

Disability Disclosure and Reasonable Adjustment Procedures for Online Students

Introduction

We are dedicated to providing all our students an equal opportunity to engage, learn, and succeed on their chosen course. In order to provide the most appropriate support, it is important that we are made aware of any disability or condition a student has – whether the student believes it may affect their studies or not. Students are therefore encouraged to disclose any disability and to seek advice from the Disability Support Team, at the earliest given opportunity. If a student is unsure whether they might have a disability, or unsure if it could affect their ability to successfully study on their course, they should raise this with the Disability Support Team, or alternatively their Admissions Adviser or Student Support Team.

This document details the procedure for accessing reasonable adjustments for students studying an online programme. Students are also advised to consult the University's Policy Regarding Reasonable Adjustments and Support for Disabled Students, which is available [here](#). A person is considered disabled under Section 6 of the Equality Act 2010 if they have a physical or mental impairment that has a 'substantial and long-term adverse effect' on their ability to carry out normal daily activities.

Note: For the purpose of this document and throughout all other documents and related support, the term 'Disability' is used in reference to any disability, learning difference, mental health issue or long-term medical condition i.e. all such conditions which might require additional support.

Procedure for Accessing Reasonable Adjustments

Disclosing a Disability

All applicants to a University of Liverpool online programme will be given an opportunity to disclose a disability during the Admissions process, and students are able to disclose a disability at any point during their time at the University by contacting the Disability Support Team or their Student Support Team.

Where a disability is disclosed, a Disability Guidance Form will be shared with students which explains the inclusive support available to all students, details how a Reasonable Adjustment plan could offer further individualised support and seeks confirmation of how the student wishes to proceed.

Once the form is returned, the Disability Support Team will contact the student to discuss their needs and advise on the next steps. A Disability Officer will also reach out to any student who discloses a disability but does not return the Disability Guidance Form to ensure that this has been received and invite a discussion about the Reasonable Adjustment procedures.

Reasonable Adjustment Plans

Under the Equality Act 2010, institutions have a duty to anticipate and make reasonable adjustments for disabled people to ensure they are not placed at a substantial disadvantage compared to non-disabled people. Institutions also have a duty to promote equality between disabled and non-disabled people known as the general duty and more information can be found in [Appendix A of the University Policy](#).

Section 3 of the University policy defines reasonable adjustments as both anticipatory and individual reasonable adjustments made available to reduce the impact of barriers commonly experienced by disabled students.

The Disability Support Team at Kaplan Open Learning are responsible for ensuring that any online student who discloses a disability and requests reasonable

adjustments be made to support their study have an appropriate Reasonable Adjustment Plan in place which identifies relevant inclusive approaches to the provision and, where appropriate, anticipatory and individual reasonable adjustments to reduce barriers to the student's participation in their academic programme.

Students who wish to access reasonable adjustments will be required to provide evidence of their disability and details of acceptable evidence can be found in Appendix C of the University's Policy Regarding Reasonable Adjustments and Support for Disabled Students. Students are responsible for the translation of any supporting documents written in a language other than English. These translations must be produced by an accredited translation agency and be signed off with a signed statement of the truth.

The appointed Disability Officer will consider a number of factors when deciding whether an individual adjustment is reasonable and will engage in a collaborative discussion with the individual student and the relevant Programme Director as required about the appropriateness of suggested individual reasonable adjustments. Factors may include, but not be limited to, the perceived effectiveness of the adjustment, the time or resources required to implement the adjustment, the student's previous experience of the adjustment and whether the need could be met through an existing inclusive approach or anticipatory adjustment. We are not obliged to offer the student their preferred adjustment, particularly if an inclusive approach or alternative reasonable adjustment is available which would provide appropriate support for the student. Further information is provided below about the complaints process should a student disagree with the proposed reasonable adjustment.

Where anticipatory and individual reasonable adjustments are identified as suitable, the Disability Officer will produce a draft Reasonable Adjustment Plan which will be shared with the student for review and further discussion if required. If the student is satisfied with the proposed adjustments, the Disability Officer will ensure communication of the student's approved Reasonable Adjustment Plan to all relevant parties, with the student's consent. All teaching staff are responsible for

implementing relevant reasonable adjustments detailed in the student's Reasonable Adjustment Plan.

A student's disability may change throughout their programme of study, or they may find that the inclusive approaches and/ or reasonable adjustments which were appropriate at one stage of their programme are no longer appropriate. In such instances, the student should request a review appointment with the Disability Support Team and discuss these changes. The appointed Disability Officer will identify whether there are additional or alternate inclusive approaches or reasonable adjustments which would meet the student's needs and where this is the case, the student will be offered a revised Reasonable Adjustment Plan.

What adjustments can be provided?

There are a number of inclusive and anticipatory adjustments that could be provided, and examples of these can be found in Appendix D of the University Policy.

An example of how we take an inclusive approach which aims to meet the needs of both disabled students and other student groups is via the availability of subtitles and transcripts for all pre-recorded materials. Specific examples of anticipatory adjustments which aim to reduce the impact of barriers commonly experienced by disabled students in an online learning context are provided below, although this is not an exhaustive list:

- Disabled students may request a seven consecutive day extension to individual coursework deadlines for reasons relating to their disability using the appropriate departmental procedure rather than using the extenuating circumstances procedure to apply for late penalties to be removed.
- Appropriate adjustments are implemented for assessed presentations e.g. presentation to a small group or to the individual assessor; additional time provided due to speech difficulties; submission of a recording for Oral Presentations in advance
- Not being penalised for spelling and grammatical errors within written assignments
- Additional time allowances of 25% for any timed examinations.

- Synchronous seminar/tutorial/webinar contribution awareness, for example, lecturers will be aware not to ask the student direct questions unless this is an assessment requirement.

External Funding

Where students are able to access external funding for a reasonable adjustment, for example through Disabled Student's Allowance (DSA), the University would expect the student to access such funding. The Disability Support Team will support the student through this process where necessary.

Records Management and Data Security

Documentation submitted to the Disability Support Team regarding a student's disability is considered as "sensitive personal data"; this includes information about a physical or mental disability as defined by the Equality Act. This information will be managed and stored (in an electronic format in most circumstances and hard copy where appropriate) by the Disability Support Team in line with the General Data Protection Regulations (GDPR). GDPR states that sensitive personal data cannot generally be disclosed, unless explicit consent has been received.

Only authorised staff members will be able to view or alter confidential data, and the Disability Support Team will ensure that:

- Any personal data which they hold is kept securely
- Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

Complaints

Disagreement with recommended reasonable adjustment/s

Both the University and Kaplan Open Learning recognise the importance of appropriate inclusive approaches and reasonable adjustments being put in place as soon as possible. In situations where a student is not satisfied with the inclusive approaches and reasonable adjustments which have been recommended, it is

important that these concerns can be addressed in a timely manner. A specific process has therefore been developed in relation to complaints about reasonable adjustments. If this does not resolve the student's complaint, then the student can move to the second stage of the Student Complaint's Procedure.

A student who disagrees with the reasonable adjustments recommended by the Disability Support Team should discuss this with the appointed Disability Officer in the first instance, who will consider the student's views and whether there are other reasonable alternatives. Where it is possible to agree a reasonable alternative, the student's Reasonable Adjustment Plan will be updated and recirculated.

If the student is unable to resolve the matter informally, they should set out their concerns in writing to Kaplan Open Learning's Head of Student Services. The Head of Student Services (or nominee) will investigate the matter and will respond to the student in writing, normally within 14 calendar days. If the Head of Student Services finds the student's concerns are justified, s/he will make recommendations for alternative inclusive approaches/reasonable adjustments which the Disability Support Team will be required to recommend for implementation.

To determine what is reasonable requires an understanding of the specific elements of a student's complaint and the academic and/or institutional context. The Head of Student Services may seek advice from relevant staff about what might be considered reasonable within the specific context and may need to disclose relevant information about the complaint to enable these individuals to determine what is relevant. Only the information necessary to aid such a determination will be shared. All parties will be reminded of the need to ensure that the information remains confidential. By making a complaint, the student accepts that the Head of Student Services may disclose relevant information on this basis.

If the student is dissatisfied with the Head of Student Services' decision, they can make a complaint under stage two of the Student Complaints Policy and Procedure. If the student wishes to raise such a complaint, they should normally do so within 28 calendar days of receipt of the Head of Student Services' decision. The Student Complaints Procedure can be found [here](#).

Non-implementation of recommended reasonable adjustments

If a student does not think that the recommended reasonable adjustments have been implemented, they should raise this with the Disability Support Team in the first instance, who will endeavour to identify an appropriate solution. If the student remains dissatisfied they should make a complaint using the Student Complaints Procedure.

Disabled Students' Allowance

Complaints about support provided through the Disabled Students' Allowance should be made using the DSA complaints procedure. Students based in England who wish to appeal against an award of DSA funding should raise a formal appeal by contacting the SLC by email: formal_appeals@slc.co.uk. Complaints about support which is provided by external NMH providers should be made using the organisation's procedures. This will be available from their website.

Further information and advice can be obtained from the Disability Support Team by emailing disability@study-online.liverpool.ac.uk, or you may alternatively seek this from your Admissions Adviser or Student Support Team.

Responsible Manager(s)	Director of Student Services Head of Student Services
Name	Katy Bailey Rob Jackson
Date Approved	December 2024
Related Policies	University of Liverpool Policy and Procedures Regarding Reasonable Adjustments and Support for Disabled Students University of Liverpool Student Complaints Policy and Procedure