POLICY: INCLUSIVITY	
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Brief Description	This policy seeks to promote a culture of critical reflection that is conducive to the creation of awareness among staff, students, and other stakeholders of practices that may support The Institute's pursuit of a safe and inclusive environment in which all can flourish.
Stakeholders affected by this Policy	• Staff • Students • Da Vinci Stakeholders
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1 INTRODUCTION

The Da Vinci Institute is a registered private higher distance education provider (Registration No. 2004/HE07/003) offering accredited qualifications on NQF levels five to ten, which are registered on the Higher Education Qualifications Sub-Framework (HEQSF). This policy forms part of the institutional Integrated Quality Management System and details the principles for ensuring that programme offerings adhere to the required academic regulatory standards and empower students to contribute to the transformation of their communities, society, and the economy of the future. This approach is underpinned by the Business- and Community-based Action Learning discourse on the co-creation and distribution of relevant knowledge.

The Institute acknowledges the importance of diversity and equality among people and respect their constitutional rights. The purpose of this policy is therefore to create a safe environment and opportunities for continual dialogue and the advancement of discourses related to matters of inclusivity, such as, discrimination, harassment, promotion of access, etc.

2 POLICY SPECIFIC DEFINITIONS

Term	Definition
Academic Language	The language used in teaching and learning, knowledge production and dissemination. It includes, inter alia, discipline specific vocabulary, grammar and punctuation, argumentation and discourse, and the applications of rhetorical conventions and devices (Government Gazette 43860, October 2020).
Access	Affordance, by a higher education institution, of the opportunity to students to register for, and pursue education and training (Government Gazette 43860, October 2020).
Code switching	The process of shifting from one linguistic code or language to another, depending on the social context or conversational setting. It is a communicative practice where the communicator skilfully switches between languages without disturbing the flow of ideas.
Communication	The imparting or exchanging of information or ideas by speaking, writing, or using some other medium, to create shared meaning between participants (senders and receivers)

Disability	Disability is defined as the loss or elimination of opportunities to take part in the life of the community, equitably with others, encountered by persons having physical, sensory, psychological, developmental, learning, neurological or other impairments, which may be permanent, temporary, or episodic in nature, thereby causing activity limitations and participation restriction within mainstream society. These barriers may be due to economic, physical/structural, social, attitudinal and/or cultural factors.
Epistemic access	The process of successful knowledge acquisition and dissemination through enabling teaching and learning pedagogies (Government Gazette 43860, October 2020).
Equality	Providing the same level of opportunity and assistance to all members of staff to enjoy the benefits of similar social status and receive the same treatment without the fear of discrimination
Equity	Providing various levels of support and assistance depending on specific needs or abilities, to achieve greater fairness of treatment and outcomes, because access without support does not equal opportunity
Impairment	Any loss of normal, physical or mental abilities. An impairment could lead to a disability
Inclusivity	An expressed policy intent on, or practice of, embracing diversity and bringing people from various backgrounds into the fold at different levels institutionally, into groups and individually (Government Gazette 43860, October 2020).
Indigenous Language	A language that has its heritage roots in Africa that is native to a region and spoken by indigenous people (Government Gazette 43860, October 2020).
Instruction	The transfer of learning from one person to another
Language	The method of human communication, either spoken or written, consisting of the use of words in a structured and conventional way.
Language of Learning and Teaching	A language used to teach or instruct students in an educational environment.
Language of Scholarship	A language used in an academic setting for knowledge production and dissemination (Government Gazette 43860, October 2020)
Multilingualism	The effective use of multiple languages either by an individual or by a community.
Person with Disabilities	The Code defines persons with disabilities as "persons who have a long-term or recurring physical or mental impairment, which substantially limits their prospects of entry into, or advancement in employment".

Scientific Language	The language used by scientists to communicate their scholarly work or research findings (Government Gazette 43860, October 2020).
Social Cohesion	The degree or extent to which a society is integrated, united and functional, providing an environment in which is citizens can live harmoniously and flourish (Government Gazette 43860, October 2020).
Transformation	The commitment to a system that is free from all forms of unfair discrimination and artificial barriers to access and success, as well as one that is built on the principles of social inclusivity, mutual respect, acceptance and diversity.
Gender neutrality	The idea that underpins the pursuit of a learning and working environment in which roles are not distinguished based on sex (i.e., biological assignment) or gender, which is based on both biological assignment and / or personal identification or non-identification.
Mixed-mode delivery methodology	A delivery methodology that aims to deconstruct the collective teaching and learning activities and resources associated with an academic module, and then reconstructing the constituent parts across various channels and platforms most suited to their facilitation.
Multi-mode delivery methodology	A delivery methodology that aims to replicate the collective teaching and learning activities and resources associated with an academic module across various channels and platforms pending the preference of the student.
Reasonable Accommodation	Reasonable accommodation refers to modifications or changes to the way a job is normally performed, that makes it possible for a suitably qualified person with a disability and/or impairment to perform on par with everyone else. The type of reasonable accommodation required, would depend on the job and its essential functions, the work environment and the person's specific disability. Cases will be assessed on an individual case-by-case basis in order to determine whether the person's disability or impairment can be reasonably accommodated and whether the accommodations are feasible.
Unfair Discrimination	Unfair discrimination means treating a person less favourably than others in the same circumstances on the grounds of, *inter alia*, their disability, race, ethnic origin, nationality, religion, sex, sexual orientation, marital status or age.

3 REGULATORY FRAMEWORK

This policy is benchmarked against and should be read in the context of the relevant legislation underpinning the principles against which institutional policies and operational procedures are developed, implemented, and maintained. These include:

6.1. Relevant legislation

a. Constitution of the Republic of South Africa (No.108 of 1996)
b. Higher Education Act (No.101 of 1997) as amended Act (No.39 of 2008)
c. Language Policy Framework for Public Higher Education Institutions determined in terms of section 27(2) of the Higher Education Act (No.101 of 1997) as amended (Government Gazette 43860, October 2020)
d. National Development Plan 2030
e. National Education Policy Act (No.27 of 1996) as amended 2007
f. National Qualifications Framework Act (No.67 of 2008)

6.2. Applicable Institutional documents

a. All the relevant Da Vinci Policies

4 SCOPE

The Inclusivity policy is applicable to all staff and students of The Institute, as well as any relevant stakeholders.

5 PURPOSE

The aim of the Inclusivity Policy is to support The Institute's transformation agenda and provide appropriate guidance to staff and students of The Institute regarding matters of inclusivity, diversity and equity. The policy aims to ensure that these constitutional imperatives are upheld to avoid prejudice and unjust exclusion in order to promote the achievement of the goals of the National Development Plan, which aim to promote social cohesion and nation building.

The Institute strives towards an inclusive education system reflective of a democratic society as envisioned by the constitution. The Institute promotes the discourse of transformation amongst staff, students, alumni, and stakeholders. The Institute considers other structural factors that may hinder access to education such as cost, access to technology, cultural inclusion into the social fabric of higher education, curriculum change, and the diversity of a transdisciplinary faculty. Transformation is reflected in all aspects of The Institute, such as governance, policy framework, management and leadership, student environment, diversity and equity in staffing, climate and culture, progressive and inclusive teaching and learning, and research and knowledge systems. The Institute aligns to the notion that being inclusive is

essential to achieve social equity and promote lifelong learning. From a policy perspective, inclusivity for The Institute means taking a systemic approach to higher education reform and thus changing the way the educational system addresses exclusion. Part of inclusivity within the Da Vinci context is to incorporate a range of pedagogical, andragogical and heutagogical approaches. In deepening the discourse, The Institute continuously reflects on instructional dynamics in different contexts and in so doing, ensures that no student is left behind.

6 ACCESS AND ACCESSIBILITY

6.1. Recruitment

The Institute is committed to the implementation of student and personnel recruitment practices that are inclusive and informed by the principles of equity and transformation at every stage. As such, all recruitment initiatives aim to be free of any form of bias or discrimination that could hinder access.

6.2. Delivery methodology

While The Institute acknowledges the benefits of the mixed-mode delivery methodology, it is also aware that restricting specific critical learning resources to digital platforms may disadvantage students that may not have readily available or uninterrupted access to the internet. In support of this, The Institute's online distance teaching and learning strategy should incorporate aspects from mixed-, and multi-mode delivery methodologies and ensure students can access all primary learning materials in one place. All material must be delivered synchronously and asynchronously over several platforms and communication channels. Students with restricted access to the internet should be able to download a comprehensive study guide that would support the achievement of all learning outcomes associated with a particular academic module and not need to remain online for prolonged periods of time. Students are encouraged to participate in all aspects of online delivery that serve to enrich and illuminate primary learning resources and promote social activities and interaction, as well as communication between the student and faculty.

6.3. Equity of Delivery

Equity of delivery must be ensured by means of initiatives such as, all staff undergoing extensive onboarding to induct them into, *inter alia*, The Institute's teaching and learning philosophies and strategies and key policies and procedures. Heads of Programme oversee facilitators involved in the delivery of a particular module to ensure alignment on the delivery requirements for the module, through *inter alia*, participation in observation sessions, review of student feedback, and internal and external moderator reports. All marking is internally moderated if not exit level and all exit level modules are externally moderated to ensure fairness, consistency, and

equity of delivery. In the case of external moderation, the same external moderator must be contracted across faculty on the same module to ensure horizontal consistency in terms of assessment. All courseware is quality assured by the Design Office and part of this function is to ensure that all the modular courseware meets the required regulatory and institutional standards. Where multiple faculty participate on the delivery of the same module, a marking standardisation meeting is held to ensure a consistent marking approach. The afore-mentioned measures thus allow for equity of delivery to be achieved and monitored. In addition, preference is given to the same moderator to be used across related modules at different levels to ensure vertical alignment as per modular outcomes.

All students receive the same student support and have access to student support services synchronously and asynchronously. Student support includes, *inter alia*, sessions with the Student Coach and Behaviour Specialist, Information Officer, Information Technology Office as well as the academic development sessions. All students receive equitable access to IT support via the IT helpdesk and capacity development and training via various scheduled interventions.

To ensure a consistent student experience, all faculty are required to remain up to date with developments in the online distance education space and consequently utilise all online platforms and related tools fully. In support of this The Institute should also offer a formal training course to faculty to aid in the development of technologically aided teaching skills.

7 GENDER NEUTRALITY

Historic conventions that promoted the assignment of gender-based privileges, and conversely resulted in gender-based discrimination, in all sectors of society, have had a particularly negative impact on education at large. The Institute is therefore dedicated to the creation of gender-neutral working and learning environments for all its stakeholders. This approach serves to counteract the notion that there are social and economic roles and behaviours deemed more suited for individuals or groups associated with a particular sex or gender. In order to create a more inclusive environment, The Institute is committed to the promotion of gender-neutrality through its approach to policy development, recruitment practices, role assignment, restroom assignment, teaching and learning practices, and language usage in both educational and business environments. In addition, The Institute seeks to promote a culture of critical reflection that is conducive to the creation of awareness among staff, students, and other stakeholders of practices that may support The Institute's pursuit of a safe and inclusive environment in which all can flourish.

8 DISABILITY/IMPAIRMENT

Da Vinci practices a policy of equal opportunities for all staff and students. Da Vinci is committed to equal opportunity in all its employment and other practices in relation to persons with impairment and/or disabilities. The Institute therefore lends its support to measures and programmes that provide for the social, educational, economic and cultural integration of persons with impairment and/or disabilities in society.

8.1. Staff

8.1.1 Equity versus Equality

In accordance with the Employment Equity Act 55 of 1998, and aligned to best practice, The Institute is committed to provide employment opportunities for persons with disabilities. In doing so, The Institute endeavours to reasonably accommodate persons with disabilities.

The Institute has a responsibility as an employer for developing policy and promoting best practice in equality of opportunity for all staff. However, this does not always mean that everybody must be treated similarly seeing that The Institute differentiates between equity and equality. It must be recognised that treating everybody the same way may lead to the continuing exclusion of individuals or groups.

The Institute recognises the importance and the necessity of taking positive action in creating equal opportunities for all staff. If disability is a barrier, The Institute will work to adopt measures to help remove such obstacles as may exist, thereby providing equal access to employment opportunities and services.

8.1.2 Principles

The Institute bases its approach to promote equal opportunity in the workplace for persons with impairments and disabilities on the following guiding principles (refer to *Reasonable Accommodation* under Policy-specific Definitions):

a. The creation of a working environment in which people are valued as individuals
b. No discrimination against any employee or applicant for employment based on non-work-related characteristics, such as, *inter alia*, race, pregnancy, gender, sexual orientation, will be tolerated
c. Employees or job applicants will be treated fairly, regardless of their impairment and/or disability, provided that the impairment and/or disability will not put the employee, employer, students, clients or other stakeholders at risk
d. Cases will be assessed on an individual case-by-case basis in order to determine whether the person's impairment and/or disability can be reasonably accommodated
e. Should an impairment and/or disability arise while in the employment of The Institute, affecting an employee's ability to perform their task, the situation will be

professionally assessed to determine whether the impairment and/or disability can be accommodated within reason.

f. Should an impairment and/or disability be disclosed, the information will be treated as private and confidential with the exception of using the information to monitor progress in employment, to comply with the reporting requirements for the Department of Higher Education (DHET) and the Employment Equity Act, for purposes of strategic planning and to maximise levels of service provision.

8.1.3 Reasonable Accommodation

The term 'reasonable accommodation' is generally understood to mean, improved access arrangements. It may be that the person would need some special treatment or facility to assist them in performing the job: it would be expected that they would be facilitated with some flexibility measures not normally extended to other impaired and/or non-disabled persons employed in that role. This might mean having time-off arrangements that facilitate them in the management of their impairment and/or disability.

Based on consultation with employees and applicants with impairments and/or disabilities, The Institute will take all reasonable steps to provide them with a workplace compatible with their particular needs. Account will be taken of both the interior and exterior working environment. It is also expected of employees with impairments and/or disabilities to identify their own reasonable adjustments and innovative ways of adapting their environment to suit their needs.

In general, the realisation of an employee's full potential in the workplace often depends on the method of work organisation and/or provision of work facilities or aids. The same principle holds in relation to persons with an impairment and/or disability, the only difference being the need for the employer and work colleagues alike to be open to a greater diversity of work organisation, methods and facilities, and to consider affording additional forms of assistance or facilitation to enable particular persons to realise their abilities and contribute to their potential as effective employees.

8.1.4 Inclusion in the workplace

The Institute envisages the application of the policy principles outlined above at three levels:

a. Recruitment and selection stage of employment

    I. Job advertisements will explicitly welcome applicants from all sections of the community, including those with impairment and/or disabilities

II. Applicants are shortlisted and selected based on merit considering qualifications, skills, performance, and achievements. Non-work-related criteria will not be considered in this regard.

The only basis on which a person with an impairment and/or disability would not be considered for a position is if:

III. They are deemed to be medically unfit
IV. Other candidates are better qualified
V. If accommodations that need to be made are not within reason.

b. Career Development

When considering employees with impairments and/or disabilities for assignments and promotion, they will have the same opportunities as other employees.

The Institute will ensure that employees with impairments and/or disabilities will be given the same opportunities to acquire skills and experience necessary for future career development. The Institute will endeavour, within reason, to remove barriers to the development and advancement of employees with impairments and/or disabilities.

The primary criterion for employment, placement or promotion will be based on an employee's ability to meet the requirements of the position.

a. Impairment and/or disabilities incurred while employed

Following an illness or injury:

I. An employee will be given the support to maintain or return to a role appropriate to their experience, abilities and altered circumstances
II. In these circumstances, The Institute will consult with the relevant medical practitioner to obtain recommendations regarding, *inter alia*, when the employee can return to work and interventions required to enable the employee to continue with their work
III. Taking into account the relevant medical practitioner's recommendations, The Institute will therefore reconsider the employee's current position and whether a more appropriate placement is required. When required, rehabilitation, re-training, relocation and flexible working arrangements will be considered.

In the event of an employee being absent for a prolonged period due to a long-term illness or recovery or rehabilitation from an injury, The Institute will implement interim arrangements for the fulfilling of the absent employee's duties.

6.4. Students

The Institute promotes the creation of a supportive environment where students can disclose their impairment and/or disability without fear of discrimination. Disclosed information will be treated as private and confidential. The Institute acknowledges that people with impairments and/or disabilities have the same right to reach their academic potential as people who do not have an impairment or disability. Therefore, reasonable provisions are made to assist and accommodate students with impairments and disabilities in the teaching and learning environment.

Should a student become disabled or impaired during the course of their studies, the same provisions would be made available to them.

For students with impairments and/or disabilities, The Institute offers the following:

a. Recordings of elective sessions are made available
b. Students are informed of technological functionalities that can be used to assist them with their impairment and/or disability
c. Where applicable, additional time is provided to complete formative and summative assessments
d. Access to a Student Coach and Learning Behavourial Specialist.

Reasonable provision will be made for access to the campus for students with physical disabilities. However, as a distance education provider, all teaching and learning interventions are offered online, which therefore does not necessitate students to visit the campus.

Where the student is willing to carry the cost, any requests for special provisions will be considered. These provisions may include, *inter alia,* sign language interpretation and recordings of prescribed texts

It is the right and responsibility of impaired or disabled applicants to declare their impairment or disability when they apply for admission, and to familiarise themselves with this policy in order to arrange possible accommodations with The Institute.

6.5. Implementation of this policy

All staff members and students have a responsibility to familiarise themselves with this policy and ensure that the provisions of this policy are adhered to and to treat their impaired or disabled colleagues or students with the same dignity and respect afforded to others.

Faculty members need to inform the Programme Conveners should they suspect a student has a learning disability so that the necessary interventions and support can be put in place.

Line managers and/or faculty members need to intervene in any instances where discriminatory behaviour is observed or brought to their attention.

Human Resources must support this policy as follows:

a. Provide counselling services for persons with an impairment or disability should it be required
b. Provide practical support and facilitation for employees with an impairment or disability in relation to work arrangements.

9 LANGUAGE

The Institute acknowledges the diversity and equality of the official languages in use by the population groups in South Africa as embedded in the Constitution of the country, as well as all other international languages, and takes cognisance that English is regarded and generally accepted as an international medium for business communication. The Institute further acknowledges that languages are critical resources in the transmission of knowledge, cognitive development, and effective participation in the knowledge economy. There is further a need to address the interests, needs and aspirations of a wide range of language communities through ongoing dialogue and debate.

The inclusive approach to language is to provide appropriate guidance to staff and students of The Institute regarding the use of the official business language of The Institute. It further aims to ensure that constitutional imperatives such as access, equity and inclusivity are upheld to avoid discrimination and unjust exclusion to promote the goals of the National Development Plan of promoting social cohesion and nation building.

6.6. Language of Instruction

All students must be proficient in English since English is used as the medium of instruction and administration as well as the preferred business language at The Institute. However, conditions must be created for the development of indigenous languages as languages of meaningful academic discourse, especially at postgraduate level. In this regard, students can write their dissertation or thesis in any language, provided that the work is translated into English for assessment purposes. It is however acknowledged that contextual meaning can be lost in translation, therefore, for example, students would be given the opportunity to clarify meaning in their oral defense. Students are also encouraged to translate the abstract of their thesis or dissertation, if written in English, into one of the official South African languages.

All indigenous languages must be valued as sources of knowledge, capable of informing learning of different disciplines. The Institute is further committed to nurturing an environment of multilingualism as a means to facilitate cognitive development, epistemic access, inclusiveness, transformation, social cohesion and respect for all languages, by for example, allowing and encouraging code-switching in tuition sessions and discussions. English may also not be used for the purpose of exploitation, exclusion, domination, or discrimination. Moreover, support must be provided to student for whom English is not their first language or mother tongue, in order to ensure academic success, by for example, allowing students to use dictionaries during, for instance, invigilated assessments.

6.7. Modules in the Curriculum

All the modules offered at The Institute are delivered in English as the medium of instruction. Students are therefore expected to be proficient in English since English is used as the language for both learning and teaching. None of the other official languages are used as a medium of instruction. Students and lecturers should, however, consider all reasonable educational alternatives, including code-switching, taking into account equity and practicability and ensuring that it does not serve as a barrier of access to speakers of other languages.

10 CONTEXTUAL RELEVANCE

The Institute promotes participatory, transformative research, that is informed by multiple indigenous knowledge systems. Research that incorporates diversity is encouraged, as are cooperative and consultative engagements with indigenous communities. The Institute recognises cultural diversity as a strength, which provides alternative epistemologies, thereby allowing for the co-creation of knowledge from diverse perspectives.

In terms of relevance, students are encouraged to align their studies with the *National Development Plan 2030*, *Agenda 2063*: *The Africa We Want* and the *UN Sustainable Development Goals.* Students are further encouraged to look towards the 5th Industrial Revolution (5IR) where the goal is to elevate humanness rather than to eliminate it, and in the process influence the co-creation of inclusive humane societies. Through its developmental research agenda, The Institute seeks to instil in its scholars a deeply embedded social consciousness.

11 REVIEW OF POLICY

Regular review and amendments of this policy will be done in line with the approved institutional policies. This will take place in consultation with the relevant quality

assurance structures at departmental and institutional level, under the auspices of the official custodians of this policy, namely the Chief Executive Officer (CEO) and the chairperson of Senate.