

# Higher Education Reasonable Adjustments Policy 22/23

APPROVED BY PMs ON MAY 22

Applies to:	
Harrogate College	
Keighley College	
Leeds City College	
Leeds Conservatoire	
White Rose Academies Trust	
University Centre Leeds	X

## CHANGE CONTROL

<b>Version:</b>	1	
<b>Approved by:</b>	PM's	
<b>Date approved:</b>	May 2022	
<b>Name of author:</b>	Student Support	
<b>Name of responsible committee:</b>	HE Registry	
<b>Related policies: (list)</b>	Higher Education Reasonable Adjustments Procedure Student Support Procedure Mental Health Policy EDI Policy	
<b>Equality impact assessment completed</b>	<b>Date:</b>	May 2022
	<b>Assessment type</b>	
	<input type="checkbox"/> Full <input type="checkbox"/> Part <input checked="" type="checkbox"/> Not required	
<b>Policy will be communicated via:</b>	Website VLE	
<b>Next review date:</b>	August 2023	

## Contents

1. SCOPE OF POLICY .....	4
2. PURPOSE OF POLICY .....	4
3. THE EQUALITY ACT 2010 DEFINITION OF DISABILITY .....	4
3. REASONABLE ADJUSTMENTS .....	5
4. SUITABLE EVIDENCE FOR REASONABLE ADJUSTMENTS .....	6
5. EXAMINATION AND ASSESSMENT .....	6
6. COMMON TYPES OF REASONABLE ADJUSTMENT .....	7
7. ACADEMIC STANDARDS .....	8
8. MITIGATING CIRCUMSTANCES .....	8
9. RESPONSIBILITIES .....	8
10. BREACH OF POLICY .....	9
11. REVIEW AND EVALUATION .....	9
12. REFERENCES .....	9
13. VERSION INFORMATION .....	10

## 1. SCOPE OF POLICY

This policy applies to Leeds City College campuses providing higher education courses, (hereafter referred to collectively as the 'University Centre Leeds'), staff and students, irrespective of age, disability or difficulty, gender and gender reassignment, marriage and civil partnership, neurodiversity, pregnancy and maternity/paternity, race, religion or belief, sex, or sexual orientation.

The University Centre Leeds recognises the Equality Act 2010 definition of disability; 'A physical or mental impairment that has a substantial and long-term negative effect on your ability to do normal daily activities' and recognises its duties under the Equality Act to provide anticipatory and continuing reasonable adjustments for access to facilities and services, practices and procedures, and provision of auxiliary aids.

All disabled students of the University Centre Leeds are entitled to reasonable adjustments appropriate to their course of study. Students may declare a disability or difficulty at any point during application, interview, registration or study.

## 2. PURPOSE OF POLICY

The University Centre Leeds aims to operate equitable, valid and reliable processes of assessment which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought.

This policy applies to applications from students for reasonable adjustments made in relation to University Centre Leeds Higher Education awards and seeks to uphold the principles of fairness, consistency, equity and equal opportunities without compromising the integrity of course assessments.

Its purpose is to ensure that reasonable adjustment applications are dealt with fairly, efficiently, in a timely manner and in accordance with the precepts set out in the Quality Assurance Agency UK Quality Code for Higher Education: Chapter B6: Assessment of Students and the Recognition of Prior Learning (October 2013).

## 3. THE EQUALITY ACT 2010 DEFINITION OF DISABILITY

Generally, impairments have to meet the statutory requirements set out in section 6 and Schedule 1 to the Equality Act 2010 and associated regulations.

The Equality Act 2010 definition of disability is usually considered cumulatively in terms of:

- identifying a physical or mental impairment;
- looking into adverse effects and assessing which are substantial;
- considering if substantial adverse effects are long term;
- judging the impact of long-term adverse effects on normal day-to-day activities.

Statutory guidance on the Equality Act 2010 definition of disability has been produced by the Office for Disability Issues (within the Department for Work and Pensions) to help better understand and apply this definition:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/570382/Equality\\_Act\\_2010-disability\\_definition.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/570382/Equality_Act_2010-disability_definition.pdf)

The clear starting point in the statutory guidance is that disability means 'limitations going beyond the normal differences in ability which may exist among people'.

'Substantial' means 'more than minor or trivial'. Substantial adverse effects can be determined by looking at the effects on a person with the impairment, comparing those to a person without the impairment, to judge if the difference between the two is more than minor or trivial.

'Long term' means the impairment has existed for at least 12 months or is likely to do so.

'Normal day-to-day activities' could be determined by reference to the illustrative, nonexhaustive list of factors on pages 47 to 51 of the statutory guidance relating to the Equality Act 2010. (Study and education related activities are included in the meaning of 'day-to-day' activities.)

The guidance from the Office for Disability Issues referred to above illustrates the factors which might reasonably be regarded as having a substantial adverse effect on normal day-to-day activities. Factors that might reasonably be expected not to have a substantial adverse effect are also provided.

Factors that might reasonably be expected to have a substantial adverse effect include:

- persistent and significant difficulty in reading and understanding written material where this is in the person's native language, for example because of a mental impairment, a learning difficulty or a sensory or multi-sensory impairment;
- persistent distractibility or difficulty concentrating;
- difficulty understanding or following simple verbal instructions;
- physical impairment – for example, difficulty operating a computer because of physical restrictions in using a keyboard.

Factors that might reasonably be expected not to have a substantial adverse effect include:

- minor problems with writing or spelling;
- inability to read very small or indistinct print without the aid of a magnifying glass;
- inability to converse orally in a language which is not the speaker's native spoken language.

### **3. REASONABLE ADJUSTMENTS**

The University Centre Leeds Higher Education Student Support Staff, (hereafter referred to as the 'HESS Staff'), contact all students who declare a disability or difficulty, to offer support and devise a support plan which includes the details of any reasonable adjustments the student may need.

The University Centre Leeds is required, under the Equality Act 2010, to make reasonable adjustments where a candidate, who is disabled within the meaning of the act, would be at a substantial disadvantage compared to someone who is not disabled. The University Centre Leeds is required to take reasonable steps to overcome that disadvantage.

A reasonable adjustment may be unique to that individual and may not be included in the list of available access arrangements. Whether an adjustment will be considered reasonable will depend on several factors which will include, but are not limited to:

- the needs of the disabled candidate;
- the effectiveness of the adjustment;
- the cost of the adjustment;
- the likely impact of the adjustment upon the candidate and other candidates.

An adjustment will not be approved if it:

- involves unreasonable costs to the University Centre Leeds;
- involves unreasonable timeframes;
- affects the security and integrity of the assessment.

In most cases it will not be reasonable for adjustments to be made to assessment objectives within a qualification. To do so would likely undermine the effectiveness of the qualification in providing a reliable indication of the knowledge, skills and understanding of the candidate. There is no duty to make adjustments which the qualifications regulators have specified should not be made.

Agreed before an assessment, reasonable adjustments allow candidates with specific needs, such as special educational needs, disabilities or temporary injuries to access the assessment and show what they know and can do without affecting the integrity of the assessment.

The University Centre Leeds will make every effort to put reasonable adjustments in place wherever possible, for any form of exam or assessment which counts towards the marks for a module, ('summative assessments').

Reasonable adjustments may also be appropriate to allow disabled students to participate fully in informal assessments and demonstrate learning outcomes, even if these assessments do not count towards a final module mark, ('formative assessments').

#### **4. SUITABLE EVIDENCE FOR REASONABLE ADJUSTMENTS**

What constitutes suitable evidence will vary depending on the disability or difficulty and the reasonable adjustment(s) being applied for. If suitable evidence has not already been provided as part of the student's support needs plan, disabled students will be required to provide evidence for reasonable adjustments. Suitable evidence can include, (but is not limited to), a JCQ Form 8<sup>1</sup>, LCC exam access arrangements assessment, letter signed by a healthcare practitioner, (e.g. GP, occupational therapist, NHS consultant, etc.), DSA study needs assessment report or DSA medical evidence form, and/or a diagnostic assessment report.

#### **5. EXAMINATION AND ASSESSMENT**

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<sup>1</sup> A JCQ Form 8 must have been completed/dated within 26 months of the examination period the reasonable adjustments are being requested for.

The following types of examinations and assessments are typical of those used on HE programmes of study at the University Centre Leeds:

- Coursework based assessments - including essays, written assignments, exhibitions, performance or practical logs, presentations, video submissions.
- Individual performance-based exams – exhibitions, performance, presentations.
- In-class assessments - performance, technical/multiple-choice examinations, practical assessments, including some online computer and software-based tests.
- Group work assessments – exhibitions, group-based projects, performance, presentations.

A full and up to date list of all exams and assessments taking place on a particular course or pathway can be found on the relevant course and module pages on the VLE. Specific details are provided in the individual assessment briefs.

## 6. COMMON TYPES OF REASONABLE ADJUSTMENT

Where appropriate, the following Reasonable Adjustments are available at the University Centre Leeds:

- Additional time allowances for timed exams and assessments, to be built in as appropriate e.g. additional reading time for thought processing, or time added to the overall exam duration.
- Extensions to deadlines for submission of written assignments.
- Appropriate marking for students with dyslexia/specific learning difficulties.
- The use of a tinted overlay or reading ruler.
- Examination paper in alternative formats, e.g. enlargement, braille, tinted paper. Sufficient notice must be given prior to exams taking place such that alternative formats can be prepared.
- Room allocation e.g. separate individual room, seat allocation at the front/back of the examination room, located near to an accessible toilet facility, located on the ground floor/floor with access to a lift.
- Supervised rest breaks, either in addition to or instead of additional time allowances.
- Use of specific personnel in examinations e.g. reader, scribe/amanuensis, sign language interpreter.
- Specific equipment, (e.g. word processor), made available or the use of assistive software, (e.g. screen reader), made available to the student in an examination.
- Ergonomic furniture e.g. chair, foot rest, height adjustable table. Sufficient notice prior to exams taking place must be provided, such that appropriate ergonomic equipment can be sourced.
- Acceptance of alternative descriptive terms.
- Alternative methods of recording, presenting and submitting a student's work for assessment.
- Alternative assessment procedures or exemptions.
- Where it is not possible to adjust the examination/assessment method, the student will not be penalised during marking for difficulties caused by an impairment, e.g., speech stammer affecting fluency in a presentation.

Please note: this is not an exhaustive list and all proposed reasonable adjustments will be considered by the University Centre Leeds, (see Responsibilities section).

## 7. ACADEMIC STANDARDS

Assessors and examiners should always maintain academic standards whilst assessing students with reasonable adjustments, so that disabled students can be graded according to the same learning outcomes as their peers. Reasonable adjustments are designed to give students equal opportunity to demonstrate learning outcomes to the best of their ability and should not compromise academic standards in any way.

## 8. MITIGATING CIRCUMSTANCES

Mitigating Circumstances are not part of the Reasonable Adjustments policy, and should be applied for separately in the event that they are needed. An existing disability or difficulty, which the University Centre Leeds has evidence of, and has already put reasonable adjustments in place for, is not usually considered to be a mitigating circumstance in itself, except where a student's studies are unexpectedly affected as a direct result of a disability or difficulty related cause, e.g., a worsening of an existing condition. The Mitigating Circumstances Procedure is available here:

<https://leedscitycollege.ac.uk/the-college/corporate-documents/>

## 9. RESPONSIBILITIES

Students are responsible for:

- Informing the University Centre Leeds as soon as possible of the nature of their impairment if they want support.
- Completing the Support Needs Referral form.
- Providing evidence in support of reasonable adjustments if this hasn't already been provided as a part of their support needs plan.
- Updating the University Centre Leeds with any changes to support needs which may affect reasonable adjustments.
- Signing the Reasonable Adjustments and Annual Details forms once initiated by HESS Staff and filled in by Academic Staff, (the student is acknowledging that alternative arrangements are correct, and is aware of new deadlines, etc.).

Academic Staff are responsible for:

- Initiating the HESS referral process with the student, (for those who have not self-referred for support, etc.), and assisting with completion of the Support Needs Referral form.
- Considering whether assessment criteria unnecessarily disadvantages disabled students.
- Ensuring that assignment briefs are written using accessible language.
- Marking and assessing all student work where reasonable adjustments are in place in accordance with 'Appendix 1: Guidance on implementing reasonable adjustments.
- Completing relevant sections of Reasonable Adjustments and Annual Details forms:
  - Listing revised assignment deadline dates with respect to extra time.
  - Acknowledging that exam access arrangements are appropriate and represent the student's normal way of working in class.



- Putting in place reasonable adjustments for any assessments which they undertake with students, for example during in-class assessments.
- Raising any concerns or issues regarding reasonable adjustments with the HESS Staff.

HESS Staff are responsible for:

- Identifying the reasonable adjustments required by each disabled student, collecting the evidence and informing HE Registry Office and Academic staff as appropriate.
- Updating ProSolution, (with exception of students studying for teaching qualifications)
- Updating shared spreadsheets listing students' reasonable adjustments.
- Initiating the Reasonable Adjustments and Annual Details forms, completing the basic details and details of assessment arrangements, signing the form to acknowledge that appropriate evidence and picture of need for reasonable adjustments has been gathered.
- Informing the student of reasonable adjustments, (including exam access arrangements), that have been put in place and explaining how the arrangements apply to them.
- Periodically reviewing the reasonable adjustments to ensure they are still fit for purpose.
- Advising academic and support staff on all aspects of reasonable adjustments as required.

HE Registry Office Staff are responsible for:

- Storing records of students' reasonable adjustments for academic board purposes.

## 10. BREACH OF POLICY

An individual is entitled to make a formal complaint via the University Centre Leeds Complaints Policy if they feel the University Centre Leeds has not complied with the procedures set out in the HE Reasonable Adjustments Policy.

## 11. REVIEW AND EVALUATION

Shared spreadsheets detailing all reasonable adjustments will be available so that students' assessment arrangements can be reviewed.

The Reasonable Adjustments Process will be reviewed on an annual basis to ensure that it is current, fit for purpose and accessible to staff and students.

## 12. REFERENCES

JCQ (2021) *Access arrangements and reasonable adjustments*. London, JCQ.  
 Available from: <https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/>  
 [Accessed: 04/02/2022]

### 13. VERSION INFORMATION

VERSION	DATE	SUMMARY OF CHANGES
V1	MAY 2022	CREATED