



DISABILITY POLICY

Owner:	Director of Student Support Services
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1. Introduction

1.1 The University of Roehampton is committed to promoting diversity and equality of opportunity and eliminating discrimination in its practices, policies and procedures, as set out in the University's [Equality and Diversity policy](#). This policy outlines the University's commitment to creating a culture and environment in which students, staff and visitors to the University are treated fairly and not disadvantaged because of a disability. The University anticipates the needs of staff, students and visitors, and establishes inclusive practices, policies and procedures accordingly.

1.2 The policy is guided by the Equality Act (2010) and the University's [Equality and Diversity policy](#), overseen by the University's [Equality, Diversity and Inclusion Committee](#).

2. Scope:

2.1 This policy covers the University's duty towards disabled students – prospective, current and alumni; disabled staff - any permanent, fixed term, associate, temporary or other members of staff employed or engaged by the University; and visitors to the University.

2.2 Additional guidance for disabled staff is provided by Human Resources and can be found on the HR webpages and guidance for managing the health and safety of visitors can be found on the [Health & Safety](#) pages.

3. Responsibilities:

3.1 The University Equality, Diversity and Inclusion Committee is responsible for ensuring the University meets its obligations under equality and diversity legislation; monitoring the implementation and effectiveness of this policy and its related procedures; and recommending changes where appropriate.

3.2 Members of the University's senior administration, heads of colleges and departments, and managers at all levels are responsible for ensuring all staff are aware of this policy and are supported to develop and maintain good practice.

3.3 All staff should be aware of their shared responsibility in supporting disabled students, colleagues and visitors and the University's statutory responsibilities under the Equality Act (2010). Advice, support and training will be provided by HR, Disability Services and the Learning and Teaching Enhancement Unit to ensure that these responsibilities are met.

3.4 Human Resources will ensure that all staff are provided with mandatory training on Disability Awareness at induction, and all staff will have the opportunity to participate in annual training on inclusive practice.

3.5 All staff, students and visitors to the university have a duty to act in accordance with this policy and treat others with dignity and respect at all times, irrespective of ability (see student code of conduct, dignity and respect policies etc).

4. Definitions

4.1 Equality Act (2010)

The Equality Act (2010) legally protects people from discrimination where they meet the Act's criteria for one of the protected characteristics. This policy covers the protected characteristic of disability. Under the Equality Act (2010), the University has a duty to make reasonable adjustments for individuals with disabilities in relation to a provision, criteria or practice; physical features; or auxiliary aids.

4.2 Disability

Disability is defined as a physical or mental impairment that has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities, where long term is considered to be 12 months or more and 'substantial' is defined by the Equality Act (2010) as 'more than minor or trivial'. Day-to-day activities are not defined in the Act, but in the context of higher education may cover for example, communicating, reading, writing, or using a computer (Equality Challenge Unit).

People who have had a disability in the past are covered, including people with fluctuating and/or recurring impairments. A disability can arise from a wide range of impairments, including (but not limited to) the following:

- A social or communication impairment such as Asperger's Syndrome/other Autistic Spectrum Disorder
- Sensory impairments such as blindness or a serious visual impairment which cannot be corrected by glasses; deafness, hard of hearing or serious hearing impairment
- Long standing illness or health condition such as cancer, HIV, diabetes, chronic heart disease, or epilepsy
- Mental Health Condition, such as depression, schizophrenia or anxiety disorder
- Specific Learning Difference e.g. dyslexia, dyspraxia or ADHD
- Physical Impairment or mobility issues

4.3 Reasonable adjustments

Under the Equality Act (2010), reasonable adjustments are the positive steps the University takes to ensure that disabled individuals can fully participate in the education and other benefits, facilities and services provided for all students, staff and visitors. The objective in making reasonable adjustments is to avoid as far as possible by reasonable means the disadvantage which a disabled person experiences because of their disability (ECU).

4.4 Inclusive practice

The University has a duty under the Equality Act (2010) to make anticipatory reasonable adjustments for all students, staff and visitors, taking a proactive, strategic approach to removing barriers that could potentially prevent an individual from participating in all aspects of university life. This is referred to as inclusive practice, and covers teaching and learning, service provision and access to information. By taking an inclusive approach to adjustments, individuals have a range of support mechanisms available to them irrespective of disclosing their disability.

5. DISABLED STUDENTS

5.1 Admissions

The University is committed to ensuring that students are recruited and selected on the basis of their academic merit and ability, as outlined in the [Admissions Policy](#), and will not refuse to admit an applicant on the grounds of disability without fully considering the specific support or facilities required for the applicant to undertake their course of study at the University.

In some cases, a panel may convene to collaboratively review reasonable adjustments for disabled students where the student's needs are complex, high costs may be associated with the adjustments, or there is a need to ensure that academic standards are maintained. The panel will be made up of senior members of the university. When determining reasonableness, this will vary case-by-case depending on individual circumstances.

In very exceptional cases, the University may not admit an otherwise qualified applicant on the grounds that reasonable adjustments cannot be made. There should be an audit trail of the decisions made, which should be clearly communicated to the student and colleagues. If the adjustment is deemed not to be reasonable, the student should be advised of the appeals process.

5.2 Disclosure, confidentiality, data protection

The university will create and maintain an environment and culture where students feel able to disclose their disability. Students will be encouraged to discuss disability related needs with the Disability Service as early as possible, at the point of application if possible. Whilst students are encouraged to disclose as early as possible, disclosure can be made at any time over the course of a student's time at the university.

Students will be given the opportunity to decide the information that will be shared and who it will be shared with. They will be asked to sign a disclosure form, giving consent to advise their departments of the nature of their disability and the support / reasonable adjustments recommended for them. They will be asked to give their agreed description of their disability to be shared with their department. They may choose to keep the disability label confidential, only sharing the details of reasonable adjustments. Some students do not wish to share information with their department. Where this is the case, they will be advised that it may not be possible to make individual adjustments for them.

The University will ensure confidentiality of disclosed information, and fulfil its obligation under the [University's Data Protection policy](#), which is aligned to the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This means protecting personal sensitive information whilst ensuring that students are not disadvantaged due to a disability.

The University will inform applicants and students about the purposes for which personal sensitive information will be used in the form of a privacy notice.

5.3 Inclusive practice

To ensure that all students are given a fair and equal opportunity to succeed, a strategic approach to managing, resourcing and anticipating reasonable adjustments for disabled students should be taken (Equality Challenge Unit, 2010). Students should expect the majority of their needs to be met through inclusive practice. In the teaching and learning environment, this means that programmes will be developed to recognise the diversity of students and delivered in such a way as to ensure that all students are able to fully

participate in all learning activities, access course materials and demonstrate their learning through inclusive assessment opportunities.

The University monitors and evaluates the range of individual adjustments to inform resourcing and implementation of anticipatory adjustments across the University, reducing (but not excluding) the need for individual adjustments. Disabled students are consulted in regard to identification and implementation of anticipatory adjustments, and are directly involved in decision making regarding their own individual reasonable adjustments.

5.4 Individual reasonable adjustments

Where a student's needs cannot be met through inclusive practice alone, individual reasonable adjustments may be recommended by professional staff in Disability Services to support students to best demonstrate their academic ability.

Disability Services makes decisions about reasonable adjustments in the context of the information provided by the student regarding their disability, the context of their studies, and the need to ensure parity of experience for all students at the University. Wherever possible, the student will be consulted regarding their adjustments, and what is deemed to be reasonable may vary depending on the circumstances of each individual case.

Recommended reasonable adjustments are shared with colleagues across the University, with the student's consent, by way of a Summary of Adjustments (SoA). Changes may be made to SoAs, or new recommendations may be made, where a student's needs change partway through their course or they become disabled during the course of their studies. Reasonable adjustments are important in terms of ensuring that students are able to stay on their course and participate in their studies.

The aim of making reasonable adjustments is to prevent disabled students from experiencing substantial disadvantage because of their disability, however it should be noted that adjustments cannot be made to competence standards (see below).

5.5 Teaching and Learning

The University of Roehampton plans and delivers teaching, ensuring programmes are as inclusive as possible at the outset with flexibility to allow individual reasonable adjustments where required.

Academic staff are guided by a Checklist for Inclusive Practice (Appendix 1), prompting consideration of inclusive approaches to planning, the learning environment, teaching methods and materials, assessment and feedback, and e-learning, technology & social media. Staff are supported by the LTEU to review, monitor and develop inclusive practice in teaching.

Universal design for learning is considered at the points of planning, implementation and evaluation to ensure that teaching, learning and assessment practice and policy is inclusive of and accessible to all students.

5.6 Assessment:

The University is guided by an [Assessment and Feedback framework](#) and strives to ensure inclusive assessment opportunities for students. Assessments are created to provide all students with opportunities to demonstrate achievement of learning outcomes. It is

recognised that disabled students may require reasonable adjustments to the assessment in order to demonstrate that they have achieved the learning outcomes.

Mitigating circumstances: the University is guided by a policy on [Mitigating Circumstances](#). Where it is deemed reasonable for a disabled student to be given extra time for coursework, they may apply for an extension on the basis of their disability. The department will decide on the amount of time to be granted, based on the context of the coursework, parity across the student cohort and any additional factors such as demands of exam boards. A disabled student will be granted an extension on the basis of their disability once only for each piece of coursework – any further extensions required must be supported by additional evidence of extenuating personal circumstances.

Examination adjustments:

Students may be recommended examination adjustments which would be applied consistently across central exams and in class tests. Disability Services will make recommendations based on evidence provided by the student and understanding of the student's preferred way of working, in consultation with the student ensuring parity of adjustments across the student cohort.

Alternative assessment

In exceptional cases an alternative form of assessment may need to be considered, where reasonable adjustments have not been effective. When considering alternative assessment, the needs of the student and the demands of the course will be taken into account, ensuring that reasonable steps are taken to ensure that a disabled student is not disadvantaged or given a considerable advantage over their peers.

Where alternative assessment is deemed to be the best way forward, a panel will convene to decide an appropriate assessment (Appendix 2). The panel will consist of the student, and members of staff from Disability Services and the department. Professional body standards will be considered, and external examiners will be consulted where appropriate. The decision making process will be documented for audit purposes. Agreement to a particular form of alternative assessment for one individual student will not set a precedent for others

Competence standards

The University aims to develop non-discriminatory competence standards when designing programmes, where a competence standard is the level of ability that a student must demonstrate in order to complete or progress a course of study. It is recognized that there is no duty to adjust competence standards - disabled students will be required to demonstrate that they have met the competence standard. However it may be possible to adjust the way in which the competence standard is assessed to ensure that disabled students are not disadvantaged in demonstrating that they have met the standard.

5.7 Off-Campus activities:

The University ensures that, wherever possible, disabled students have equal opportunity to access and fully participate in off-campus activities, including field trips, placements and Study Abroad opportunities. Disability Services will work with the student, department and partner to ensure that reasonable adjustments and appropriate support are in place.

Field trips:

All modules with field trip or off-campus activities involved are inclusive of all students wherever possible. Expectations of students on field trips are made clear in

module handbooks, to ensure that students are able to make an informed choice when selecting modules. Module leaders request information from all students regarding support needs prior to a field trip, and complete a risk assessment. If a student is not able to attend a field trip for disability related reasons, an alternative experience will be offered to ensure that they are able to meet the learning outcomes.

Placement:

The University liaises with placement providers to ensure that disabled students are not disadvantaged in terms of finding and carrying out appropriate and successful placements. Students are encouraged to disclose their disability and discuss it with the placement provider so that any reasonable adjustments or supports can be agreed. The University is responsible for ensuring that students are not disadvantaged in finding a placement or on placement; the placement provider is responsible for making reasonable adjustments for disabled students on placement. Students should note that this can only happen if they consent to disclose to the provider.

Study Abroad:

The University supports disabled students to participate in Study Abroad opportunities and will liaise with partner institutes regarding any potential support needs or recommended adjustments with the student's permission.

5.8 Student experience:

The University of Roehampton strives to ensure an inclusive approach for disabled students across all of the student experience. This includes teaching and learning, service provision, access to information, facilities and extracurricular activities. All members of staff have a shared responsibility for ensuring that all students have equal access to opportunities provided by the University.

5.9 Specialist support:

Disability Services support students to complete their course successfully by offering specialist, professional services to students. Prospective students are encouraged to discuss any disability related needs at the point of application so that reasonable adjustments can be identified and implemented as early as possible. Disability Services provides information, advice and guidance to colleagues in the University to support them to meet the needs of their students.

Department Disability Coordinators (DDCs) are the point of contact for disabled students in departments, responsible for disseminating information regarding reasonable adjustments for individual students to colleagues in the department. They support colleagues to develop inclusive approaches to supporting students and implement any recommended individual adjustments.

Non-Medical Help Support

Where students have been recommended Non-Medical Help as part of their Disabled Students' Allowance (DSA), they may choose to receive this support from the University of Roehampton's Non-Medical Help (NMH) Service. This service complies with the Disabled Students Allowance Quality Assurance Framework, and is delivered in accordance with the standards set out in the framework. Students may also choose to receive support from an external provider; preferences regarding the provider should be discussed with their needs assessor.

Mental health & wellbeing

The mental health and wellbeing of all students is important to the University, where support is guided by the [Mental Health policy](#). Where students have a diagnosed mental health condition, they may be supported by either a Disability Adviser or a Mental Health Adviser, or both. Disability and Wellbeing Services work collaboratively under the umbrella of Student Support Services.

5.10 Retention:

Where a student's studies are interrupted as a direct result of a disability, the University will make reasonable efforts to ensure that they can continue their programme of study. The University may initiate procedures outlined in the [Fitness to Study policy](#) to explore supports and reasonable adjustments required for the student to continue their studies. Where the programme of study includes professional body requirements, the University will need to ensure that these can still be met. Where it is not possible for the student to continue on or return to their programme of study, the University will offer support in exploring alternative programmes.

6. DISABLED STAFF

As an employer, the University has a duty under the Equality Act (2010) to promote equality of opportunity for disabled staff, eliminate discrimination, victimisation and harassment as well as fostering good relationships between disabled and non-disabled staff. The University takes positive steps to ensure that disabled staff can access and progress in employment.

Disabled staff are encouraged to disclose a disability to their line manager or their account manager in Human Resources (HR). HR produce guidelines for disabled staff ([link/ attached](#)) and for managers ([link / attached](#)), outlining procedures for identifying and implementing support.

6.1 Recruitment:

If an applicant discloses a disability and meets the person specification for the role then they will be entitled to an interview. At the interview invite stage, applicants will be asked if any reasonable adjustments are required to ensure applicants do not experience disadvantage.

6.2 Responsibility:

Managers must ensure that disabled employees are aware of the range of support mechanisms available in the university through inclusive practice. Where individual adjustments are required, managers should seek advice and support from HR to ensure parity of approach across the university.

6.3 Staff Retention:

Where a member of staff becomes disabled during their course of employment, the University will make reasonable adjustments and offer support to allow them to stay in post wherever possible. If not possible, an alternative post appropriate to their experience and abilities will be sought.

6.4 Technology

The University recognises the value of using technology to aid inclusion and support for disabled students, staff and visitors.

- E-learning: The university e-learning team works with departments to ensure accessibility of digital resources, compatibility of VLE platforms, and consistency across all departments in terms of formatting. A regular accessibility audit of digital tools and resources is undertaken.
- Assistive technology: The University provides site licences for assistive software in anticipation of the support needs of students and staff. It is also recognised that specialist staff competent in the use of this software are required to deliver training.
- Lecture capture: the University has ReCap in place and a [Lecture Capture Policy](#) in place to guide its use. ReCap is used on campus to support access to lecture materials in an alternative format to support and consolidate learning. The University endeavours to ensure transparency around availability of lecture capture provision, and manage expectations of students and staff. Where students cannot access audio recordings due to a disability, a transcript will be provided. For general resources, a transcript or subtitles will be available in advance.
- Web accessibility: the University is committed to ensuring that our website is accessible to all users, and we aim to meet the standards set out in the Web Content Accessibility Guidelines (WCAG). The need to consult disabled users on accessibility and compatibility is recognised, where user feedback informs improvement and development of our webpages.
- Alternative formats: the university strives to provide material in alternative formats where required. This is managed by the University Communications team, HR and Digital Learning Services.

6.5 Estates and Campus

Accessibility and inclusion are considered at the design stage of any project, and it is ensured that new buildings meet the British standards for access and include facilities such as hearing loops to facilitate inclusive use of the buildings.

The University takes an inclusive approach to maintaining the campus and facilities, carrying out regular access audits to ensure that any potential barriers to the campus are identified and addressed where possible. Practical information about the buildings and campus are published to support disabled students, staff and visitors to plan their way around the campus. Where there are access issues due to buildings being listed, or issues with facilities, the University ensures that disabled students, staff and visitors are advised so that they can make informed decisions about coming to Roehampton and gain knowledge of the facilities available.

Accommodation: the University anticipates the accommodation needs of disabled students by having a number of basic facilities in place in student accommodation. This includes ground floor flats, rooms with adapted kitchen and bathroom facilities, portable alarm systems for students with hearing difficulties and ensuite facilities. The University also has a wet room / changing facility. Any further individual requirements for adaptations to accommodation should be discussed with Disability Services well in advance of starting at Roehampton.

Library: the University has a new Library that has been designed to be inclusive of all staff, students and visitors in regard to its physical features and services.

Health & Safety: the University is guided by a [Health & Safety Policy](#) and has a duty to ensure that no student, staff member or visitor is at risk because of their disability. The Health and Safety department are responsible for carrying out personal emergency evacuation plans (PEEPs) for individuals who disclose a disability and identify that they may have difficulty safely evacuating a building.

Rest Spaces: the University recognises that it is reasonable to provide rest spaces for students, staff and visitors who need a quiet space to manage the effects of their disability. The aim is to ensure an appropriate space in each College for individuals to rest, administer medication and recover.

6.6 Training for all staff

All staff are provided with appropriate training to ensure that they are able to meet the needs of disabled students, and signpost to the relevant services. This is delivered via HR induction training, bespoke training and annual training on disability awareness and inclusive practice available for all staff

Complaints and Appeals: The University has in place regulations to deal with complaints and appeals arising directly or indirectly from a disability related matters.

6.7 Monitoring and review:

Human Resources will maintain records of staff who declare a disability and may record data on applications for employment to enable monitoring of the operation of this Policy across all areas of employment.

Disability Services will maintain records of all students and potential students who declare a disability and will record data on the support provided to students.

The University will encourage the involvement of people with disabilities, from within the University and outside agencies, in reviewing the implementation and effectiveness of this Policy.

In order to maintain best practice in the application of this policy, liaison will be maintained with the specialist advisory bodies and groups concerned with disability, including Disability Services.

In order to provide an appropriate level of support to people with disabilities, the University will consult widely and strive to implement best practices and to access available resources to support students and staff, including making applications under Access to work Schemes and allowances available for disabled students.

This Policy will be monitored and reviewed regularly by the Equality, Diversity and Inclusion Committee to judge its effectiveness and to determine whether it is meeting legislative requirements and the University's equality objectives. This monitoring will be undertaken in consultation with the University's main stakeholders.

Reference documents:

<https://www.ecu.ac.uk/wp-content/uploads/external/managing-reasonable-adjustments-in-higher-education.pdf>

<https://www.ecu.ac.uk/wp-content/uploads/external/equality-act-2010-briefing-revised-08-12.pdf>

https://www.ecu.ac.uk/wp-content/uploads/2015/08/ECU_Understanding_competence-standards-FINAL.pdf

<https://www.ecu.ac.uk/guidance-resources/student-recruitment-retention-attainment/student-retention/inclusive-learning-teaching/competence-standards-reasonable-adjustments/>

https://www.equalityhumanrights.com/sites/default/files/what_equality_law_means_for_you_as_an_education_provider_further_and_higher_education.pdf

<https://www.equalityhumanrights.com/sites/default/files/equalityact2010-technicalguidance-feandhe-2015.pdf>

<https://www.gov.uk/guidance/equality-act-2010-guidance>