

Policy on Reasonable Adjustments for Students

# Key Details

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| **POLICY TITLE** | Policy on Reasonable Adjustments for Students |
| **DATE APPROVED** | 25 May 2022 |
| **APPROVING BODY** | Learning Teaching & Student Engagement Committee |
| **VERSION** | V1 |
| **PREVIOUS REVIEW DATES** | New Policy  |
| **NEXT REVIEW DATE** | May 2024 |
| **OUTCOME OF EQUALITY IMPACT ASSESSMENT** | *No major change* |
| **RELATED POLICIES / PROCEDURES / GUIDANCE** | Fitness to StudyMitigating Circumstances  |
| **IMPLEMENTATION DATE** | September 2022 |
| **POLICY OWNER (JOB TITLE)** | Director of Student Services |
| **UNIT / SERVICE** | Student Services |
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# Version Control

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| **VERSION** | **DATE** | **REASON FOR CHANGE** |
| 1.0 | 25 May 2022 | First version |

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# Introduction

## **Purpose**

The purpose of this policy is to:

* Inform students about how to access support
* Support the University in complying with the requirements of relevant legislation,
* Clarify where responsibility lies for the identification and implementation of reasonable adjustments
* Outline the necessary steps for the effective implementation of reasonable adjustments
* Inform students how to appeal a decision made in relation to a reasonable adjustment

## The University seeks to provide equal access for its disabled students through inclusive design where possible and, otherwise, through reasonable adjustments. This commitment builds upon the foundation of equality legislation and anti-discrimination guidance.

## The Equality Act (2010) provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics.

## It is a legal duty for 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. 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).

## 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 should therefore ensure, where possible, that adjustments to policies, practices, and procedures have been made in advance to reduce or remove the barriers to disabled students.

## Reasonable adjustments should not compromise the academic standards of programmes or modules, as the Equality Act places no duty to make a reasonable adjustment to a competence standard.

## A competence standard is ‘an academic, medical, or other standard, applied for the purpose of determining whether a person has a particular level of competence or ability’. A competence standard must apply equally to all students, be genuinely relevant to the programme, and be a proportionate means to achieving a legitimate aim.

## There is however a duty to make reasonable adjustments to the way in which a competence standard is assessed so that disabled students are not disadvantaged as a result of their disability. 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.

## **Scope**

## The policy applies to all disabled students enrolled to study on one of Cardiff Met’s Cardiff campuses, including undergraduate, postgraduate, full-time, part-time, overseas and degree apprenticeship students.

## If a student is also a staff member, this policy applies only to the time they spend studying. They should consult with their line manager in relation to reasonable adjustments for work.

## 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.

## 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.

## 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. Failure to comply with the duty to make reasonable adjustments is considered discrimination.

## 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:

## the effect of the disability on the individual student.

## the effectiveness of the particular steps in removing or overcoming the relevant disadvantage.

## the relevant interests of other people, e.g. whether an adjustment would result in a significant disadvantage for other students.

## the practicality of the changes.

## any potential health and safety issues.

## the resources available (both those of the University and other financial assistance such as the Disabled Students’ Allowances)

## the financial and other costs of making the adjustment.

## the type of education/provision or other benefit, facility, or service being provided by the University.

## the extent to which aids and services will otherwise be provided to disabled students (e.g. local authority support)

# University Responsibility and Commitments

## Deans of School and Directors of Professional Services are accountable for implementing this policy.

## The Estates & Environment Directorate are responsible for ensuring that University estate, including buildings and open spaces on campus, are accessible for all students, as far as reasonably practicable. Specifically, they will ensure that all new buildings and estates developments are designed with inclusion and accessibility in mind.

## The Accommodation Services team will support students to find accessible accommodation by working with a wide range of stakeholders, including maintaining a stock of its own accessible accommodation.

## The Quality Enhancement Directorate provides resources for staff which embed principles of inclusivity and accessibility for learning, teaching and assessment into day-to-day practice.

## The University’s quality assurance processes ensure that academics reflect on equality and diversity of learning, teaching, and assessment.

## Programme Directors are responsible for ensuring that reasonable adjustments recommended for students on their programme are being fully implemented.

## Members of academic teaching staff are expected to ensure that their teaching materials comply with all relevant legislation, including in relation to digital accessibility.

## Marketing and External Relations are responsible for ensuring that all public-facing university content meets standards for accessibility and inclusion.

## The University requires Equality Impact Assessments (EIA) to be carried out on all new and existing policies and practices. These are helpful in identifying whether any policies or practices would disproportionately disadvantage certain groups of users and enable Schools and Departments to consider anticipatory adjustments. The University Secretariat monitors the use of EIAs.

## The Student Wellbeing and Learning Support teams work together to undertake needs assessments to find out the support and reasonable adjustments required to enable students to engage with their programme of study and wider University provision.

## The Student Wellbeing team compiles Individual support plans (ISPs) which are the formal record of the adjustments recommended for an individual student.

# Student Responsibility and Commitments

## Students are responsible for:

## disclosing a disability at the earliest opportunity, including before formal enrolment if possible.

## 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 their 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.

## engaging with adjustments, including but not limited to

## attending training on how to use specialist equipment or software,

## ensuring that in-person support workers are aware of their timetable

## reporting any issues with adjustments promptly

## Students may disclose their disability or health condition to any member of university staff, but the Student Wellbeing Service are the only people who may make formal recommendations of reasonable adjustments. If a student discloses to a member of staff not in the Student Wellbeing Team, their permission will be sought for the information to be passed on.

## Students should inform their Programme Director or Personal Tutor if any recommended adjustments are not being implemented by their teaching team, and the immediate action must be taken to remedy this omission.

# Identification of individual reasonable adjustments

## Cardiff Met has in place a number of standard adjustments to support all students. These include

## Lecture notes being made available in advance of teaching through the Virtual Learning Environment

## All lectures being recorded and made available to students

## Auto-captioning of video recorded material

## Site licences for commonly-used supportive software

## Compliance with the requirements of digital accessibility legislation in all teaching materials

## However, it is recognised that it will be necessary to recommend specific additional adjustments for students with specified needs.

## The Student Wellbeing team will meet with a student and assess their needs and appropriate adjustments on the basis of evidence provided.

## A student who is potentially eligible for funded support under Disabled Students’ Allowance will be supported to access that process and if approved will be referred for a formal Needs Assessment which can be provided by the Learning Support Team.

## The Student Wellbeing team may also recommend institutional adjustments, which might include (please note this list is not exhaustive)

## Extended library loans

## Use of assistive equipment on campus

## Rest breaks in timed assessments

## Extra time to complete timed assessments NB this provision does not apply to ‘open book’ assessments where the student is given an extended time period e.g. 30 hours to complete an assessment.

## Alternative forms of assessment (providing that, as in paragraph 1.7 this does not compromise the competency standard of the programme)

## Use of specialist equipment in timed assessments taking place on Cardiff Met’s campuses e.g. a computer or adjustable chair.

## The Student Wellbeing team will record all recommended adjustments on the Individual Support Plan (ISP). The ISP will be stored with the student’s case record, distributed to Programme Directors and professional services departments for action, as well as being held by the student themselves.

## The ISP should be considered the definitive record of required adjustments. Should additional or new adjustments be required, the ISP will be updated.

## Should a student feel the recommended adjustments are insufficient, or should their needs change, they should speak to the Student Wellbeing team in the first instance, who will arrange for the ISP to be reviewed. NB it may not always be possible to meet student expectations in relation to adjustments. Where this is not possible, a full explanation will be given.

## There are some requests which will always be refused. These are listed below

### Formal exemption from any kind of assessment

### Exemption from attendance on campus where academically necessary

### Universal extensions on coursework or assessments without additional evidence of need

### Adjustments which compromise the academic standards of the taught programme

## Should a student be unhappy with the recommendations made, and wish to appeal them, they should in the first instance email wellbeing-services@cardiffmet.ac.uk setting out their reasons for appeal and specifying the preferred outcome.

## The Head of Student Wellbeing will review the appeal and respond to the student within five working days.

## If a student is unhappy with the outcome of their appeal, they should submit a complaint through the Student Complaints process.

# Roles and Responsibilities

## Specific roles and responsibilities are listed in sections 2 and 3 above.

## The policy is the responsibility of the Director of Student Services, who will determine if the policy is being implemented appropriately.

## The Director of Student Services, and the Student Wellbeing team will undertake periodic audits of the student experience to ensure that the policy is being followed, and will follow up appropriately with any highlighted issues.

# Related Policies and Procedures

## Students may also find the following policies and procedures useful

### Mitigating Circumstances

### Fitness to Study Process

# Review and Approval

## The policy will be reviewed every two years, or sooner if relevant legislation or guidelines are introduced.

## The policy will be approved by the Learning Teaching and Student Engagement Committee (or its successor).