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KMMS Reasonable Adjustments Policy

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1. Introduction

1.1. Kent and Medway Medical School (KMMS) is committed to providing an inclusive learning environment, in which all students have the opportunity to achieve their full potential. This includes the use of inclusive teaching practices, which are beneficial to all students, and which also result in a reduced need for individual adjustments to be made. In addition, KMMS, as part of the University of Kent and Canterbury Christ Church University, has a legal responsibility to meet the requirements of the Equality Act (2010), which includes both active and anticipatory duties and applies to all aspects of a disabled student's experience. KMMS adheres to the GMC guidelines, specifically to the publication 'Welcome and Valued', in this regard. KMMS is also responsible for meeting the GMC standards of accreditation (See [GMC Guidance](#)).

1.2. This policy should be considered in conjunction with:

- KMMS Reasonable Adjustment Procedure
- KMMS Assessment Strategy
- KMMS Low-level Concerns, Fitness to Study and Fitness to Practice Policy
- KMMS Attendance and Engagement Policy
- KMMS Countering Bullying, Undermining and Harassment Policy
- Raising and Escalating Complaints/Concerns within Practice Environments Policy and Guidance

2. Legal Requirements

2.1. The Equality and Human Rights Commission has produced [guidance](#) to support Further and Higher Education providers to fulfil their legal duties under the Equality Act (2010).

2.2. In this guidance specific advice is given with regard to the duty to provide reasonable adjustments for students with disabilities:

2.2.1. The duty to make reasonable adjustments requires education providers to take positive steps to ensure that students with disabilities can fully participate in their education and enjoy the other benefits, namely facilities and services which education providers provide for students.

This goes beyond simply avoiding discrimination. It requires education providers to anticipate the needs of potential disabled students for reasonable adjustments and to make sure they have adequate resources for their implementation.

2.2.2. The duty to make reasonable adjustments is not a minimalist requirement of simply ensuring that some access is available to students with disabilities; it is, so far as is reasonably practicable, to approximate the access enjoyed by students with disabilities to that enjoyed by the rest of the student body. The purpose of the duty to make reasonable adjustments is to provide access to an education as close as is reasonably possible to the standard normally offered to students at large.

2.3. The duty to make reasonable adjustments comprises three requirements. For further and higher education providers, these requirements are:

2.3.1. Where a provision, criterion or practice puts students with disabilities at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.

2.3.2. Where a physical feature puts students with disabilities at a substantial disadvantage compared with people who are not disabled, to take reasonable steps to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.

2.3.3. Where not providing an auxiliary aid or service puts students with disabilities at a substantial disadvantage compared with students who are

not disabled, to take reasonable steps to provide that auxiliary aid/service.

- 2.4. KMMS duties and responsibilities are therefore both active and anticipatory and apply to all aspects of the experience of students with disabilities.

3. Occupational Health

- 3.1. In accordance with the KMMS Occupational Health processes, the Occupational Health service provider will follow-up with students whose Health Questionnaire suggests that reasonable adjustments may be required either by phone or face-to-face appointment and determine what support might be required in clinical placements.
- 3.2. The Occupational Health service provider will communicate placement support information directly to the University of Kent's Student Support and Wellbeing Service via their online portal, to enable an adviser to follow up with students if any clarification or additional support is needed.
- 3.3. University of Kent's Student Support and Wellbeing Service will include this information in a student's Inclusive Learning Plan (ILP) as required.
- 3.4. The KMMS Student Life and Guidance Team will have access to the names of students who have engaged and/or completed the process for monitoring purposes but will not be able to access information on the student's specific condition.

4. Inclusive Teaching Practices

- 4.1. To minimise the number of individual adjustments that are required and to ensure that students with disabilities have full access to modules delivered through the KMMS, staff are expected to consider the accessibility of their modules at the design stage, as part of the module specification documentation. Other opportunities to review the accessibility of courses could include course review stages and any point in the course when an activity is being added or changed or new material is being introduced.
- 4.2. To anticipate potential barriers on a module, core activities will be identified to consider what alternatives could be offered if, for any reason related to a disability or impairment, the student was not able to perform that activity or demonstrate the learning outcome as anticipated. Where possible, the solution will be designed into the course from the outset. Similarly, awareness of possible solutions will be recorded/shared, so that prompt action can be taken to implement these alternatives, if they are ever required.
- 4.3. [Kent Inclusive Practices](#) (KIPs) offer guidance on simple but powerful mainstream adjustments to learning and teaching delivery and are informed by analysis of the most frequently requested adjustments. Embedding these adjustments will improve the learning environment for all students, reduce the need for retrospective adjustments and lessen the reliance upon individual learning plans. The [guidance for delivering KIPs in academic roles](#) document indicates how to embed KIPs within a school to ensure that everyone has access to the resources and information they need to study independently.

5. Reasonable Adjustments

- 5.1. In determining whether an adjustment is reasonable, it is important that competence standards should not be compromised. The Equality Act (2010) defines a competence standard as an 'academic, medical or other standard

applied for the purpose of determining whether or not a person has a particular level of competence or ability'. Reasonable adjustments will not apply to competence standards, but they will apply to the way that standards are assessed.

- 5.2. There are a number of reasonable adjustments that are well embedded in the practices of both Universities and these should be taken as a baseline, requiring no interventions except the organisation and delivery of the adjustment.
- 5.3. The KMMS programme will include module and curriculum change reviews to ensure reasonable adjustment is considered.
- 5.4. The KMMS Student Life and Guidance Team will coordinate the implementation of reasonable adjustments and offer support to students who require them, involving occupational health service and other teams as required.

6. Admissions Process

- 6.1. If a student discloses a disability (including physical impairments, long term medical conditions, Specific Learning Difficulties (SpLD), and mental health conditions) on their application, this information will be kept confidential from the admissions team in the first instance, so that it is clear to students that the decision regarding their application is considered on the same basis as any other students.
- 6.2. Queries regarding reasonable adjustments will be handled by the University of Kent's Student Support and Wellbeing Team.

- 6.3. All students who are made an offer for KMMS, will be asked to complete an Occupational Health form, which will be returned directly to the Occupational Health service provider.
- 6.4. Where required, reasonable adjustments will be made to the admissions process itself, including interviews and related activities, as long as these adjustments are consistent with reasonable adjustments which would be permitted on the course.

7. Course Delivery

7.1. Occupational Health Service

7.1.1 The Occupational Health service provider will work closely with the University of Kent's Disability Adviser for KMMS to consider the needs of any disabled learners, particularly with regard to adjustments that may be required to undertake clinical placements.

7.1.2 Advice on necessary adjustments can be given without KMMS needing to know the details of the student's clinical condition, thereby not breaching confidentiality, and maintaining appropriate boundaries.

7.2. The Medical School will publish examples of the adjustments it considers reasonable to make for medical students, to help students feel comfortable about asking the medical school to make reasonable adjustments for them (see 7.9 onwards below).

7.3. All students who require reasonable adjustments to be made, will be invited to meet with a Disability/SpLD/Mental Health adviser at the University of Kent, to discuss the creation of an ILP. The adviser will record study-related adjustments with the student and record these on the ILP.

- 7.4. In addition, the recommendations of the Occupational Health service provider will be incorporated into the ILP, particularly in relation to adjustments which might be required on placements and/or in clinical settings.
- 7.5. The ILP includes a section on Placement support and advises on the reasonable adjustments required but may not contain details of the student's specific condition.
- 7.6. Recording of lectures
- 7.6.1. In order to enable the distributed nature of the course delivery, Digital Lecture Capture (DLC) will be the norm. This also provides an anticipatory and discreet adjustment which is beneficial to all students.
- 7.6.2. If DLC is not being used for a particular learning event, students will be permitted to make audio recordings of lectures using their own equipment, if specified on their ILP. Staff delivering teaching events will inform students if aspects of the session would be inappropriate to record.
- 7.6.3. Where it is inappropriate for students to record seminars (or another student objects), it is best practice to conclude with a plenary and refer the students to the module / session outline to review the areas covered.
- 7.7. Provision of teaching material in advance;
- 7.7.1. This will be the normal practice for all KMMS teaching events. The purpose of this is to enable all students to prepare in advance for the lecture/seminar.
- 7.7.2. While all students might benefit from this, for students who have slow reading/processing speed, difficulties with concentration/handwriting or other related difficulties, it can be essential that they have advance

access to sufficient material in order to enable them to fully engage with the class itself (preferably at least 24 hours in advance).

7.7.3. This requirement will be met in a number of ways, depending on the subject matter and the preferred mode of delivery. These may include:

- copies of presentation material (e.g., PowerPoint slides)
- direction to a specific part of a core text
- comprehensive or annotated summary of the material to be covered.

7.7.4. If material is not being provided to all students in advance (e.g., via the virtual learning environment or in the module guide), it should be emailed in advance to the students who have this specified on their ILP.

7.9 Examination arrangements and in-class assessments

7.9.1 Examples of possible reasonable adjustments for KMMS assessments may include (not exhaustive):

- extra time: 25% extra time in written examinations including ‘in-class’ assessments:
 - in some instances, where a student has complex needs or more than one difficulty, the ILP may indicate a greater percentage of extra time. Allowances greater than 25% will be peer-reviewed within KMMS Student Life and Guidance. Online tests should take account of any required extra time provision.
- the provision of separate and individual rooms for written examinations, where practicable, or examination rooms with fewer students (e.g., up to 10/room)
- scribe and/or reader; University of Kent’s Student Support and Wellbeing Service can make available scribe support for in class assessments, with at least one week’s notice before the assessment

- use of a PC with appropriate assistive software as stated in ILP
- coloured answer book or paper as indicated in ILP
- ergonomic furniture may sometimes be required and will be specified on the ILP.

7.10 Coursework

7.10.1 Examples of possible reasonable adjustments for KMMS coursework assessments may include:

- consideration when marking:
 - when marking the coursework of students with a Specific Learning Difficulty the marker should be aware that students may experience difficulties with spelling, grammar and punctuation
 - if the core learning aims have been met and the argument is clear, the student should not be penalised for such errors.
- permission to request extensions:
 - there may be occasions when, for reasons related to their disabilities, some students are unable to adhere to coursework deadlines. In these circumstances, due consideration should be given to a request for a coursework extension
 - students are advised that they must request extensions in advance, wherever possible, and that they should follow the standard extension request procedure for their School, other than any requirement for medical evidence.

7.11 Alternative Forms of Assessment

7.11.1 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 between the relevant adviser and the academic school.

7.11.2 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.

7.12 Placement Adjustments

7.12.1 It is KMMS and 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.

7.12.2 A Placement Learning Support Plan (PLSP) will be created for students who require adjustments for the above as an extended section of the ILP.

7.12.3 The PLSP will prepare all parties (student, academic & placement staff) to ensure a successful placement experience is achieved. In so doing, potential barriers will be identified, and measures taken to address and adjust for these wherever it is reasonably practicable to do so.

7.12.4 Where required, clinical educators and relevant placement provider staff should be enabled to work with the student and academic colleagues in the development of an individual PLSP. This will give an opportunity to factor in their knowledge of the specific placement environment during the development of the PLSP.

7.12.5 Students' can request a review of their PLSP by the University of Kent's Student Support and Wellbeing service to ensure it accurately outlines their support requirements while on placement. 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 should contact the KMMS Student Life and Guidance team at the earliest opportunity.

7.13 Additional Considerations

7.13.1 Further consideration will be needed in relation to the appropriateness of some of the above adjustments in the context of training provided by KMMS. Some useful guidance is provided by the Higher Education Occupational Physicians/Practitioners ([HEOPS](#))

8. Temporary Adjustments

- 8.1. Students will be advised via the Student Handbook and KMMS webpages that, if they require temporary adjustments, they should discuss this in the first instance with the KMMS Student Life and Guidance Manager.
- 8.2. In most cases, the KMMS Student Life and Guidance Manager will be able to facilitate a direct solution in consultation with relevant KMMS colleagues, including the Programme Director to ensure consistency in how temporary adjustments are applied. They will also be able to refer the student to a specialist adviser in the University of Kent's Student Support and Wellbeing service at the 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 (of more than one term) 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.

- 8.3. Temporary adjustments that relate to assessments will be discussed with the Academic Assessment Lead and the Programme Director to ensure consistency in how temporary adjustments are applied.

- 8.4. 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.

- 8.5. The Medical Licensing Assessment is due to be effective from 2024. Reasonable adjustments will be reflected in this assessment where practicable and in line with guidance from the GMC.