

Reasonable Adjustments for Disabled Students Policy

1. INTRODUCTION

1.1. The University seeks to provide equal access and opportunity for students with disabilities through the implementation of the Inclusive Education Framework where possible and, otherwise, through reasonable adjustments. This commitment builds upon the foundation of equality legislation and anti-discrimination guidance.

2. Purpose

2.1. The University has a legal duty to adhere to the Equality Act (2010) (The Act), which includes the Disability Discrimination Act of 1995, the Special Educational Needs and Disability Act 2001 and the Disability Discrimination Act 2005. The Act provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics.

2.2. A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. This encompasses individuals with physical or sensory impairments, mental ill health, specific learning difficulties and a range of chronic or fluctuating conditions. Examples of these may include:

- Blind/Visual Impairment
- Deaf/Hearing Impairment
- Mobility MS, Cerebral Palsy, Motor Neurone
- Dyslexia, Dyspraxia, Dyscalculia
- Chronic Fatigue Syndrome
- ASD or ADHD
- Depression and anxiety
- Bipolar
- Epilepsy

2.3. It is unlawful to discriminate against a disabled person in relation to the provision of education and related services. However, it is lawful to treat a disabled person more favourably because of their disability.

2.4. The Act places a legal duty on higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled.

2.5. The duty arises in relation to all aspects of the student experience, including:

- provisions, criteria, or practices (for example, procedures, policies, course materials, and teaching and assessment methods);

- physical features (for example, access to buildings, fixtures and fittings);
- providing auxiliary aids or services (for example, equipment or human support).

3. Scope

3.1. The Inclusive Education Framework aims to ensure that accessibility is embedded in education activities for all students, including learning, teaching, and assessment.

3.2. The duty to make reasonable adjustments is anticipatory: it requires the University to plan ahead and anticipate the likely needs of disabled students, rather than waiting until adjustments are proposed. The University is therefore required to ensure, where possible, that adjustments to policies, practices, and procedures have been made in advance to reduce or remove the barriers to disabled students.

3.3. The purpose of the duty is to take reasonable steps to remove or avoid disadvantage so that disabled students can effectively participate in the education and other benefits, facilities, and services provided for students by the University.

Failure to comply with the duty to make reasonable adjustments would constitute unlawful discrimination under The Act.

3.4. The duty requires that only adjustments that are reasonable are made. What is reasonable will usually depend on the individual circumstances of the case. In assessing what is reasonable, the University should take the following into account:

- i. the effect of the disability on the individual student;
- ii. the effectiveness of the particular steps in removing or overcoming the relevant disadvantage;
- iii. the relevant interests of other people, e.g. whether an adjustment would result in a significant disadvantage for other students;
- iv. the practicality of the changes;
- v. any potential health and safety issues;
- vi. the resources available (both those of the University and other financial assistance such as the Disabled Students' Allowances)
- vii. the financial and other costs of making the adjustment;
- viii. the type of education/provision or other benefit, facility, or service being provided by the University; and
- ix. the extent to which aids and services will otherwise be provided to disabled students (e.g. local authority support).

3.5. There is no duty on the University to adjust genuine 'competence standards', which are academic, medical, or other standards applied by or on behalf of the University for the purpose of determining whether a person has a particular level of competence or capability. However, the duty does apply to the way in which that standard is assessed.

3.6. Assessments must demonstrate that the learning outcomes for a module have been met, for example, when setting a presentation as the required mode of assessment, this should be clearly linked to a learning outcome (for example, communication skills demonstrated through ability to

deliver a presentation). Reasonable adjustments must not affect the validity or reliability of the assessment outcomes. However, they may involve, for example, changing the usual assessment arrangements or method, adapting assessment materials, providing a scribe or reader in the assessment, and re-organising the assessment environment.

3.7. Reasonable adjustments may also be necessary when determining the approval of an extension that goes beyond the automatic 7-day extension for which all students can apply. The Procedure document outlines the process for managing extensions for up to an additional 7 days for students with a Reasonable Adjustment.

3.8. All schools are required to have a Disability Inclusion Tutor (DIT), DITS work with Disability and Inclusion Service (DIS) to ensure that Reasonable Adjustments are implemented for students disclosing a disability. Further details on the process for this can be found in the accompanying procedure.

4. POLICY

4.1. The purpose of this policy is to:

- i. Outline the responsibilities of staff and students (section 5);
- ii. Inform and guide the University regarding compliance with the requirements of relevant legislation; and
- iii. Clarify where responsibility lies for the identification and implementation of reasonable adjustments, (section 5)

5. ROLES AND RESPONSIBILITIES

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| Students | <ul style="list-style-type: none"> • Disclosing a disability at the earliest opportunity; • Providing evidence to support the disability (such as a diagnostic assessment for learning impairments, medical or GP's letters/reports for physical or mental health conditions, or existing DSA needs assessment); • Attending meetings as requested to discuss your needs; • Disclosing any changes such as increased impairment (e.g. because of a deteriorating condition) requiring new adjustments or a modification of existing adjustments; • Providing documentation to support the recommended adjustments where appropriate. |
| Disability Support and Inclusion Team (Student Services) | <ul style="list-style-type: none"> • Liaising with students and their Academic School to ensure appropriate information/evidence is sought regarding a student's disability and inform the Academic school of adjustments required |
| Disability Inclusion Tutors (Academic School) | <ul style="list-style-type: none"> • Working with the Director of Education and Head of School, ensure the Inclusive Education Framework and Reasonable Adjustments are implemented and adhered to within the Academic School |
| Module Managers / Leads | <ul style="list-style-type: none"> • Ensure the Inclusive Education Framework and Reasonable Adjustments are delivered within modules and for individual students. |

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| Heads of School | <ul style="list-style-type: none"> Ensuring that the School complies with the Reasonable Adjustments Policy and Inclusive Education Framework. To ensure the School has at least one DIT in place with a commensurate workload allocation |
| Keele Institute of Innovative Education (KIITE) | <ul style="list-style-type: none"> Provide resources for staff in designing and delivering teaching, learning and assessment that embeds the requirements of the Inclusive Education Framework. |
| All other staff | <ul style="list-style-type: none"> Recognise the disclosure of a disability and refer this to the Disability support and Inclusion Team |

6. RELATED POLICIES AND PROCEDURES

6.1. This policy should work alongside all policies and procedures relating to students. Specifically working in conjunction with the Inclusive Education Framework.

7. REVIEW, APPROVAL & PUBLICATION

7.1. This policy should be reviewed every 3 years, or earlier if required, by the Director Student Support and Success, Head of Student Accessibility and Inclusion, and Education Committee.

7.2. The University Executive Committee will approve this policy.

7.3. This policy will be included in the policy zone area of the University Website.

8. ANNEXES

- Annex 1: DIT Role Description
- Annex 2: Reasonable Adjustments Disclosure Flowchart
- Annex 3: RA Process for Extensions

9. DOCUMENT CONTROL INFORMATION

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| Document Name | Reasonable Adjustments for Disabled Student Policy |
| Owner | Director of Student Services and Success, Student Services |
| Version Number | Version 1 |
| Equality Analysis Form Submission Date | [Decision from Equality Analysis and form submission date] |
| Approval Date | 11 June 2024 |
| Approved By | University Executive Committee |
| Date of Commencement | 1 st September 2024 |
| Date of Last Review | September 2024 |
| Date for Next Review | September 2027 |
| Related University Policy Documents | Safeguarding, Support to Study, Leave of Absence, Fitness to Study, Exceptional circumstances, Regulation B8 'Termination of Studies by the University', Regulation D1 'Assessment', PGR Code of Practice, Ensuite Policy. |
| <i>For Office Use – Keywords for search function</i> | |

Disability Inclusion Tutor Role

1. What is a Disability Inclusion Tutor

Disability Inclusion Tutor (DITs) are academic members of staff who are the named academic link between the central Disability Support and Inclusion (DSI) team and Academic Schools at Keele.

DIT's work with dedicated DSI Disability Advisors (DAs) who operate as part of a wider range of [Student Services](#) provision.

DITs and DAs work together to ensure that all recommended Reasonable Adjustments (RAs) and study support is in place for students with disabilities, long term health conditions and/or Specific Learning Difficulties.

DAs provide the RAs and the DITs provide advice and information required to implement the RA specifically related to their programme area. This is to ensure that barriers are removed for students with disabilities as part of our responsibilities under the Equality Act (2010). Examples of specialist advice may relate to (but are not limited to) practical work, such as work conducted in laboratories, clinical settings, fieldwork, placements, and requirements related to Professional, Statutory and Regulatory Bodies (PSRB's).

The DIT should have good oversight of the competence standards for their Academic School, as well as teaching and assessment methods. They should also have a thorough understanding of inclusive academic practice. With the support of the Head of School, the DIT will oversee the implementation of reasonable adjustments and inclusive practice in each Academic School.

It is important to note that all academic areas should follow the Inclusive Education Code of Practice when this is available in 2024. The need to put in place individual adjustments should be minimal if inclusive best practice is followed.

2. Process

A student may inform any member of staff at the University that they have a disability, long term health condition and/or Specific Learning Difficulty. Legally at this point it is considered that the University is aware of a student's disability and it is essential this information is passed to DSI via email to support.dsi@keele.ac.uk.

Whether a student self-refers, or the information is provided by a member of staff, DSI will arrange to meet with the student so that their needs can be assessed, and support put in place. In some cases a meeting may not be required to implement RAs, but this will be in agreement with the student via DSI.

An application for Disabled Students Allowance (DSA) may be completed which funds an independent assessment of need and some additional support. DSI will advise the student through this process.

DSI will agree adjustments with the student, using medical and/or other evidence where required, and they will then recommend RAs for the student which will be recorded centrally.

These are communicated through eVision to the appropriate DIT and Module Leader. The DIT also receives an email to inform them of new or revised RAs.

It is important that named members of staff understand their responsibilities in ensuring RA's and support are in place:

- DSI are responsible for ensuring self-referrals and referrals are acted upon, making sure that students receive accurate and timely advice, and that RA's are provided to the appropriate Academic School(s).
- Heads of Schools are required to assign an academic member of staff as DIT and ensure they are appointed appropriately and supported in this role.
- Module Leaders are responsible for ensuring RA's are acted upon and in place for students on their module. They can seek advice from the DIT and DA when required.
- The role of a DIT is explained below.

3. The role of the DIT:

- DITs **must** have oversight of the implementation of RAs within their area of responsibility. This includes ensuring:
 - Module leaders access e-vision and share relevant information with teaching staff in the module to ensure that RAs are put in place effectively.
 - RAs relating to assessment are shared appropriately to ensure they are put in place.
 - If assessments are not centrally organised in formal assessment periods, the school must guarantee that RAs are in place. For example, extra time in class tests.
- When required, DITs will liaise with students, DSI and other staff regarding RA's and support needs, and should:
 - Be aware of all students with more complex support needs, within their area of responsibility.
 - Be a point of contact for students experiencing issues or problems with the implementation of their reasonable adjustments and inform DSI of any concerns or ongoing issues regarding support for disabled students in their area of responsibility.
 - Be the main point of contact for staff within the area of responsibility for disability related queries and questions.

- DITs will work with DSI to make decisions about individual cases based on the module learning outcomes and any PSRB requirements. This may require input from others within the Academic School.
 - Be the main point of contact for DSI staff with queries relating to the course, competence standards and teaching and learning activities.
- DITs will process student requests for an RA extension in line with current policy.
- DITs should inform and work with the relevant Head of School and DSI to address areas where there are high numbers of cases of complex needs and reasonable adjustments. DITs must be given an allocated FTE to complete this role. It is anticipated that this would be 0.1FTE, but this would be reviewed annually to ensure it is responsive to the role and student numbers/need. The review process should take place with DSI and could result in the FTE increasing or decreasing, as deemed appropriate by the School and DSI. In cases where there is a considerable workload linked to this role, it may be necessary to consider appointing more than one DIT.
- DITs will work with DAs to respond to enquiries from teaching staff regarding support for students with additional needs, for example, questions regarding teaching resources/materials, classroom set-up, teaching practice, fieldtrips, placements, assessment and feedback, as well as contacting DSI as and when further support, information or clarification is required.
- DITs must engage in CPD and share best practice, including championing the Inclusive Teaching Code of Practice. They must maintain their professional development by attending disability training sessions, best practice workshops and networking events arranged by DSI and disseminating information to other members of staff in their area of responsibility.

Please direct questions about the DIT role to: [support.dsi@keele.ac.uk](mailto:support.dsi@ Keele.ac.uk)

Disability Support and Inclusion, Accessibility and Inclusion

Information correct June 2023. To be reviewed annually.

Reasonable Adjustments Procedure
(RA Policy Annex 3)

1. Introduction

- 1.1. As highlighted in the Reasonable Adjustments for Disabled Students Policy, The Equality Act places a legal duty on higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled. This procedure sets out the process to be followed from the point where a student discloses that they have a disability.

2. Process for dealing with student disclosures

- 2.1. Students are advised to inform Disability Support and Inclusion (DSI) service of their disabilities and support needs but may inform any member of staff and the University is then legally considered to be aware of the disability. This is not a change from current practice and staff should be reminded of this regularly. This information should be passed to the DSI team via email (of which only the DSI team have access to for GDPR purposes) for reasonable adjustment to be added to support.dsi@keele.ac.uk
- 2.2. At the point where DSI are made aware of a disclosure, they will normally arrange to meet with the student to assess their needs and identify the support required to be put in place through Reasonable Adjustments (RAs). In some cases, a meeting may not be required to implement RAs, subject to this being agreed with the student via DSI.
- 2.3. Some students are eligible for financial support to cover the study-related costs related to a mental health problem, long-term illness or any other disability. DSI offers support for students in completing an application for Disabled Students Allowance (DSA).
- 2.4. DSI will agree adjustments with the student, informed by medical and/or other evidence where required, and they will then recommend RAs for the student which will be recorded centrally. RA's will be communicated through eVision to the appropriate Disability Inclusion Tutor DIT and Module Lead / Manager. The DIT also receives an email to inform them of new or revised RAs for students in their school.
- 2.5. It is important that named members of staff understand their responsibilities in ensuing RA's and support are in place:
- DSI are responsible for ensuring student self-referrals and referrals from others are acted upon, making sure that students receive accurate and timely advice, and that RAs are
 - provided to the appropriate Academic School(s).
 - Heads of Schools are required to assign an academic member of staff as a DIT (ensuring that cover is in place for any periods of absence) and ensure they are appointed appropriately and supported in this role.
 - Module Leads / Managers are responsible for ensuring RAs are acted upon and in place for students on their module. They can seek advice from the DIT and DA when required.
 - Staff delivering teaching sessions are required to implement RAs during taught
 - sessions.
 - Staff delivering and supporting assessments are required to implement RAs during
 - assessments.

3. Process for Dealing with Reasonable Adjustment Extension Requests

- 3.1. We can anticipate that students with some disabilities will find it difficult to meet deadlines. For example, students with specific learning difficulties where study activities take longer and/ or time management is difficult. Students with fluctuating conditions, including mental health, may find it difficult to plan their workload. Therefore, as we can anticipate this is the case, we have a legal duty to ensure we are able to put in place reasonable adjustments.
- 3.2. In line with our commitment to Inclusive Education, all students now have the option to request an automatic 7-day extension via eVision. The cap of three 7-day extensions will be removed automatically for students with a relevant reasonable adjustment in place. Where longer than 7 days is required, an exceptional further extension, may be considered as appropriate, up to a maximum of an additional 7 days. In such cases, they should:
 - a) Contact the DIT/DA to request a Review of Disability Support Meeting to consider what support is already in place, and if further support or extension is required. The meeting should be held within 5 working days of the request being received.

OR:

 - b) Apply via eVision for the option of another assessment opportunity to further stagger their workload;
- 3.3. As an outcome of this meeting the DIT has discretion to grant up to an additional 7 days only in exceptional circumstances, if the nature of the task/student's needs means this is reasonable. This review meeting should involve a panel including the Disability Advisor, the DIT (or relevant school representative) and the student.
- 3.4. All information about reasonable adjustments will be available to relevant academic colleagues via Scims, this includes the Disability Inclusive Tutors (DITs). Module Leaders will also be included in any communication about reasonable adjustments for students on their module.