useful for students with disabilities in the manner that accommodate the needs of the different disabilities.

- b. It is important to note that there shall not be any adverse impact on the application of a prospective student based on his or her disclosure of a disability. The application will be processed in the same manner as other applications, without any discrimination on the basis of the disclosed disability.
- c. Applicants will be made aware that if they disclose their disability, the information provided on their application will, subject to applicable legislation, be retained on the HEI's confidential records and made available to relevant individuals involved in the admissions process and the members of the Accessibility Committee, which will provide necessary support during the application, interview, and entrance test process for students with disabilities.
- d. Applicants who have declared a disability on their application form will be consulted about their needs and given advice on how the HEI will accommodate their needs.
- e. The HEI shall provide contact details for the Disability Coordinators and information on facilities available for students with disabilities on their prospectus, website, and advertisement for admission.
- f. In case, the HEI does not have appropriate facilities to provide reasonable accommodations for students with disabilities to study at their institution on legitimate grounds, and the student has otherwise been deemed eligible to be admitted to the university in terms of the admission criteria, the Accessibility Committee shall report the matter to the Vice Chancellor/Rector of the institution and the HEI shall make necessary arrangements to provide the opportunity for the student to undertake the program of study at the HEI.
- g. Upon admission, students with disabilities will be offered an opportunity to provide additional information and documentation about their accessibility needs.

4.2. Entrance exam: Several HEIs require applicants to take an entrance exam. Any such exam must conform to the following requirements:

- a. Students with disabilities must be able to request special arrangements for entrance tests or interviews as per their needs, subject to the requirements of Section 4.1(a).
- b. The HEI will ensure the provision of reasonable accommodations for students with disabilities depending on the type of their disability and need during their entrance exam. For example, students with visual impairment may be provided modified exam materials such as Braille papers (Grade 1/un-contracted or Grade 2/contracted), large print exams: either A4 size (18pt bold font) or A3 size (15.5pt font). Students

with hearing impairments may be provided special materials or lip-reading test. Depending on the type of disability, including learning disabilities, arrangements such as the following may be made: extra time (25-100 per cent extra time depending on the student's need), supervised breaks during the examination, use of a computer, use of an amanuensis, use of a reader or a scribe, option for an oral exam, separate invigilation, or a private area to take tests. For physical disabilities, appropriate accommodations shall be provided depending on the individual case, including providing wheelchair access etc. However, the Accessibility Committee shall ensure that the accommodation provided is reasonably related to the type of disability, so that while providing the accommodation, no one is given an unfair advantage.

- c. In some cases, students with disabilities may be exempted from a part of an examination because of a disability. The HEI may decide to use an alternate assessment tool to ascertain suitability of the student for the degree program. This will be decided by the Academic Council of the HEI.
- d. Students with disabilities must be informed well in advance about the arrangements being provided for them to undertake the entrance exam.
- e. In case the entrance exam is administered by a third party, if the designated test administrator does not provide appropriate facilities for students with disabilities to suitably take the test, the HEI will arrange for an alternate entrance exam for students with disabilities.

4.3. Financial aid, quotas, and age relaxation requirements: People with disabilities may qualify for several benefits including those presented below:

- a. Students with disabilities may qualify for certain benefits under the provisions of the applicable disability laws of the jurisdiction in which they are located. The HEI shall ensure the provision of such benefits in accordance with relevant legislation. In the absence of, or in addition to, any such benefits, the HEI shall adopt a needs-based system to facilitate students with disabilities whose financial situation may not otherwise permit them to afford their educational and any additional expenses related to their needs. The need basis of students with disabilities shall be determined in accordance with the criteria applicable in any government program prescribed for needy students. Presently, the benchmark laid down in Ehsaas Undergraduate Scholarship Program may be used as standard. For all needy students, all institutional charges including tuition fee, hostel fee and utility charges shall be waived, to the extent not covered from any other scholarship / support program. The website and prospectus for the HEI will clearly mention any available fee waivers and concessions.
- b. Students with disabilities may qualify for age relaxation in admission requirements and disability quotas under applicable legislation, and the HEI shall ensure compliance in accordance with relevant legislation. The HEI's website and prospectus will clearly mention any designated quota for persons with disabilities and any age relaxation options.

- c. Reservation of at least one seat for higher qualification i.e. MS/MPhil and PhD for students with disabilities in all public sector universities / institutions
- d. Age relaxation up to ten years for admission to all educational programs.

5. PROCESS FOR REQUESTING REASONABLE ACCOMMODATIONS

- 5.1. The HEIs shall provide reasonable accommodations to students with disabilities whenever necessary to encourage their participation in higher education including in classrooms, libraries, laboratories, cafeterias and sports centers. The website of the HEI and other web-based services such as student portals, LMS etc. shall accordingly conform to level AA of the Web Content Accessibility Guidelines (WCAG).
- 5.2. It is important to note that the duty of HEIs to provide support and necessary accommodations to students with disabilities is an anticipatory duty. In other words, the HEIs should have preparedness to offer reasonable accommodations to students and should not wait to initiate action until requested.
- 5.3. All students will be informed about options to request reasonable accommodations commensurate with their need during the orientation session. Students with disabilities will be offered an assessment of their study and support needs at the earliest opportunity, preferably before they enroll, or shortly after the commencement of their program. As evidence of their disability for the purposes of this assessment, the Accessibility Committee may rely on a medical certificate from a registered medical practitioner, documenting the disability and the need for any accommodations.
- 5.4. At the commencement of each course, staff and faculty shall also clearly inform the students that any student who, because of a disability, may require special accommodations in order to meet the course requirements should contact the instructor or the Disability Coordinators as soon as possible so that requisite arrangements can be made. Faculty are encouraged to use textbooks that are available in alternate format. It may not be necessary to rewrite a course to accommodate students with disabilities; simply modifying the presentation of materials may make it fully accessible.
- 5.5. It is important to note that in making its assessment, the Accessibility Committee will strive to understand and recommend reasonable accommodations specifically focusing on the needs of the individual student rather than recommending generic accommodations that may apply to a certain category a disability. Once an assessment has been conducted, the Accessibility Committee shall forward its directions to the relevant implementing authority, *provided that* in case of any accommodations that are directly related to examinations and assessments (i.e. listed under Section 6.2), approval of the competent authority designated by the HEI shall be required before implementation.
- 5.6. The views of the student with disabilities will be taken into consideration at all times during the assessment of their needs. The assessment report, containing detailed recommendations, will be shared with the student prior to its implementation.

- 5.7. Alternatively, the class instructor, the Disability Coordinators and the student may mutually discuss and decide on any special requirements needed (including those needed for mid-term or final examinations) and accommodations at the start of the course and share them with the Accessibility Committee if its support is needed.
- 5.8. These accommodations may take considerable time, and students should be informed of their course requirements, course components and reading materials well before the commencement of a course and on their accessibility requirements at the start of the course.
- 5.9. The Accessibility Committee will monitor the implementation of any accommodations deemed necessary and reasonable.
- 5.10. The University will ensure the provision of the same level of services and support to students who acquire any disability (or become aware of their disability) during the course of their study. Every reasonable opportunity will be provided to them to complete their studies successfully.
- 5.11. A student with a temporary disability may receive accommodations as needed on a case by case basis upon submission of a medical certificate by a registered medical practitioner and upon recommendation by the Accessibility Committee for reasons to be recorded in writing.
- 5.12. Faculty and staff should be aware of the use of accommodations and learning aides for students with disabilities.
- 5.13. HEIs shall have training programs to train faculty, staff, and members of the accessibility committee on best practices for accommodating students with disabilities and especially encourage its staff, faculty, and students to participate in development opportunities related to the provision of education to persons with disabilities.
- 5.14. Students with disabilities shall be encouraged to suggest improvements in accessibility and accommodation services available at the HEI. If one student with a particular type of disability had difficulty with a specific task, the faculty, the Accessibility Committee, and the Disability Coordinators may not assume that the next student with the same type of disability will experience similar problems. Students with disabilities are frequently sensitive about their disabilities, so faculty, the Disability Coordinators and staff should make every effort to treat these issues sensitively and confidentially.

6. TYPES OF ACCOMODATIONS

- 6.1. Reasonable accommodations. In determining the accommodations to be provided, the Accessibility Committee shall make sure that these are reasonably tied to the nature and extent of the disability suffered. It is important to remember that accommodations are not advantages, but are a means of providing each student with full access to study programs. Depending on the case, accommodations may include:
 - a. medical and mental health assistance such as access to counselling;

- b. changes to physical infrastructure of HEIs including addition of footpaths, road crossings, signage etc., provision of ramps or special pathways, wheel chairs, furniture, boards, dedicated washrooms and other basic facilities retrofitting in the existing buildings and to ensure the same in future construction;
- c. Provision of free transport service within the campus for students with disabilities in particular;
- d. human, digital and assistive technology support including (but not limited to) readings, lecture tape recordings, audiotaped or Brailled handouts, laptops or high-tech computers capable of running heavy screen reading, optical character readers, Braille displays, and other special software, Braille embossers, books, and magazines, Braille lab signs and equipment for students with visual impairments, lecture notes, headphones and induction, assistive hearing devices, video cameras, recordings and video conferencing, for students with auditory impairments, wheelchair assistance, lecture notes, scribes for students with ambulatory difficulties, scanners and printers, special books/tutorials including large print versions, e-books or audio books, media with closed captioning, and wheelchair assistance;
- e. additional time, explanation and quiet areas; and
- f. any other accommodation as may be necessary as determined by the Accessibility Committee from time to time, *provided that* any such accommodations that are directly related to examinations and assessments, such as those under Section 6.2, shall require the student to provide a Disability Certificate (as defined in Section 2.3 of this policy).

6.2. Examinations and assessments: At the commencement of each course appropriate arrangements for examination and assessment will be determined through mutual consultation between the faculty, the Disability Coordinators and the student. To qualify for an accommodation, the student must provide a Disability Certificate (as defined in Section 2.3 of this policy). Alternate arrangements will be made with the view that students are able to demonstrate their learning appropriately and suitably meet the criteria for progression or the conferment of an award. In general, standards for academic credit should not be modified. They may need accommodations in testing, but the content should not be changed unless necessary. Alternate arrangements for examination (for example, extra time, reduced distractions, use of assistive technology such as laptops, scribes etc.) must be approved in accordance with the provisions of Section 5.5 in advance. Where needed, students with disabilities can choose whether or not to have their disability declared on their exam booklet so an external examiner is alerted to their disability.

6.3. Residential/on-campus housing related accommodations: The HEI will ensure the provision of on-campus residential facilities/hostel to students with disabilities if they require it. In case of large universities with numerous hostel facilities, it is advised that special rooms be allocated to people with disabilities with washrooms, privacy and other necessary arrangements.

- 6.4. Participation in sports, cultural, and recreational facilities: Students should be able to participate equally in all aspects of student life. HEIs must provide reasonable accommodations to allow students with disabilities to take part in student activities and athletics if they wish to.
- 6.5. Continuing education, vocational training, online education, skill development, distance learning, adult education, and training: Students with disabilities should have access to all necessary accommodations that would allow them to pursue all educational and skill related activities offered to their peers at HEIs.
- 6.6. Accommodations during convocation: The HEI shall make every effort to ensure that students with disabilities are able to participate fully in their convocations and enjoy this day along with all their fellow graduates.

7. GRIEVANCES

- 7.1. Any grievances pertaining to disability services available at the HEI or any complaint by a student with disability concerning discrimination, abuse or mistreatment by another student, staff or faculty will be submitted to the Disability Coordinators. HEIs will ensure that students are aware of the process for filing a grievance. If they are unable to resolve the concern, the Accessibility Committee may be approached. The matter may be referred to the Vice Chancellor if the issue is not appropriately resolved by the Accessibility Committee.
- 7.2. If the grievance concerns a Disability Coordinator or a member of the Accessibility Committee, the complaint shall be received directly by the office of the Vice Chancellor/Rector, who shall replace the person against whom the complaint has been made if substantial grounds for removal are established on grounds such as harassment, discrimination, indolence etc.
- 7.3. If any complaint made in accordance with Sections 7.1 and 7.2 has not adequately been addressed by the office of the Vice Chancellor, the student may contact the HEC Disability Officer regarding the lack of compliance of the HEI with the provisions of this policy.

8. FUNDS TO SUPPORT REASONABLE ACCOMODATIONS

- 8.1. The HEIs shall establish a special fund to support students with disabilities and annually contribute sufficient funds therein through exclusive budgetary provision. Additionally, all funds and contributions raised through philanthropy shall accrue in this fund. Whenever the HEI or a student with disabilities' own financial resources are deficient in meeting an accessibility requirement pertaining to his or her studies, the HEI will use this fund to provide the necessary accommodations after a thorough evaluation of each case.

9. RESPONSIBILITIES OF THE HIGHER EDUCATION COMMISSION

- 9.1. The HEC will designate a Disability Officer who will provide guidance on the matters pertaining to this policy and facilitate vis-à-vis disability-related interactions with the HEC.
- 9.2. The HEC may require the Disability Officer to assign weightage to the HEI's compliance with

this policy in the recurring grant formula, the ranking criteria and the Institutional Performance Evaluation (IPE).

- 9.3. Proposals for infrastructure development at HEIs may be submitted to the HEC's Disability Officer and will be reviewed to ensure that any new building infrastructure comply with international accessibility codes for persons with disabilities.
- 9.4. The HEC will collaborate with international and national organizations for the advancement of persons with disabilities.

10. REPORTING REQUIREMENT, FURTHER ADVICE AND GUIDANCE

- 10.1. Each HEI shall establish the standing Accessibility Committee and designate Disability Coordinators in accordance with the provisions of the policy no later than September 30, 2021 and submit a statement of compliance with this provision (as well as with other applicable provisions, including Section 3.1 & 3.4) to the HEC by the aforementioned date (including the names and designations of the appointed members).
- 10.2. Each HEI shall be required to submit to the HEC an annual report demonstrating compliance with the provisions of the policy by December 31st of each year. The HEC Disability Officer shall notify the form on which the HEIs shall report compliance.
- 10.3. The HEC's Disability Officer may be consulted for clarification and advice in regard to the implementation of this policy.
- 10.4. In case of any difference of opinion regarding the interpretation of this policy, the HEC's judgment shall be considered final.
- 10.5. The Disability Officer at the HEC will assist students with disabilities during the degree attestation/equivalence process. No attestation / equivalence fee will be charged from students with disabilities as per criteria mentioned at clause 2.3. However, this waiver shall not cover fee for urgent cases.