

Disability Policy

Introduction

This policy forms part of the School's overall commitment to ensuring equality for its diverse staff and student body. It outlines the School's duties and the options available to both students and staff with disabilities, including mental health disabilities, in seeking support or adjustments to their studying and working environment; and it provides a framework to support the ongoing development of an inclusive, safe, enabling and supportive environment for all of the School's staff, students, and visitors, regardless of disability. This policy should be read in conjunction with the School's Equality, Diversity and Inclusion Policy.

Scope

This policy applies to all LIS staff and students. Where relevant, the policy also applies to prospective staff, prospective students, and visitors.

Legislative context: Equality Act 2010

As a disability is a protected characteristic under the <u>Equality Act 2010</u>, public bodies such as the London Interdisciplinary School must, in the exercise of their functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimization, and any other conduct that is prohibited by or under this Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Public bodies are required to integrate consideration of equality and good relations into their day-to-day business and to consider how a function can affect different groups in different ways. This enables the School to reasonably anticipate the needs of disabled staff, students and visitors, and to address the potential impacts of any proposed changes to ensure they do not have an adverse effect.

Development of this Policy

This Policy has been developed in line with sector best practice (<u>JISC</u>, <u>Advance HE</u>, Disabled Students Sector Leadership Group) and in consultation with School staff. When we have students enrolled in our programme, we will consult them on this policy so that we can evolve it in line with their feedback.

Definitions

Disability: For the purpose of this policy, the term "disability" has the same meaning as that given in the <u>Equality Act 2010</u> and the <u>Special Educational Needs and Disability Act 2001 (SENDA)</u>: "A physical or mental impairment which has a substantial and long-term adverse effect on your ability to carry out normal day-to-day activities".



While understanding the Medical Model nature of the definition used in the <u>Equality Act 2010</u>, the School recognizes the Social Model of Disability, which views disability as being created by barriers within society rather than locating the disability within the individual. Barriers can be: in the physical environment, such as inaccessible buildings or services; attitudinal, resulting in stereotypes, prejudices and assumptions about the capabilities of disabled people; or organisational, such as having inflexible policies and procedures. The School aims to address all of these barriers to ensure that disabled people are able to participate in all aspects of School life.

Reasonable Adjustment: A Reasonable Adjustment is defined as a decision taken by the School to allow changes to be made to standard arrangements for individual disabled staff and students, so that they may continue in their employment or studies at School. Reasonable adjustments will also apply to prospective employees, prospective students, and visitors to the School.

Principles

The School is committed to addressing the barriers to inclusion (structural, cultural, organizational and attitudinal) that adversely impact upon people with disabilities, and views accessible, appropriate and inclusive provision as a core element of the School's provision. The School is committed to complying with the disability provisions of the Equality Act 2010 and the preceding legislation including SENDA 2001 by:

- Making its provision as accessible as possible, aiming to do this by using inclusive approaches, or by ensuring that anticipatory action is taken as far as is reasonably practicable to provide inclusive working, learning and teaching and access to the School's facilities and services. Where this is not possible and/or additional needs are identified, the School will seek to implement appropriate individual reasonable adjustments.
- Ensuring that any reasonable adjustments are evidence-based and are determined through an assessment of the individual's disability-related requirements, taking into consideration additional factors such as the environment, health and safety, academic standards, and principles of employment law to prevent substantial disadvantage.
- Taking all steps to ensure that nobody—whether prospective or current staff, prospective or current student or visitor—is treated less favourably on the grounds of disability.
- Promoting a positive working and studying environment for disabled staff and students.
- Providing training, support and guidance for all academic and professional staff to ensure that they are
 equipped to provide the necessary support and can respond appropriately to the needs of staff and
 students with disabilities.
- Encouraging a climate of openness and positive disclosure for staff and students with disabilities, including mental health disabilities. The Student Support Department offers a safe and supportive environment for students to disclose their disability-related requirements; and Human Resources will be given guidance on facilitating discussions around disclosure and appropriate support for staff. In keeping with data protection legislation, any information disclosed by a student or member of staff relating to a disability shall only be passed on with consent and where there is a legal basis to do so.
- Regularly reviewing, monitoring and revising, as appropriate, all School systems, procedures, facilities, services and buildings in compliance with the <u>Equality Act 2010</u> and the <u>SENDA 2001</u> in addition to the <u>Human Rights Act 1998</u>, which includes the right not be denied access to education.



- Creating, maintaining and disseminating information about services and facilities available for disabled staff, students, alumni, visitors and prospective staff and students.

Policies

The <u>Equality</u>, <u>Diversity and Inclusion Committee</u>, which is a subcommittee of the Academic Council, plays a key role in contributing to and monitoring the work of the School in respect of disability-related matters. This Committee will meet at least termly to discuss all matters relating to equality, diversity and inclusion and reports termly to the Academic Council and annually to the Board of Directors.

The School will ensure that in all policies, procedures, regulations, functions and activities, including strategic planning and resource allocation, consideration is given to reasonable means of enabling disabled staff and students' full participation in all aspects of the academic and social life of the School.

The School will ensure that the requirements of disabled students are considered during programme validation and review and that appropriate amendments are made. Programme specifications that raise barriers to access by disabled people will be reconsidered and reasonable adjustments made to minimise such barriers.

The School will ensure that its publicity, programme details and general information is accessible to people with disabilities.

The School website will contain information on disabled access and support for staff, students and visitors.

Disclosing a disability

The School will give encouragement and opportunities to staff and students to disclose any disability that may have a substantial and long-term adverse effect on their ability to undertake normal day-to-day activities. A discussion can then take place about disability-related reasonable adjustments or other support that may be required. Individuals can choose to bring someone to accompany them at meetings to provide extra support if required. Staff are encouraged to discuss their needs with their line manager or seek support from their HR representative.

Students can seek advice via their academic tutor or the Student Support Department.

Disclosing a disability to the School is a personal matter of which it is an individual's choice if and when they do so. Disclosing a disability will enable the School to inform staff and students about the options available to them. If individuals choose not to disclose their disability, this may have implications for the provision available to them. Whilst it is beneficial to disclose as early as possible, disclosure can be done at any time.



Reasonable Adjustments and Student Support plans

Eligibility for Student Support plans

The School will consider reasonable adjustments for students with disabilities, including:

- long-term health conditions, such as cancer, HIV or diabetes
- · mobility difficulties
- mental health conditions, such as depression, bipolar disorder, psychosis and eating disorders
- autism spectrum conditions
- · sensory impairments, such as hearing or visual loss
- · specific learning differences, such as dyslexia or dyspraxia

This is not a complete list; a student might have another disability that impacts on their studies.

Providing Evidence

Students should confirm their eligibility for support and any reasonable adjustments by providing appropriate evidence of their disability or on-going health condition. This evidence will be held securely and will only be seen by staff who need to make a decision about what specialist support and/or reasonable adjustments a student can receive.

Specific learning difficulties

For specific learning difficulties i.e. dyslexia, dyspraxia etc. a student will need to provide a full diagnostic assessment report carried out by an educational psychologist or suitably qualified specialist teacher. The report must give a diagnosis of a specific learning difficulty, and not simply be for the purpose of assessing the need for exam adjustments, such as extra time and the use of a computer.

The School can arrange for current students to undertake new diagnostic assessments where necessary.

For all other disabilities and on-going health conditions

For all other disabilities students must provide evidence from a suitably qualified medical professional such as a GP, consultant, specialist nurse etc. Depending on the prognosis of their condition this evidence may need to be within the last 12 months. It should specify the following:

- The name of their impairment or health condition
- When their impairment or health condition was diagnosed/identified
- How long their impairment/health condition is likely to last
- The main effects of their condition, particularly in relation to studying
- The side effects of any medication or treatment



There is no checklist against which judgments can be made to determine what is reasonable. The consideration of whether an adjustment is 'reasonable' is judged against: –

- The effectiveness of the adjustment in preventing the disadvantage.
- The extent to which it is practicable for the School to make the adjustment.
- The cost and availability of resources including external assistance and finance. -
- The extent to which making the adjustment would disrupt the School's activities

Reasonable Adjustments and Student Support plans

Upon disclosure of a disability and an assessment leading to reasonable adjustments, students will be provided with a Student Support Plan. The Plan will detail the reasonable adjustments which have been made and will be monitored by the Head of Student Support.

The School aims to ensure that a student has a support plan in place for each academic session. This will outline the support they receive and all reasonable adjustments for that year. This will include the deadline for any additional time provided in assessment or where an alternative assessment is required.

Examples of reasonable adjustments for a student might include:

- Physical adjustments: for example, putting in a ramp for a wheelchair user or using contrasting coloured flooring to help people with visual impairments to see changes in floor level.
- Access to information: for example, by ensuring the availability and use of appropriate ways to give and receive information in alternative media.
- Special study arrangements: for example, permitting flexible studying (where this is appropriate), modifying programme materials and curriculum resources or allowing a disabled learner to interrupt their studies for a period of time.
- Special examination arrangements: for example, allowing readers or the use of a computer, providing examination scripts in alternative fonts.
- Alternative assessments: using a different method of assessment for a disabled person
- Additional time in coursework. This is normally up to one week. Students with additional time as part
 of their support plan do not need to request permission to use the additional time they have been
 allocated.

The School does not make reasonable adjustments in assessment when something unforeseen happens, such as if a student is unexpectedly ill or injured. In this situation, students should apply for extenuating circumstances or an extension.

A Support Plan does not remove the need for a student to apply for Extenuating Circumstances or an Extension, although the grounds for which a student requires the EC need to be different to those already deemed 'covered' by the Support Plan. Therefore, the student will need to evidence a worsening or acute episode of their ongoing known condition / disability or a new condition / circumstance not previously



known.

Reasonable adjustments for assessments and examinations

Adjustments that the Head of Student support may recommend include:

- A separate room;
- A scribe;
- A reader;
- A BSL interpreter;
- Assessment materials in a different format (e.g., coloured/enlarged paper, braille, transcripts)
- Coloured overlays;
- A computer;
- Assistive technology;
- Alternative assessment forms which meet the required programme objectives and learning outcomes (see below)
- Additional time in an examination
- Additional time in coursework (see below)

An adjustment may be granted for the duration of the student's programme where the disability, specific learning difference or medical condition and their impact upon assessments are unlikely to change. In some instances, alternative forms of assessment may be required to accommodate a student.

Additional Time in coursework

The *typical* maximum amount of additional time in coursework that may be provided in a Support Plan is one week. This is on the basis that deadlines and assessment briefs in coursework are known to a student at a minimum at the start of a term providing sufficient time to prepare.

Where a student's needs are more complex, they may be a candidate for an alternative assessment.

A student with additional time due to a Support Plan is entitled to request an extension for unrelated reasons or where their on-going condition has worsened or become acute.

Alternative Assessments

Occasionally a Student Support Plan may identify a specific form of assessment (e.g. a timed, closed book examination) where an alternative form of assessment is needed or one week of additional time would be insufficient (for those with complex needs).



There will be times when the process of a timed examination or other assessment format cannot be adjusted to accommodate a student's needs, or where the level of adjustment required is deemed unreasonable, or other students would be significantly disadvantaged, in these circumstances an alternative method of assessment should be considered.

An alternative form of assessment must assess the same intended learning outcomes as the standard assessment, must be conducted under conditions that are as far as possible equivalent to those of standard assessments, including, where relevant, pressure of time.

Alternative assessments must be agreed with the External Examiner in line with the <u>Assessments Approval</u> <u>Procedure</u>. The outcome of the assessment will be communicated to the student in the normal way and the student will have the same entitlement to feedback.

Determination of Support Plans

The evidence provided will be considered by the Head of Student Support who will draft a plan liaising with relevant staff including for example

- Communities Manager (for building related matters)
- Head of Technology

The draft plan will then be provided to the following for approval:

- Registrar
- Head of Academic Services
- Head of Teaching and Learning

Once approved it will be provided to the student by the Head of Student Support.

Appeals

Students may appeal the decision of the Panel in relation to reasonable adjustments under the <u>Academic</u> Appeals Procedure

Reasonable adjustments for Optional Internships

Where a student requires reasonable adjustments to support them during an optional internship organised through the School, they must notify the Student Support Department at least six weeks before the beginning of the Internship. In order for the Student Support Department to progress discussions with the relevant employer on reasonable adjustments, the student will be required to give consent for information on their disability, specific learning difference or medical condition to be shared.

If students have concerns about disclosure and would like to discuss these confidentially, they can contact the Student Support Department.

Reasonable Adjustments for Staff



Where the Human Resources Department determines that reasonable adjustments for individual disabled staff are required, these might include, where appropriate:

- Reasonable adjustments such as reallocation of duties;
- Altering working hours;
- Changing work location;
- · Modifying equipment; and
- Consideration of other roles.

Where the Student Support Department determines that reasonable adjustments for individual disabled students are required, these might include, where appropriate:

- Additional support and assistance for assessments (e.g., a separate room, a scribe, a reader, a BSL interpreter, assessment materials in a different format, coloured overlays, a computer, assistive technology)
- Additional support for learning;
- Adjustments to learning environment;
- Provision of lecture notes in advance; and
- Consideration of alternative forms of assessment.

Example reasonable adjustments for examinations and assessments are set out in the section above.

Where the Student Support Department and an employer offering an optional internship determine that reasonable adjustments for individual disabled students are required, these might include, where appropriate:

- Altered working hours;
- Changed work location;
- Modified equipment.

In all cases, reasonable adjustments will be made within the parameters of the following factors:

- The nature of student or staff circumstances following consultation with the individual and examination of available evidence and relevant assessments.
- The nature of the work or academic programme of study.
- The likely effectiveness of the adjustment in removing the disadvantage.
- The practicality of the adjustment, taking into account disruption, health and safety issues, the reasonable expectations of others and external factors (for example, factors in relation to student internships).
- The costs, including the availability of external funding sources to assist in the adjustment.
- Legal precedent.
- The possibility of using inclusive measures, which is the School's preferred method of ensuring accessibility, rather than a reasonable adjustment.



Financial Support for Students

If a disability is disclosed to the School, a wide range of financial support can be accessed, namely:

- Government financial assistance is available to support people with disabilities in the workplace.
- External resources such as the <u>Disabled Students Allowance</u> (DSA). DSAs are Government grants available to eligible disabled students on higher education courses in the UK to help with extra course costs they may incur by attending their course, as a direct result of their disability. The allowances can help to pay for a non-medical personal helper, items of specialist equipment, assistive software, travel or other course-related costs. The allowance is not means-tested and is not repayable. DSAs are not available to all students, but are subject to eligibility criteria, which are stated on the <u>gov.uk</u> website, together with the amounts payable.

Health and Safety

If a disabled student or staff member has special requirements in relation to fire or general evacuation, the School encourages them to bring this to the attention of their personal tutor or line manager so that appropriate plans and arrangements can be made. Further information can be found in the School's Health and Safety Policy.

Prospective Students

As is set out in the School's <u>Admissions Regulations and Procedures</u>, all applications to the School will be assessed on the basis of academic suitability for the School programme. Discussions about the support requirements of students will be separate from any academic decision.

Prospective students who may have additional requirements (e.g., assistance or equipment) and have been invited to a Discovery Day (Open Day) or Selection Day will be asked to notify the School in advance of their visit so that reasonable adjustments can be made as necessary and appropriate.

On being called to a Selection Day, or on being made an offer, a student who has disclosed a disability, specific learning difference or medical condition shall be invited to discuss the support required to complete the programme with a trained and specially designated member of staff in the Student Support Department to:

- Ensure that the student is fully aware of the demands of the programme;
- Identify any resources or arrangements that the student requires;
- Determine whether the School can reasonably provide these.

Where adjustments are reasonable, the School shall deal with the student efficiently and fairly, in line with this Policy.



Where reasonable adjustments have been agreed with an applicant who has accepted an offer of a place on the programme, the School will provide the student with a clear record of the adjustments to be made in the form of an accessible learning contract.

The learning contract shall set out as a minimum:

- A clear, precise and accurate listing of adjustments to be provided by the School;
- An agreed clear contact point for the student during their studies;
- A clear statement as to the expectations of the School that the student will keep the School
 reasonably and expeditiously informed as to any alterations in their disability and resulting effects on
 their study.

Further information can be found in the Admissions Regulations and Procedures for Students.

Prospective Staff

All prospective staff who accept the offer of an interview will be asked in advance if they require any special arrangements to be made for them at the interview and adjustments may be made as necessary and appropriate.

All school vacancies will be open to suitably qualified people irrespective of disability.

Optional Internships

Where a student has disclosed a disability, specific learning difference or medical condition and requires reasonable adjustments during an optional internship organised by the School, they must notify the Student Support Department at least one month before their Internship begins. The Student Support Department requires consent from the student for information about their disability, specific learning difference or medical condition to be shared with the relevant employer in order to begin discussions of reasonable adjustments on an internship

Where a student has disclosed a disability, specific learning difference or medical condition and has given consent for the School to share this information with employers, the Student Support Department will work with the relevant employer to ensure that, where appropriate, reasonable adjustments are in place to support the student at the workplace during their Internship. These reasonable adjustments may include:

- Altering working hours;
- Changing work location; and
- Modifying equipment.

The Student Support Department and Employer will agree clear record of adjustments to be made in the form of an internship learning contract, which shall set out as a minimum:

 A clear, precise and accurate listing of adjustments to be provided by the employer for the duration of the internship;



- An agreed clear contact point at the employer for the student during their internship;
- A clear statement as to the expectations of the School that the student will keep the School reasonably and expeditiously informed as to any alterations in their disability and resulting effects on their ability to fulfil their work internship.

This record of adjustments will be agreed between the School's Student Support Department and the employer one month before the beginning of the internship.

Where the student experiences any disability-related issues at their internship, they should contact their Internship Supervisor at the employer in the first instance, drawing on the support of the Director of Admissions and Student Support or their LIS Careers Mentor as required. Where the student feels that the issue is not resolved by the Internship Supervisor, they should contact their Careers Mentor, who will liaise with the Director of Admissions and Student Support and the employer to find a solution.

Roles and Responsibilities

The Board of Directors is responsible for ensuring compliance by the School with equality law.

All School staff are expected to be aware of this Policy and the legal framework, and to treat disabled people, whether staff, students or visitors, in accordance with these provisions.

In particular, **Heads of Departments and others in management positions** are responsible for ensuring that this Policy and the legal framework are communicated effectively through staff development programmes and are being implemented in their area.

The Equality, Diversity and Inclusion Committee will monitor the implementation of this policy, including:

- Monitoring, analysing and reporting on data relating to disability and equality;
- Monitoring the School's performance against the delivery of its equality objectives in relation to disability and recommending changes where improvements are required;
- Evaluating and monitoring the School's performance against its Access and Participation Plan disability objectives, and recommending changes where improvements are required;
- Considering staff and student feedback on the School's Disability Policy as appropriate to the Board of Directors.

Details on the Equality, Diversity and Inclusion Committee are set out in <u>Equality</u>, <u>Diversity and Inclusion</u> Committee: Membership and Terms of Reference.

The Student Support Department will determine any reasonable adjustments to be made for disabled students to support their learning and assessment. This assessment will be made by a trained assessor. The Student Support Department will also liaise with employers in ensuring that reasonable adjustments are put in place for students on optional internships.



The Director of Finance and Human Resources will ensure that disability training and support will be made available for managers, and that disability equality guidance and information on good practice will be available on the School website.

The Human Resources Department will determine any reasonable adjustments to be made for disabled staff to support their ability to perform at work. This assessment will be made by a trained, designated individual reporting into the Head of HR.

Students and staff are responsible for requesting any review of implemented reasonable adjustments, if such adjustments are not proving to be effective in meeting their entitlements.

Complaints or Feedback about the Disability Policy

Where a member of staff, student or prospective student has a complaint or feedback about the School's Disability Policy, they should follow the School's complaints policy and process.

Monitoring and Evaluation

The School's Equality, Diversity and Inclusion Committee will provide ongoing monitoring and review of the effectiveness of provision for staff and students with disabilities, as well as evaluate progress and identify opportunities for enhancement to advance disability equality at the School. The Committee will make an annual report to the Board of Directors on the effectiveness of this Policy. The Committee will also review this Policy annually in the light of possible government/legislation changes or any feedback or complaints brought by staff or students, and will recommend any amendments for authorisation by the Board of Directors.



Version Control

Name of policy/procedure:	Disability Policy		
Document owner:	A. Kilich, Head of Student Support		
Date Originally Created:	01/2019		
Related documents: (e.g. associated forms, underpinning processes, related policies or overarching policies)	Equality, Diversity and Inclusion Policy Examinations and Assessments Regulations and Procedures for Students Health and Safety Policy Equality, Diversity and Inclusion Committee: Membership and Terms of Reference		

Version Control					
Version	Author	Date	Brief summary of changes	Effective	
1	Hannah Kohler (Director of Admissions and Student Support)	13/01/2019	Original draft		
2	Hannah Kohler (Director of Admissions and Student Support)	03/06/2019	Added section about complaints about the policy. Clarified the role of the Equality, Diversity & Inclusion Committee and the Director of Admissions and Student Support. Included context for how the policy was developed; included reference to internships. Expanded detail on reasonable adjustments for assessments and examinations.		
3	Hannah Kohler (Director of Admissions and Student Support)	14/08/2019	Minor wording changes		
4	Board of Directors	18/11/2019	Approved		
5	Alisha Kilich (Head of Student Support)	10/2021	Minor changes of job titles	2021-2022	
6	A Redford, Head of Quality	RWG chair's action 08/09/2022	Additional detail on reasonable adjustment and support plans.	2022-2023 onwards	
7	A Redford, Head of Quality	EDIC, 22/11/2023	Change in role titles	2023-2024 onwards	