

## Regent College London

### Inclusion policy and procedure

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.

## Definitions

8. Equality, equity and diversity are defined as follows:
- Equality is ensuring individuals or groups of individuals are not treated less favourably. Equality seeks to advance equality of opportunity in access to a programme of study, training, development, career opportunities etc without any direct or indirect discrimination, or conscious or unconscious biases.
  - Equity is concerned with promoting fairness so that everyone starts from the same place. This may include positive measures to achieve greater equality of outcome.
  - Diversity means more than just acknowledging and/or tolerating difference. Diversity involves understanding, appreciating and embracing differences, and practicing mutual respect for qualities and experiences that are different from the majority. Inclusion is a sense of belonging; feeling respected and valued; feeling a level of support and commitment from others so that one can achieve their best at work and study.

## Responsibilities

9. The responsibilities of senior managers, other staff and students under this policy are as follows:
- The Senior Leadership Team is responsible for ensuring that the principles of this policy are embedded throughout the College.
  - All staff members are responsible for promoting an inclusive environment and for supporting students and colleagues in line with this policy.
  - Students are expected to respect the diversity of the College community and contribute to an inclusive environment.

## How this policy and procedure works

### Disclosure

10. 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.

11. 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.

12. 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 Students Allowance (DSA)

13. The DSA is a non-means-tested grant covering costs of specialist support and equipment for eligible students. The Student Support Team can assist with DSA applications and queries. For further information: [Help if you're a student with a learning difficulty, health problem or disability: Disabled Students' Allowance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/help-if-youre-a-student-with-a-learning-difficulty-health-problem-or-disability-disabled-students-allowance)

14. 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

15. 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. Normally, students wishing to apply for examination concessions must disclose no later than one month before the examinations are due to take place. We may require students to provide evidence that they are differently abled before agreeing to any adjustment or concession.

16. Students should refer to the [Mitigating Circumstances Procedure](#) for further guidance.

#### Reasonable Adjustments

17. 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. We will require students to provide evidence that they are differently abled before agreeing to any adjustment. Where evidence is not available, but a disability is apparent, the College will consider putting in place reasonable adjustments in the interim until evidence is available.

18. In some circumstances, the Disability Adviser may judge that the arrangements requested by the student or contained in the Assessment of Needs fall outside what the College considers a reasonable adjustment. In this case the arrangements will not be put in place.

19. 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.

20. 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.

21. Examples of reasonable adjustment include:

- extra staff assistance for disabled students
- induction loop or infrared broadcast system
- making physical changes to a room or access to a room or building
- providing information in a different format
- specialist equipment
- making arrangements to assist a student in an emergency.

22. 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.

23. 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

24. A Support Plan outlines how the College will support a student to engage with their studies effectively. It is developed by the student support team in agreement with concerned departments, reviewed regularly, and communicated to relevant staff.

25. Support Plans are:

- developed by the Student Support 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 support functions
- undergo regular review by the Student Support 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

26. 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.

27. 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.

28. 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.

29. 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.

30. 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.

31. 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.

### Further advice and support

32. 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)

<i>Version number</i>	<i>1.3</i>
<i>Approved by</i>	<i>Academic Council</i>
<i>Approval date</i>	<i>July 2024</i>
<i>Next review date</i>	<i>July 2025</i>
<i>Policy owner</i>	<i>Chief Operations Officer</i>