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KMMS Procedures for Reasonable Adjustments and the Implementation of Inclusive Learning Plans/Placement Learning Support Plans

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1. Introduction

- 1.1. All students should be assessed using methods which enable them to demonstrate that they have met the learning outcomes of the course. In some cases, where practicable, this may require the teaching and/or assessment methods to be adapted, to meet an individual student's needs, in accordance with the institution's legal responsibility to make reasonable adjustments.
- 1.2. These procedures should be considered in conjunction with the KMMS Reasonable Adjustment Policy.

2. Procedure for the determination of reasonable adjustments by the University of Kent Student Support and Wellbeing Service.

- 2.1. Consideration of reasonable adjustments will commence at the point when the student first discloses. Hence, if an applicant indicates a disability, long term medical condition, Specific Learning Difficulty (SpLD) or mental health difficulty on their UCAS application, they will receive communication from Student Support and Wellbeing at the University of Kent, prior to starting their course, with information regarding the support which will be available to them, including guidance regarding what evidence they will need to provide. A flow-chart of the processes involved are listed in **Appendix 3**.
- 2.2. Formal evidence from an appropriate professional will be required before reasonable adjustments can be implemented. The student will be invited to meet with a specialist adviser (disability/SpLD/Mental Health) in Student Support and Wellbeing at the University of Kent, to discuss the evidence they have provided and to agree on any reasonable adjustments that they require in an academic setting.

- 2.3. Where a student is on placement and/or unable to attend an appointment, a telephone/video-linked appointment can be made, to prevent unnecessary delay. Students can also meet with a specialist adviser (disability/SpLD/Mental Health) at the Medway campus, if that is more convenient.
- 2.4. If students think that they might have an SpLD but do not have formal evidence of this, they will be given the opportunity to have a screening conducted by the University of Kent Student Support and Wellbeing Service with referral for a full assessment, if required.
- 2.5. Common adjustments, including those which have been defined by Health Education Operational Practitioners ([HEOPS](#)) as ‘common adjustments which are compatible with patient safety,’ are listed in **Appendix 1**. If required by a student, these adjustments can be included on an ILP without further consideration. More complex requirements or adjustments which may need to vary according to the activity being taught and/or assessed will be discussed with relevant staff in the School before being implemented on the ILP. In order to prevent delay in the rest of the ILP being issued, it can, where necessary, be an iterative process, with issues being highlighted as requiring further discussion before an adjustment is approved. This process will be as transparent as possible, thus enabling the student to have a voice in what strategies might be workable for them.
- 2.6. Adjustments listed by HEOPS as ‘unlikely to be reasonable in the working environment, or likely to place patients at risk’ are listed in **Appendix 2**, however consideration would be made on a case-by-case basis to ensure objective justification is made in any situation where an adjustment is considered not to be possible. It is likely that this will require a joint discussion between KMMS, University of Kent Student Support and Wellbeing and Occupational Health, with possible consideration by the

Fitness to Practise panel. The placement provider would provide input for possible implementation in relation to the specific setting.

3. Inclusive Learning Plans

- 3.1. Agreed adjustments, will be documented on the student's Inclusive Learning Plan (ILP). The ILP will not include details of the student's condition, unless this is required for safety reasons, or the student specifically requests that this information is shared.

- 3.2. As soon as the ILP is completed, it will be instantly visible to the KMMS Student Life and Wellbeing (SLW) team and the student via the Student Record System. The KMMS Student Life and Wellbeing Team will be responsible for overseeing the implementation of the reasonable adjustments documented in the ILP. Implementation of individual ILPs will be case dependent. In addition to working with the ILP author this will include contacting relevant parties, including, but not limited to the KMMS Academic Lead for Student Life and Wellbeing, Head of Year, Curriculum and Assessment Manager, Personal Academic Tutors, Educational Supervisors, and relevant placement staff when necessary while adhering strictly to confidentiality procedures. If any queries are raised regarding the appropriateness of an adjustment in relation to a particular activity, this should be communicated to the author of the ILP as soon as possible, so that an alternative suitable adjustment can be discussed and agreed.

- 3.3. The ILP is also instantly visible to the student via their Student Record. If the student feels at any time that an adjustment is not working (e.g., their condition has worsened or an adjustment does not appear to be working effectively), it is the student's responsibility to communicate with the relevant specialist adviser to alert them to this, so that alternative reasonable adjustments can be discussed and agreed. Changes to the ILP are

communicated by the University of Kent Student Support and Wellbeing team to the KMMS Student Life and Wellbeing team, who will ensure the changes are implemented in a timely way.

3.4. Where a student requires an alternative form of assessment, this should be considered on a case-by-case basis. Adjustments to assessments will be made if it is possible to do so without compromising competence standards. These should be discussed in collaboration with the relevant adviser and the Academic Lead for Assessment.

3.5. In order to determine whether a request for an alternative assessment is reasonable, consideration is taken of the impact of the student's impairment on their ability to undertake the prescribed mode of assessment. For a request to be reasonable, the student would have to be placed at a significant disadvantage compared to a non-disabled student, were they to undertake the prescribed mode of assessment.

3.6. The student is encouraged to speak to the KMMS Student Life and Wellbeing team if they have any questions or queries about the implementation of their ILP.

4. Placement Learning Support Plans

4.1. It is KMMS and the placement providers responsibility to ensure that reasonable adjustments are put in place for disabled students during any practice/work placements and fieldtrips that are a compulsory element of their programme of study. A Placement Learning Support Plan (PLSP) will be created for students who require adjustments for the above.

4.2. All students will require Occupational Health (OH) clearance before they go on placement. Where a full OH assessment is required the OH Practitioner

will advise on appropriate adjustments that the student will require on their clinical placements and will send a report directly to the University of Kent Student Support and Wellbeing Service, for inclusion in the student's ILP/PLSP.

- 4.3. The PLSP will be made available to the KMMS Student Life and Wellbeing team by the University of Kent Student Support and Wellbeing Service as part of the ILP. It will be uploaded onto the student's record in the Student Record System as above, so that the student can access it and/or download it at anytime, anywhere.
- 4.4. The Programme Director will review all new PLSPs to ensure that they are appropriate for the placement settings in the programme. Any queries are raised regarding the appropriateness of an adjustment(s) should be communicated to the author of the PLSP as soon as possible, so that an alternative suitable adjustment can be discussed and agreed.
- 4.5. Before the start of each academic year, the Head of Year will review the PLSPs for all the students due to progress to the next stage of study.
- 4.6. With the student's consent, KMMS staff will be responsible for ensuring that all placement providers are informed of any reasonable adjustments required for a student on placement. For more complex adjustments, the student, KMMS Academic Lead for Student Life and Wellbeing, placement provider and specialist adviser in University of Kent Student Support and Wellbeing should be involved in early discussions in advance of the placement, to ensure that there is clarity as to how the adjustment(s) will be implemented in practice. The student will be encouraged to confirm the adjustment(s) with the provider when they arrive on site and raise any concerns or queries immediately if the adjustment (s) is/are not being implemented and/or is/are not adequate for the specific setting. This should be handled via the Raising

and Escalating Complaints/ Concerns within practice Environments policy and Guidance.

4.7. As part of the service level agreement (SLA), each placement provider will be informed of the expectation that they will abide by KMMS policy and procedure, including on Reasonable Adjustments.

4.8. The placement provider will implement and fund where appropriate adjustments as defined by the student's Placement Learning Support Plan (tariff funding cannot be used). If a placement provider has any query regarding the appropriateness of an adjustment in relation to a specific placement activity, this should be communicated to the KMMS Student Life and Wellbeing Manager as soon as possible. The following are examples of possible placement adjustments (list not exhaustive). This will be looked at on a case-by-case basis and may or may not be possible depending on the placement environment and learning activities required (see appendix 1 and 2 for additional guidance):

- geographical location of placement & parking facility
- sympathetic clinical rotations/ shift pattern
- avoidance of high-risk clinical activities
- assistive technology,
- increased supervisory support.

4.9. The PLSP will be regularly reviewed to ensure it accurately outlines the student's support requirements. These may vary, depending on the placement environment in which the student is working. Students should have the opportunity to review their PLSP prior to each new placement learning environment. Any students with concerns regarding the implementation of the proposed reasonable adjustments on placement should contact their adviser at the University of Kent Student Support and Wellbeing Service at the earliest opportunity.

5. Temporary Adjustments

5.1. Students will be advised via the Student Portal and KMMS webpages that, if they require temporary adjustments, they should discuss this in the first instance with the KMMS Student Life and Wellbeing Manager.

5.2. Requests for temporary adjustments could potentially be requested in situations including, but not limited to:

5.2.1. where a student has sustained an injury such as a broken limb

5.2.2. where a student is experiencing a distressing life-event, such as bereavement

5.2.3. where a student is pregnant

5.2.4. where a student is requesting a reasonable adjustment for religious observance.

5.3. In most cases, the KMMS Student Life and Wellbeing Manager will be able to facilitate a direct solution in consultation with the relevant KMMS colleagues, including the Programme Director to ensure consistency in how temporary adjustments are applied. Temporary adjustments that relate to assessments will be discussed with the Academic Assessment Lead and Programme Director.

5.4. The KMMS Student Life and Wellbeing Manager will also be able to refer the student to a specialist adviser (disability/SpLD/Mental Health etc) in the Student Support and Wellbeing service at University of Kent, for a temporary ILP, if the student's situation has resulted in health-related issues which are likely to last for an extended period and or have resulted in more complex learning/assessment requirements. If necessary, the student will be referred to Occupational Health for advice on any temporary placement-based

adjustments.

5.5. As above, this will all be subject to review at any time and will be actioned in line with confidentiality procedures. At times information sharing may be necessary to implement and follow up with learning and assessment required adjustments and this will be carried out on a case-by-case basis and only after seeking consent from the student to do so.

6. Reviewing reasonable adjustments

6.1. Students who have reasonable adjustments in place via ILP/PLSP's are invited to review their reasonable adjustments, if required, annually.

6.2. In addition, students are reminded to inform KMMS Student Life and Wellbeing and their Disability/SpLD/Mental Health Adviser at any time in their studies if there is a change of circumstance (e.g., a fluctuation in their condition or a change need in the adjustment provided to reduce barriers).

6.3. If the KMMS Student Life and Wellbeing Manager is aware of any changes that occur during the teaching term (e.g., moving to a different placement), an immediate referral can be made to Occupational Health for a review of placement-based adjustments, if required.

6.4. The KMMS Student Life and Wellbeing Manager will also inform the specialist advisers of any changes to the assessment type so any further reasonable adjustments required can be added to the ILP, as described above.

Appendix 1. Reasonable adjustments

Commonly offered adjustments. This list is not exhaustive but provides examples of minor and common adjustments, which have been requested by students and accepted by training institutions, and which are compatible with patient and service user safety:

- Extra time in academic written examinations – this is commonly 25%, by convention, and is not evidence based.
- Extra time in clinical examinations which are not a time limited assessments of skills and knowledge, and where patient safety does not depend on time-critical performance.
- Coloured paper or coloured overlays for paper documents.
- Instruction on good learning techniques including repetition, checking, use of spell checking and grammar checking software and use of a dictionary.
- Handouts and lecture notes in advance of lectures.
- The facility to record lectures e.g., use of a dictaphone.
- Extra time to complete assignments.
- Use of a laptop to take notes and a choice of paper or computer media to access written information during academic examinations.
- Text to voice and voice to text software or telephone systems.
- Written notes from group meetings, conferences, and lectures.
- Adjusted training course to avoid exposure prone procedures (for non-EPP disciplines only).
- A relapse prevention plan agreed with the treating Psychiatrist to detect early signs of relapse and ensure that patient contact is suspended at an early stage of relapse.
- Adjusted training hours and extended training course duration.
- Adjusted equipment for clinical tasks with enhanced visual or sound features.
- Training in signing or lip reading.
- Less than full time training when this is compatible with regulatory requirements.

Appendix 2. Unreasonable adjustments

Higher Education Occupational Practitioners (HEOPS)¹ also indicate that the following adjustments are 'unlikely to be reasonable in the working environment, or likely to place patients at risk'. The list is not exhaustive and is not prescriptive and will be decided on a case-by-case basis:

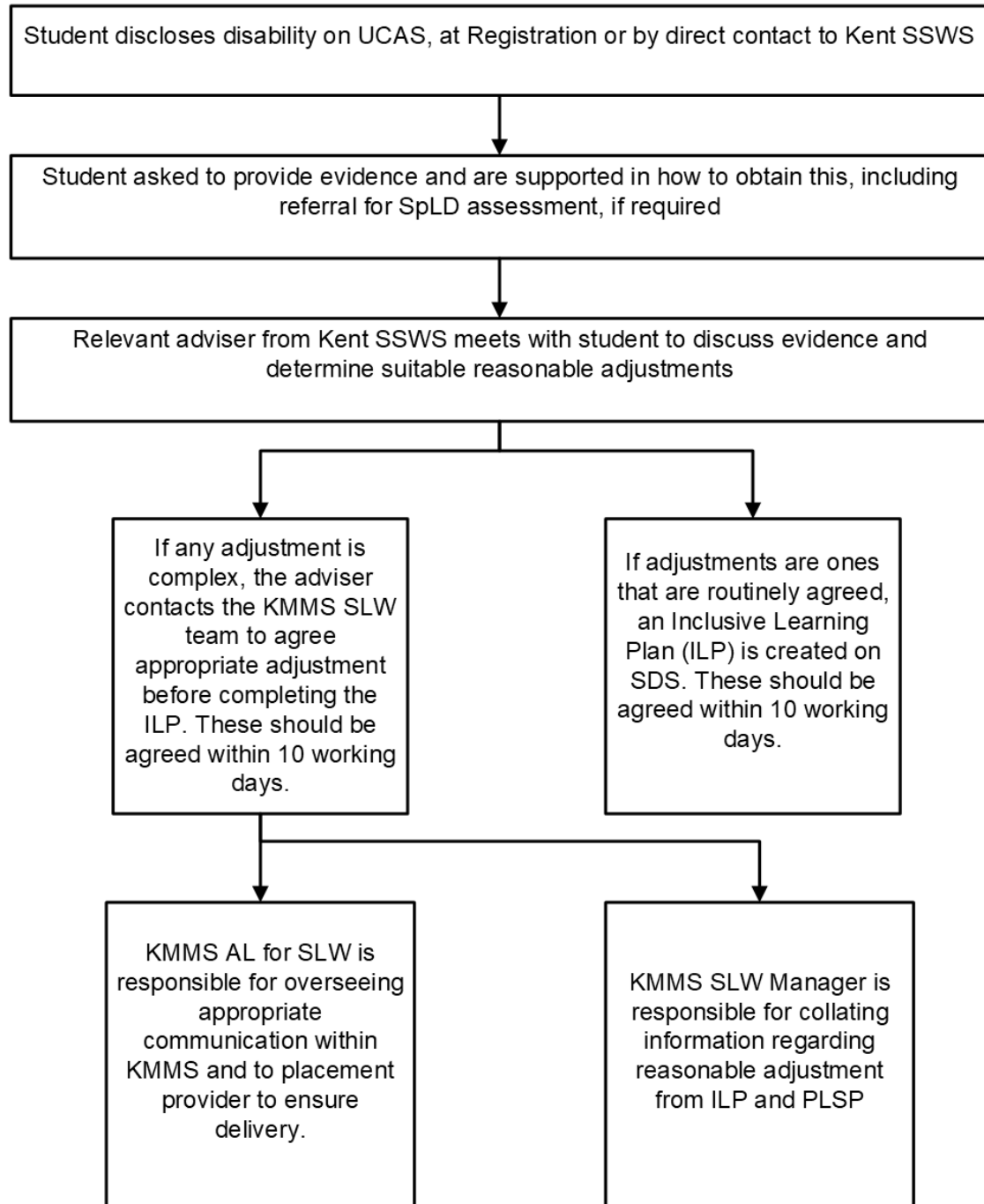
- Extra time in clinical examinations which are a time limited assessment of skills and knowledge, where patient safety depends on time-critical performance.
- Provision of a personal assistant to read or write on behalf of the student.
- Provision of a personal assistant to undertake numerical calculations on behalf of the student.
- Provision of a personal assistant, qualified to practise in the relevant discipline, to undertake mandatory practical procedures listed by the regulatory body as mandatory competencies for the discipline.
- Permission to be absent permanently from training placements.
- Exemption from any mandatory competencies published by the relevant statutory regulatory body.
- Adjusted training hours and times are sometimes available to students in the academic environment. However, after graduation and registration, similar adjustments to working hours might not be possible, and could be linked to corresponding adjustments in salary. Less than full time employment could be a reasonable adjustment after graduation and so would not necessarily exclude a student from full time training, with adjustments to give time off for medical treatment.
- Coloured paper for all records cannot be guaranteed under all conditions of professional practice.

¹ https://heops.org.uk/wp-content/uploads/bsk-pdf-manager/2019/09/1521730240General_guidance_on_adjustments_for_students_training_in_regulated_professions_v23.pdf

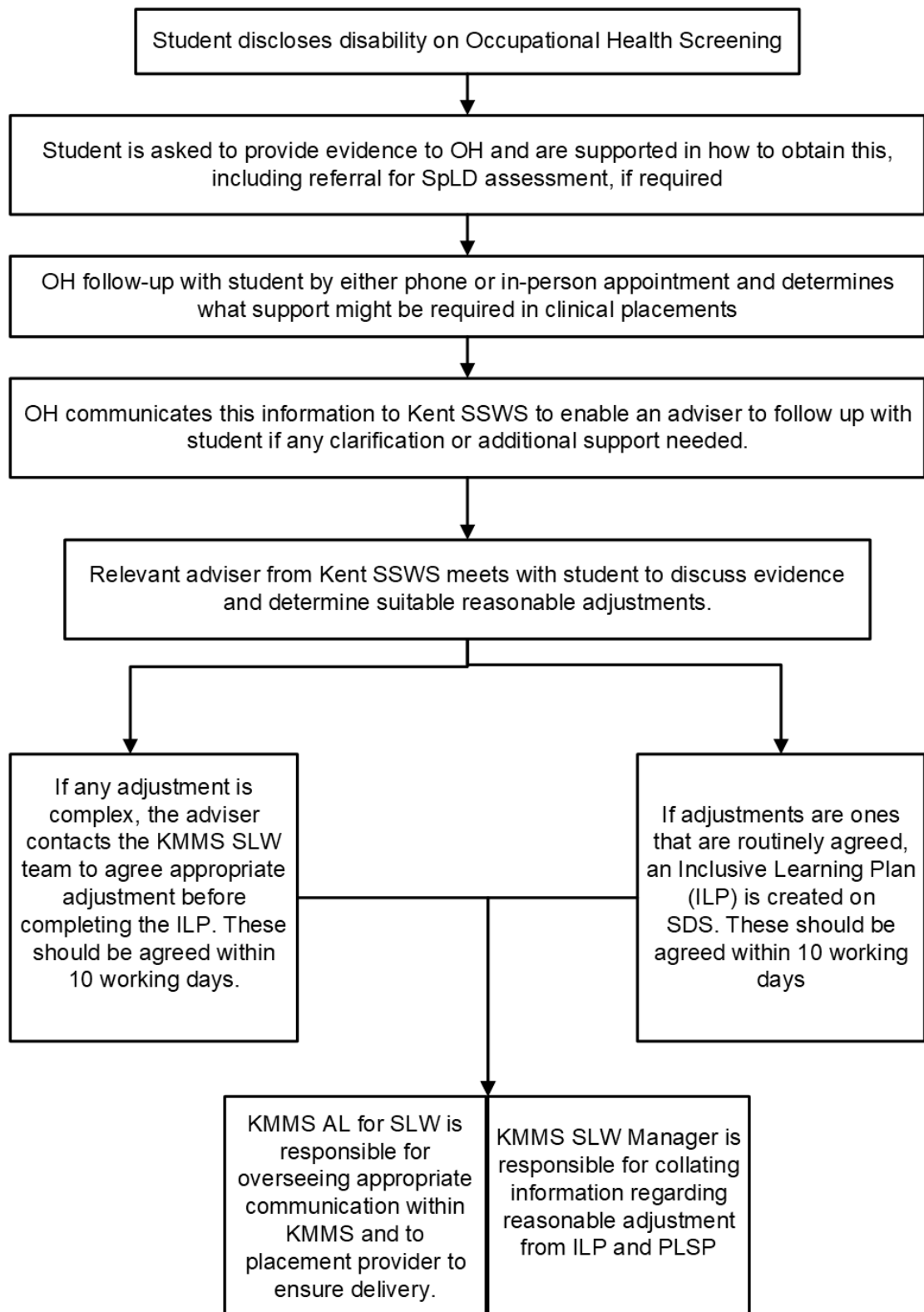
- Electronic recording devices are not reasonable for all clinical environments. Dictation of clinical records during some clinical activities is impractical and could impair patient safety in areas such as infection control.
- During academic written examinations, it may be possible for some training institutions to offer a choice of information on paper or on computer media. This choice cannot be guaranteed in the workplace under conditions of professional practice. In addition, many regulators make communication using all routes and all media, including electronic media, a mandatory competency.

Appendix 3. Flowcharts

Implementation of ILPs/PLSPs following contact with KSSW or disclosure via UCAS:



Implementation of ILPs/PLSPs following OH Screening:



Implementation of ILPs/PLSPs following Dyslexia Screening:

