

D 4. STUDENTS NEEDING ACCESS SUPPORT (INCLUDING BECAUSE OF DISABILITY)

For students on programmes and awards validated by the Plymouth University this section of the Consolidated Academic Policies and Regulations (CAPR) has been agreed by the University (as the awarding institution) as meeting its regulatory requirements for students needing access support (including because of disability). The shaded sections below form GSM London regulatory and policy framework as applied to Plymouth University and GSM awards

Related guidance and codes of practice can be found at the QAA Code of Practice, Admissions in Higher Education. Chapter B2 Recruitment, Selection and Admissions to HE and Inclusive Teaching and Learning in Higher Education as a Route to Excellence.

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/587221/Inclusive Teaching and Learning in Higher Education as a route to-excellence.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/587221/Inclusive_Teaching_and_Learning_in_Higher_Education_as_a_route_to-excellence.pdf)

Purpose and scope

4.1 This section of the Consolidated Academic Policies and Regulations (CAPR) explains what access support is; how the College manages disclosure; and how adjustments made be made to programmes and assessments to provide access.

4.2 These regulations apply to all applicants, prospective and current students and any disclosure regardless of the date of the event giving rise to the disclosure.

NOTE: The College cannot ensure it makes suitable adjustments in line with the Equality Act 2010 if the student does not disclose or limits disclosure of any known access need (including disabilities). The College will make clear how any limitation or non-disclosure may affect or has affected any adjustments to a programme or assessments.

NOTE: There are limitations on what adjustments can be agreed. The College will only agree adjustments that can actually be done within the College's financial and human resources and have proved effective in helping a particular student or group of students to overcome barriers related to their access needs without advantaging them in any way.

Definitions

4.3 'Disability' means a physical or mental impairment that in the long term negatively and substantially affects a person's ability to do normal daily activities.

4.4 'Access support' means any equipment, facility or service that helps a person overcome barriers related to an impairment or disadvantage that affects their access to particular services or ease in completing a task.

4.5 In these regulations, 'reasonable' means something that can actually be done within the College's resources and effectively helps a student or group of students with access needs.

Introduction

Overview

- 4.6 The College aims to promote a culture where every student has a fair and equitable chance of success; where all members act responsibly to uphold the College's beliefs in social justice and inclusion; and where public confidence is maintained in the integrity of its awards.
- 4.7 However, while all students are admitted to a programme because they can benefit from and achieve the intended learning outcomes, they may also have a range of access support needs, including:
- (a) physical access – including mobility disabilities;
 - (b) learning access (including online learning access) – including specific learning difficulties or social disabilities;
 - (c) social access – including homelessness or leaving care;
 - (d) educational access – including educational disadvantage or mental health; or
 - (e) personal access – including caring or parental responsibilities.
- 4.8 Additionally, students may not have specific access support needs but have experienced discrimination or disadvantage – because of age, identifying as transgender, sexuality, disability, being pregnant or having a child, ethnicity, race or nationality, sex or gender, or religion and belief – which may affect their ability to fully benefit from their chosen programme or achieve its learning outcomes without specific support. Where their experiences have had significant adverse effects, the College may provide adjustment.

Principles

- 4.9 The College aims to offer a supportive, inclusive and enabling environment for all students with access needs. However, it is important that such students take responsibility for helping the College to support those needs.
- 4.10 The College expects that students with access needs including disabilities who are admitted to a programme will achieve its core learning outcomes. They are therefore assessed on the same learning outcomes as other students on the programme and will generally do the same designated assessment tasks as them.
- 4.11 The College will not generally make retrospective adjustments to assessment or other provision within the programme if a student has not disclosed a disability or access need. If a student is affected by an access need or disability (or this is diagnosed) after the programme starts, the College will generally make suitable adjustments retrospectively if the student discloses the disability or access need.

D.4. Students Needing Access Support (Including Because of Disability)

Adjustment to assessment

- 4.12 Exceptionally, the College and the student may agree that – although the student’s disabilities do not prevent achievement of the programme’s learning outcomes as a whole – there are specific outcomes, at the module level, which the student cannot demonstrate because of their access needs.
- 4.13 If the College is clear that these individual module learning outcomes are not essential to the programme’s overall learning outcomes, the College and the student may agree a form of alternative assessment. This assessment will seek to assess whether a student meets all necessary module outcomes in a different way than the assessment outlined in the module handbook.
- 4.14 Such arrangements must consider the integrity of the assessment process and the fair and equitable chance of success of all students on the module including past and future cohorts. In particular:

- (a) if the College grants a student more time to complete an assessment, this should not go beyond the date when other students receive feedback on it;
- (b) if a student wants more time than (a) allows, the College should develop an alternative form of assessment; and
- (c) more time cannot be given for any ‘live’ assessment (e.g., a presentation) that requires other students to attend. Neither can the date of an assessment involving other students be rescheduled to give a student more time. In these circumstances, the College will develop an alternative form of assessment. The new format could be, for example, a piece of written work, a recording of the presentation or a viva voce (verbal question-and-answer) examination.

- 4.15 If the College agreed an adjustment to the assessment format but did not implement it appropriately, the student may have reason to request a review of the conduct of the assessment by the Board of Examiners.

Procedures

Overview

- 4.16 The process for supporting a student with access needs contains four stages:

- (a) Stage 1 – Informing the College.
- (b) Stage 2 – Considering the access needs.
- (c) Stage 3 – Developing an IGRAS statement.
- (d) Stage 4 – Monitoring, review and unforeseen circumstances.

Stage 1 – Informing the College

D.4. Students Needing Access Support (Including Because of Disability)

- 4.17 Students are strongly advised to inform the College at the earliest possible opportunity if they have any known access needs including disability, condition (seen or unseen) or experience that may affect their learning experience or ability to do set assessments.

NOTE: The College must ensure it gives regular encouragement and opportunity for disclosure at the point of application, registration or enrolment, induction and throughout a student's study.

- 4.18 The College recognises that many students who are considering disclosure of access needs will have concerns, anxieties or difficulties about it. The College encourages all students to find the most suitable support within and outside the College to help them disclose these matters. The College Wellbeing Team can provide a confidential support and advice service to students.

- 4.19 Following initial disclosure the College will discuss with the student, and the students helper if required, confidentially about access needs. The student will always have control over who has access to any disclosed information.

Stage 2 – Considering the access needs

- 4.20 Following a student's disclosure, the College will ask the student how they would prefer their access needs to be considered and assessed. Generally, this will involve a member of the Learning Support and Wellbeing Team. Other members of staff may support the student in the process.
- 4.21 The College will usually request a meeting or series of meetings with the student to fully understand the student's access needs. As part of this process, the College may request written confirmation from a medical practitioner or a chartered psychologist/licensed specialist practitioner of any disability, or ask another suitable authority to help it fully understand the student's access needs.
- 4.22 If the student agrees, the College may suggest the development of an Integrated Guidance Report on Access Support (IGRAS). This will outline how the student's needs could be met through the College's procedures and arrangements. Each IGRAS is unique and relates specifically to the individual circumstances of the student.
- 4.23 If the College thinks an IGRAS is not suitable, it may suggest other more informal methods to the student. These include support from people or groups outside the College.

Stage 3 – Developing an IGRAS statement

- 4.24 If the student agrees, the Learning Support and Wellbeing Team, the student and any professional advisors will discuss and collaboratively develop the IGRAS. The IGRAS will say how the College will support the student in the following areas:

- (a) Physical access.
- (b) Learning access.

D.4. Students Needing Access Support (Including Because of Disability)

- (c) Social access.
- (d) Educational access.
- (e) Personal access.

4.25 When writing the IGRAS, staff should consider and anticipate all assessments and other activities that could be affected throughout the programme – not just for the current academic session – including required activities and events such as field trips and placements that are part of the curriculum.

4.26 In developing an IGRAS, the College and the student will discuss what reasonable adjustments may be made. However, any arrangements in an IGRAS must reflect:

- (a) the integrity of College processes;
- (b) the fair and equitable chance of success of all students on the programme including past and future cohorts; and
- (c) the full programme's learning outcomes and assessment criteria.

Guidance on IGRAS

The College provides full guidance on developing an IGRAS, but in general it must specify clearly any adjustments.

Some examples are:

- Help from another person, typically to provide communication support, for example a BSL interpreter. The support worker's remit must be clearly specified, as must the way tutors will be informed about their presence.
- Extra sessions on an individual basis for a short period of time or throughout the student's study.
- Allowing rest breaks or specialist timetables.
- Providing large-print handouts or recordings of seminars or lectures.
- In-class reading materials to be provided in advance of class, where possible.
- Provision of equipment not available to other students doing an assessment.

All students must comply with the College's policy about recording lectures. The intellectual property in the recording belongs to the people who created the recording's content (usually the College), not the student making the recording.

4.27 As part of this process, the College may request written confirmation from a medical practitioner or a chartered psychologist/licensed specialist practitioner of any disability, or ask another suitable authority to help it understand whether a particular adjustment is needed or useful.

4.28 With assessments, the IGRAS will specify whether or not the student is eligible for:

- (a) another person's help, typically to provide communication support, for example a signer or amanuensis. The support worker's remit must be clearly specified to ensure that the College assesses the student's own work without material input from the support worker;
- (b) a defined period of additional time to complete written assessed work;
- (c) an alternative format of assessment for specified types of assessments;
- (d) the use in the assessment task of equipment not available to other students;
- (e) the application of specific marking guidelines for poor written English, communication weakness and presentation weakness arising from a disability that do not materially affect the demonstration of achievement of the learning outcomes; or
- (f) more time for timed assessments (e.g., tests/examinations), which normally will be no more than 100%.

No other adjustments to assessment will be permitted, except with the approval of the Chair of the Academic Board.

4.29 In an IGRAS, all proposed adjustments to a programme or assessment must specify the date on which they will be effective, and must provide reasonable time to make the adjustment. At minimum, an adjustment will only be valid from final approval, and the College must make this clear to the student when the IGRAS is being developed.

4.30 Once a proposed IGRAS has been prepared it must be finally approved. For final approval, the report must be signed by the student and the relevant programme leader.

4.31 A copy will be held by the Learning Support and Wellbeing Team. A copy will go to the student and relevant Departments (e.g., IT Services, Examinations and Assessment, Student Advisory).

Stage 4 – Monitoring, review and unforeseen circumstances

4.32 Each IGRAS will be reviewed annually (or more often if thought necessary and specified in the statement) by the Learning Support and Wellbeing Team.

4.33 If a student's access needs or their consequences change during the programme, the student is responsible for informing the College of this and requesting a review of the IGRAS.

4.34 Students with access needs may claim that unforeseen circumstances have affected their assessment, regardless of their use of an adjustment to the assessment format or more time being given. The College recognises that despite being given a reasonable adjustment, the student may be affected by circumstances they cannot control such as illness or bereavement.

D.4. Students Needing Access Support (Including Because of Disability)

4.35 Students who have chronic or long-term conditions that vary over time and periodically become more acute should submit extenuating circumstances if they feel that the change in their condition affected their assessment and they did not ask for more time or another adjustment to the assessment format in advance. The College will need to see evidence from a medical practitioner confirming that the student's condition became more severe during the assessment period.

Students may also wish to see the College Fitness for Study policy

https://www.gsmlondon.ac.uk/assets/files/20180205_100637.pdf

Advice and support

4.36 Advice for students on access support including because of a disability, and the associated lower-level College rules, is available from the Student Hub or the GSM London Students' Union (gmsuadvicecentre@gsmlondon.ac.uk). More complex queries may be referred to appropriate individuals.

4.37 Advice for staff on access support for student including because of a disability is available from their nominated Academic Policy Partner.

4.38 Any staff development needs – particularly on supporting individual students with access needs and making relevant adjustments – may be discussed with the Learning Support and Wellbeing Team and the Staff and Educational Development Team.

Fees

4.39 No additional fees or charges are associated with assessment or adjustment under this policy

4.40 However, students who request alternative assessment formats or have other support needs (for example, a signer), but who without College authorisation do not attend classes or submit for assessment may be liable for any costs the College incurs in providing that support. This is in addition to any academic penalty the College may apply for non-attendance at or non-submission of an assessment.

4.41 The College is not liable for financial or other consequences arising from action under this policy.

Legal and regulatory context

4.42 This policy has been informed by the UK Quality Code for Higher Education (UKQC), "Chapter B4: Enabling Student Development and Achievement". The UKQC is the definitive reference point for all UK higher education institutions and sets out how academic standards are established and maintained and how the quality of learning opportunities is assured and enhanced.

4.43 This policy has been developed having regard to the principles and obligations outlined in the Equality Act 2010, and the College's duties for the safety and security of all members and

D.4. Students Needing Access Support (Including Because of Disability)

visitors under the Health and Safety at Work Etc. Act 1974, and under the statutory regulations made under this act.

- 4.44 The College may not be bound by the principles and this policy alone may not provide the procedure to meet all of these principles, some of which may be met by other College policies and procedures.. It uses the principles as guidance only, to help it deal soundly with these matters.

Enforcement, monitoring and review

- 4.45 If any person or body in the College refuses to comply with a request or decision made to enforce this policy, their refusal must be reported to the Academic Registrar, who will take such action to enforce this policy as they think necessary.
- 4.46 Each year, the College must receive a report that enables it to monitor, identify and act on any shortfalls in how this policy is interpreted and applied.
- 4.47 The annual report must include statistical data, where available, on numbers of disclosures and requests submitted; the outcomes of the requests; Departments and programmes to which they refer; the length of the process; and the equality characteristics (including sex and ethnicity) of those submitting concerns.
- 4.48 Every three (3) years, the College must review this policy to ensure that:
- (a) it remains up to date and continues to meet the expectations of the UK Quality Code, applicable legislation or guidance;
 - (b) areas of improvement, or any concerns, raised by students, external examiners, or professional bodies have been addressed; and
 - (c) opportunities to reduce unnecessary bureaucracy have been taken.

Schedule (not part of the policies and regulations):

Responsible Officer: Academic Registrar
Approved by: Board of Directors and Academic Board
Version: 2.0
Date: June 2017
Monitoring and Review Body: Academic Regulations and Awards Committee
Effective From: July 2017
Next Scheduled Review: June 2019