

Section 10 Reasonable adjustments to learning, teaching, and assessment for disabled students: policy and procedures

10.1 Introduction

- 10.1.1 Universities are required to make adjustments that anticipate the needs of, and benefit a wide range of disabled students, for example, through inclusive teaching and assessment practices. In addition, we are required to ensure the specific needs of a disabled student are met, where anticipatory adjustments do not meet those needs.
- 10.1.2 The University promotes equality of opportunity and has a legal duty to eliminate any unlawful or unfair discrimination and harassment in the workplace or place of study. The University wants our prospective applicants, applicants, and students to be reassured about the University's commitment to providing disabled students with equal access to teaching, learning and assessment.
- 10.1.3 We encourage all disabled students to register with the Disability Support and Inclusion team and to access support from the earliest possible opportunity. We manage declarations of a disability sensitively and in accordance with university [data protection policies](#), and in accordance with our consent to share information procedures.
- 10.1.4 This policy sets out what students can expect from the University with regards to reasonable adjustments and inclusion with regards to learning, teaching, and assessment practices. The policy provides a framework to assist university staff to consider reasonable adjustments in learning, teaching, and assessment. This policy forms one aspect of our commitment to ensuring the provision of accessible higher education for our disabled students. It should be considered alongside the Estates Plan (promoting equitable access to our campuses); the Digital Plan (promoting accessible solutions in digital environments); and our commitment to Digital Accessibility.

10.2 Aims of the policy

- 10.2.1 The aims of this policy are to:
- Outline what students can expect from the University in relation to the process by which we consider and apply decisions about reasonable adjustments to learning, teaching, and assessment.
 - Ensure, where possible, that all students can engage in any elements of study or assessment which take the form of placements, field trips, or work-based learning, to learning outcomes and competence standards.
 - Ensure the University can effectively carry out its duties to disabled students under the Equality Act 2010 from a learning, teaching, and assessment perspective, specifically to:
 - Take appropriate steps to meet the particular needs of individuals from protected groups where these are different to the needs of others, and work to eliminate any barriers to their success.
 - Have robust procedures in place to recommend and action reasonable adjustments for disabled students.

10.3 Context and definitions

10.3.1 Reasonable adjustments form one part of an integrated approach to supporting disabled students in learning, teaching, and assessment, which also includes:

- Inclusive practice
- Anticipatory adjustments
- Alternative forms of assessment

What is a disability?

10.3.2 For this policy, the definition of disability is that which is stated in the Equality Act 2010 – namely, that ‘a person has a disability if they have a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on that person’s ability to carry out normal day-to-day activities’.

10.3.3 This includes conditions that are controlled by medication which might be variable in effect, or which might recur, for example, a long-term mental illness or chronic condition such as diabetes. A student who has cancer, HIV or multiple sclerosis should be treated as disabled under the Act.

10.3.4 The University will usually accept a working diagnosis from a GP or consultant as evidence of a disability. Please refer to our [Student Hub](#) for further information.

10.3.5 The policy does not extend to students with a temporary illness, condition, or injury. For cases that do not align with this definition please refer to **section 10.7.6** below.

What is inclusive practice?

10.3.6 Inclusive practice in teaching, learning and assessment removes barriers to learning that many students may encounter. This approach, for example, would offer a variety of assessment methods for all students in recognitions of the range of learning preferences. The University has adopted the Inclusive Education Framework.

What are anticipatory adjustments?

10.3.7 The anticipatory reasonable adjustment duty in the Equality Act 2010 requires universities to continually identify any possible disability-related disadvantage, and to take reasonable steps to avoid or remove it. For example, providing hearing loops in learning spaces, or creating systems and procedures to provide examination access arrangements and support.

What are reasonable adjustments?

10.3.8 Reasonable adjustments enable students to participate in higher education without disadvantage within a framework of academic standards. The Equality Act 2010 places a duty on Higher Education Institutions (HEIs) to make reasonable adjustments for disabled students to remove substantial disadvantage in relation to:

- A provision, criterion, or practice: such as assessments, examinations, presentations, field trips, placements and teaching.
- Physical features: such as steps up to a building.
- Auxiliary aids: equipment or services should be provided to remove a disadvantage, such as a hearing loop.

What are reasonable adjustments to assessment?

10.3.9 This does not alter the assessment mode, but rather it provides adjustments that assist the students to undertake that assessment. For example:

- Additional time in an exam, or personal support such as a reader, scribe, or use of a computer.
- Delivering an assessed presentation using help such as prompt cards or delivering to a smaller audience.

What is an alternative form of assessment?

10.3.10 An alternative form of assessment changes the assessment mode to accommodate the needs of a disabled student where the original form of assessment would disadvantage that individual.

10.3.11 For example, students with severely impaired short-term memory may benefit from writing an essay, rather than a timed exam, or students with speech and language impairments might provide written responses to a series of questions, rather than a viva.

10.4 Factors to consider when determining reasonable adjustments

- 10.4.1 The Equality Act 2010 does not define what is reasonable, so each case must be reviewed on its own merits. What is considered 'reasonable' will depend on an individual's and an institution's circumstances. This can include consideration of the following factors:
- a) How effective the adjustment will be in removing the disadvantage and in enabling the student to access study and demonstrate learning outcomes.
 - b) How practical it is to take the steps.
 - c) The effect of the disability on the individual.
 - d) The type of education, for example, full time or part time.
 - e) Practicality and cost of the changes – for example, whether the adjustment can be met within the existing staffing and financial resource of the University, and whether there are grants, loans, and other help available to implement the adjustment (for example, Disabled Students' Allowance).
 - f) Whether support can be provided by others, for example, a full time support worker funded by social care.
 - g) The relevant interests of other people, including other students.
 - h) Whether the adjustment will affect the validity or reliability of assessment outcomes.
 - i) Whether the adjustment will compromise the health and safety of the student, or other members of the University community.
 - j) Whether the adjustment will compromise a competence standard within the programme of study – for example, the demonstration of a clinical skill.
- 10.4.2 Determination of what is reasonable may vary between programmes of study because of their differing requirements, particularly in relation to students on programmes that are regulated by a Professional, Statutory and Regulatory Body (PSRB) or Professional Accrediting Body, which lead to a license to practise, or registration with a professional body.
- 10.4.3 We are likely to deem support as 'reasonable' if it conforms with the following possible considerations (although this list is not exhaustive or determinative):
- a) Funding can reasonably be met from funds within the University if other funding (for example Disability Support Allowance (DSA)) does not cover the support need.
 - b) The support is required to meet a legitimate learning need on the student's programme of study.
 - c) The support is at a level judged to be broadly comparable within the Higher Education (HE) sector, as opposed to other sectors (for example, Further Education or School).
 - d) The adjustment or support will enable the student to engage with their programme of study on an equitable basis, supporting their learning needs while developing independence where appropriate.
 - e) Reasonable adjustments cannot be made to the actual competence standards or learning outcomes, as determined by an assessment panel and/or relevant fitness to practise requirements.
 - f) Support should not go beyond a level where a university graduate would be seen as unfit to practise in a professional field relevant to their university qualification, or to progress to further study.
 - g) Additional support for a disabled student provided as part of the overall student experience at the University should not be provided at a level or in such a way as to impact negatively on the academic progress, wider experience or professional work of other students or staff. Reasonable adjustments should never put a student at an advantage over others.

10.5 Competence standards

- 10.5.1 A competence standard is used to determine whether a person has a certain level of competence or ability. Competence standards are defined within the Equality Act 2010 as:
- 'An academic, medical or other standard applied for the purpose of determining whether or not a person has a particular level of competence or ability.' (Sch 13, para 4(3)).
- 10.5.2 Competence standards must be objectively justifiable (they must provide a proportionate means to a legitimate aim) and genuinely relevant to the course. They cannot be applied after the fact and cannot cover pedagogic preferences or norms of practice. Competence standards relating to established practice, assumptions the standard of a 'good degree' or reputational concerns may not be justifiable.
- 10.5.3 It is not necessary to make adjustments to a competence standard. However, it is necessary to make adjustments to the ways in which competence standards are assessed, to ensure disabled students are not disadvantaged by the chosen assessment method.
- 10.5.4 The University's ongoing validation / revalidation processes will ensure that competence standards have been identified legitimately, are explicit, written down, clearly published and made available to students and applicants, so informed choices can be made about the programme of study.
- 10.5.5 Sometimes the process of assessing whether a competence standard has been achieved is inextricably linked to the standard itself. The passing of an assessment may be conditional upon having a practical skill or ability, which must be demonstrated by completing a practical test. In relatively rare circumstances, the ability to take the test may itself amount to a competence standard. For example, an assessment for a practical course in car maintenance cannot be done solely as a written test, because the purpose of the test is to ascertain whether someone can complete car repairs.

10.6 Reasonable adjustment process, roles, and responsibilities

Students

- 10.6.1 Applicants and students are strongly encouraged to declare any disability or support needs they may have at the earliest opportunity.
- 10.6.2 In most cases student will declare a disability through UCAS admissions process and through additional opportunities at enrolment (for more information see the [Admissions Policy](#)). Students who declare a disability during the applicant and enrolment stage will be invited to [register with the Disability Support and Inclusion team \(DSIT\)](#) and attend an appointment.
- 10.6.3 Students who have not informed the University of a disability pre-entry, or students who become disabled during their time at university, can register with the Disability Support and Inclusion team at any time during their studies by completing the [Registration form](#).

The University

- 10.6.4 Early declarations of a disability enable the University to work in partnership with students to support academic success. If the Disability Support and Inclusion team is fully aware of a student's needs, they will be better equipped to ensure students are supported.
- 10.6.5 Where a student presents to the Disability Support and Inclusion team, requirements and requests for individual adjustments will be discussed between the individual student and the Disability Practitioner. The Disability Practitioner will co-ordinate the request on behalf of the student. This includes liaising with the School, and other professional services as necessary (for example, Estates, ITS, Library and Learning Services). The arrangements will be documented in the student's Learner Adjustment Plan (refer to [section 10.7](#) for more information) and will be shared with the programme team.
- 10.6.6 Where a student presents to academic or professional staff and has not engaged with the Disability Support and Inclusion team, reasonable adjustments must still be made, if the situation requires. The reasonable adjustment is to be requested by the staff member via the Disability Support and Inclusion team referral form. The request is implemented by a Disability Practitioner, for an initial period of 3 months. This will be communicated to staff via the LAP report. A Disability Practitioner will contact the student to offer a full assessment, and the student will be informed that the reasonable adjustment has been put in place.
- 10.6.7 Reasonable adjustments will be reviewed on request or in response to a changed requirement or additional concerns. For example, if a student identifies that those adjustments are not meeting their needs, or where a new diagnosis and disability is identified.

Study abroad, placements and fieldtrips

- 10.6.8 The University is committed to ensuring that all study visits are designed with inclusion in mind; however, placements and visits might require individual adjustments that are different from those made for academic study. Students should talk to the Disability Support and Inclusion team who can work with the Placement and Study Abroad teams and the placement or study abroad provider to identify adjustments in these settings.

International students

- 10.6.9 International students do not have access to funding for specialist learning support for their disability through Disabled Students' Allowance (DSA). The University will:
- Identify and implement reasonable adjustments to learning.
 - Signpost to general university learning support and university-licensed assistive software.
- 10.6.10 International students on student visas must note that some reasonable adjustments that might be available might have an impact on a student's ability to meet the terms and conditions of their student visa. For example, a proposed adjustment that affects the length of a student's study or the nature of their engagement with their programme of study. In considering reasonable adjustments, the University will give due regard to visa requirements to ensure that international students on a student visa are provided with the necessary information around any reasonable adjustments that may be recommended. Students are also advised to seek their own immigration advice promptly if they consider that the terms and conditions of their visa may be impacted. For more information, refer to our [Visa and immigration](#) webpage.
- 10.6.11 In all cases, the University's legal responsibilities in relation to the sponsorship of international students under the points-based immigration system will take precedence.

Key roles and responsibilities

- 10.6.12 Key roles and responsibilities related to reasonable adjustments to learning, teaching and assessment are set out below:

Area	Overall responsibility
Admissions	Provides admissions workflows that enable early declaration of a disability within the process.
Disability Support and Inclusion team (DSIT)	Works with students before and after enrolment to discuss and identify reasonable adjustments and co-ordinates these across the University through the student's Learner Adjustment Plan (LAP). Coordinates support and communicates with all university stakeholders responsible for delivering the support. Signposts to other university services. Offers ongoing support for any new or presenting difficulties, barriers or challenges linked to study. Convenes or contributes to complex case responses and resolution across relevant university services and academic teams. Review and implement short-term reasonable adjustments made by academic and professional staff.
Registry (Student Records and Assessment team)	Provides processes for capturing student data. Apply examination adjustments. Apply placement adjustments within the student records system.
Programme Administration and Student Support (PASS) team	Apply agreed LAP deadline extensions within the student records system and Moodle.
Academic team	Delivers reasonable adjustments in teaching, learning, and assessment practices.

Area	Overall responsibility
Library and Learning Services	Delivers reasonable adjustments to support access to library and learning resources. Provides university assistive technology support (supplementary support for those in receipt of DSA support).
ITS team	Lead service for the procurement and implementation for cross-university IT systems and software, ITS access. Ensures that systems and software meet the University's accessibility requirements. Provides accessible resources.
Timetabling team	Timetables academic sessions, including identifying accessible spaces for disabled students. Provides accessible timetable formats.
Technical teams	Deliver reasonable adjustments on technical teaching areas and labs, including layout of rooms. Adapt technical resources.
Study Abroad team	Works with the DSIT and student's study abroad provider to support the delivering of reasonable adjustments for study abroad activities.
Placement team	Works with the DSIT and student's placement provider to support the delivering of reasonable adjustments for placement activities.
Visa and Compliance team	Works with academic staff, DSIT and Registry to provide accurate information on the impact of any potential reasonable adjustments on a student's ability to meet the terms and conditions of their visa.

10.7 Learner Adjustment Plan (LAP) process

- 10.7.1 Reasonable adjustments to assessments are recommended by the Disability Support and Inclusion team through the Learner Adjustment Plan (LAP) process. Adjustments are based on individual requirements and evidence of need. The processes related to the production, use and revision of Learner Adjustment Plans is set out on the Disability and Inclusion section of the Student Hub under [Learner Adjustment Plans](#).
- 10.7.2 The Disability Support and Inclusion team will notify the Assessment team in Registry where reasonable adjustments for centrally organised examinations are recommended. This will be done **no later than 5 weeks before** the examination period in order for the Assessment team in Registry to be able to guarantee the alternative examination arrangements will be able to be put in place. Where requests for examination adjustments are raised near the time of the examination, while every reasonable effort will be made to accommodate these, it cannot be guaranteed that they will be put in place at such short notice. Students with examination adjustments will receive an email from the Assessment team in Registry at least **1 week** before each examination period directing them to check their examination timing, location, and their individual arrangements on e:Vision, except for when late adjustments are put in place where the notification period will be reduced.
- 10.7.3 The Head/Dean of School, or nominated representative, in conjunction with the Programme Administration and Support Service (PASS) team, is responsible for making individual arrangements for departmentally organised examinations or tests. The School should liaise with the Disability Support and Inclusion team regarding arrangements. The School is responsible for communicating the timing and location of the examination to the student.
- 10.7.4 The information on the LAP will advise academic colleagues of the reasonable adjustments recommended, to ensure that the curriculum and related assessments are accessible to the student. The Disability Practitioner must be contacted immediately if there are concerns about any of the recommendations, particularly with regards to the impact on academic criteria and assessment outcomes.
- 10.7.5 In cases where a student considers that they have been treated less favourably because of their disability, or believe their LAP is not being followed, there is an opportunity for appeal (refer to [section 48](#)).

- 10.7.6 For circumstances in which the student's condition is not within the definition of disability as set out by the Equality Act 2010, the condition will be considered in two ways:
- As an illness or injury, for which the procedure for exceptional circumstances will be followed (refer to [section 13](#)).
 - At the discretion of the Disability Support and Inclusion team, in liaison with the Head/Dean of School or nominated representative and other staff regarding the appropriate adjustments to be made. For example: hay fever is usually not a disability but may be sufficiently debilitating to recommend examination adjustments; a person who has a broken leg may not meet the definition of disability, but they may have mobility difficulties which might require adjustments. Thus, it is the effect of the condition, rather than the underlying condition itself, which needs to be considered.
- 10.7.7 The reasonable adjustment process is in place so both the student and the University are clear about what can be done to facilitate a student's learning and assessment. However, unforeseen exceptional circumstances can still occur which could not have been predicted through the reasonable adjustment process. In these exceptional circumstances, students should follow the exceptional circumstances process (refer to [section 13](#)).
- 10.7.8 If recording of lectures has been recommended on the LAP, the student needs to be aware that the lecture remains the property of the lecturer delivering the session. The recording must only be used for reviewing for clarity or understanding; the material must not be reproduced or passed on to anyone else. If notes are not expected to be taken for a session, then the student will not normally be given permission to record that session unless the student, for example, may need to listen again in a quiet environment. Additional information about audio recording as a reasonable adjustment can be found on the Disability Support and Inclusion section of the [Student Hub](#).
- 10.7.9 Computers are not provided in examinations for students with poor handwriting unless they have a disability diagnosis and an LAP in place. Students with poor handwriting are advised to discuss their circumstances with the Disability Support and Inclusion team to explore if there is an undiagnosed disability. Also refer to [section 9.18](#) regarding the policy for marking illegible examination scripts.

10.8 Reasonable adjustments for placements

- 10.8.1 The Disability Support and Inclusion team will make recommendations for reasonable adjustments for placements on the student's LAP. The Assessment team in Registry are responsible for implementing the change(s) on the student record system in liaison with the School and the Disability Support and Inclusion team.
- 10.8.2 If adjustments to the timings of modules are required to facilitate the placement adjustment the Associate Head/Dean of School, or their representative, must confirm the order and timings of the modules to the Assessment team in Registry.
- 10.8.3 If an extension to programme is required to facilitate a reasonable adjustment to a placement, then this extension will not count towards the student's maximum period of study detailed in the [University Regulations](#).

Professional (PSRB) placements

- 10.8.4 Some programmes which lead to a professional registration require a referral for an Occupational Health assessment. Occupational Health will sometimes make recommendations for reasonable adjustments. The operational decision on whether these adjustments can be implemented on the programme may be made straight away, but others will require a Panel decision, with input from the Course/Programme Lead, Associate Head, a Placement team representative, the Head of Disability Support and Inclusion and Registry. If the reasonable adjustment will impact on the length of placement the following process should be followed:
- A Placements Panel will be convened to consider the reasonable adjustment. Membership of the Panel will include the Associate Head of School, or their representative; the Course/Programme Lead or their representative; the Head of Disability Support or their representative; the Registry Manager – Assessment or their representative; and a Placement team representative. Other staff members may be co-opted to sit on the Panel where appropriate.
 - The Panel would assess if the recommendations made by Occupational Health can be implemented taking into consideration [section 10.4.1](#) of this policy.
 - The Panel will agree what reasonable adjustments can be implemented, including if adjustments to the timings of non-placement modules should be made to facilitate the placement adjustment. This agreement will be documented.

- If the Occupational Health recommendation broadly aligns with a previous recommendation made for another student, then the Panel decision from the previous case will be implemented without convening a new Panel, unless there has been a significant change to the programme structure meaning that the previous Panel agreement is no longer valid.

10.9 Reasonable adjustments for examinations

- 10.9.1 The Disability Support and Inclusion team are normally responsible for facilitating the provision of specialist equipment through liaison with the University Estates team, for example, chairs and desks, and for advising the Assessment team in Registry of the type of specialist equipment. Porters are normally responsible for relocating equipment to the appropriate examination room.
- 10.9.2 The Assessment team in Registry are responsible for providing scribes and readers for centrally organised examinations provided reasonable notice of the adjustment is given by the Disability Support and Inclusion team. It is the School's responsibility to provide scribes and readers for departmentally organised exams. Schools can contact the Assessment team in Registry or the Disability Support and Inclusion team for guidance and training on the roles of readers and scribes if required. In some circumstances, it may be possible for Registry to provide scribes and readers for departmentally organised exams, but it should not be the expectation of Schools that this is possible.

10.10 Reasonable adjustments for assessment deadlines

- 10.10.1 LAP extensions may be granted for reassessment deadlines in line with the LAP process once reassessment requirements are known by the student. If required, students should raise a case via the [Student Hub portal](#) should they need extensions applying.
- 10.10.2 Unless the LAP is revised by the Disability Support and Inclusion team, any further request for an extension to an LAP deadline must be made through the exceptional circumstances process and this request should only be considered for additional circumstances (that is, something other than the student's disability). For clarity, once an LAP extension deadline has been agreed it **cannot be extended or adjusted again through the LAP process** without the LAP being reviewed by the Disability Support and Inclusion team; all additional extensions must be managed through the procedures for exceptional circumstances. For example, the Head/Dean of School, or nominated representative cannot approve a 1-week LAP extension for an assessment and then extend the deadline again for the same assessment by a further 2 weeks using the same LAP.