

REASONABLE ADJUSTMENT POLICY

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THE GLASGOW SCHOOL OF ART
REASONABLE ADJUSTMENT POLICY

Contents

1. Introduction.....	3
2. Purpose	3
3. Legal Context.....	3
4. How to disclose a specific support need and/or access support	5
5. Procedure for identifying and implementing individual reasonable adjustments	5
6. Responsibilities.....	6

1. Introduction

- 1.1 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.
- 1.2 It is recognised that at times students may face personal challenges which may impact on their ability to fully participate in their learning. GSA offers a wide range of professional support services and further details of these can be accessed via [Student Support](#). GSA would encourage all students to contact [Student Support](#) at the earliest opportunity to discuss and agree personalised support strategies to remove barriers to learning where possible. Any reasonable adjustments agreed or updated will be communicated to staff involved in supporting the students' learning via a Reasonable Adjustment Report.
- 1.3 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.

2. Purpose

- 2.1 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;
 - 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.

3. Legal Context

- 3.1 The Equality Act 2010 protects people from discrimination on the grounds of disability and requires that higher education institutions make reasonable adjustments to provision, and practice where this places a person at a substantial disadvantage as a result of their disability.

- 3.2 The Equality Act 2010 defines a disability as:

A person has a disability 'if they have a physical or mental impairment, and the impairment has a substantial and long term (more than 12 months) adverse effect on their ability to carry out normal day-to-day activities'. Whether a person is disabled is determined by the effect the physical or mental impairment has on their ability to carry out normal day to day activities.

- 3.3 The GSA recognises that disabled students are not a homogeneous group but will

have individual needs and challenges. Disability encompasses individuals with physical or sensory impairments, mental ill health, specific learning difficulties, and a range of chronic or fluctuating conditions.

3.4 In addition to making reasonable adjustments for individuals, higher education institutions have a duty to anticipate the requirements of people who use their services and to therefore take steps to ensure that these are designed and delivered in ways that are accessible and inclusive to all.

3.5 It is a legal duty for higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled. The duty arises in relation to all aspects of the student experience, including:

- a) provisions or practices (for example, procedures, policies, course materials, and teaching and assessment methods);
- b) physical features (for example, access to buildings, fixtures and fittings);
- c) providing auxiliary aids or services (for example, equipment, assistive technology or non- medical human support).

3.6 Inclusive design of curriculum content can ensure that accessibility is embedded in activities for all students' learning, teaching, and assessment. GSA acknowledges that disabled people are not a homogenous group and there is a continued requirement for individual adjustments.

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

- a) The effect of the disability or specific learning need on the individual student;
- b) 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;
- c) The practicality of the changes;
- d) Any potential health and safety issues;
- e) The resources available (both those of the GSA and other financial assistance such as the Disabled Students' Allowances);
- f) The type of education/provision or other benefit, facility, or service being provided by the Glasgow School of Art;
- g) The extent to which aids and services will otherwise be provided to disabled students (e.g. local authority support).

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

3.9 There is however a duty to make reasonable adjustments to the way in which a

competence standard is assessed so that disabled students are not disadvantaged as a result of their disability. Reasonable adjustments must not affect the validity or reliability of the assessment outcomes. However, adjustment may involve, for example, changing the usual assessment arrangements or method, adapting assessment materials, providing a scribe or reader in the assessment, and/or re-organising the assessment environment.

4. How to disclose a specific support need and/or access support

- 4.1 Student Support will contact all applicants who have disclosed a disability and have accepted an offer of a confirmed place at the GSA. A registration appointment will be offered with Student Support to discuss support needs and where relevant, complete the Reasonable Adjustment Process.
- 4.2 If students require a parent or guardian present at their registration appointment, please inform Student Support in advance.
- 4.3 If the student discloses to any staff member a medical issue which is likely to constitute a disability (i.e. a physical or mental impairment which has a substantial and long-term adverse impact on their ability to carry out normal day to day activities) then by law (the Equality Act 2010) GSA is 'deemed to know' of the disability. The staff member must then inform the Disability and Learning Development Tutor (via learningsupport@gsa.ac.uk) who will meet with the student to discuss potential support.
- 4.4 Students are also able to self-refer by completing the registration form at <https://live.uniticms.com/gsa/> and they may contact learningsupport@gsa.ac.uk or visit Student Support, 30 Hill St if they require support to register.

5. Procedure for identifying and implementing individual reasonable adjustments

- 5.1 Students will have the opportunity to have a needs assessment to identify personalised reasonable adjustments. In cases where students request support prior to the needs assessment, departmental staff should put interim reasonable adjustments in place in the interim. An adjustment is considered "reasonable" if it is fair, practical, and proportionate for GSA to implement in order to remove or reduce disadvantages experienced by a disabled student. In most cases, adjustments previously implemented for other students with a RAR would also be considered "reasonable" in these circumstances.
- 5.2 Where possible, reasonable adjustments should be put in place immediately, however, there may be occasions when this is not possible due to reliance on third parties. For example, the University of Glasgow require advance notice of any reasonable adjustments to examinations that are facilitated by them. Some alternative format documents (e.g., documents in braille) may require time for production, as they cannot be produced by GSA. Access to some types of non-medical help (e.g., readers and scribes) may be delayed due to the time needed to recruit staff.

5.3

5.4 The GSA Disability and Learning Development Tutor will offer a needs assessment to identify the support and reasonable adjustments required to enable students to engage with their programme of study and the wider GSA provision.

5.5 Student Support will consider whether the institutional GSA adjustments meet students' specific needs, and will then consider whether individual adjustments are also required.

5.6 In determining individual reasonable adjustments, Student Support will take into account the factors set out in paragraph 3.6 relating to reasonableness, and in particular:

- a) Student's individual circumstances and the programme;
- b) The effectiveness of the adjustment;
- c) Student's previous experience of the adjustment, and the time and resource required to implement the adjustment.

5.7 Students will be able to discuss their recommended adjustments and agree them with a Disability and Learning Development Tutor.

5.8 The Disability and Learning Development Tutor will take into account supporting evidence, e.g. GP's letter, educational psychologist's report, Disabled Student Allowance (DSA) needs assessment outcome and student's account of their needs.

5.9 If students want their disability information to remain confidential, they will be advised whether 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.

5.10 Once reasonable adjustments have been agreed, they will be detailed in a Reasonable Adjustment Report which will be shared with the student by email. Students will then have a 2-week period to request changes, or opt-out from sharing the document. If the student confirms their consent, or the 2-week period elapses without the student opting out, a copy will be shared with:

- a) Relevant teaching staff within Schools via the Academic Support Manager,
- b) The Head of the Technical Support Department
- c) The GSA Halls of Residence Manager if relevant
- d) Glasgow University if on a joint programme and,
- e) Any appropriate Professional Services Departments, such as the library

5.11 If students have any issues with the implementation of their support adjustments, they should arrange to discuss this with their Academic Contact (see section 6.5), Personal Tutor, Programme or Stage Leader or their Disability and Learning Development Tutor within Student Support.

6. Responsibilities

6.1 Students are responsible for:

- a) disclosing a disability or specific learning support need at the earliest opportunity;
- b) providing evidence to support the disability or specific learning need (such as a diagnostic assessment for learning impairments, medical or GP's letters/reports for physical or mental health conditions, or existing DSA needs assessment);
- c) If students are able to access external funding for a reasonable adjustment, for example through the SAAS Disabled Students Allowance (DSA) process, GSA expects students to access such funding and Student Support can assist with this process.
- d) attending meetings as requested to discuss their needs;
- e) disclosing any changes such as increased impairment (e.g. because of a deteriorating condition) requiring new adjustments or a modification of existing adjustments;
- f) providing documentation to support the recommended adjustments.
- g) giving permission for the Reasonable Adjustment Report to be shared with relevant teaching and learning staff, with a 2-week opportunity to request changes or withdraw consent.
- h) alerting academic staff and Student Support, of any emerging issues as these arise and for utilising the services made available to them.

6.2 Student Support are responsible for:

- a) contacting all students that have disclosed a disability to offer an appointment to discuss support needs and where relevant complete the Reasonable Adjustment Process;
- b) offering specialist advice where this is requested;
- c) completing the reasonable adjustment process and producing a draft Reasonable Adjustment Report which will be communicated to the student for approval, within 20 working days.
- d) notifying the student verbally and by email that the student has a 2-week period to request changes, or opt-out from sharing the Reasonable Adjustment Report.
- e) once the student approves the draft report, or 2-weeks elapse without the student opting out, the Student Support Administrator will upload the Reasonable Adjustment Report to a designated SharePoint folder with ownership for access with Student Support, the relevant ASM and the Head of the Technical Support Department. The delegated recipients will be notified by email that there is a new Reasonable Adjustment Report stored in the file by Student Support.

6.3 The Academic Support Manager (or nominated other) is responsible for:

- a) confirming with the Student Support Administrator by email that the Reasonable Adjustment Report has been received.
- b) Ensuring all appropriate staff are given access to the individual student file in a read only format ensuring that all staff working with the student are aware of the student's individual

- requirements and reasonable adjustments.
- c) Ensuring a student's Reasonable Adjustment Report remains available to the academic team for the length of the student's programme

6.4 The Programme Leader (or nominated other) is responsible for:

- a) ensuring that reasonable adjustments are in place
- b) ensuring that all staff working with the student are aware of the student's individual requirements
- c) nominating an appropriate member of academic staff to be the student's point of contact
e.g. Personal Tutor, Head of Year
- d) ensuring that reasonable adjustments are in place and that the effectiveness of these measures is reviewed in conjunction with the student each semester. This responsibility includes responding to disability related needs as these emerge or shift as the student progresses through each stage of their programme and ensuring that reasonable adjustments are considered and put in place for programme related activities, such as field or study trips.
- e) ensuring, with the explicit permission of the student, 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.

6.5 The expectation is that all students with a Reasonable Adjustment Report will have a named Academic Contact. This could be the Personal Tutor, Programme Leader, Stage Leader or other nominated member of staff.

6.6 Academic point of contact is responsible for:

- a) acknowledging receipt of the Reasonable Adjustment Report
- b) letting the student know that they will be the student's academic point of contact and how to get in touch
- c) arranging a meeting to discuss the content of the Reasonable Adjustment Report and outline how the programme team will meet their requirements through existing programme delivery mechanisms and, where necessary, individual adjustments
- d) confirming the outcomes of this meeting