



# QAHE Limited Reasonable Adjustments Policy

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## 1. Introduction

QAHE Limited (QA Higher Education) is committed to providing an inclusive environment which enables all students to achieve their highest potential. QA Higher Education has a wide range of provision to support disabled students including specialist support, support through academic departments, and appropriate policies and procedures.

This policy sets out how the QA Higher Education meets its obligations under the Equality Act. It identifies the institution's approach to supporting disabled students and formalises areas of responsibility. [The Equality Act 2010](#) requires staff to take positive steps, known as Reasonable Adjustment(s), to ensure that disabled students can fully participate in their education. Reasonable Adjustments are actions taken to remove barriers faced by students with a disability so that they may participate in education on the same basis as students without disability.

The policy:

- Outlines the legal requirement for reasonable adjustments in learning and assessment at QA Higher Education.
- Details the formal processes and procedures involved in making reasonable adjustments at QA Higher Education.
- Explains the roles and responsibilities of those involved in making reasonable adjustments at QA Higher Education.

## 2. Policy Ownership

This policy is owned by the **Learning Support Team** at QA Higher Education.

The Learning Support Team is responsible for the development, implementation, and periodic review of this policy to ensure compliance with the Equality Act 2010 and alignment with sector best practice. The team also oversees the day-to-day coordination of reasonable adjustments, ensuring that institutional responsibilities are met and that disabled students receive appropriate, timely, and effective support.

The Learning Support Team works collaboratively with academic departments, the Facilities Team, and senior leadership to promote an inclusive learning environment and to embed anticipatory and inclusive practices across the institution.

Ownership of the policy includes:

- Ensuring the policy remains current and legally compliant.
- Providing training, guidance, and resources to staff involved in the implementation of reasonable adjustments.
- Reviewing and updating associated procedures and documentation.
- Reporting on implementation outcomes and identifying areas for improvement.



All suggested updates to this policy must be reviewed and approved by the Learning Support Team before implementation.

### 3. Scope

This policy applies to all disabled applicants and students of QA Higher Education, across all programmes, levels, and modes of study. This includes full-time, part-time, distance, and online learning students, as well as those studying at any QA Higher Education campus or through partnership or franchise arrangements with external institutions.

The policy covers:

- Applicants who disclose a disability during the admissions process.
- Students who declare a disability at any point during their studies.
- Students who acquire a disability or receive a diagnosis during their time at QA Higher Education.
- Temporary conditions that may result in short-term reasonable adjustments (assessed on a case-by-case basis).

The policy outlines the institution's responsibilities in relation to the provision of Reasonable Adjustments in learning, teaching, and assessment to ensure that disabled students are not placed at a substantial disadvantage.

It applies to:

- All QA Higher Education staff involved in the delivery of teaching, support, and assessment.
- All professional services teams with responsibilities for supporting students, including Learning Support, Facilities, and academic leadership teams.
- Students who have disclosed a disability and engaged with the Learning Support Service.

Please note:

Reasonable Adjustments are forward-looking in nature and are not normally applied retrospectively. The institution encourages early disclosure and engagement to ensure timely support.



## 4. Definitions

### Disability

As defined under the Equality Act 2010, a person has 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. "Long-term" typically means the condition has lasted, or is expected to last, 12 months or more.

### Disabled Student

Any student who meets the definition of disability under the Equality Act 2010. This includes, but is not limited to, students with:

- Specific learning difficulties (e.g., dyslexia, dyspraxia)
- Mental health conditions (e.g., anxiety, depression)
- Long-term health conditions (e.g., epilepsy, diabetes)
- Mobility or physical impairments
- Sensory impairments (visual and/or hearing)
- Autism spectrum conditions
- Temporary conditions that result in substantial disadvantage

Students awaiting diagnosis may also be considered for support where sufficient medical or professional evidence indicates long-term impact.

### Reasonable Adjustments

Changes or modifications made to remove or reduce disadvantages experienced by disabled students, enabling equitable access to education. These can include:

- Adjustments to teaching and assessment methods
- Provision of assistive technology or accessible materials
- Extra time in assessments or alternative assessment formats
- Physical adjustments such as ergonomic furniture or accessible campus facilities

Reasonable Adjustments are assessed on a case-by-case basis and are based on evidence of need.

### Inclusive Approaches

Proactive practices embedded into teaching, learning, assessment, and campus life that aim to anticipate and meet the needs of all students, including those with disabilities. Examples include:

- Use of accessible digital formats
  - Lecture recording
  - Clear communication of learning outcomes
- Inclusive approaches reduce the need for individual adjustments and promote a more accessible learning environment for all.

### Equality Act 2010

The Equality Act 2010 is UK legislation that protects individuals from discrimination and promotes equal opportunities. Under the Act, Higher Education providers have a legal duty to:



- Avoid discrimination against disabled students
- Make Reasonable Adjustments to remove barriers to learning
- Promote equality of opportunity between disabled and non-disabled students

## 5. Policy Statement

QA Higher Education is committed to creating an inclusive and supportive learning environment where all students, including those with disabilities, have equitable access to education, resources, and opportunities to succeed.

This policy ensures that disabled students are not placed at a substantial disadvantage in teaching, learning, or assessment compared to their non-disabled peers. QA Higher Education recognises its legal and moral duty under the Equality Act 2010 to make Reasonable Adjustments and to promote inclusive practices across all areas of academic and student life.

QA Higher Education will take all reasonable steps to remove or reduce barriers that hinder the full participation of disabled students. This includes ensuring that adjustments are:

Timely

Based on individual needs and supporting evidence

Proportionate and appropriate within the context of academic standards

The institution promotes a culture of anticipatory and inclusive practice, encouraging academic and professional staff to embed accessibility into the design and delivery of courses, assessments, and services.

By implementing this policy, QA Higher Education aims to:

- Ensure compliance with legal obligations
- Foster dignity, autonomy, and equality of opportunity for disabled students
- Promote shared responsibility across departments for supporting disabled students effectively

This policy applies to all students, staff, and services involved in teaching, learning, assessment, and student support across all QA Higher Education campuses and partnership arrangements.

## 6. Responsibilities

This section outlines the roles and responsibilities of key areas of the University. It does not seek to provide operational detail about these responsibilities.

### University

- Maintain a central Learning Support Service to liaise with Faculties on behalf of students.



- Provide a community of practice and encourage CPD for staff supporting students with disabilities, learning differences, hidden illnesses, and long-term medical conditions.
- Ensure that an appropriate monitoring and recording system is available for Faculties and the Learning Support team.

## Faculties

The Programme Director and Head of Year of each programme will ensure that:

- All relevant academic team members are made aware of any students under their teaching with reasonable adjustments in place.
- To attend relevant CPD sessions and to stay up to date with best practice for supporting disabled students in HE

## Detailed responsibilities

- **Learning Support Advisors** are members of staff responsible for ensuring that disabled students are contacted and offered a meeting to discuss reasonable adjustments. They are responsible for creating an SOA (Summary of Adjustments) and for sharing with relevant teams who will play a role in the student's support. This also includes identifying which students require a Personal Emergency Evacuation Plan (PEEP) and sharing this information with our Facilities team.
- **All Teaching Staff** are responsible for implementing relevant reasonable adjustments detailed in the student's SOA. Module Coordinators are responsible for checking which students on the module require reasonable adjustments and ensuring that staff teaching on the module are aware of these students' requirements.
- **Heads of Academic Years** are responsible for ensuring that anticipatory approaches are agreed on an annual basis and that inclusive approaches and reasonable adjustments are in place for assessments organised within the department, including in-class tests.
- **Programme Directors** are responsible for reviewing the curriculum of their programmes and identifying appropriate inclusive approaches. Additionally, they are responsible for ensuring that teaching and learning materials and practices within their department are accessible and meet the identified needs of disabled students. Finally, they are responsible for ensuring that their staff are aware of this policy.
- **The Facilities Team** is responsible for ensuring that the University campus, including all University buildings, is physically accessible and that accessibility equipment and ergonomic furniture is managed effectively. They are also responsible for ensuring that campus services, such as parking and catering, are accessible. This also includes ensuring that a Personal Emergency Evacuation Plan is provided to any disabled student who requires one.
- **Senior Management Team (SMT)** are responsible for the University's strategy with regards to disabled students, ensuring compliance with the Equality Act and regulating the associated resources to fund support for disabled students.

## Student Responsibilities

- Disclose a disability and/or medical condition as early as possible.
- Register with the appropriate service and to ensure appropriate support is in place as early as possible in the academic year.



- Provide the Learning Support Service with up-to-date contact details, keep appointments, arrive on time, and let services know as early as possible if unable to attend.
- Provide up-to-date medical evidence and/or educational psychologist assessment and/or assessment of need as and when required.
- Inform the Learning Support Service of any changes to circumstances that may affect the level of support required.
- Access and engage with the recommended support.
- Take responsibility for managing studies once suitable support has been put in place.
- Provide feedback on experiences to improve service and practices.
- Treat service staff with respect in line with institution regulations and Student Code of Conduct.

## 7. Related Policies and Procedures

This policy should be read in conjunction with the following QA Higher Education policies, procedures, and guidance documents, which collectively support the institution's commitment to inclusivity and the provision of Reasonable Adjustments for disabled students:

- **Disability Policy** – Outlines QA Higher Education's broader commitment to supporting disabled students and staff, and provides further detail on institutional responsibilities under the Equality Act 2010.
- **Respect for All Policy**– Sets out expectations for student behaviour, including respect for staff and fellow students, and engagement with support services.
- **Assessment Policy** – Provides guidance on assessment design, inclusive practices, and processes for alternative assessments and adjustments.
- **Extenuating Circumstances Procedure** – Describes the process for students to report unexpected and short-term circumstances that may impact academic performance, which may be used alongside Reasonable Adjustments where appropriate.
- **Admissions Framework**– Includes provisions for the fair and inclusive consideration of applicants with disabilities during the admissions process.
- **Fitness to Study Policy** – Addresses situations where a student's wellbeing or health may affect their ability to engage with their studies safely and effectively.
- **Data Protection and Privacy Policy** – Outlines how students' personal and medical information is managed in accordance with GDPR and data protection legislation.

These related documents provide additional operational detail and guidance for staff and students engaging with the support processes described in this policy.

## 8. Implementation Procedures

The implementation of this policy is coordinated by the Learning Support Team in collaboration with academic departments, professional services, and students. The following procedures ensure that Reasonable Adjustments are identified, communicated, and applied in a timely and effective manner.



## 1. Disclosure and Registration

- Students are encouraged to disclose a disability or long-term health condition as early as possible—either during the admissions process or at any point during their studies.
- Upon disclosure, students will be referred to the Learning Support Team to begin the process of assessment and support planning.
- Students must provide appropriate supporting evidence, such as medical documentation or diagnostic assessments, to confirm eligibility for Reasonable Adjustments.

## 2. Assessment of Needs

- A Learning Support Advisor will arrange a one-to-one meeting with the student to review the impact of their condition and discuss suitable adjustments.
- Where appropriate, a Personal Emergency Evacuation Plan (PEEP) will also be developed in consultation with the student and shared with the Facilities Team.

## 3. Creation of a Summary of Adjustments (SOA)

- Based on the student's needs and evidence, the Learning Support Advisor will draft a **Summary of Adjustments (SOA)**.
- The SOA outlines recommended adjustments to teaching, learning, assessments, and physical access where applicable.
- The SOA will be reviewed and approved by the Learning Support Team and shared with:
  - Programme Directors
  - Heads of Academic Years
  - Module Coordinators
  - Relevant teaching staff
  - Professional services teams (e.g. Exams, Facilities)

## 4. Communication and Confidentiality

- Reasonable Adjustments are shared only with relevant staff on a need-to-know basis to maintain confidentiality.
- Students must give consent for their SOA to be shared during the registration process with Learning Support.
- Staff accessing student information must handle it in line with GDPR and institutional data protection procedures.

## 5. Implementation of Adjustments

- Teaching and professional staff are responsible for implementing the adjustments as detailed in the SOA.
- Adjustments may include, but are not limited to:
  - Additional time in exams
  - Alternative formats for teaching materials



- Lecture recordings
- Modified assessment methods
- Ergonomic furniture or assistive technology

## 6. Monitoring and Review

- The Learning Support Team maintains a secure and up-to-date list of students with SOAs and regularly monitors support arrangements.
- Adjustments will be reviewed annually, or sooner if a student's condition or course circumstances change.
- Students are responsible for informing Learning Support if they experience changes in their needs.

## 7. Staff Training and Support

- QA Higher Education will provide training and guidance for academic and professional staff to support the effective implementation of Reasonable Adjustments.
- The Learning Support Team offers ongoing advice and consultation to staff handling complex or evolving student needs.

## 8. Escalation and Dispute Resolution

- Any concerns about the adequacy or implementation of adjustments should be raised in the first instance with the Learning Support Team.
- Formal complaints or appeals related to Reasonable Adjustments will be reviewed by the Quality Assurance Team in accordance with QA Higher Education complaints procedures.

## 9. Monitoring and Compliance

QA Higher Education is committed to ensuring that this policy is implemented effectively and consistently across all areas of the institution. Ongoing monitoring and compliance mechanisms are in place to ensure that disabled students receive appropriate support and that QA Higher Education meets its legal obligations under the Equality Act 2010.

### Monitoring

The **Learning Support Team** maintains a secure, up-to-date register of students with Summary of Adjustments (SOAs) and is responsible for overseeing the timely implementation of adjustments.

Academic departments are expected to confirm receipt and implementation of adjustments relevant to teaching and assessment.

The **Quality Assurance Team** conducts periodic reviews of policy implementation, including sampling cases to ensure consistent application of Reasonable Adjustments across programmes and campuses.

Student feedback is actively sought through surveys, focus groups, and feedback forms to evaluate the effectiveness and impact of support provisions.

The effectiveness of Reasonable Adjustments is reviewed annually or as required, especially where student needs or course requirements change.



## Compliance

Compliance with this policy forms part of the institution's broader equality, diversity, and inclusion responsibilities and is monitored as part of internal quality assurance processes.

Any failure to implement agreed Reasonable Adjustments may be investigated as a breach of policy and addressed through appropriate internal procedures.

The **Quality Assurance Team** is responsible for reviewing complaints or appeals relating to Reasonable Adjustments and ensuring outcomes inform policy development and staff training.

- All data is managed in accordance with the institution's **Data Protection Policy** and the **General Data Protection Regulation (GDPR)**, ensuring confidentiality and secure handling of sensitive information.

## Reporting

- Summary reports on the uptake and implementation of Reasonable Adjustments are submitted annually to Senior Management to support strategic planning and resource allocation.
- Key findings from monitoring and compliance reviews are used to inform training, improve procedures, and enhance inclusive practices across QA Higher Education.

## 10. Equality Impact Assessment

This policy has been developed in line with the Equality Act 2010 to promote fairness, accessibility, and inclusion for disabled students at QA Higher Education.

The policy actively supports the elimination of discrimination, the advancement of equality of opportunity, and the fostering of good relations between disabled and non-disabled students. By clearly outlining the responsibilities and procedures for implementing Reasonable Adjustments, the policy ensures that disabled students are not placed at a disadvantage in their learning or assessment.

No adverse impacts on any protected characteristic groups have been identified. The policy is designed to positively impact disabled students and to encourage inclusive practice that benefits the wider student population.

This Equality Impact Assessment will be reviewed alongside the policy every three years or sooner if significant changes are made.

## 11. Data Protection

QA Higher Education is committed to protecting the personal and sensitive data of all students, including information related to disabilities and medical conditions.

All data collected and processed under this policy is handled in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This includes data submitted during the disclosure and assessment process, such as medical evidence or diagnostic reports.

Key principles include:



- **Confidentiality:** Information about a student's disability is only shared with relevant staff on a strict need-to-know basis, and only with the student's explicit consent.
- **Secure Storage:** Student records, including Summary of Adjustments (SOAs), are stored securely and accessed only by authorised personnel.
- **Student Consent:** Students are required to provide written consent before their information is shared with academic and support staff for the purpose of implementing Reasonable Adjustments.
- **Right to Access:** Students have the right to access their personal data and to request corrections or deletions in line with QA Higher Education's Data Protection Policy.

QA Higher Education ensures all staff handling sensitive student data are trained in data protection responsibilities and act in accordance with institutional policies and relevant legislation.

## 12. Further Information

For further information, advice, or support regarding this policy or the process of accessing Reasonable Adjustments, students and staff are encouraged to contact the Learning Support Team.

### Learning Support Team Contact Details:

✉ Email: [QAHE.LearningSupport@qa.com](mailto:QAHE.LearningSupport@qa.com)

📍 Available across all QA Higher Education campuses

The Learning Support Team can provide:

- Guidance on disclosing a disability
- Support with registering for Reasonable Adjustments
- Clarification on procedures outlined in this policy
- Advice for staff supporting disabled students

Additional resources, forms, and guidance materials are available on the QA Higher Education student portal and intranet.

For queries related to policy compliance or complaints, please contact the Quality Assurance Team via your local academic office or refer to the QAHE Complaints Procedure.

## 13. Review

This policy will be reviewed every three years to ensure its continued effectiveness and compliance with relevant legislation, including the Equality Act 2010.

Reviews may also be conducted sooner in response to:

- Significant changes in legal or regulatory requirements
- Updates in institutional practices or strategic priorities
- Feedback from students, staff, or other stakeholders
- Emerging best practices in supporting disabled students in higher education



The review process will involve consultation with relevant departments, including the Learning Support Team, academic faculties, and the Quality Assurance Team, to ensure the policy remains current and fit for purpose.

