



# Student Reasonable Adjustment Policy



## Scope

Pre-application through to completion of one or more credit bearing taught or research modules, usually leading to an award at City St George's, University of London. Does not apply to students that are undertaking a period of study or year abroad.

## Summary

This document outlines the legislative context, principles and purpose of this policy. It should be read in conjunction with the Student Reasonable Adjustments Guidance. These documents demonstrate City St George's, University of London's commitment to the creation and maintenance of a culture in which diversity is celebrated, equality of opportunity is promoted, and in which unlawful discrimination is not tolerated. This is outlined in the [Equality, Diversity and Inclusion Strategy](#).

## Should be read in conjunction with:

Student Reasonable Adjustments Guidance for detail on how the Policy is implemented [Please note: *This will be developed by the Student Reasonable Adjustments Working Group (Summer 2025) in accordance with the Policy Implementation Plan*].

**Approved/re-approved: April 2021. Updated April 2025.**

**Date for review:** To be reviewed on an annual basis, with allowance for updates.

**Effective from:** September 2025

## Equality and Diversity Statement

City St George's, University of London is committed to promoting equality, diversity and inclusion in all its activities, processes, and culture, for our whole community, including staff, students and visitors.

The university will meet its obligations under the Equality Act 2010 in its policies and seek to eliminate discrimination on the basis of age, disability, sex, gender reassignment, gender identity, marital status, pregnancy, caring responsibilities, race, nationality, ethnic origin, religion and belief and socio-economic background.

## Freedom of Speech

City St George's, University of London, regards freedom of speech and academic freedom to be fundamental to delivering its mission as the University of business, practice and the professions. Its values in this respect are set out in a code of practice on freedom of speech and academic freedom, which explains how the University will uphold, secure, and promote freedom of speech within the law. See: <https://www.citystgeorges.ac.uk/about/governance/policies/code-of-practice-on-freedom-of-speech> . Nothing in this policy should be interpreted in any way that would be inconsistent with the code of practice and – in the event of any inconsistency – the provisions of the code will prevail.

## Introduction

1. City St George's understands that it is often societal and environmental barriers, not specific impairments which disable people. We welcome and encourage students with disabilities to apply, actively engage in and contribute to our community. We strongly believe that the more diverse our community, the greater its potential for innovation and excellence in education, teaching, research and learning.
2. In this policy *you* and *your* means the student; *we*, *us* and *our* means City St George's University of London and its staff members.
3. This policy provides an overview of how City St George's complies with our legal obligations as set out in the Equality Act 2010 and aims to ensure consistent practice in the application of anticipatory and reasonable adjustments. The overall aim is to ensure that all students, regardless of disability, can fully participate in their chosen programme of study and equally access all opportunities that being part of the City St George's community offers. We balance this alongside educational, safety and fitness to practise requirements to ensure that the standards required for your chosen profession are maintained. We are committed to implementing recommended Reasonable Adjustments in full unless there is a legitimate pedagogical, safety or fitness to practise reason for not doing so.
4. This policy demonstrates our commitment to a culture in which all students, staff and stakeholders feel valued, and in which unlawful discrimination is not tolerated; this is in accordance with our [Equality, Diversity and Inclusion Commitments](#).
5. We want all students to fulfil their potential and have a positive university experience. We are committed to inclusive practice, the anticipation and removal of barriers to access and participation, the development of sector-leading models of practice, and the provision of an inclusive and accessible environment. This is to improve access to higher education amongst underrepresented communities, including those with disabilities, reduce attainment gaps and advance equal opportunities, supporting a high-quality learning and student experience for all. In applying this policy, we will also respect lawful freedom of speech and academic freedom. Expectations of inclusive conduct do not, in themselves, limit the lawful expression of ideas, even where others may strongly disagree with them or find them uncomfortable. Concerns about speech will be considered under the appropriate University procedures and the law, alongside our duties to address unlawful harassment and discrimination.
6. **Definitions**
  - 6.1. **Disabled student:** Any student with a physical or mental impairment which has a substantial and long-term negative impact on their ability to carry out normal day-to-day activities in the context of their studies. This includes individuals with physical or sensory impairments, mental ill health, specific learning differences and a range of chronic or fluctuating conditions. (Equality Act 2010).
  - 6.2. **Reasonable Adjustments:** We have a legal duty to provide modifications or adjustments made with the aim of ensuring, as far as reasonable, that disabled students are not put at a disadvantage compared to their non-disabled peers and able to access learning, teaching and assessment. This may include adjustments to learning and teaching methods, physical and digital materials including tools, assessment formats and facilities as well as making recommendations with respect to programme related placements or work experience external to City St George's. There is no set definition of what is "reasonable" as it depends on individual needs. When we consider

if a proposed adjustment is reasonable, many factors will be taken into account. These may include understanding exactly what support will help, the impact and effectiveness of this, Health & Safety considerations and cost. We have a legal duty to provide modifications or adjustments made with the aim of ensuring, as far as reasonable, that disabled students are not put at a disadvantage compared to their non-disabled peers and able to access learning, teaching and assessment. This may include adjustments to learning and teaching methods, physical and digital materials including tools, assessment formats and facilities as well as making recommendations with respect to programme related placements or work experience external to City St George's. Adjustments will be implemented in a way that preserves academic standards and learning outcomes and respects the lawful exercise of freedom of speech and academic freedom by staff and students. Accessibility-related changes to teaching methods or materials are aimed at enabling participation and do not require alteration or removal of lawful viewpoints or academic content.

- 6.3. **Anticipatory Adjustments:** We have a legal duty to provide anticipatory reasonable adjustments; to anticipate and minimise or remove any disadvantage that might reasonably be foreseen and faced by an applicant or student with disabilities. We will provide anticipatory adjustments through the review and development of inclusive admissions processes, teaching, assessment, and the development of accessible physical facilities and digital content and services. This obligation cannot be fulfilled through the application of reasonable adjustments. Whilst inclusive practice falls outside the scope of this policy, embedding this will reduce individual reasonable adjustment requirements. In instances where anticipatory adjustments do not sufficiently meet your individual needs as a student with disabilities, we are committed to the provision of support and reasonable adjustments where their application does not compromise academic or professional competency standards. These measures will be designed and implemented to uphold lawful freedom of speech and academic freedom. They focus on removing access barriers to participation, assessment, and facilities, and will not be used to limit lawful academic content, debate, or the expression of views. Support will be provided based on need regardless of lawful views or expressions.
- 6.4. **Student Support Plan:** A documented plan which outlines agreed reasonable adjustments and how they will be implemented accounting for a student's individual needs and any practical, educational or professional considerations. Adjustments only apply to future activities; they cannot be applied retrospectively.
- 6.5. **Competency Standard:** The Equality Act (2010) defines a competence standard as: 'An academic, medical, or other standard applied for the purposes of determining whether or not a person has a particular level of competence or ability'. These are the essential skills and knowledge that you must have to successfully complete your degree. We want every student to succeed and be treated fairly. A competency standard must apply equally to all students and be genuinely relevant to the programme. All City St George's programmes require you to reach specific academic standards to be awarded a City St George's, University of London qualification. If you have a disability, you are required to attain the same competencies as your peers. We are not required to make reasonable adjustments to competency standards themselves. However, we will make reasonable adjustments to the way we assess you whenever possible. If your disability puts you at a disadvantage in a particular assessment method, we will work to adjust that method so you can still effectively demonstrate your skills and knowledge

without being unfairly disadvantaged if possible. Our goal is to ensure you have every opportunity to show us what you can do, and that our assessment methods do not create unnecessary barriers for you.

#### **6.6. Professional, Statutory, Regulatory Body (PSRB) Competency Standards:**

Some programmes also have Professional Statutory Regulatory Body (PSRB) competency standards. City St George's cannot necessarily reduce or change these, but we are committed to removing barriers for students with disabilities to help them to achieve safe and effective practice without supervision by the end of their programme of study. However, standards or competencies that must be met to qualify and work as a registered professional are not subject to adjustments. In rare instances, the process of assessing whether a competence standard has been achieved is inextricably linked to the standard itself, i.e. the ability to complete an assessment may itself amount to a competency standard, and we may be unable to apply adjustments.

### **7. Sharing your disability with us**

- 7.1. We encourage you to let us know if you have a disability when applying to study with us. We will be better placed to support you if you let us know at the earliest opportunity, however you can share your disability at any point during your time with us. If you wait to do this, it may affect our ability to provide support and adjustments.
- 7.2. Admissions decisions are based on aptitude and ability for the chosen programme and are made irrespective of whether you have shared your disability with us. The only exceptions arise where there are concerns about your ability to engage with the course and meet the competency standards or your fitness to practise, more information about which can be found on the [Student Hub](#). In these instances, we will consult with relevant team(s) and reserve the right to delay or withdraw your admission. Our [Admissions Policy](#) is available on our website.
- 7.3. Current students who are pregnant or have short term conditions or injuries and require temporary support provision, should contact the Student Hub (for students based at Clerkenwell campus) or the Student Life Centre (for students based at Tooting campus).
- 7.4. If you are re-sitting without attendance, or your studies have been interrupted or suspended, you can also let us know about your disability, however; the support that can be offered in these circumstances may be more limited and will depend on your circumstances.
- 7.5. If you are studying for a period or a year abroad, we will be able to provide advice and guidance on the support that may be available to you. Reasonable adjustments would usually be implemented by your host institution.
- 7.6. Our responsibility for the identification and provision of reasonable adjustments by partner providers can vary and is determined by agreements we have in place with each partner.

### **8. Your personal data**

Any information you disclose to us in application or registration forms is treated as confidential to City St George's in accordance with the [Data Protection Policy](#). Information disclosed on application becomes part of the electronic student record. Effective support and sometimes health and safety issues necessitate disclosure of arrangements to key staff. Information will be shared in accordance with the privacy notice/ confidentiality statement

outlined on submission of your e-referral or online registration form. If you have any questions or concerns about confidentiality, we encourage you to contact us. For more information about your personal data and how we use this, please see the [Student Privacy Notice](#).

## 9. Students –Responsibilities and Reasonable Adjustments Policy

- 9.1. You are encouraged to let us know about your disability or long-term health condition as soon as possible. You can do this by telling Student Health & Wellbeing (for students based at Clerkenwell Campus) or the Disability Service (for students based at Tooting campus) either as an applicant or as a current student. This provides an opportunity for you to tell us about yourself and how your condition and/or disability impacts your studies. You can submit additional information, such as medical evidence or diagnosis reports along with your e-referral or online registration. A member of the team can support you with the process if you wish. Information about how to complete these can be found on the [Student Hub](#). If you prefer, once you have started your studies, you could alternatively speak to a member of staff elsewhere in the University (for example, a Personal Tutor) who can help signpost you to Student Health & Wellbeing or the Disability Service.
- 9.2. Delayed registration may limit our ability to provide support and adjustments, for example  
if you miss a deadline for making exam arrangements or regarding Occupational Health clearance.
- 9.3. Once you have registered, the Student Health & Wellbeing team or the Disability Service will contact you to listen and try to understand your concerns. They may ask for evidence of your disability. This could be a letter from a doctor, other registered healthcare professional, or a student support/disability advisor. The teams will involve you in decisions about what reasonable adjustments and/or support provision may be required. The teams may also work collaboratively with other staff at City St George's. Any adjustments that are identified will be communicated with your agreement through a Student Support Plan.
- 9.4. All students undertaking specific professional qualifications with a practical or clinical component (e.g. placements) are required to engage with Occupational Health as part of the Fitness to Practise process, which is a condition of entry to the programme. If you disclose a disability to Occupational Health, this may result in recommendations for placement-based adjustments. Please note that these adjustments may need to be discussed and agreed upon with the relevant placement provider before they can be implemented. For more detailed information about reasonable adjustments in clinical placements, you should contact the placement team on the campus where your programme is based.
- 9.5. Once the relevant teams have received your Student Support Plan, adjustments will usually be implemented. Exceptions may arise if your course is accredited or overseen by a professional, statutory or regulatory body (PSRB), instances where requests for adjustments are received after relevant published deadlines or, where more complex adjustments or resolution procedures are required. Decisions will be made in accordance with relevant disability and equality legislation, most notably the Equality Act 2010.

9.6. If we cannot make adjustments that you have requested, we will explain why and look to explore alternative options with you. If you are not satisfied with the way we have managed or responded to your request for reasonable adjustments, you may choose to follow the Student Complaints Procedure.

9.7. Telling us about a disability or receiving reasonable adjustments does not stop you from using other appropriate policies and procedures if you need them such as the Extenuating Circumstances Policy or Extensions Policy.

## 10. Staff - **About Reasonable Adjustments for Students and Responsibilities**

10.1. City St George's strives to take a whole-institution approach to wellbeing. Student wellbeing is the collective responsibility of all staff. Staff are expected to engage in the relevant training to ensure they are enabled to support conversations around student wellbeing and how to sign-post students to relevant support as appropriate. Usually, this will be through directing students to complete an e-referral for Student Support & Wellbeing (students based at Clerkenwell campus) or an online registration form for the Disability Service (students based at Tooting campus). If a staff member is worried about a student, they may share concerns with professional colleagues for further advice and guidance. Where possible, they should discuss this with the student first and obtain their consent beforehand.

10.2. Students may disclose a disability at any time and in several different ways. This could involve telling a member of staff directly or sharing information through other academic and non-academic processes (for example, by disclosing needs as part of an application for extenuating circumstances).

10.3. Where a student tells a member of staff about a disability or long-term health condition that they have not previously disclosed to the University, or the staff member observes behaviour that may indicate the student is experiencing difficulties related to a disability or long-term health condition, the staff member has a duty of care on behalf of City St George's to ensure the concern is appropriately raised. This will usually involve supporting the student to complete the steps outlined in paragraph 28 so that support can be offered; however, students are not obliged to take up this support and may decline in writing. This duty must be exercised within the law and in a way that does not penalise or escalate concerns based solely on a student's lawful expression of views, participation in debate, or the holding of opinions, without other indicators of welfare risk or unlawful conduct. Further information is available in the Student Reasonable Adjustments Policy Guidance.

10.5. Staff with responsibility for academic or clinical activities, facilities, provisions, services and processes must ensure that these are inclusive, compliant with accessibility standards and relevant legislation and embed anticipatory adjustments. Staff have a duty to make reasonable adjustments for a student before a full assessment by the Student Health & Wellbeing, or the Disability Service has taken place.

10.5. Teaching staff must ensure that competence standards are assessed in a way that is appropriate to the specific competence, with adjustments where possible to ensure that they do not have a discriminatory impact on students with a protected

characteristic. All module leaders should clearly distinguish between the mode of assessment, where there is a duty to offer an alternative mode of assessment to meet learning outcomes as part of inclusive practice, and a competence standard, where a student must demonstrate a particular level of competence. Staff should also record the reason for selecting a particular format of assessment (for example, a timed examination; an oral presentation; a practical demonstration of a particular skill) if this is required to test a competency standard. This information should be clearly communicated to students<sup>1</sup>. If staff have concerns or queries regarding the implementation of a reasonable adjustment, please seek guidance from Learning Enhancement and Development (LEaD), Student Health & Wellbeing or the Disability Service. Further information is available in the Student Reasonable Adjustments Policy Guidance.

## 11. Feedback and Complaints

- 11.1. We welcome feedback which can be provided informally or formally and use this to influence change and better meet the needs of our community. For more information, please see the Student Reasonable Adjustments Guidance or visit the [Student Hub](#).
- 11.2. If you are dissatisfied with any aspect of the reasonable adjustments process or recommended reasonable adjustments, you are encouraged to raise this informally and at the earliest opportunity with the relevant student support team(s). If you have concerns relating to clinical placement-based reasonable adjustments, you should contact the placements team on the campus where your programme is based. If an acceptable resolution is not reached, you may choose to follow the Student Complaints Procedure. Further information can be found in the Student Reasonable Adjustments Guidance and on the [Student Hub](#). For impartial, independent advice and support with these processes, please contact [City St George's Students' Union](#).

## 12. Data Protection - How We Process Information About Your Disability

- 12.1. City St George's is committed to handling data with care and ensuring compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) which set out the legislative framework for managing personal data. All data is held in accordance with UK GDPR. To be able to fulfil our responsibilities to support you and provide reasonable adjustments, we need to process your personal and special category data. We will usually do this under the lawful basis of *public task* or *legal obligation*, and an applicable *substantial public interest* condition, depending on the purposes for which the data are being processed.
- 12.2. Your personal data will be retained for a limited period, as stipulated in City St George's [Data Protection Policy](#), in accordance with the DPA 2018 and UK GDPR, and shall not be used or shared for any other purposes. For more information about your personal data and how we use this, please see the [Student Privacy Notice](#).
- 12.3. Information held by Student Health & Wellbeing and the Disability Service is confidential. All personal information is processed in accordance with data protection laws and stored securely on our database for a maximum period of seven years.

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<sup>1</sup> See [The Good Practice Framework: Supporting Disabled Students, OIA, 2017, page 13](#)

- 12.4. Your information and records will be shared to relevant parties at your request and / or with your knowledge. The exception to breaching confidentiality arises where there is concern for your safety and wellbeing, and/or the safety of others.
- 12.5. We may need to share your sensitive personal data with our partner providers (or third parties) including but not limited to occupational health and placement providers. Where we engage with third party organisations, a contract or agreement will be in place to ensure that your information rights are protected. You will usually be aware that these data are being shared. Please contact relevant partner providers, for information about their own data protection policies and procedures.
- 12.6. We respect your information rights, including the right to object to or restrict the processing of your (special category) personal data. Objections and requests to restrict processing of your personal data will be considered on an individual basis under UK GDPR and other applicable laws. Where possible, we will uphold the right to object to or restrict processing but there may be times when we are obliged to decline the request. For example, to protect the safety and wellbeing of yourself or another or to meet a legal obligation such as our requirement to consider all information relevant to fitness to practice.
- 12.7. If your objection or request to restrict processing your personal data is upheld, we will ensure that you are made aware of the implications. This may include prevention of the provision of additional support, reasonable adjustments or temporary support provisions. We may also need to inform staff members, partner providers or external parties that you have exercised your information rights.
- 12.8. Our obligations of confidentiality do not apply under the following circumstances:
  - a) Information is or becomes public knowledge other than as a result of a breach of confidentiality by us.
  - b) We are required to disclose under Professional, Statutory and Regulatory Body (PSRB) requirements in relation to vocational programmes.
  - c) We are required to disclose by law; this includes but is not limited to the release of information for the purpose of investigating or responding to a complaint.
  - d) We are required to give proper instructions to any professional adviser who has an obligation to keep any such information confidential; and
  - e) In instances where there is concern for the safety of an individual(s), we have a legal obligation to fulfil Duty of Care. This includes a duty of care for public safety.

## **Disclaimer**

The information in this policy is correct at the time of writing. We subscribe to the Office of the Independent Adjudicator for Higher Education (OIA) scheme, this policy is therefore subject to its review. We are committed to complying with any formal decision and/or recommendation (s) issued by the OIA arising from a student complaint, noting that we are not bound to comply with the OIA decision. We reserve the right to make amendments to this policy. If amendments are made, we will take reasonable steps to publicise the changes in a timely manner.

## Monitoring and Review

The Student Experience Board is responsible for university oversight of this policy.

### Policy Details Table

Document Title	Student Reasonable Adjustments Policy
Maintained by	Student Experience Directorate
Owned by	Director of Student Experience
Approving Committee or Body	Senate
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Website Link	
If you have queries about this document or if you require it in an alternative format, please contact	<a href="mailto:wellbeing@city.ac.uk">wellbeing@city.ac.uk</a>