



QAHE Limited Disability Policy

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1. Introduction.....	3
2. Policy Ownership.....	4
3. Scope.....	5
4. Definitions.....	5
4.1. Disability.....	5
4.2. Impairment.....	6
4.3. Substantial.....	6
4.4. Long-term.....	6
4.5. Progressive Condition.....	6
4.6. Reasonable Adjustments.....	6
4.7. Disclosure.....	6
4.8. Confidentiality.....	6
4.9. Learning Support Assessment.....	7
4.10. Summary of Adjustments (SoA).....	7
4.11. Fitness to Study.....	7
4.12. Learning Support Team.....	7
5. Policy Statement.....	7
6. Responsibilities.....	8
6.1. Students.....	8
6.2. Academic and Professional Services Staff.....	9
6.3. Learning Support Team.....	9
6.4. Senior Leadership and Policy Owners.....	9
7. Related Policies and Legal Frameworks.....	10
7.1. Internal QA Higher Education Policies and Procedures.....	10
7.2. External Legislation and Regulatory Frameworks.....	10
8. Implementation Procedures.....	11
8.1. Awareness and Communication.....	11
8.2. Disclosure and Identification.....	11
8.3. Learning Support Assessment.....	12
8.4. Summary of Adjustments.....	12
8.5. Implementation and co-ordination.....	12
8.6. Review and Updates.....	12
8.7. Monitoring, Feedback, and Continuous Improvement.....	13
9. Monitoring and Compliance.....	13



9.1. Oversight and Governance	13
9.2. Quality and Evaluation	13
9.3. OfS and Legislative Compliance	14
9.4. Training and Staff Development	14
9.5. Continuous Improvement and Review Cycle	14
10. Equality Impact Assessment	14
11. Data Protection	15
12. Further Information	16
13. Review.....	16



1. Introduction

At QAHE Limited (QA Higher Education), we are committed to fostering an inclusive, accessible, and supportive learning environment where all students can thrive and achieve their full potential. We recognise that some students may face barriers to participation or achievement because of a disability, long-term health condition, mental health condition, or specific learning difference.

QA Higher Education upholds its legal and moral obligations under the Equality Act 2010, which places both an anticipatory duty and an individual duty on higher education providers to make reasonable adjustments for disabled students. This means we must take proactive steps to identify and remove barriers that may place disabled students at a substantial disadvantage and respond promptly to individual needs as they arise.

Through early identification, timely support, and collaborative working between students, staff, and the Learning Support Team, QA Higher Education aims to ensure that disabled students are fully included in all aspects of academic and student life. Adjustments will be made wherever reasonable to provide equal access to teaching, learning, assessment, placements, and wider university opportunities.

This policy outlines QA Higher Education's commitment to inclusivity, the responsibilities of staff and students, and the procedures for identifying, assessing, and implementing reasonable adjustments to support disabled students effectively.

2. Policy Ownership

- This policy is owned by the Learning Support Manager within the Safeguarding, Student Life and Wellbeing Team at QA Higher Education.
- The Learning Support Manager is responsible for the implementation, monitoring, and review of this policy and for ensuring that reasonable adjustments are applied consistently across all QA Higher Education campuses and partner sites.
- Day-to-day coordination, assessment, and delivery of support for disabled students are managed by the Learning Support Team, who work in partnership with academic departments, Student Services, and external agencies where appropriate.
- Students or staff who wish to raise a concern or appeal a decision relating to reasonable adjustments should initially contact the Learning Support Team. If the matter cannot be resolved informally, it may be escalated to the Head of Learning Support, and subsequently to the Assistant Director of Safeguarding, Student Life and Wellbeing for review.
- To ensure timely and effective support, QA Higher Education commits to the following service standards:



- Acknowledgement: All new referrals or enquiries to the Learning Support Team will be acknowledged within three (3) working days.
- Support Plan: Following disclosure and assessment, an individual Learning Support Plan (or Reasonable Adjustment Plan) will normally be agreed and shared within fifteen (15) working days. Timeframes will be dependent on student and third party response times, and that all information is available to complete an assessment.
- This policy will be reviewed annually, or sooner if required by legislative, regulatory, or institutional changes, to ensure ongoing compliance and best practice in supporting disabled students.

3. Scope

This policy applies to all applicants and enrolled students at (QA Higher Education), including those studying on undergraduate, postgraduate, full-time, part-time, distance, or blended learning programmes delivered across all QA Higher Education campuses.

It covers all aspects of the student experience, including but not limited to:

- Teaching and learning activities (in-person, online, and blended delivery)
- Assessments and examinations
- Placements and professional practice
- Library and digital learning resources
- Student services, extracurricular activities, and graduation events

The policy sets out how QA Higher Education identifies, assesses, and implements reasonable adjustments to ensure disabled students are not placed at a substantial disadvantage in comparison to their peers.

This policy should be read in conjunction with the partner universities Extenuating Circumstances and Mitigation Policy. However, students should not be required to submit extenuating circumstances claims for issues that can be addressed through proactive reasonable adjustments. The Learning Support Team will work with academic and professional services staff to ensure that reasonable adjustments are implemented wherever appropriate, reducing the need for reactive mitigation.

4. Definitions

The following definitions are used within this policy to ensure clarity and consistency in how QA Higher Education supports disabled students and applies reasonable adjustments.

4.1. Disability

Under the Equality Act 2010, a person is considered to have a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.



This definition includes, but is not limited to:

Specific learning differences (e.g., dyslexia, dyspraxia, ADHD)

Mental health conditions (e.g., anxiety, depression)

Long-term health conditions (e.g., epilepsy, diabetes, chronic fatigue syndrome)

Sensory impairments (e.g., visual or hearing impairments)

Physical impairments or mobility difficulties

Autism spectrum conditions

A long-term effect is one that has lasted or is likely to last 12 months or more, and

“substantial” means more than minor or trivial.

4.2. Impairment

A reduction in physical or mental function, whether temporary or permanent. This includes conditions affecting mobility, vision, hearing, cognition, learning, emotional regulation, and mental health.

4.3. Substantial

An effect that is more than minor or trivial. It impacts an individual's ability to perform tasks or engage in activities compared to someone without the impairment.

4.4. Long-term

The impairment has lasted or is expected to last at least 12 months or for the rest of the person's life. This includes conditions with fluctuating or recurring symptoms.

4.5. Progressive Condition

A condition that is likely to worsen over time, such as multiple sclerosis, muscular dystrophy, Parkinson's disease, or motor neurone disease. Individuals with such conditions are considered disabled from the point at which the condition begins to have an effect on normal day-to-day activities.

4.6. Reasonable Adjustments

A reasonable adjustment is a change, modification, or accommodation made to remove or reduce barriers that place a disabled student at a substantial disadvantage compared with non-disabled peers.

Adjustments may relate to:

- Teaching and learning methods (e.g., lecture recordings, assistive technology)
- Assessment and exams (e.g., extra time, alternative formats, rest breaks)
- Placements ((e.g., accessible transport, adapted duties)
- Campus facilities and digital environments (e.g., step-free access, accessible online content)

The purpose of a reasonable adjustment is to ensure fair and equal access, not to provide unfair advantage. QA Higher Education will implement adjustments that are proportionate, effective, and do not compromise academic or professional standards.

4.7. Disclosure

The act of informing QA Higher Education of a disability. Disclosure can be made at any stage of the student journey and may be verbal or written. QA Higher Education encourages early disclosure to allow timely support to be put in place.



4.8. Confidentiality

All information disclosed about a disability will be treated in the strictest confidence and shared only with relevant personnel on a need-to-know basis, and only with the student's explicit, informed consent.

4.9. Learning Support Assessment

A Learning Support Assessment is an individual meeting between the student and a member of the Learning Support Team to discuss the student's needs, barriers to learning, and suitable adjustments.

Standard reasonable adjustments can be agreed following this assessment without requiring medical evidence, although evidence may be requested for complex or resource-intensive arrangements, or when coordinating with external funding such as the Disabled Students' Allowance (DSA).

4.10. Summary of Adjustments (SoA)

A Summary of Adjustments (SOA) is a formal document produced by the Learning Support Team following a Learning Support Assessment. It outlines the agreed reasonable adjustments and support strategies that will be implemented to remove or reduce barriers to learning and assessment.

The SOA:

- Is created in collaboration with the student.
- Can be agreed without medical evidence for standard adjustments.
- Is shared confidentially with relevant staff on a *need-to-know* basis.
- Is subject to regular review and update if a student's circumstances or course requirements change.

4.11. Fitness to Study

A term used to describe a student's capacity to participate fully and appropriately in academic study and the wider student experience, taking into account any support or adjustments required due to disability or health-related issues.

4.12. Learning Support Team

QA Higher Education's dedicated service responsible for assessing students' support needs, arranging reasonable adjustments, and providing guidance to both students and staff.

5. Policy Statement

QA Higher Education is committed to providing an inclusive, accessible, and equitable learning environment in which all students can achieve their full potential. We recognise that disabled students may face additional barriers to participation and success, and we are committed to removing or minimising those barriers through timely and effective support.



Under the Equality Act 2010, QA Higher Education has both an anticipatory and an individual duty to make reasonable adjustments to ensure that disabled students are not placed at a substantial disadvantage compared with non-disabled peers. This duty applies to all aspects of university life, including teaching, learning, assessment, placements, fieldwork, and digital or physical access.

QA Higher Education's approach is guided by the following principles:

- **Proactive and Timely Support:** We take early action to identify and remove barriers to learning. Students should not be disadvantaged while awaiting diagnosis or evidence.
- **Evidence-Light Approach:** Standard reasonable adjustments can be approved and implemented following a Learning Support Assessment without requiring medical evidence. Evidence may only be requested for complex or resource-intensive adjustments, or where coordination with external funding (such as the Disabled Students' Allowance) is required.
- **Individualised Adjustments:** Support is tailored to each student's needs, taking into account the nature of their course and any professional or competence standards.
- **Collaboration and Shared Responsibility:** The Learning Support Team, academic departments, and professional services work together with the student to ensure adjustments are appropriate, effective, and consistently applied.
- **Confidentiality and Dignity:** Information about a student's disability will only be shared on a need-to-know basis, and always with the student's knowledge and consent unless disclosure is required by law or safeguarding duty.
- **Equity, Not Advantage:** Adjustments are intended to remove disadvantage and promote equal access to learning opportunities, not to provide an unfair benefit.

Through this policy, QA Higher Education affirms its commitment to fostering a culture of accessibility, understanding, and respect, ensuring that all students have an equal opportunity to succeed.

6. Responsibilities

The successful implementation of this policy relies on shared understanding and commitment across QA Higher Education. Every member of the university community has a role to play in ensuring that disabled students are supported, respected, and provided with equitable access to education and university life.

6.1. Students

- Are encouraged to disclose any disability, long-term health condition, mental health condition, or specific learning difference as early as possible to enable timely support.
- May disclose at any point during their studies, through the application process, enrolment, or directly to the Learning Support Team.



- Should engage in the Learning Support Assessment process and collaborate in developing their Learning Support Plan.
- Are responsible for sharing relevant information about their needs and for notifying the Learning Support Team of any changes in their circumstances that might affect their support.
- Are not required to provide medical evidence to access standard reasonable adjustments; however, they may be asked for evidence if requesting complex or resource-intensive arrangements.

6.2. Academic and Professional Services Staff

- Must familiarise themselves with this policy and the principles of inclusive practice.
- Should respond to student disclosures with empathy, respect, and confidentiality, and signpost students promptly to the Learning Support Team.
- Are responsible for implementing reasonable adjustments outlined in a student's Summary of Adjustments and for maintaining the student's privacy.
- Should communicate with the Learning Support Team if an agreed adjustment appears to conflict with a competence standard or is not practically feasible, so that an alternative solution can be considered.
- Must ensure that teaching materials, assessments, and digital content are accessible and comply with the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.

6.3. Learning Support Team

- Coordinates the identification, assessment, and implementation of reasonable adjustments for disabled students.
- Conducts Learning Support Assessments and develops individual Learning Support Plans in collaboration with students.
- Ensures that standard adjustments can be agreed and implemented without requiring medical evidence, unless additional documentation is necessary for complex cases or to access external support (e.g. DSA).
- Provides advice and guidance to academic and support staff on inclusive practice, competence standards, and accessibility requirements.
- Maintains appropriate records, ensuring confidentiality and compliance with data protection law.
- Reviews Summary of Adjustments periodically to ensure continued relevance and effectiveness.

6.4. Senior Leadership and Policy Owners

- The Learning Support Manager is responsible for the effective implementation and monitoring of this policy.
- The Assistant Director of Safeguarding, Student Life and Wellbeing provides strategic oversight, ensuring compliance with the Equality Act 2010, OfS expectations, and QA Higher Education's institutional priorities.
- Senior management will ensure that adequate resources, training, and systems are in place to uphold QA Higher Education's legal and ethical duties.



- Policy owners will conduct regular reviews and audits of support processes and outcomes, including feedback from students and staff.

7. Related Policies and Legal Frameworks

This policy should be read alongside a range of internal QA Higher Education policies and external legal and regulatory frameworks that collectively support equality, accessibility, and inclusive practice.

7.1. Internal QA Higher Education Policies and Procedures

The following institutional documents complement and support the effective implementation of the Disability Policy:

- Equality and Diversity Policy – sets out QA Higher Education’s overarching commitment to fostering an inclusive and equitable environment for all students and staff.
- Reasonable Adjustments Policy – details how assessment arrangements are modified to ensure fair access for disabled students.
- QA Higher Education Safeguarding Policy – establishes QA Higher Education’s duty of care for students’ safety and welfare, including those with disabilities or mental health conditions.
- Carers policy recognises intersectional needs of students who may also be carers or have other protected characteristics.
- Data Protection and Privacy Policies – govern the secure and lawful handling of personal and special category data.

7.2. External Legislation and Regulatory Frameworks

This policy is underpinned by the following key legal and regulatory frameworks that govern higher education in the United Kingdom:

- Equality Act 2010 – establishes the legal duty for higher education providers to make reasonable adjustments and prohibits discrimination, harassment, and victimisation on the grounds of disability.
- Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 – require QA Higher Education to ensure its digital platforms and learning materials are accessible to disabled users.
- Data Protection Act 2018 and UK GDPR – set out obligations for the processing, storage, and sharing of personal and special category data.



- Health and Safety at Work Act 1974 – ensures that physical and digital learning environments are safe and accessible.
- Higher Education and Research Act 2017 – establishes the regulatory framework for higher education and underpins the Office for Students' (OfS) role in promoting equality of opportunity.
- Office for Students (OfS) – Equality of Opportunity Risk Register (EORR) – identifies students with disabilities as a key group facing persistent barriers to access, success, and progression, requiring targeted institutional mitigations.
- Office for Students – 2025 Considerations for Providers on Disabled Students – sets out expectations for consistent, transparent, and anticipatory support for disabled students, including timely reasonable adjustments and staff training.
- Equality and Human Rights Commission (EHRC) Technical Guidance for Further and Higher Education (2014) – provides authoritative guidance on complying with the Equality Act 2010 in HE contexts.
- Disabled Students' Allowance (DSA) Regulations and Guidance – outline external funding available to support disabled students, complementing institutional support but not replacing QA Higher Education's legal duties.

8. Implementation Procedures

The successful implementation of this policy relies on proactive engagement across QA Higher Education. The following procedures outline how the university identifies, assesses, and supports disabled students to ensure that reasonable adjustments are implemented consistently, fairly, and without unnecessary delay.

8.1. Awareness and Communication

- Information about disability support and reasonable adjustments will be clearly communicated to applicants, students, and staff through:

QA Higher Education's website, student intranet, and course handbooks

Applicant and enrolment materials, including UCAS and admissions guidance

Induction sessions and staff development programmes

Periodic awareness campaigns promoting inclusive practice

- All staff involved in teaching, learning, assessment, or student support will receive regular training on inclusive education, competence standards, and reasonable adjustments to ensure consistent understanding and application of this policy.

8.2. Disclosure and Identification

- Students are encouraged to disclose a disability, long-term health condition, or specific learning difference at any stage, during application, enrolment, or throughout their studies.
- Disclosure can be made through:

The QA Higher Education application process or UCAS personal details

Online enrolment

Directly contacting the Learning Support Team via qahe.learningsupport@qa.com

Through academic tutors or professional services, who must promptly refer the student to the Learning Support Team.



- Staff who receive a disclosure must respond with empathy, confidentiality, and sensitivity, and ensure the student is referred to the Learning Support Team as soon as possible.

8.3. Learning Support Assessment

- Upon disclosure, the student will be invited to attend a Learning Support Assessment with a qualified member of the Learning Support Team.
- The assessment explores the student's experiences, barriers to learning, course demands, and suitable adjustments.
- The Learning Support Team will identify standard adjustments that can be implemented without medical evidence.
- Where additional or complex adjustments are needed (e.g., requiring external equipment, major timetable changes, or significant cost), further evidence may be requested to ensure effectiveness and proportionality.
- The Learning Support Team will support students in obtaining or using external evidence if needed (e.g., for Disabled Students' Allowance applications).

8.4. Summary of Adjustments

- Following the Learning Support Assessment, the Learning Support Team will produce a Summary of Adjustments (SOA) in collaboration with the student.
- The SOA will outline:

Agreed reasonable adjustments and inclusive teaching recommendations

Any actions required by staff or departments

Points of contact for queries or review

- The SOA will be shared confidentially with relevant academic and professional services staff on a need-to-know basis only.
- Students will receive a copy of their SOA and confirmation of when the adjustments will take effect.
- QA Higher Education commits to sharing the SOA within 15 working days of the initial assessment wherever practicable

8.5. Implementation and co-ordination

- Academic departments and professional services are responsible for implementing adjustments promptly and consistently, in collaboration with the Learning Support Team.
- Adjustments may include, but are not limited to:

Teaching and Learning – accessible materials, lecture recordings, captioning, or note-taking support

Assessment – additional time, alternative formats, rest breaks, or flexible deadlines

Placements – accessible travel, adapted equipment, or supervision adjustments

Digital and Physical Access – accessible learning platforms and spaces

- If an adjustment appears to conflict with a competence standard, the Learning Support Team will convene with relevant academic staff to explore alternative means of meeting that standard.



8.6. Review and Updates

- The SOA will be reviewed regularly, at least annually, or sooner if a student's circumstances or course requirements change.
- Students can request a review at any time by contacting the Learning Support Team.
- Adjustments may be modified, added, or withdrawn following review, with student agreement.

8.7. Monitoring, Feedback, and Continuous Improvement

- QA Higher Education will monitor the timeliness and effectiveness of adjustments through:

Student feedback and satisfaction surveys

Annual internal audits

Equality Impact Assessments and data reporting to the Director of Safeguarding, Student Life and Wellbeing

Periodic review against OfS equality of opportunity expectations and the Equality Act 2010

- Feedback from students, staff, and external bodies will inform ongoing improvements to policy, training, and practice.

9. Monitoring and Compliance

QA Higher Education is committed to continuous improvement and accountability in the delivery of disability support and reasonable adjustments. Monitoring ensures that QA Higher Education meets its legal and regulatory obligations under the Equality Act 2010 and the expectations of the OfS.

9.1. Oversight and Governance

The Learning Support Manager is responsible for overseeing the implementation and day-to-day compliance of this policy.

The Director of Safeguarding, Student Life and Wellbeing provides institutional oversight, ensuring that QA Higher Education fulfils its statutory duties and OfS regulatory requirements.

Annual reports on disability support provision, student outcomes, and identified risks will be submitted to the:

- Student Welfare Risk Panel
- Academic Board
- Senior Leadership Team

These reports will include data on access, engagement, and success rates for disabled students, as well as feedback from staff and students on the effectiveness of support.

9.2. Quality and Evaluation

QA Higher Education will embed quality assurance processes that measure the effectiveness, timeliness, and consistency of reasonable adjustments, including:

- Tracking the time taken from disclosure to Summary of Adjustments (SOA) completion.
- Monitoring whether adjustments are implemented promptly and in line with agreed service standards.



- Reviewing student satisfaction and outcomes through surveys, Student Voice forums, and feedback from the Learning Support Team.
 - Conducting Equality Impact Assessments (EIA) for relevant policies, systems, and changes to ensure accessibility and non-discrimination.
 - Including disability inclusion metrics in annual quality monitoring and risk management frameworks.
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- QA Higher Education will collect and review data on disclosure rates, adjustments made, and student satisfaction to inform enhancements.
 - Annual policy reviews will ensure the policy remains up to date with legislation and best practice.
 - Findings from these evaluations will be used to improve policy, processes, and training, and will inform QA Higher Education's Access and Participation Plan (APP) commitments.

9.3. OfS and Legislative Compliance

QA Higher Education monitors this policy against the following statutory and regulatory requirements:

- Equality Act 2010 – compliance with anticipatory and individual duties to make reasonable adjustments for disabled students.
- OfS Equality of Opportunity Risk Register (EORR) – identification and mitigation of risks to access, success, and progression for disabled students.
- OfS 2025 Considerations for Providers on Disabled Students – ensuring timely, transparent, and consistent implementation of reasonable adjustments, underpinned by data-driven monitoring.
- EHRC Technical Guidance for Further and Higher Education (2014) – adherence to principles of non-discrimination, inclusivity, and proactive accessibility.
- Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 – ensuring compliance in digital learning environments.

9.4. Training and Staff Development

- QA Higher Education will ensure that all academic and professional staff involved in student learning, assessment, and support receive regular training on inclusive practice, competence standards, and disability awareness.
- Training outcomes and participation rates will be monitored annually and included in policy review reports.
- The Learning Support Team will review new legislative and regulatory updates and provide annual policy briefings to relevant staff and managers.

9.5. Continuous Improvement and Review Cycle

- This policy will be reviewed annually, or sooner if there are significant changes in legislation, OfS guidance, or QA Higher Education procedures.
- Student and staff feedback, alongside institutional data, will directly inform the review process.
- Recommendations for improvement will be tracked through QA Higher Education's internal quality assurance framework, ensuring visible accountability and progress.



10. Equality Impact Assessment

This policy has been developed in accordance with the Equality Act 2010, which protects individuals from discrimination and promotes equal opportunities for all, particularly those with protected characteristics. Under the Act, QA Higher Education recognises its legal duty to:

- Eliminate unlawful discrimination, harassment, and victimisation.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people from diverse backgrounds.

In line with the Equality Act, this policy ensures that students with disabilities are not placed at a substantial disadvantage compared to their non-disabled peers. It outlines QA Higher Education's commitment to making reasonable adjustments, promoting inclusive practices, and encouraging disclosure in a safe, confidential, and supportive environment.

11. Data Protection

QA Higher Education is committed to ensuring that all personal data relating to students with disabilities is collected, stored, processed, and shared in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

- **Confidentiality and Security:**
Information about a student's disability is treated as sensitive personal data and will be handled with the highest levels of confidentiality and security. Access to this information is strictly limited to authorised personnel directly involved in providing support and reasonable adjustments.
- **Consent:**
QA Higher Education will obtain explicit, informed, and documented consent from the student before processing or sharing any sensitive personal data related to their disability, except where disclosure is legally required or necessary to protect the health, safety, or rights of the student or others.
- **Purpose Limitation:**
Personal data collected in relation to a student's disability will be used solely for the purposes of assessing support needs, making reasonable adjustments, and ensuring inclusive access to education and facilities.
- **Data Minimisation:**
Only data that is necessary and relevant to provide appropriate support will be collected and retained. QA Higher Education will regularly review data held to ensure it remains accurate and up to date.
- **Rights of Data Subjects:**
Students have the right to access their personal data, request corrections, and, where appropriate, request restrictions on processing. They may also withdraw consent at any time, understanding that this may affect the level of support QA Higher Education can provide.



- **Retention and Disposal:**
Personal data related to disability will be retained only as long as necessary for the purpose it was collected and will be securely disposed of in accordance with QA Higher Education's data retention policy.

QA Higher Education encourages students to contact the Learning Support Team or the Data Protection Officer with any questions or concerns regarding the handling of their personal data under this policy.

12. Further Information

For additional guidance, support, or queries related to this Disability Policy, please contact the following:

- **Learning Support Team**
For advice on disability disclosure, reasonable adjustments, and available support services.
Email: learningsupport@qahe.ac.uk
Phone: +44 (0)1234 567890
 - **Student Wellbeing Services**
For mental health support, counselling, and wellbeing resources.
Email: qahe.welfare@qa.com
Phone: +44 (0)1234 567891
 - **Data Protection Officer**
For concerns regarding the handling of personal and sensitive data.
Email: dataprotection@qahe.ac.uk
 - **Complaints**
For raising concerns or formal complaints related to disability support or discrimination.
Email: qahe.complaints@qa.com
 - **QA Higher Education Website**
Visit www.qahe.ac.uk/disability-support for detailed information on policies, procedures, accessibility, and useful resources.
 - **External Resources:**
 - **Equality Advisory Support Service (EASS):** Offers advice on discrimination and equality law. Website: www.equalityadvisoryservice.com
 - **Disability Rights UK:** Provides information and support for disabled students. Website: www.disabilityrightsuk.org
- Students and staff are encouraged to reach out proactively to ensure they receive the support and information needed to thrive in the QA Higher Education community.



13. Review

This Disability Policy will be reviewed annually to ensure it remains current, effective, and aligned with relevant legislation, best practices, and the needs of disabled students at QA Higher Education.

The review process will involve:

- Consultation with key stakeholders, including students, staff, and university partners.
- Analysis of monitoring data, feedback, and any complaints related to disability support.
- Consideration of changes in legal requirements such as the Equality Act 2010 and data protection legislation.
- Identification of opportunities to improve accessibility, inclusivity, and reasonable adjustment processes.

The next scheduled review date is April 2026, or earlier if required due to changes in legislation or organisational needs.

Responsibility for coordinating the review lies with the Assistant Director of Student Life and Wellbeing, who will submit any proposed amendments to the QA Higher Education Senior Management Team for approval.

