

As a public sector organisation, GSA has a legal duty under the Equality Act 2010 to assess the impact all of its new or revised policies, practices, procedures or projects may have on protected groups (as defined by the Act).

The purpose of this assessment is to use relevant evidence and critical thinking to identify any impact (positive, negative or neutral) the policy, practice, procedure or project that is being assessed may have on the people it affects or is intended for.

The EqIA is a tool which helps mainstream equality into everything GSA does. It requires us to consider how we can mitigate or eliminate negative impact and, in turn, advance positive outcomes. Therefore, it must be undertaken during the development / review of the policy, practice, procedure or project it refers to and not after it has been finalised. Ideally, EqIAs should be a team effort of relevant parties to ensure a variety of perspectives have been consulted. All finalised EqIAs must be signed off by an executive lead and either the Head of Student Support and Development or GSA's Equality Officer, however, support from the Equality Officer is available at any stage of completion.

Further guidance on how to complete an EqIA can be found on GSA's website and the Equality and Diversity section on the staff intranet. If you have any additional questions, please contact [equality@gsa.ac.uk](mailto:equality@gsa.ac.uk).

<b>Name of Equality Impact Assessment</b> (E.g. Area of decision making/title of policy, procedure, programme or relevant practice)	Reasonable Adjustment Policy and Procedure
<b>New or reviewed</b>	Reviewed
<b>Owner/Review Lead and role</b>	Julie Grant – Head of Student Support and Development
<b>Department or School</b>	Student Support and Development
<b>Date of assessment</b>	September 2022

### 1. Purpose of policy / practice / procedure / project being assessed – brief description

The Glasgow School of Art [GSA] seeks to provide equal access for all students, including those who are disabled, through inclusive design where possible and, otherwise, through reasonable adjustments. This commitment builds upon the foundation of equality legislation and anti-discrimination guidance.

In 2022 the Individual Requirement Policy and the Individual Requirement Form (IRF) was replaced with the Reasonable Adjustment Policy and the Reasonable Adjustment Report. The Reasonable Adjustment Report communicates the specific learning needs and 'reasonable adjustments' that are

required to ensure that an individual student receives appropriate specific learning support and is not disadvantaged in the learning environment, as a consequence of their disclosed needs.

The purpose of this policy is to:

- a) Inform students of how to access support;
- b) Support GSA in complying with the requirements of relevant legislation (Public Sector Equality Duty under the Equality Act 2010);
- c) Clarify where responsibility lies for the identification and implementation of reasonable adjustments;
- d) Outline the necessary steps for the effective implementation of reasonable adjustments.

**2. Evidence used when undertaking this assessment** – this can comprise of internal and external reports, survey data, etc

[Equality Act 2010 \(legislation.gov.uk\)](http://legislation.gov.uk)  
[Disability | Advance HE \(advance-he.ac.uk\)](http://advance-he.ac.uk)  
[Disabled Students in Further Education and Higher Education - Disability Information Scotland \(disabilityscot.org.uk\)](http://disabilityscot.org.uk)  
[Annex A - Key legislation and guidance on disabled students - Disabled students at university: discussion paper - gov.scot \(www.gov.scot\)](http://www.gov.scot)  
[Duty to make reasonable adjustments for disabled people - Citizens Advice Scotland](#)  
[Reasonable adjustments in FE | Disability charity Scope UK](#)  
[Disability rights: Education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)  
[Student-Equality-Monitoring-Report-2020-2021-OFFICIAL.pdf \(gsa.ac.uk\)](http://gsa.ac.uk)  
[GSA Strategic Plan 2022-2027](#)

Student Support internal statistics, as well as formal and informal student and staff feedback have also been considered.

**3. Type of impact by protected characteristic** – please provide details of the potential impact (could be more than just one type); make reference to relevant evidence (from the list you provided above) where applicable

	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
<b>Age</b>	Potential positive impact is expected for all who are experiencing physical or mental health issues related to/caused by a protected characteristic.	Potential negative impact associated with disabled students being perceived as being treated more favourably;	

		Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.	
<b>Disability</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
	All disabled students, regardless of whether they have disclosed their disability or not, are expected to be positively impacted by this policy and procedure as it provides clarity, information and reinstates GSA's commitment to equality of opportunity for disabled students. Hopefully, this policy and procedure will also positively impact disability disclosure rates.	Potential negative impact associated with disabled students being perceived as being treated more favourably;  Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.	
<b>Gender reassignment (covers Trans identities)</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
	Potential positive impact is expected for all who are experiencing physical or mental health issues related to/caused by a protected characteristic.	Potential negative impact associated with disabled students being perceived as being treated more favourably;  Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.	
<b>Marriage and Civil Partnership</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
	Potential positive impact is expected for all who are experiencing mental health issues related to/caused by a protected characteristic.	Potential negative impact associated with disabled students being perceived as being treated more favourably;  Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.	

<b>Pregnancy and Maternity</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
	<p>Potential positive impact is expected for all who are experiencing physical or mental health issues related to/caused by a protected characteristic.</p> <p>If a student requires reasonable adjustment as a result of pregnancy or maternity, this can be implemented using the proposed procedure.</p>	<p>Potential negative impact associated with disabled students being perceived as being treated more favourably;</p> <p>Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.</p>	
<b>Race</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
	<p>Potential positive impact is expected for all who are experiencing mental health issues related to/caused by a protected characteristic.</p> <p>Support is offered to students whose knowledge of the English language is limited or use English as a second/additional language.</p>	<p>Potential negative impact associated with disabled students being perceived as being treated more favourably;</p> <p>Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.</p> <p>Students whose knowledge of the English language is limited or use English as a second/additional language may require additional support to understand the process and procedure. GSA commits to ensuring that staff involved in this process have an awareness of additional barriers faced.</p>	
<b>Religion or Belief</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>
	<p>Potential positive impact is expected for all who are experiencing mental health issues related to/caused by a protected characteristic.</p>	<p>Potential negative impact associated with disabled students being perceived as being treated more favourably;</p>	

		<p>Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.</p> <p>There is sector evidence to suggest that culture can have a significant impact on understanding of, and accessing disability and/or mental health services.</p> <p>During religious festivals there may be some difficulty for students which require minor reasonable adjustment. GSA commit to ensuring that staff involved in this process have a degree of cultural competency.</p>	
<b>Sex</b>	<p><b>Positive impact</b></p> <p>Potential positive impact is expected for all who are experiencing mental health issues related to/caused by a protected characteristic.</p>	<p><b>Negative impact</b></p> <p>Potential negative impact associated with disabled students being perceived as being treated more favourably;</p> <p>Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.</p> <p>There is evidence to suggest that students identifying as male are less likely to access services. Consideration will be given to this and services will be promoted and targeted where possible.</p>	<p><b>Neutral impact</b></p>
	<b>Positive impact</b>	<b>Negative impact</b>	<b>Neutral impact</b>

<b>Sexual orientation</b>	Potential positive impact is expected for all who are experiencing mental health issues related to/caused by a protected characteristic.	Potential negative impact associated with disabled students being perceived as being treated more favourably;  Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.	
<b>Impact on other groups</b> (e.g. Care Experienced; Carers; Military Veterans; Low Socioeconomic Status (SES); Asylum Seekers; British Sign Language Users, etc)	<b>Positive impact</b> Potential positive impact is expected for all who are experiencing issues related to/caused by any of the categories listed.	<b>Negative impact</b> Potential negative impact associated with disabled students being perceived as being treated more favourably;  Students could be concerned with stigma around disability, mental health and other personal circumstances which could prevent them from seeking support.	<b>Neutral impact</b>

**4. How has the identified negative impact been mitigated?** – please provide details of undertaken actions broken down by protected characteristic

It is anticipated that GSA’s approach to supporting students will contribute to the further development of inclusive learning and teaching practice for all.

This policy and procedure will support early intervention and partnership work to identify students that may benefit from accessing additional support.

The potential negative impact in relation to disabled students being perceived to be treated more favourably than other students has been mitigated against by clearly defining GSA’s legal duty to provide reasonable adjustments, as well as what is meant by ‘disability’ and how it is defined under the Equality Act 2010.

The policy and processes also emphasise sensitivity, discretion and confidentiality to mitigate against any student concerns about stigma associated with disability, mental health and any other relevant personal circumstances. Please see the [Student Support and Development Privacy Statement](#) for further information. Point 5.7 of the procedure specifies that *‘If students want their disability information to remain confidential, they will be advised if this will restrict the adjustments that can be made for them. This would be the case if circumstances are such that staff would need to know who students are in order to make the relevant adjustment’*. Additionally, in point 6.4.e it is stated that *‘any external agencies, placement providers involved with the*

*programme of study are informed about, and are able to put in place, the reasonable adjustments necessary to support the student's learning experience' only after obtaining 'the explicit permission of the student'.*

Lastly, GSA has always strived, and will continue to strive to break down stigma associated with any of the protected characteristics and beyond. This will be achieved through continuous awareness raising and communication of relevant internal and external resources to students and staff by utilising any appropriate channels GSA has (staff and student intranet, social media, emails, etc) with the aim to normalise the conversation around these topics and ultimately eliminate stigma and prejudice and advance a culture of dignity and respect.

**5. Any outstanding mitigation (where applicable) – please provide a concise action plan with action owner and a timescale for completion**

<b>Action</b>	<b>Equality Impact</b>	<b>Person Responsible</b>	<b>Time frame</b>
GSA commit to ensuring that staff involved in this process have an awareness of additional barriers faced by students due to intersectionality.	Develop an understanding of intersectionality and the impact this may have.	The Head of Student Support and Development with all team members responsible for accessing relevant institutional training in place.	Ongoing
GSA commit to ensuring that staff involved in this process have a degree of cultural competency in relation to race, religion and belief.	Staff involved in the process will have a degree of cultural competency in relation to race, religion and belief.	The Head of Student Support and Development with all team members responsible for accessing relevant institutional training in place.	Ongoing
Students may not wish to or be able to attend face-to-face meetings, and that adjustments should be made accordingly (e.g. telephone/zoom meetings).	Increase accessibility and remove barrier to potential non-attendance.	All members of the Student Support and Development Team	Ongoing
Explore ways of promoting the policy and procedure	Ensure all students are aware of the support available. Support Services are available, accessible and	All members of the Student Support and Development Team	Ongoing

	appropriate for all students and throughout the academic year		
Students whose knowledge of the English language is limited or use English as a second/additional language may require additional support to understand the process and procedure	Support will be offered at all stages to ensure understanding and removal of any potential barrier.	All members of the Student Support and Development Team	Ongoing

**6. How does the outcome of this assessment and the actions undertaken support GSA's [2021 - 2025 Equality Outcomes](#)**

The Reasonable Adjustments Report policy and procedure and the associated Equality impact assessment support the following GSA Equality outcomes:

*EQUALITY OUTCOME 1: Actively foster and support an organisational culture in which dignity and respect for self and others is understood and practiced, where confidence is encouraged and promoted, and where ignorance, prejudice and bias is challenged.*

- It is hoped that the RAR policy and procedure will advance equality of opportunity for all students and will thereby support the development of a culture of dignity and respect where all students and staff feel safe.

*EQUALITY OUTCOME 2: Continue to evaluate our physical and digital environment, aiming to optimise accessibility and inclusivity by acknowledging and providing for the needs of our students, staff and stakeholders.*

- The RAR policy and procedure contributes to GSA's goals for inclusive design and advancing both physical and digital accessibility.

*EQUALITY OUTCOME 3: Actively build and support a staff population which is more reflective of the Scottish population and encourage a diverse student body.*

- It is hoped that this policy and procedure will ensure prospective students that they will be supported in their learning journey.

*EQUALITY OUTCOME 4: Improve lifelong outcomes for students by identifying and supporting those groups facing persistent inequality throughout and beyond their student learning journey into positive destinations.*

- The RAR policy and procedure's aim is to support students into fulfilling their full potential, and ultimately advance attainment figures.

*EQUALITY OUTCOME 5: Develop a comprehensive and robust equality and diversity data set which enables us to identify gaps, inform action, assess progress and measure impact for each Equality Outcome.*

- The frequent reviews of the policy, procedure and any adjustments made will provide valuable data which will help inform further actions and practice.



**7. How does the outcome of this assessment and the actions undertaken support the three main duties GSA has under the Equality Act 2010 [Equality Act 2010](#) to:**

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity;
- foster good relations between people who share a relevant protected characteristic and those who do not?

The Reasonable Adjustments Report policy and procedure and the associated Equality impact assessment support all three of the GSA's duties under the Equality Act 2010 – please see section 6 above.

**8. Where/when will action progress and outcome be reported and reviewed?**

Any actions related to staff training will be progressed via the career review process.

All other actions will be reported and reviewed using the GSA Programme Monitoring Annual Review process (PMAR) .

**Next review date** – please consider any outstanding actions outlined above; the review period must be in line with the policy/service review and/or at intervals of no more than three years

September 2025

<b>Signed off by Owner/Review Lead</b>	Julie Grant; Head of Student Support and Development	20.09.2022
<b>Signed off by Executive Lead</b>	Allan Atlee, Deputy Director Academic	22/09/2022
<b>Signed off by Equality Lead</b>	Svetoslava Sergieva – Equality Officer	21.09.2022
<b>Signed off by Education Committee</b>		(date)