

## Regent College

### Inclusion policy and procedure

Regent College is committed to enabling the academic and professional successes of all our students. We have an inclusive approach towards all students who are differently abled, those who self-declare a disability, and those who are assessed as such by any external body.

The College promotes the use of inclusive language to foster an atmosphere where enablement is the goal of any policy or procedure which impacts upon students who nominate, or are nominated, as disabled.

1. This document describes how the College works with students who declare a disability, or a different level of ability, affected by a diagnosed, or a non-diagnosed, condition.
2. The primary audiences for this document are:
  - Students wishing to make a disclosure
  - Staff who are responsible for helping students, or prospective students, who disclose any (dis)abling condition.
3. This document has been developed with reference to:
  - *The Good Practice Framework for Supporting Disabled Students* (published by the Office for the Independent Adjudicator for Higher Education).
  - *A Guide to the Special Consideration Process: General and Vocational Qualification* (published by the Joint Council for Qualifications CIC, adopted by Pearson Ltd.)

#### Who does this document apply to?

4. This document applies to all students enrolled at the College and anyone who is applying to study with us. For brevity, this document refers to both students and applicants as 'students'.

#### Legal framework

5. The [Equality Act 2010](#) states that a person has a disability if the person has a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on the person's ability to carry out normal day-to-day activities. Anyone who has HIV, cancer or multiple sclerosis is automatically treated as disabled under the Act.
6. The Act prohibits discrimination on the basis of any protected characteristics, including disability. It also references instances of harassment and victimisation which are covered within the Act. It carries a broad definition of disability which includes general impairments, long-term conditions,

levels of substantial influence which may vary through time, and impact upon normal day-to-day activities.

7. Discrimination can include:

- direct discrimination – treating a disabled student less favourably than other students;
- discrimination arising from disability – treating a disabled student unfavourably because of something arising in consequence of their disability, unless the treatment is a proportionate means of achieving a legitimate aim;
- indirect discrimination – applying to a disabled student a ‘provision, criterion or practice’ which puts that student at a particular disadvantage when compared with students who do not have the disability, and the provider cannot show it to be a proportionate means of achieving a legitimate aim.

### **How this policy and procedure works**

#### Disclosure

8. Students may disclose a disability at any point during the application process or after they have enrolled. We encourage students to disclose as early as possible so that we can plan and give appropriate support. Although there is no legal obligation on students to make a disclosure, we are committed to providing an open, welcoming, and supportive atmosphere in which differently abled students feel comfortable disclosing information about the assistance they need.

9. Students may disclose in confidence to any member of staff. Students who disclose any condition which may affect their ability to take full advantage of the opportunities we offer will be invited to meet with the Wellbeing Team, to explore their options and requirements. The Wellbeing Team can:

- facilitate an accompanied Campus Tour before, or in addition to, induction processes;
- provide advice on the Disabled Students Allowance (DSA);
- consider and recommend reasonable adjustments available;
- discuss any disability related issues or concerns.

10. Sometimes a student may not wish for information about their abilities to be disclosed to the Wellbeing Team and/or anyone else within the College. Where this is the case, the student should be aware that this may limit the advice and support we can offer to them.

#### The Disabled Student’s Allowance (DSA)

11. Students who declare a disability can apply for the Disabled Student’s Allowance (DSA). The DSA is a non-means tested grant that, in the Academic Year 2021/22, provides an allowance of up to £25,000 per year. This allowance can cover the costs of Specialist One to One Study Skills Support/One to One Specialist Mentoring, assistive software, and more.

12. We are committed to ensuring that all disabled students can access the DSA. The Wellbeing Team can answer any queries that students have about it. We can also assist students with referrals to Assessment Centres if an independent assessment is required to support a DSA application.

#### Support with examinations and assessments

13. We can make adjustments to and/or concessions for examination and assessments for students who are differently abled. Each case is considered to promote maximum enablement and is on a person-centred basis. Students wishing to apply for examination concessions must disclose no later than one month before the examinations are due to take place.

#### Reasonable Adjustments

14. A reasonable adjustment is a change to remove or reduce the effect of a student's disability so that they can engage with their studies effectively. We will make reasonable adjustments for a student when we know, or can reasonably be expected to have known, that they are differently abled.

15. Where a provision, criterion or practice is putting a student with a disability at a substantial disadvantage compared to other students, we will take such steps as is reasonable to avoid that disadvantage.

Where a physical feature is putting a student with a different level of ability at a substantial disadvantage compared to other students, we will take such steps as is reasonable to avoid that disadvantage. A Personal Emergency Evacuation Plan will be completed on site in the company of the student to ensure the correct level of support is given when they are at our campus. Examples of a physical feature are:

16. Examples of a physical feature are:

- any feature arising from the design or construction of a building;
- any feature of any approach to, exit from, or access to a building;
- any fixtures, fittings, furnishings, furniture, equipment or other moveable property in or on premises;
- any other physical element or quality.

17. Where a student with a different level of ability would, but for the provision of an 'auxiliary aid', be put at a substantial disadvantage compared to other students, we will take such steps as is reasonable to provide the auxiliary aid. Examples of auxiliary aids are:

- a piece of equipment;
- the provision of a sign language interpreter, lip-speaker or deafblind communicator;
- extra staff assistance for disabled students;
- an electronic or manual notetaking service;
- induction loop or infrared broadcast system;
- videophones;
- audio-visual fire alarms;
- readers for people with visual impairments;

- assistance with guiding.

18. We acknowledge that the College would be committing unlawful discrimination if it did not make a reasonable adjustment to the implementation or assessment of a competence standard to enable a disabled student to show that they have attained the standard required.

19. Examples of some of the proactive changes we have made to create a more inclusive learning environment are:

- improving the accessibility of learning materials and procedures;
- making teaching materials accessible via both synchronous and asynchronous digital delivery;
- allowing and facilitating the recording of teaching, and support sessions, with easy access, as a matter of course;
- ensuring reading lists are focused, up-to date, and available as modules start;
- use of plain English and clear presentation in lectures;
- using a range of assessment methods;
- speech recognition and transcription software for lecturers so that students can read in real time and can have access to such transcripts.

#### Support plans

20. A support plan is a document describing what we will do to support a student to engage with their studies effectively. We will create an individual Personal Support Plan for any student who discloses any form of physical or mental (dis)ability, or about whom there are concerns that a mental or physical health condition is significantly affecting their ability to engage.

21. Support Plans are:

- developed by the Wellbeing Team and the academic team (to ensure that adequate academic support is in place during and after the duration of the Plan), and are time limited
- further moderated by the Customer Support Officers (CSOs) concerned, within Hub X meetings
- undergo regular review by the Wellbeing Team
- communicated to all academics and support staff who may need to offer assistance to the student concerned, without sharing confidential or personalised details
- include support for the student's planned return to study, where the plan involves a temporary absence.

#### **Related policies and procedures**

22. All our policies and procedures for students can be accessed from [our website](#). Whenever we are applying one of these procedures to or for a disabled student, we will consider adjusting it to remove any disadvantage to the student.

23. Our Mitigating Circumstances procedure describes how a student may apply for an extension to the deadline for completing an assessment task, or a deferral of an assessment task, due to unexpected and exceptional life events. Disabled students should not need to use the Mitigating Circumstances

procedure to make sure they are assessed on a level playing field with their peers; that is the function of reasonable adjustments. However, disabled students may use the Mitigating Circumstances procedure if:

- they experience an acute episode or worsening of their condition which means that the reasonable adjustments in place are no longer sufficient; or,
- there was a shortcoming or failure in the support arrangements, or arrangements were not implemented in time.

24. Where a disabled student applies for an extension using the Mitigating Circumstances procedure, we will exercise discretion and flexibility in the application of that procedure, for example by not insisting on the provision of medical evidence relating to a condition we are already aware of.

25. Our Students Complaints procedure describes how we deal with complaints from students (including prospective students, current students and recent students) about something the College (or a member of College staff) has done or not done. Students who wish to complain about the way we have (or have not) dealt with an issue related to disability should refer to this procedure.

26. Our Fitness to Study procedure explains what we do where there are concerns that a student is not well enough to study, including where the student is not aware they are not well enough to study.

27. Our Student Disciplinary procedure informs and guides our response where a student breaches, or is alleged or suspected to have breached, the good conduct we expect of all students as described in the Student Charter. Sometimes a student may display behaviour as a consequence of their impairment which causes disruption or offence to other students or staff. In these circumstances staff must take care to explain to the student why the behaviour is causing disruption or offence. The Wellbeing Team is available to provide mediation or conciliation between the student and those affected by the behaviour.

28. A differently abled student may breach the Student Charter for reasons entirely unrelated to their (di)sability. In such cases the College will take disciplinary action in the same way as it would for any other student. However, we will consider whether reasonable adjustments need be made to our normal disciplinary procedures, and how best to support the student through the process.

### Further advice and support

29. Students needing further advice about, or support with this document, or who wish to raise any Inclusion/Disability related issue, should contact the Wellbeing Team at [wellbeing@rcl.ac.uk](mailto:wellbeing@rcl.ac.uk)

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