

Reasonable adjustments for disabled students

Policy and Procedure

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Introduction

The RVC is committed to ensuring all students are given the best opportunity to succeed. We recognise that some students may need additional support and consideration due to a disability. The RVC has a duty to make reasonable adjustments where a student is placed at a substantial disadvantage because of their disability compared with those who do not share that disability. This policy and procedure set out how we support students with disabilities through the identification and implementation of reasonable adjustments.

Related policies and procedures

- Admissions policy
- Examination Adjustment guidelines
- Assistance Dog policy
- Health and Safety policy
- Assessment Extension request procedure
- Student Performance and Development policy
- Fitness to Practise
- Disability Disclosure guidelines

Legal context

The Equality Act (2010) provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics.

Definition of disability

The Equality Act says that a person has a disability if they have a physical or mental impairment which has a long term (12 months or is expected to last for 12 months or more) and substantial adverse effect on their ability to carry out normal day-to-day activities. Substantial here is defined as more than a minor or trivial adverse effect.

Some examples of disabilities include:

- Specific learning differences including dyslexia, dyspraxia, dyscalculia
- Physical or mobility difficulties
- D/deaf or hard of hearing
- Blindness/Visual impairment
- Long term mental health conditions including depression, anxiety disorders, eating disorders, obsessive compulsive disorders, psychotic illnesses, and personality disorders
- A long-term health condition such as diabetes, epilepsy, chronic fatigue syndrome, fibromyalgia, cardiovascular disease, and rheumatoid arthritis
- A progressive condition such as HIV, cancer, multiple sclerosis, muscular dystrophy, motor neurone disease, and lupus
- Neurodivergent/Autistic spectrum conditions (ASC)/Attention deficit (hyperactivity) disorder

Our legal responsibilities

The Equality Act outlines the need to make reasonable adjustments for people with disabilities. The duty to make reasonable adjustments comprises three requirements for higher education providers:

- Where a provision, criterion or practice puts disabled students at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- Where a physical feature puts disabled students at a substantial disadvantage compared with people who are not disabled, to take reasonable steps to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing an auxiliary aid or service puts disabled students at a substantial disadvantage compared with students who are not disabled, to take reasonable steps to provide that auxiliary aid/service.

The duty to make reasonable adjustments is an anticipatory one owed to disabled people and disabled students generally. It requires the RVC to plan ahead and anticipate the likely needs of disabled students, rather than waiting until adjustments are proposed. The RVC will therefore endeavor to make, where possible, adjustments to policies, practices, and procedures in advance to reduce or remove potential barriers for disabled students.

In addition, placement providers have the same duties to provide reasonable adjustments for students undertaking placements within their practice area where their specific disability puts them at a substantial disadvantage in that environment. Whilst the RVC is not responsible for making reasonable adjustments for students on placements that are provided by external organisations we will support students to share their needs and liaise with providers about their responsibilities to ensure students are appropriately supported where necessary. Students are able to share their Reasonable Adjustment Forms with placement providers to outline the support that they need.

What is a reasonable adjustment?

The duty requires that only adjustments that are reasonable are made. What is reasonable will usually depend on the individual circumstances of the case. In assessing what is reasonable, the RVC will take the following into account:

- the effect of the disability on the individual student;
- the effectiveness of the particular steps in removing or overcoming the relevant disadvantage;
- the relevant interests of other people, e.g. whether an adjustment would result in a significant disadvantage for other students;
- the practicality of the changes;
- any potential health and safety issues;
- the resources available (both those of the RVC and other financial assistance such as the Disabled Students' Allowances)
- the financial and other costs of making the adjustment;
- the type of education/provision or other benefit, facility, or service being provided by the RVC;
- the extent to which aids and services will otherwise be provided to disabled

students (e.g. local authority support)

- the professional requirements/competence standards of the programme

Reasonable adjustments should not compromise the academic standards of programmes or modules, as the Equality Act places no duty to make a reasonable adjustment to a competence standard.

Common reasonable adjustments include additional time in examinations, materials in an alternative format, accessible rooms, equipment or aids (such as assistive technology software or ergonomic aids)

What is a competence standard?

All courses will have competence standards that students must meet. The Equality Act defines a 'competence standard' as an academic, medical, or other standard applied for the purpose of determining whether or not a person has a particular level of competence or ability. All RVC students on professional degrees leading to clinical qualification as either a veterinary nurse or veterinary surgeon must also meet the appropriate professional standards of their programme of study e.g. RCVS day 1 competencies.

There is no duty to make reasonable adjustments to the application of a competence standard, however, such a duty does apply to the process by which competence is assessed. Therefore, although the RVC has no duty to alter a competence standard, we will consider whether a reasonable adjustment could be made to some aspect of the process by which it assesses a competence standard.

For example, skills assessed in practical lab sessions, presentations, OSCEs or rotations may well be a competence standard that is not subject to reasonable adjustment, however reasonable adjustments may be made to the way those standards are assessed.

Health and Safety

Health and Safety requirements supersede the duty to make reasonable adjustments so the RVC cannot consider any adjustments that would pose a risk to the safety of any members of the RVC community.

Student responsibility

Students are responsible for:

- disclosing a disability at the earliest opportunity.
- providing supporting evidence of disability e.g. medical evidence/dyslexia assessment reports.
- informing the Disability Adviser at the earliest opportunity about any problems with their provision or if their circumstances, status or course details change.
- applying for the Disabled Students' Allowances (DSA) where eligible and appropriate.
- arranging and attending any appointments to discuss and review their support with the Disability Adviser

Students on courses leading to professional registration e.g. BVetMed or Veterinary

Nursing) may be referred to the Fitness to Practise procedure if they:

- fail to disclose information on application or enrolment which would have an adverse impact on their medical fitness to study and on their ability to practise safely and/or competently;
- have an undeclared physical or mental health condition which affects their performance and may, therefore, put themselves or others at risk;
- do not declare any subsequent issues which may have a negative impact on their medical fitness to study and/or ability to practise safely and/or competently.
- do not engage with Occupational Health as part of the pre-entry process or if referred by the RVC where there are concerns for their physical and/or mental wellbeing or where additional expertise is required to identify reasonable adjustments in a professional environment.

Students on non-professional courses may be referred to the Student Performance and Development procedure for consideration of their fitness to study in the same circumstances.

Occupational Health Assessment (OH)

The RVC seeks advice from its contracted Occupational Health services regarding students' medical fitness to study. All RVC students undertake an OH screening as part of the pre-entry process. Any students declaring a disability during the OH screening process are automatically referred to the Advice Centre who can follow up to discuss and arrange support.

Students applying for courses leading to professional registration should be medically fit to enrol on the course and to be able continue with their studies if there is a change in their health during the course. RVC students are, therefore, required to disclose health conditions for Occupational Health screening, and have a continuous duty to disclose any health conditions which emerge subsequently for medical fitness purposes.

The purpose of this service is to ensure that our students able to meet the physical and mental demands of their particular course of study, which can include time spent off-campus on teaching placements. The use of an external OH provider also serves to fulfil the RVC's moral and legal obligation to ensure the safety, security and well-being of our students that constitutes our duty of care and highlight the need for any reasonable adjustments.

Medical fitness is determined by the physical and psychological functioning of the student balanced with the functional requirements and competences of the course, taking into account potential risks to the student, patients under their care and others. In the determination of medical fitness, reasonable adjustments may be recommended by Occupational Health to support the student to meet medical fitness in practise. Students have a duty to allow information on such reasonable adjustments to be shared with the RVC where without the implementation of those adjustments, the student would not be medically fit to engage in the practice placement activities.

Medical fitness encompasses a wide range of criteria including evidence of immunity, mobility, upper limb function, vision, hearing, speech, literacy and numeracy, skin function, interruption of consciousness, concentration, awareness, memory and the ability to learn

and understand.

Enrolled students may be referred to Occupational Health where there are concerns for their physical and/or mental wellbeing or where additional expertise is required to identify reasonable adjustments in a professional environment. The RVC will endeavour to implement any subsequent recommended reasonable adjustments. Where the recommended adjustments are not considered reasonable (e.g. if they would compromise academic or professional standards) the RVC reserves the right to not implement them. In these cases students will be informed of the reasons and alternatives will be considered.

Anticipatory duty

The RVC anticipates the needs of students with disabilities in our delivery of teaching and learning. Examples include:

- The use of lecture capture software
- Access to lecture materials via RVC LEARN
- The design of our OSCE assessment
- Accessible buildings (e.g. lifts/ramps, induction loops)
- Networked assistive technology
- The Clinical Skills Centre has specific support for neurodivergent students

The RVC requires Equality Impact Assessments (EIA) to be carried out on all new and existing policies and procedures. These are helpful in identifying whether any policies or procedures would disproportionately disadvantage certain groups of users and enable Professional Services and Academic Departments to consider anticipatory adjustments.

Confidentiality and Disclosure

Under the Equalities Act 2010, if a student declares a disability (this covers learning difference, long term mental health conditions and chronic health conditions) to a member of staff they are deemed to have declared to the RVC and should be referred directly to the Advice Centre in order that appropriate additional support can be considered. Where a student does not have a diagnosis of disability, but evidence of a disability is apparent from the student themselves, for example through their behaviour or language, the education provider is deemed to have knowledge of the student's disability and should make reasonable adjustments.

If staff become aware of a student with a disability they should advise the student to contact the Disability Adviser as soon as possible and where possible should contact the Advice Centre at disability@rvc.ac.uk to give them the details of the student so that they can follow up. Please refer to the 'Disability Disclosure Guidelines' for further information.

RVC students are given multiple opportunities to disclose a disability. These include:

- on application to the RVC
- during the Occupational Health pre-entry screening process
- during the AHEMS/EMS and Rotation administrative processes
- Contact from the Exams Office directing students who may need Examination Adjustments to contact the Advice Centre

Students are encouraged to disclose a disability at the admissions stage so that the RVC can prepare and assess the relevant support appropriate to the student in advance of commencing their course.

Every student registering with the Advice Centre will be required to complete a Confidentiality Consent form confirming that they give consent to share information with relevant staff in order for the RVC to make reasonable adjustments for them. The Advice Centre will not discuss a student's case with a third party unless we have specific consent from the student to do so or if we have to break confidentiality in cases of risk.

Students who do not agree to full consent to share information will be advised that in some circumstances it may not be possible to implement reasonable adjustments.

Non-Disclosure

The RVC cannot be held responsible for failure to make reasonable adjustments beyond our anticipatory duty if a student chooses not to disclose a disability or we did not know and could not reasonably be expected to know that the student was disabled.

Students may choose to inform a member of staff about a disability in confidence and request for this information not to be passed on or used. Any request for confidentiality should be adhered to. Please see the Disability Disclosure Guidelines for detailed guidance on how this should be managed. No information can be disclosed without a student's permission except under exceptional circumstances.

Identification and implementation of reasonable adjustments

Students with disabilities or a specific learning difference should register with the Advice Centre in order to access the full range of support available to them.

Students are only registered with the Advice Centre once they have provided appropriate evidence of a disability or learning difference (unless the student's disability is obvious or if they are awaiting a diagnosis of a disability in which case medical evidence will not be required) and have agreed and signed a Reasonable Adjustments Form (RAF) after discussion with a Disability Adviser. The RAF sets out the recommended reasonable adjustments that should be made for a student and is completed by the Advice Centre based on any medical evidence provided by a student and subsequent discussion with that student about their needs. Advice may also be sought from academic colleagues about course competence standards to help determine suitable reasonable adjustments.

As part of the assessment of reasonable adjustments students may also be referred to Occupational Health and/or the Corporate Health and Safety team to conduct Personal Emergency Evacuation Plans and/or Study Risk Assessments as required. The outcome of these referrals will help inform the reasonable adjustments that will be considered.

The agreed Reasonable Adjustments Form is communicated to relevant staff who are responsible for implementing the identified reasonable adjustments.

Senior Tutors, Academics and Advice Centre staff may also meet with students to discuss and agree reasonable adjustments in the clinical environment through the Student Performance and Development process. This will include consideration of any information from Occupational Health/Health and Safety as appropriate. Agreed reasonable adjustments will be added to the students Reasonable Adjustments Form and circulated to

relevant staff for implementation.

Where a student does not have a diagnosis of disability, but evidence of a disability is apparent from the student themselves, for example through their behaviour or language, the RVC is deemed to have knowledge of the student's disability. Staff members who become aware of a possible disability should take steps to determine whether a student may have a disability and whether to put reasonable adjustments in place. Such steps may include consideration of what the student says about their disability or health condition and how they present when speaking to staff and peers. Their behaviour may also be taken into consideration, for example, attendance at lectures, submission of work, general engagement with courses and other activities and whether there are discrepancies between certain modules or formats of assessment. If it is determined that a student may need adjustments to be made urgently so they can access their learning or assessments without being disadvantaged reasonable adjustments can be considered without the need for a Reasonable Adjustment Form or supporting medical evidence. Any reasonable adjustments made in these circumstances should be notified to the Disability Adviser. The student should also be referred to the Disability Adviser to discuss other aspects of support that may help and to complete a Reasonable Adjustment Form so that any adjustments made can be captured and put in place for the remainder of the student's course. Staff should contact the Disability Adviser for advice as necessary.

Where reasonable adjustments cannot be identified or implemented due to professional requirements, cases may be escalated to the Fitness to Practise procedure for additional consideration. This will occur when all reasonable steps have been taken to identify adjustments that will support the student and maintain professional competence standards e.g. staff with the relevant academic and support expertise have been consulted, liaison with professional bodies for any matters needing clarity has been undertaken.

The support outlined on a student's Reasonable Adjustment Form remains in place for the duration of the student's programme of study. If a student changes course or completes a course and enrolls onto a different programme of study they must inform the Advice Centre so that their support arrangements can be amended and recirculated as appropriate.

Issues with support

Students and staff are advised to contact the Disability Adviser at the earliest opportunity if there are any issues with the implementation of the recommended support.

In the event that RVC departments are unable to make the recommended adjustments or have queries regarding the Reasonable Adjustments form they should contact the Advice Centre so that this can be explored further and, where necessary, alternative arrangements made.

Students who experience difficulties on AHEMS/EMS/Placements or Rotations should contact the Advice Centre. The Advice Centre will then liaise with the relevant offices to review the situation and explore what actions can be taken to alleviate the issues. This may include updating the Reasonable Adjustment Form, organizing a meeting with the student and relevant office to discuss the issue further or referring the matter to the Student Performance and Development procedure for additional consideration.

Fitness to study/practise

Where a student's health deteriorates and there are concerns about their welfare, the

welfare of others or their ability to manage the demands of the course they may be referred to the Student Performance and Development Procedure and/or the Fitness to Practise process depending on the nature of the concerns and the current requirements of their programme of study.

Reasonable adjustments will be made to these processes as needed to enable students to fully engage with them.

Temporary injuries/health conditions

Students experiencing temporary physical difficulties should contact the Disability Adviser, disability@rvc.ac.uk, to discuss what adjustments can be made for them whilst they recover.

Support in Exams/Assessments

Please refer to the Examination Adjustment guidelines

Assistance dogs

Please refer to the RVC Assistance Dog policy

RVC Accommodation

Priority for RVC Accommodation is given to students who require continuous residency at one location due to specific requirements that are a result of a disability or chronic health condition. These include:

- Physical disabilities that require adapted rooms/equipment or where travelling/commuting may exacerbate their condition.
- Vision and hearing impairments where specialist safety equipment is required e.g. specialist fire alarms and cooking facilities
- Autism where this had significant impact on social confidence and/or independent living skills.
- Severe mental health difficulties where safeguarding might be a factor.
- A limited number of severe health conditions such as Crohn's Disease where the need for proximity to campus is paramount.

Disabled Students Allowance

Students with disabilities or specific learning difficulties may be eligible for support from the Disabled Students Allowance (DSA). It is the student's responsibility to apply for the Disabled Students Allowance and the RVC is not responsible for the decision on a student's eligibility for DSA funding, the timescale of the application nor the support recommended through the DSA as these are decided by the funding bodies themselves. However, the Advice Centre can provide advice and guidance to students to assist them through each step of the process.

The RVC will not fund support for students that could be funded through the DSA (or any other statutory fund).

Full details on the Disabled Students Allowance can be found at:

<https://www.gov.uk/disabled-students-allowances-dsas/overview> for students applying to Student Finance England

The Advice Centre will provide the following support to students/applicants:

- At each available opportunity the Disability Adviser will advise students on the available support from the Disabled Students Allowance, information on the DSA is also provided pre-entry.
- During an appointment the Disability Adviser will advise the students about the support available from the DSA, the funding body they need to apply to, the application process, the evidence needed to apply and the timeframe of the DSA process and can assist students with completing the application form. They can also advise students on any financial contribution that they may need to make in line with DSA regulations and discuss any available means-tested funding available.
- The Advice Centre will stamp section 5 of the DSA form for part time and postgraduate students and those full time students only applying for DSA. It is the student's responsibility to keep the Advice Centre informed about the progress of their application. The Disability Adviser can liaise with funding bodies on the progress of a student's application where the student has given 'consent to share' to the funding body and has asked Disability to follow up the progress of their application. Consent to share can be given on the DSA application form itself or by the student completing a consent to share form and submitting it to the funding body if they had not given consent on the application form.
- Where a student has considerable need for urgent support the RVC may cover the costs of the support on an interim basis whilst the student awaits confirmation of their DSA funding. The decision as to whether interim support will be funded will be made on a case by case basis.
- The Advice Centre can advise students with regard to arranging DSA needs assessment appointments at assessment centres. Needs assessments are where an independent assessor recommends the support that should be funded through the students DSA.
- The Disability Adviser can explain and give advice to students on DSA needs assessment reports and DSA confirmation of funding letters
- Where a student has given consent, the assessment centre will email a copy of the DSA needs assessment report to RVC. The institutional recommendations section of a needs assessment report gives advice on the reasonable adjustments that the RVC may consider but it is for guidance only and it is the decision of the Disability Adviser as to what reasonable adjustments are outlined on a student's Reasonable Adjustments Form.

Support for students not eligible for DSA funding or exceeding the maximum funding for DSA

EU students, overseas students and other students who do not meet the general eligibility criteria for student finance will not be able to apply for DSA. Students who are not eligible for DSA cannot expect the same level of support as that provided through the DSA.

The RVC will offer a package of support for those not eligible for DSA which may include specialist software, specialist mentoring and/or specialist study skills support.

The RVC will comply with the “reasonable adjustments” provisions of The Equality Act 2010 which require us to consider whether we can pay from our own resources, those support costs of any enrolled student which cannot be met from DSAs or some other external funding source. Any DSA-eligible student will be required to submit to a completed application for maximum available DSAs, or evidence of having directly submitted such an application to the funding body; we will then be able to consider how much the RVC can pay for any predicted costs gap between their assessed DSA qualifying costs and maximum funding available from DSAs/other external sources.

In accordance with budget constraints, it may be necessary for us to set an indicative upper limit on the total amount which the RVC would be able to pay from its own resources for a given student in a given academic year, for support costs which cannot be met from DSAs or some other external funding source. This would include giving appropriate consideration to the ‘reasonableness’ of the costs and will be considered on a case by case basis.

Dyslexia screening process

We recognise that some students will have undiagnosed specific learning differences. We offer free dyslexia screening to help students who suspect they may have a learning difference. Students can contact the Advice Centre, disability@rvc.ac.uk, to request a screening and will be sent joining instructions for our online screening software and directed to make a follow up appointment with the Disability Adviser once they have completed the screening.

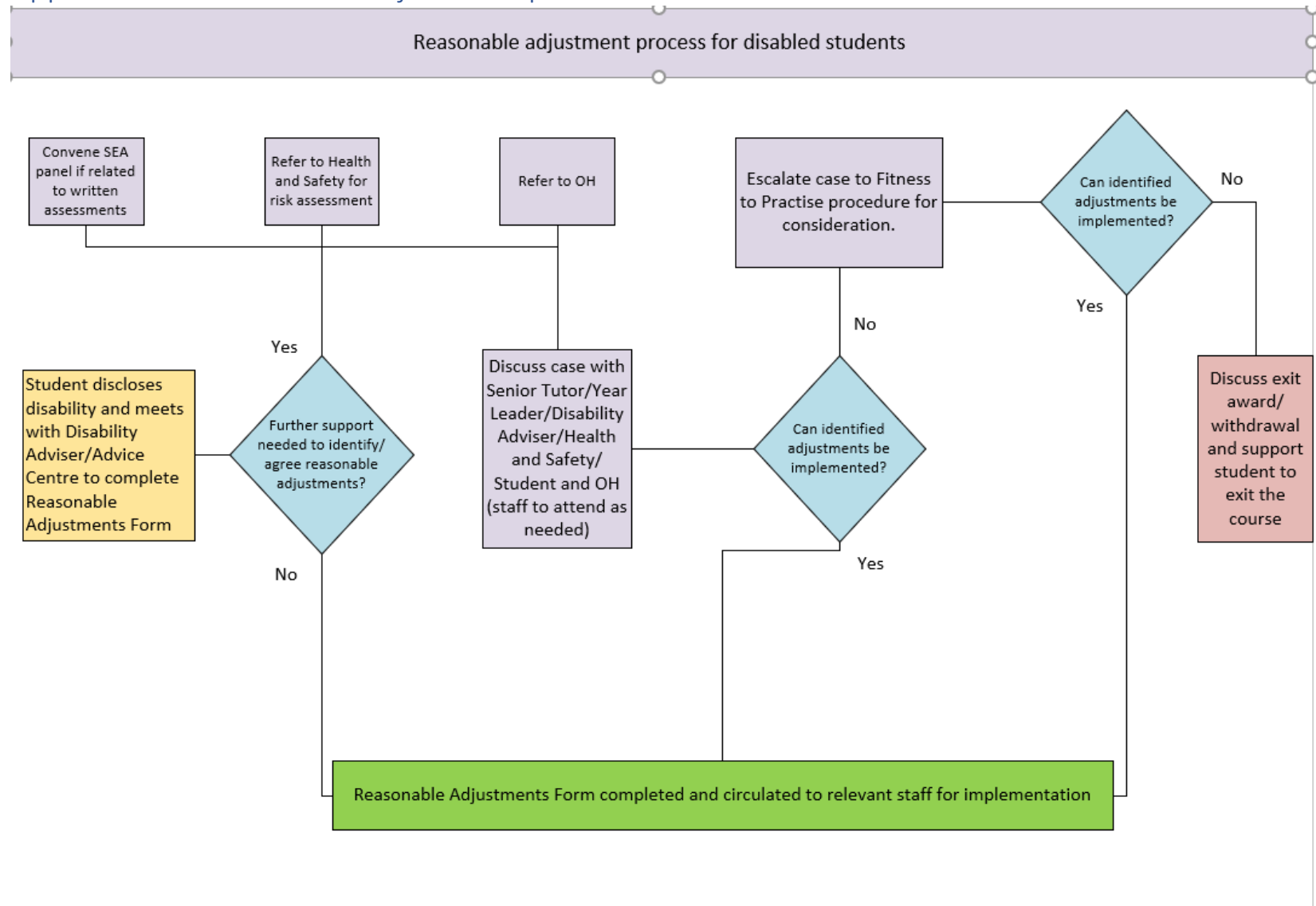
Depending on the screening outcome we can advise students on obtaining a full diagnostic assessment. Those subsequently assessed as having dyslexia/specific learning difference will be eligible for support as outlined in this document.

Recording support

The Advice Centre keep detailed records on our interactions with students to maintain a clear audit trail and ensure that support is provided as effectively and efficiently as possible. This will include details of communications and any relevant documents e.g. evidence of disability/learning difference/mental health, DSA documentation.

Records are kept in accordance with the RVC Data Protection Policy.

Appendix 1 – Reasonable Adjustment process



Appendix 2 Evidence needed for students to register with the Advice Centre/receive support via the Disabled Students Allowance

Students must provide medical or other evidence in English. Where a student has evidence in a different language it must be translated into English by a qualified transcription service and formally authenticated in order for us to put support in place. The original translation must also be submitted and all documents must be signed.

RVC will not pay your doctor or medical specialist for any letters of evidence you require.

The below list is not exhaustive and is an example of the sorts of information we and funding bodies like the DSA's may require.

Specific learning difference e.g. dyslexia or dyspraxia

If you have a specific learning difference you will need to provide evidence in the form of a diagnostic assessment from an Educational Psychologist or suitably qualified specialist practitioner.

If you don't already have a formal diagnosis of a specific learning difference we can offer an initial screening and assist you through the process of getting a full assessment if appropriate.

Mental health conditions, physical or sensory impairments, or medical conditions

You will need to get a letter from your doctor, consultant or other medical professional/specialist stating:

- Your diagnosis
- Whether your condition is long/short term
- The effect your condition may have on engagement with your studies at the RVC and the impact, if any, it has on day-to-day activities
- Or alternatively, get the '[DSA Disability Evidence form](#)' completed by your GP

Autistic Spectrum Conditions and ADHD

A letter or diagnostic report completed by a medical professional, e.g. consultant psychiatrist or clinical psychologist

If you do not have a letter or diagnostic report, we recommend that you ask your GP or relevant health professional to complete the DSA Disability Evidence Form