

Reasonable Adjustments Policy

Faculty of Medicine and Health Sciences

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1. Purpose

This policy applies to all students studying on all courses within the Faculty of Medicine and Health Sciences who consider themselves to be disabled. The policy outlines the principles and processes through which reasonable adjustments can be put in place.

2. Scope

The University of Buckingham (the University) and the Faculty of Medicine and Health Sciences (the Faculty) is committed to the principle that the healthcare workforce should represent the community it serves and we welcome applicants with a passion for their chosen subject or profession regardless of personal characteristics including disabilities. We are committed to equality of opportunity for all and encourage applicants and students to disclose disabilities at the earliest opportunity so we can identify and put in place appropriate support to facilitate success. For courses leading to clinical qualifications, this document should be read in conjunction with guidance documents from the relevant professional body. For example, medical students should refer to the GMC document “Welcomed and Valued”: https://www.gmc-uk.org/-/media/documents/welcomed-and-valued-2021-english_pdf-86053468.pdf

3. Legal context

The Equality Act 2010 states that a person has a disability if they have “a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities”. ‘Substantial’ is defined by the Act as “more than minor or trivial”. An impairment is considered to have a long-term effect if it has lasted for at least 12 months or is likely to last for at least 12 months. Normal day-to-day activities are not defined in the Act, but examples relevant to students could include reading, writing/typing, walking or other forms of travelling, communicating with others and carrying out routine practical tasks relevant to the subject of study.

It is unlawful for organisations to treat a disabled person less favourably than a non-disabled person for reasons related to their disability. Where this situation would arise within the University, we are required to make reasonable adjustments to ensure that a student who has disclosed a disability is not placed at a substantial disadvantage when compared with their peers. It is also permitted to offer reasonable adjustments that put a disabled student at an advantage over their peers where this is necessary to remove a barrier to study.

4. Inclusive Practice

The ideal way to avoid disadvantage would be to identify and anticipate the needs of future students and to design courses and the teaching and assessment activities within them in such a way that facilitates access and success for all. Our intention is therefore for the “standard” educational offering to be as inclusive as possible and we have adopted many strategies traditionally offered as reasonable adjustments as part of our general practice for the benefit of all students. For example, lectures are recorded and slides are made available in advance as standard wherever possible and a variety of accessibility features are included within the software used for written examinations. Inclusive practice has particular advantages over individual reasonable adjustments for those who may have an undiagnosed learning difficulty or other disability and also for students with a diagnosis who can avoid the need to request such provisions on an individual basis.

5. Reasonable Adjustments

All students are different and there will inevitably be some circumstances where individual student needs cannot be met through inclusive practice alone. We therefore invite all students who consider themselves to have a disability to declare those to us and to request any specific adjustments that they feel might be necessary. The following general principles apply to requests for reasonable adjustments:

5.1 Independent evidence of needs

Reasonable adjustment requests should be accompanied by independent evidence of the relevant impairment from an appropriate professional. For example, evidence of learning difficulties should normally be provided by an educational psychologist and evidence relating to health conditions should normally be provided by a doctor with relevant expertise. The evidence should normally be from a “direct” source involved in assessing the current/recent need rather than “indirect” evidence such as of exam arrangements or support provision having been available previously.

All evidence should be provided in English and should include a description of any substantial adverse effects on day-to-day activities. Where this is apparent only without controlling medication or aids, it should confirm what the deduced effect would be. It should also include confirmation of when the effect started or when it is likely to end and/or confirmation if the effect is likely to recur and when. Additionally, it should also confirm where an effect is minor but likely to become substantial.

5.2 Fairness without blanket rules

Multiple students with the same diagnosis can present in very different ways so it is important to consider each person’s individual needs rather than to simply apply a fixed adjustment for each specific diagnosis or type of disability. In the interests of fairness however, it is also important that students with similar difficulties are provided with similar support. In deciding on an adjustment, it is therefore appropriate to make comparisons with those in place for other students with similar disabilities and with the expectations of students who don’t have reasonable adjustments in place.

5.3 Holistic and not cumulative

Some students may have multiple diagnoses or disabilities and in such cases it is important to consider the student holistically, with one or more adjustments being put in place that address their combined difficulties. It is not appropriate to “calculate” adjustments simply by adding up those commonly applied for each individual diagnosis.

5.4 Normal way of working

Adjustments that are reasonable to make for assessments should normally be the student’s “normal way of working” when practising the skills being assessed. For example, if a modified stethoscope is needed to enable a student to work on a day to day basis with patients, it would normally be reasonable for that same type of stethoscope to be used in assessments requiring the use of a stethoscope. An exception to this might be if a student’s normal way of working overrides a competence standard being assessed. Similarly, if a student’s normal way of working on day to day basis does not require additional equipment or other adjustments, it is unlikely to be reasonable to use these adjustments in an assessment situation. An exception to this might be where the impairment in question is specifically exacerbated by something that is unique to the assessment process.

5.5 Course suitability

Reasonable adjustments must not prevent a student from being able to meet the stated course or unit outcomes and therefore the ability to successfully complete a course. Any adjustments put in place for assessment activities must relate to the undertaking of the assessment process rather than to the marking of the assessment. For example, we must never alter the outcomes being assessed or the

criteria used to determine the standard achieved but it may be possible to allow extra time or equipment to help you to practise and/or demonstrate these.

A variety of modifications could potentially be made to existing courses to facilitate access for all but this does not extend to creating a new course with very different features to those advertised. For example, if a course is advertised with face to face teaching or requiring travel to multiple sites, studying from home would not be a reasonable adjustment and a different course that is delivered online or is book-based may be more appropriate. Where we are unable to offer a requested adjustment for a particular course, we will aim to suggest an alternative adjustment that addresses the same need. For example, if a course is only available full time but a student would like to study part time due to a disability, it may be possible to offer breaks in studies at progression points instead.

5.6 Adjustments are not automatically transferrable

As courses differ in many ways, it follows that what is reasonable to adjust may differ between courses too and for this reason, there is no automatic transfer of reasonable adjustments across courses, departments or educational institutions. What is considered reasonable may also vary for different types of assessment (e.g. a student with reading difficulties may need extra time for written examinations but not for OSCEs) or between different stages of the course (e.g. on campus vs on placement).

5.7 Meet needs

What is considered reasonable will depend on a variety of factors in relation to the specific course and specific disability and what can be offered is also dependent on available resources, including availability of rooms, invigilators etc., as well as the timeframe within which the adjustment has been requested. Where specific requests or recommendations are considered not reasonable, alternative adjustments that address the need and remove the identified disadvantage will normally be offered instead. The exception to this is where a need conflicts with a competence requirement or other minimum standard associated with the course or assessment.

5.8 Minimum standards for health

Some courses, particularly those leading to clinical qualifications, have specific requirements for health of students and these can vary across professional roles and between different specialty areas. Health requirements for entry into a profession are unlikely to be a barrier to study for most applicants but there may be circumstances where it is impossible for a student to work safely with patients, even with adjustments and support. All offers for places on courses with minimum health standards will be subject to fitness to study clearance through our Occupational Health team.

Specific requirements for individual courses can be found on the websites of the relevant regulatory body such as the GMC or HCPC. As an example, the minimum fitness standards for medical students at the time of writing can be found here: https://heops.org.uk/wp-content/uploads/bsk-pdf-manager/2019/09/1521730794HEOPS_Medical_Students_fitness_standards_2015_v12.pdf. http://www.heops.org.uk/HEOPS_Medical_Students_fitness_standards_2013_v10.pdf In situations where these minimum standards are not met, it is not possible to change or bypass the standards through the use of reasonable adjustments and the student will not be able to commence the course at that time.

5.9 Professional practice in mind

Clinical courses will normally lead to professional registration and the requirement for external assessments. It is not appropriate to expect a student to meet all of the requirements of a qualified professional and what is reasonable for a medical school to provide day to day on campus may differ from what is reasonable on a placement site or within employment. We do however aim to keep the reasonable adjustments offered for assessments within the Faculty broadly in line with those available for any national exams students would be expected to take around the point of graduation/registration.

Where this is not appropriate on joining the course but might be considered reasonable later with practise and/or support, we would look to work towards this by offering a graduated approach to reasonable adjustments at different stages of the course alongside appropriate support.

5.10 Overall time limit

The total combined adjustments for time limited assessments would not normally be expected to exceed double the time set for the assessment without adjustments. An overall limit is required to facilitate timetabling and staffing arrangements and to not prolong the stress experienced by students through being in an exam setting for extended periods of time. This limit should accommodate all combinations of commonly applied adjustments that affect overall time e.g. it will accommodate a student who needs 25% extra time for a learning difficulty in addition to three 10-minute rest breaks per hour for a combination of medical conditions, with additional time to spare. Should a specific combination of adjustments be expected to take longer than double the time set for the assessment without adjustments, it may be appropriate to consider splitting the assessment over two sittings with a larger break in the middle (e.g. a supervised lunch hour) or in some circumstances, to consider whether the student is fit to be assessed.

6. Applying for reasonable adjustments

6.1 Reasonable adjustments during the selection process

The Faculty will provide all reasonable support to enable prospective students with declared disabilities and health conditions to undertake and complete the selection requirements of their preferred course without disadvantage. It is important to note that disability or health information does not form part of the selection criteria and we only ask for and use information at this stage that is necessary to facilitate access to the selection process.

An applicant declaring a disability at the point of application or during the selection process will be invited to identify any specific needs or adjustments that they require to enable them to access the selection events/tasks for their chosen course at the point that they receive the invitation. Requests for reasonable adjustments should be accompanied by recent (normally less than 2 years old) supporting evidence from an independent professional in an appropriate field.

Requests and evidence will be reviewed by the student support team, with advice from Occupational Health or the University's inclusivity advisor if necessary, and will normally be approved unless one of the following exceptions applies:

- The requested adjustment is not relevant to the planned selection event/task (e.g. an adjustment in relation to wheelchair access would not be needed for an online event)
- The requested adjustment has already been accommodated within the design of the event/task (e.g. extra reading time may not be needed if the instructions contain very few words or there is an option for instructions to be provided in a different way)
- The need associated with the requested adjustment is not supported by appropriate evidence.
- The requested adjustment would prevent the applicant from demonstrating the specific attributes being tested within the selection event/task
- The requested adjustment is considered unreasonable in terms of feasibility and/or availability of resources and the need(s) for which the adjustment has been requested can be met through alternative adjustment(s) that do not put the applicant at a disadvantage.

Where adjustments are considered necessary and reasonable, these will be notified to the selection team and the applicant will be advised of the new selection arrangements. Please note that it may be necessary to invite a candidate to an alternative selection event on a different day in order to

accommodate some reasonable adjustments, particularly if a request is received at short notice.

After the selection process is completed, applicants with reasonable adjustments will be scored and awarded places in the same way as students who have not declared a disability. Disability status and other protected characteristics will not be highlighted to those involved in this process. Applicants who are offered and accept a place on the course will then be invited to provide more details on their disability and how it might affect their studies as described below.

6.2 Reasonable adjustments on joining the course

All applicants who accept a place on a course within the Faculty will be invited to complete a study needs form if they consider themselves to have a disability that they wish to declare. This form should be completed even if students have already provided disability information at the selection stage. On receipt of the form, the Faculty's student support team will co-ordinate provision of reasonable adjustments in relation to teaching, learning and assessment throughout all stages of the course. This includes liaison with placement providers and local disability specialists as necessary. The Wellbeing, Skills and Diversity team will co-ordinate any adjustments or other disability support that is not directly related to course activities (e.g. in relation to accommodation or student union activities) and students can discuss these with the University's inclusivity advisor and/or the relevant departments directly.

6.2.1 For non-clinical courses

The study needs form and the accompanying professional evidence will be reviewed by the Faculty's student support team in collaboration with the inclusivity advisor or their nominated representative to consider what reasonable adjustments may be appropriate for the course of study.

6.2.2 For clinical courses

All candidates who are successful in obtaining a place on a clinical course will be required to complete a health screening questionnaire and attend a fitness to study assessment with one of our Occupational Health teams. Where the health information provided indicates that a student may require one or more reasonable adjustments in order to remove barriers to study, recommendations will be made by the Occupational Health team.

The Faculty's student support team will review the recommendations from Occupational Health alongside any other relevant information provided by the student on the study needs form or accompanying evidence in order to consider what reasonable adjustments will be appropriate for the course of study.

6.2.3 For all courses

Proposed adjustments for course activities and/or assessments will be notified to the student in writing. This information should be read in conjunction with the student agreement and the policies referred to within it that will need to be complied with unless explicitly stated in your reasonable adjustment offer. At this point, it would also be appropriate for students to familiarise themselves with other documents or ask questions about how processes of relevance work in practice (e.g. documents detailing items permitted in invigilated exams or how common reasonable adjustments for exams are implemented as standard) to ensure the proposed adjustments are appropriate. Once implemented, these will normally stay in place for the duration of the course unless stated otherwise or a change is agreed following a review.

6.3 New disabilities or declarations after joining the course

Students are able to declare a new disability at any time during their course and are encouraged to do so as soon as they are aware of it. Students making a new declaration will be asked to complete a study needs form and the process for putting reasonable adjustments in place will continue in line with the principles outlined above for declarations made at the start or prior to joining the course. Adjustments will apply from the point that they are implemented and cannot be backdated or influence activities or outcomes that have already taken place.

Where a student with existing reasonable adjustments receives an additional diagnosis, the principles described above will continue to apply and it may be appropriate to add to or change adjustments or it may be that the needs associated with the new diagnosis are already accommodated within the existing reasonable adjustments. Where a change to the existing reasonable adjustments is proposed, these will be notified to the student in writing and once agreed, the student record will be updated.

It is expected that students on clinical courses will declare existing health conditions and disabilities to the Occupational Health team before registration as part of the fitness clearance process. Where a new or newly declared disability or health condition could be impacting on studies and/or patient safety, students will be referred to Occupational Health for a review of fitness to study. In most cases, this will not affect ability to study but there may be recommendations for new or different reasonable adjustments to be put in place.

In very rare cases, it is possible that a student with a new disability may no longer meet the minimum fitness standards for their course or may no longer be able to meet the required outcomes for the course even with reasonable adjustments in place. In such cases, the relevant regulatory body would be consulted to seek further advice and it may be necessary to initiate fitness to practice proceedings that could lead to withdrawal from the course if no other solution can be identified.

Where there is concern regarding a student's progress on the course and a health or learning difficulty is suspected as a contributory factor, referral to an appropriate professional may be initiated by the student support team after gaining the student's permission. Should the professional review identify any previously unknown difficulties, reasonable adjustments should be offered in line with the principles outlined above for applications submitted by students themselves. If a student does not give permission for the relevant referral, this will be logged on the student record system for consideration where relevant in the future (e.g. by an appeals panel or as part of a fitness to practice investigation).

6.4 Temporary adjustments

The formal legal definition of disability refers to long term impairments and therefore impairments expected to be short term would normally be considered as illness unless they were due to exacerbations of existing chronic conditions. However, where such impairments last significantly longer than a conventional sickness period (normally up to 5 days) and provide a significant barrier to engagement with course activities, but do not warrant a formal suspension of studies (e.g. recovery from an injury or surgery), it may be appropriate to consider temporary adjustments to facilitate engagement.

Where it is not possible for the relevant professional review to take place at short notice, the Student Support Lead or their nominated representative will make an initial decision following a review of the available evidence. The student will then be referred for professional review at a later date if necessary. Any temporary adjustments offered should focus primarily on removing barriers to safe engagement during the period of impairment and they should follow the same "reasonable" principles described above for long term adjustments. Where this is not possible or does not resolve the barrier to engagement, illness processes should be used and suspension of studies may be necessary. Any temporary adjustment(s) for assessment activities will apply to the upcoming assessment period only.

7. Review of reasonable adjustments

Informal reviews of reasonable adjustments take place within the Faculty's student support team in advance of key summative assessment periods to ensure that agreed adjustments reflect recent updates to the student's circumstances and are notified to the relevant assessment staff in good time to make the necessary arrangements. Students will not normally be notified of these reviews unless

there are any proposed changes to adjustments or recommendations for reassessment of need. However, students are encouraged to contact their personal tutor and the Faculty's student support team at any time if they have any concerns about their health and/or their reasonable adjustments. In addition, students can request a formal review of their reasonable adjustments if their circumstances have changed, they identify a new barrier to accessing their course or they feel that their reasonable adjustments are no longer appropriate. Students requesting a review should complete the study needs form again with their updated circumstances and if proposed new adjustments have been identified, include details of these along with any relevant evidence documents. The contents of the request will be reviewed by the student support team and one of the following decisions will be made, normally within 2 working weeks of the form being submitted:

- approve the request
- arrange a referral to Occupational Health or educational psychologist
- offer an alternative solution to meet the identified need
- offer a meeting or phone call to discuss further
- Reject the request due to incompatibility with course learning outcomes or minimum fitness standards

8. Confidentiality

All medical and sensitive personal information that a student or prospective student provides will be held in the strictest confidence by the Occupational Health Service and/or the University in line with the General Data Protection Regulation ((EU) 2016/679) adopted as UK General Data Protection Regulation (UK GDPR) and the UK Data Protection Act 2018. Information provided direct to Occupational Health remains confidential unless it appears in a fitness certificate or formal Occupational Health report, in which case it would be passed to the Faculty's student support team. This information, along with that provided direct to the University (e.g. via the study needs form and any associated evidence documents), is available only to staff within the Faculty's student support team and key members of the central Wellbeing, Skills and Diversity team.

A student's disability status and the specific reasonable adjustments currently in place are stored on the University's student record systems and are therefore accessible to a broader group of staff. This information is likely to be used by staff who will need to implement the reasonable adjustments and also by others involved in student data analysis and other functions described in the University's privacy policy. For students on clinical courses, details of reasonable adjustment requirements are also included on "Transfer of Information" documents sent to placement providers. This is to facilitate the implementation of reasonable adjustments for course activities that take place on placement sites. If a student accepts a reasonable adjustment such as extra time or the use of IT then they also accept that it may become apparent to their peers that they are having reasonable adjustments applied.

9. Advice and Support

Further advice about disability support and reasonable adjustments can be from the Faculty's Student Support Team. The team can be contacted on FMHS-studentsupport@buckingham.ac.uk.

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