

## Learning and Teaching Support Handbook

### Chapter 26 - Inclusive Practice within Academic Study

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#### 1. Introduction

##### Aspiration statements

- 1.1 The University of Exeter is fully committed to adopting an inclusive approach to academic study. This is clearly embodied in the aims of the University's [Education Strategy](#), in particular the Success for All Our Students theme which aims to promote inclusivity, wellbeing and accessibility through our curriculum, policies and processes. All programmes of study, including Degree Apprenticeships, consider how to increase access for marginalised communities and ensure that no-one is disadvantaged in their learning because of their disability.
- 1.2 The University has always welcomed and supported students with disabilities to be part of its rich learning community and strives to enable all students to reach their full academic potential. The University has embraced its responsibilities within existing diversity and equality legislation and developed models of practice in keeping with institutional obligations and at the forefront of sector provision.

- 1.3 The University adopts an inclusive approach to staff, students and the community. The University understands that there are many models of disability, including the social model, which recognises that people are disabled because of the barriers society puts up; not because of their specific disability.
- 1.4 The University is also committed to the provision of individual reasonable adjustments to academic study and assessment to ensure that students with disabilities are not placed at a substantial disadvantage when compared with their peers. The University seeks to uphold this principle, noting the requirement to make reasonable adjustments to academic study and assessment insofar as they do not compromise the integrity of academic competence standards.

For more information and guidance about this policy, please contact the [Wellbeing Services](#) team and/or the [Educator Development](#) team.

Other related policies providing support for students include the Health, Wellbeing and Support for Study procedure.

### **Legislative Background**

- 1.5 The University is aware of, and has regard to the legislative background in which it operates. The Equality Act 2010 (“the Act”) makes it clear that the University is legally bound to facilitate disabled access to Higher Education. The University understands that compliance with this obligation could involve treating some people more favourably than others. The Act also provides protection against discrimination, harassment and victimisation on the grounds of disability.
- 1.6 The Act also sets out the general equality duty which applies to all public sector organisations and requires the University to have ‘due regard’ for advancing equality. The University is required to:
- a. Remove or minimise disadvantages suffered by people due to their disability.
  - b. Take steps to meet their individual and collective needs.
  - c. Encourage participation in public life or in other activities where their participation is disproportionately low.

- 1.7 Additionally, the University has an anticipatory duty to act in advance and make adjustments so as to remove any disadvantage that might reasonably be foreseen as likely to affect students with disabilities. Whilst this may appear to present challenges, ensuring the University embeds inclusive teaching and learning practices within all education provision, including assessment, means many of these requirements will already be met.
- 1.8 The way in which the University complies with these legal obligations is detailed within this policy. All staff are expected to adhere to this policy.

## 2. Definitions Referred to within this Policy

- 2.1 For the purpose of this policy the University uses the definition of 'inclusive learning and teaching' as stated by the [Higher Education Academy](#) (2020):

“Inclusive learning and teaching recognises all students' entitlement to a learning experience that respects diversity, enables participation, removes barriers and anticipates and considers a variety of learning needs and preferences. Inclusive learning takes into account educational, cultural and social background and experience, physical or sensory impairment and mental well-being. Students may be less able to learn if they are not included and feel that they belong. All staff and students benefit from learning that acknowledges and draws upon differences and commonalities and is based on principles of equity, collaboration, flexibility and accountability.”

- 2.2 References to 'students' within this policy, unless otherwise specified, should be taken to reference all students – both Taught and Postgraduate Research students.
- 2.3 References to Wellbeing Services throughout this policy should be taken to reference the relevant services on all campuses including Wellbeing Services, Mental Health Pathway, AccessAbility and the Accessibility Services.
- 2.4 The University uses the same definition of disability as found in the Act, namely that, “A person (P) has a disability if – (a) P has a physical or mental impairment and (b) the

impairment has a substantial and long-term adverse effect on P's ability to carry out normal day to day activities".

- 2.5 The Act requires that the University make reasonable adjustments to ensure that students with disabilities are not placed at a substantial disadvantage when compared to their peers.
- 2.6 The Act also places on the University a duty to ensure that there is no discrimination against students with disabilities, either directly or indirectly.
- 2.7 **Direct Discrimination:** is treating a student with a disability less favourably than a student without a disability on the basis of that disability.
- 2.8 **Indirect Discrimination:** occurs when provisions, criteria or practices are applied in the same way for all students or a particular student group, but have the effect of putting students with a disability at a particular disadvantage. Indirect discrimination may arise even if it is not the intention to put students with disabilities at a disadvantage.
- 2.9 In considering, whether a student should be offered the option of an alternative assessment and what form that assessment might take, decision-makers should have regard to the difference between positive discrimination and positive action; **Positive discrimination** is illegal and would refer to steps taken to treat one student more favourably than others in relation to the process of assessment, on the basis of one or more of the nine protected characteristics set out by the Act (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity). There are very limited circumstances in which some form of positive discrimination is lawful, for example where there is no alternative and not making the adjustment to the assessment process would leave a student at a distinct disadvantage.
- Positive action** is, however, legal and would apply to steps taken to address any inequality of opportunity experienced by a student during an assessment process, when compared to other students, as a result of them having one or more protected characteristic. Decision-makers should, therefore, be reassured that action taken,

which seeks to remove barriers to the completion of an assessment or to the provision of the necessary evidence that intended learning outcomes have been achieved, is permissible.

- 2.10 **Knowledge of Disability:** if the University treats a student with a disability in an unfavourable way it will be unlawful unless the University does not know that the student has a disability and/or could not have been reasonably expected to know the student has a disability. It is important to note that the University is deemed to know the moment a student informs any member of staff they have a disability unless they request absolute confidentiality. Therefore, it is important at this point that the member of staff to whom they have disclosed their disability refers the student to the Wellbeing Services, Mental Health Pathway, AccessAbility and the Accessibility Services.

### 3. Definitions of Reasonable Adjustments and Competence Standards

- 3.1 Reasonable Adjustments are put in place for students with disabilities to avoid discrimination arising from disability and remove barriers to learning and teaching for students with disabilities. The application of an adjustment will result from consideration of the circumstances of the individual student and will involve discussions with the student regarding possible courses of action. What is 'reasonable' for the University will vary according to a range of factors and will depend on the circumstances of the individual case. Factors influencing the determination of what is reasonable will include the effectiveness of taking particular steps in enabling the student to overcome the particular disadvantage, health and safety issues, the effect on other students and the cost to the University.
- 3.2 There is no requirement to make a reasonable adjustment to a competence standard which the Act defines as "an academic, medical, or other standard applied by or on behalf of an education provider for the purpose of determining whether or not a person has a particular level of competence or ability".
- 3.3 It is important that competence standards set by the University are assessed and approved internally (by either the DoESE or Faculty Education Strategy Group for Taught Programmes, or the equivalent for Professional Doctorate programmes, with

input from Wellbeing and Legal to ensure the standard meets the required definition) to ensure that they do not have a discriminatory impact on students with disabilities or certain groups of students with disabilities. If a competence standard is found to be discriminatory, then to remain lawful they must be “objectively justifiable”; that is, they must be a “proportionate means of achieving a legitimate aim”.

- 3.4 A ‘legitimate aim’ would be any lawful decision made in running programmes or modules, but if there is a discriminatory effect, the sole aim of reducing costs is unlikely to be lawful. ‘Proportionate’ means that there must be no other way of achieving that aim which would be less detrimental to the rights of students with disabilities.
- 3.5 Sometimes the process of assessing whether a competence standard has been achieved is inextricably linked to the standard itself. The passing of an assessment may be conditional upon having a practical skill or ability which must be demonstrated by completing a practical test. Therefore, in relatively rare circumstances, the ability to take the test may itself amount to a competence standard. This is particularly relevant to programmes where the competence standards may be prescribed by an external professional body (e.g. medicine and education) and may be linked to fitness to practice. Where Professional, Statutory & Regulatory Bodies (PSRBs) exist, the removal of barriers to learning should be explored in the context of the competence standards and associated guidance of the regulatory body as well as Occupational Health input if appropriate. For information and guidance on competence standards, please refer to the [Academic Competence Standards](#) guidance.
- 3.6 The University’s way of implementing reasonable adjustments is through an [Individual Learning Plan](#) (ILP). This is following an assessment by a competent professional who has assessed a student’s need and written the ILP on this basis. The ILP lists, where appropriate, the barriers to learning which the student experiences and/or any recommendations on the basis of discussions with the Faculty, it does not, nor is there any legal requirement that the ILP includes information on the student’s specific diagnosis or disability. Students are encouraged to discuss their needs with other staff beyond the professional drawing up the ILP, however this is not a requirement. ILPs apply equally to both formative and summative assessment.

- 3.7 In exceptional circumstances i.e. in cases of late diagnosis and when there is not time for students to meet and arrange an ILP, requests may also be accessed through the Health, Wellbeing and Support to Study process where supported by medical evidence from a GP or Wellbeing services. This would be a temporary provision; where necessary, and students should be directed to Wellbeing so that their ILPs can be formed and the student can secure advice from staff with the required expertise.

## 4. Reasonable Adjustments

### 4.1 Taught Students

- 4.1.1 Where a barrier to learning has been identified (along with any recommendations made on the basis of discussions with the Faculty), and has been included as such on a student's ILP, consideration should be given to whether adjustments should be made to the modes of learning or assessment included in their modules, thus enabling the student to overcome the barrier. Whilst it is encouraged that inclusivity is built in at the original assessment and module design stage, reasonable adjustments will likely be required to many existing modules in order help students to overcome barriers to learning.

- 4.1.2 In order to help staff build inclusivity into their modules, a set of Frequently Requested Adjustments have been compiled for consideration and are available within the [University's EduExe Toolkit](#). Considering the most frequently requested adjustments at the module design and development stage will generate more inclusive assessments and delivery of learning from the start, which in turn requires fewer subsequent adjustments based on individual barriers to learning. Furthermore. In addition, a set of case studies available via the [EduExe Toolkit](#) explore a variety of scenarios around making adjustments, to support the provision of more inclusive teaching methods. For more guidance on providing a more inclusive learning experience, please contact the [Educator Development team](#).

- 4.1.3 To support decision-making and dialogue around the provision of alternative assessments, an Alternative Assessment Matrix should be drawn up to list the most common assessment formats, potential barriers to learning and a set of alternatives that could be offered. Such matrices should be drawn up at Faculty or Department level

in agreement with the module convenor and with approval from the Faculty Education Strategy Group; matrices should be stored centrally by the Quality and Standards Team for quality assurance purposes and for consideration within programme/module approval and design discussions. Such matrices should provide staff with a list of pre-approved alternatives, mapped to specific barriers to learning, that are recommended in order to remove the student's barrier to learning most effectively.

4.1.4 Following discussions with Wellbeing/Accessibility Services to establish an ILP which includes reference to the student's barrier(s) to learning, and/or any recommendations on the basis of discussions with the Faculty, the student may then raise with the relevant Hub/ equivalent Professional Services team that they require an alternative assessment to be provided. The Hub/ equivalent Professional Services team should use the alternative assessment matrix to identify a suitable assessment alternative in discussion with the module convenor. The Hub/equivalent Professional Services team will then communicate the outcome to the student and will establish the alternative on central student records databases e.g. SITS, ELE2.

4.1.5 In instances where the matrix does not provide an alternative which effectively removes the barrier to learning, or where the student is not satisfied with the proposed solution, the module convenor should engage in dialogue with the student to investigate whether agreement can be reached using alternatives included on the matrix; if agreement cannot be reached the module convenor should seek advice from the Mitigation Committee (or equivalent), referring to the DoESE or Assessment Officer (or equivalent) where an appropriate resolution cannot be found. Involvement of the Faculty APAC Chair may be sought in more complex cases which cannot be resolved by the DoESE or Assessment Officer (or equivalent). Once a final agreement is reached, the decision should be logged with the Mitigation Committee (or equivalent) and Wellbeing Services/ Accessibility Services should be notified. If a student remains unhappy with the proposed resolution they may submit a complaint in accordance with section 6.9 below.

4.1.6 Alternative Assessment Matrices should be provided to External Examiners in their introductory/ welcome pack at the start of their appointment for information. In addition, in accordance with the External Examiner Handbook, of the Quality Review



Framework, External Examiners should receive proportionate examples of the alternative assessments which have been provided as part of their assigned programme/module.

## 4.2 Postgraduate Research Students

4.2.1 Where a barrier to learning or reasonable adjustment has been identified and has been included as such on a student's ILP, consideration should be given to whether adjustments must be made to the modes of learning or assessment thus enabling the student to overcome the barrier. Whilst it is encouraged that inclusivity is built into assessment and research design where possible and actively practiced throughout Professional Doctorate and Postgraduate Research degrees, reasonable adjustments may be required to formal assessments (including upgrade and thesis/dissertation examination by Viva Voce and the assessment of other taught modules of the Professional Doctorates), supervisory meetings, lab work, data collection etc., in order help students to overcome barriers to learning. Please note that this is not an exhaustive list and there may be other occasions within the research degree where adjustments may be required.

4.2.2 In order to help staff build inclusivity into a student's assessments and research project, some supporting material is available within the [University's EduExe Toolkit](#). For more guidance on providing a more inclusive learning experience, please contact the [Educator Development team](#).

4.2.3 To support decision-making and dialogue around the provision of reasonable adjustments, a matrix of reasonable adjustments has been drawn up with input from the PGR Administration Office and Wellbeing Services to list the most common adjustments and potential barriers to learning for examination of theses/dissertation by Viva Voce and for the assessment of other taught modules of the Professional Doctorates, which will detail a set of alternatives that could be offered. Such matrices are drawn up at the Doctoral College level to ensure consistency across Faculties and PGR experience, and with approval from the Dean of Postgraduate Research and Wellbeing Services, following consultation with Directors of Postgraduate Research from across the University, and will be reviewed annually. Such matrices should provide staff with a list

of pre-approved adjustments, mapped to specific barriers to learning, that are recommended in order to remove the student's barrier to learning most effectively.

4.2.4 Before an ILP, which includes reference to the reasonable adjustment or student's barrier(s) to learning, is confirmed, the Wellbeing/AccessAbility advisor should use the relevant PGR Reasonable Adjustment matrix to identify a suitable adjustment in discussion with the [PGR Support Team](#) or [PGR Administration Office](#). The Wellbeing/AccessAbility team will then confirm the adjustments in the student's ILP, a copy of which is sent to the PGR Support Team, PGR Administration Team and supervisory team to ensure that adjustments are implemented. In the case of adjustments to assessment the PGR Support Team or PGR Administration team, as appropriate, will ensure that the External Examiners, or other assessors, are aware of the adjustments required.

4.2.5 In instances where the relevant matrix does not provide an alternative which effectively removes the barrier to learning, or where the student is not satisfied with the proposed solution, the Wellbeing/AccessAbility advisor should engage in dialogue with the student to investigate whether agreement can be reached using alternatives included on the matrix. If agreement cannot be reached the advisor should seek advice from the [PGR Support Team](#) or [PGR Administration Office](#) in the first place who will refer to the Department DPGR and Doctoral College Quality Development Manager where an appropriate resolution cannot be found. Involvement of the Dean of Postgraduate Research should be sought in more complex cases which cannot be resolved by the Department or Faculty DPGR, or where the requested adjustment is an exemption to the TQA. Once a final agreement is reached, the decision should be logged with the PGR Support Office/PGR Admin and Wellbeing. The confirmed adjustment should be noted on an updated ILP. If a student remains unhappy with the proposed resolution they may submit a complaint in accordance with section 6.9 below.

4.2.6 For Professional Doctorate programmes, the reasonable adjustments matrix for the assessment of taught modules, other than the examination of theses/dissertation by Viva Voce, **must** be provided to External Examiners in their introductory/ welcome pack at the start of their appointment for information. In addition, in accordance with the

External Examiner Handbook, of the Quality Review Framework, External Examiners should receive proportionate examples of the alternative assessments which have been provided as part of their assigned programme/ module.

## 5. Roles and Responsibilities

This section sets out the various responsibilities on behalf of specific parts of the University as well as the University's overall responsibilities.

### 5.1 Responsibilities of the University

The responsibilities of the University are as follows:

- a. The University is under a legal duty to comply with the Act.
- b. The University is committed to inclusive practice and to support a diverse population of students.
- c. The University is committed to ensuring all students can learn effectively.

### 5.2 Responsibilities of the Wellbeing Services, Mental Health Pathway, AccessAbility and the Accessibility Services

The services are collectively responsible for the following:

- a. Reviewing relevant documentary evidence/information and writing up ILPs to include where possible reference to any barriers to learning, in collaboration with the student.
- b. Informing students of their responsibilities, as noted under section 5.8 below - Individual Student Responsibilities in relation to Individual Learning Plans.
- c. Meeting with the student to assess their needs.
- d. Reviewing ILPs when requested.
- e. Liaising with relevant staff where non-standard adjustments are required.
- f. Inputting the ILP onto the Student Record System ('SRS').

### 5.3 Responsibilities of the Exams Office (Taught Programmes Only)

The Exams Office is responsible for the following (note for the BMBS, these responsibilities may be carried out by the local assessments team):

- a. Implementing the adjustments required by a student's ILP, providing it is received by the deadline.

- b. Liaising with the Wellbeing Service/AccessAbility services as required over any specific adjustments, or over the provision of any specific materials or support, i.e. specialist chairs or a scribe.
- c. If requests are made after the deadline, making reasonable attempts to accommodate these requests, given the constraints of the exam timetable. (If the required adjustments are not able to be made by the Exams Office, a student should contact their Faculty who may be able to arrange for the exam to be sat in Faculty with the required adjustments, or if this is not possible then deferring the exam.)

#### 5.4 Responsibilities of the PGR Administration Office (PGR examinations only)

- a. Sharing a student's ILP with the Board of Examiners and advising them how the ILP will be implemented, provided it is received by the time the student submits their thesis/dissertation.
- b. Liaising with the Wellbeing Service/ AccessAbility Services as required over any specific adjustments, or over the provision of any specific materials or support, i.e. specialist chairs or a scribe.
- c. If requests are made after the deadline, making reasonable attempts to accommodate these requests, given the constraints of the timing of the viva relative to when the request is received. (If the required adjustments are not able to be agreed ahead of the viva, the examination may be postponed.)

#### 5.5 Responsibilities of Faculties (or delegated Schools)

The Faculty (or delegated School) is responsible for the following:

- a. The APVC-E and Faculty Director of PGR (or equivalent) is responsible for ensuring that all ILPs within a Faculty are complied with. At the Department level the DoESE/ Department Director of PGR is responsible for ensuring all ILPs are complied with.

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- b. Fulfilling any other teaching-related adjustments as recommended by ILPs.
- c. Ensuring that Module Convenors to liaise with their Education Support Office, or equivalent Professional Services team, to agree any alternative assessments in

consultation with the Faculty/ Department Alternative Assessment Matrix (for more information on the Alternative Assessment process, please refer to Section 4 above – Reasonable Adjustments, and the Alternative Assessment request, approval and appeals process document).

- d. Ensuring that DoESEs assist with resolution of complex cases in relation to identifying appropriate alternative assessments, escalating to Chairs of Faculty APACs where resolution cannot be found.
- e. Ensuring that when ILP requirements are in conflict with the requirements of PSRBs, that Wellbeing Services are notified and the student informed.
- f. Ensuring that learning materials are distributed to students, usually by academic staff, but if this is to be done by the Education Support Office, ensuring that this is clear and understood by those involved.

#### **5.6 Responsibilities of Education and Postgraduate Research Support Offices (Taught Programmes and Professional Doctorates)**

The Education Support Offices and Professional Doctorate PGR Support Teams are responsible for the following:

- a. Liaising with Module Convenors, in consultation with the Faculty/ Department Alternative Assessment Matrix, to agree and implement student requests for alternative assessments in accordance with the ILP, and notifying the student of any outcomes (for more information on the Alternative Assessment process, please refer to Section 4 above – Reasonable Adjustments, and the Alternative Assessment request, approval and appeals process document).
- b. Ensuring reasonable adjustments, are applied to any mid-term/in class tests/exams not organised by the Exams Office.
- c. Should an Academic Tutor (also known as Personal Tutor) be incorrectly recorded in SITS, ensuring that the ILP is sent to the correct Academic Tutor and SITS updated accordingly.
- d. Responding to student enquiries about how their ILP will be implemented.
- e. Responding to student requests for extensions and mitigation based on their ILP.
- f. The PGR Support Teams in Faculties are responsible for supporting ILP related tasks for Professional Doctorate students, including alternative assessments and

reasonable adjustments, in relation to the assessment of taught modules, other than the examination of theses/dissertation by Viva Voce.

### 5.7 Individual Responsibility for all Teaching and Research Staff

Individual members of staff who are teaching or supervising a student with an ILP have the following responsibilities:

- a. Where the member of staff is the Module Convenor or Programme Lead, ensuring that all members of the student's teaching staff are aware of any adjustments they are required to make. Please note this includes any Postgraduate Teaching Assistants, Senior Tutors, Guest Lecturers, or Technicians who are delivering any parts of the module.
- b. Where the member of staff is the Lead Supervisor, ensuring that all others on the supervisory team are aware of a student's ILP, including the PGR Pastoral Tutor or other staff involved in lab-work or fieldwork relating to the student's research.
- c. Addressing the needs of the student as identified in the ILP by implementing the recommended adjustments. Key staff involved in the implementation of ILPs are module leaders, PGR Supervisors and Academic Tutors (also known as Personal Tutors) in liaison with Hubs and Wellbeing Services and Pastoral Mentors. If part of the ILP is not understood or it is not possible to implement a certain adjustment, this should be discussed with the relevant Service as soon as possible (details on how to do this are included in section 11.2 and 11.3 below) in order to fulfil our legal obligations to implement the ILP as far as possible.

### 5.8 Individual Student Responsibilities in Relation to Individual Learning Plans

- a. To ensure that they declare their disability or barrier to learning to the University and any partner institutions, e.g. for students engaging in study abroad programmes. The University can only act and support a student if it is aware of a student's needs.
- b. Attend the appointment to agree the ILP, and provide relevant documentation as required.
- c. Give consent to share the information in their ILP, to ensure reasonable adjustments can be put in place. If consent is not given this will limit what adjustments can be made for the relevant student.

- d. Engage with the recommendations within the ILP, and the support processes put in place as part of the ILP.
- e. Ensure once the ILP has been created that they take the time to review the ILP and respond to the advisor if there are any problems.
- f. Engage with the Hubs (for Taught) or [PGR Support Teams](#) (for Postgraduate research and Professional Doctorates) to request consideration of alternative assessments where these are required
- g. Understand that there are deadlines by which the Exams Office/Postgraduate Administration Office has to be in receipt of all ILPs and alternative assessment requests so they can put in place adjustments for centrally organised exams/vivas. Inform the University if their adjustments are not being made or are not satisfactorily addressing barriers to learning so the University can remedy this as soon as they are made aware (details on how to do this for ILPs are included in section 6.9; for alternative assessments please refer to the Alternative Assessment request, approval and appeals process document).
- h. Students also need to be aware that their ILP is a living document and they need to keep the University informed of any changes which need to be made (e.g. if attending a field trip requires additional adjustments) and allow plenty of time for these to be made.
- i. Be aware that if they are interacting with other services whilst e.g. attending a training programme, they may need to pro-actively ensure that any barriers to learning have been communicated with those organising the training.

## **6. Summary of the Process of getting an Individual Learning Plan**

- 6.1 The student must disclose to the University that they have a disability. If this is done prior to arrival i.e. as part of a UCAS application form, then the student will be contacted by Wellbeing Services (Mental Health Pathway, AccessAbility and Accessibility). The student may also make a disclosure in year to any member of staff; it is important at this point that the member of staff refers the student to Wellbeing Services (Mental Health Pathway, AccessAbility and Accessibility) for an assessment.

- 6.2 The student's barriers to learning will then be assessed and full consideration will be given to their needs. As part of this assessment the relevant advisor will draw up an ILP. The student may or may not be happy for their Faculty to know their disability, therefore it may or may not be stated on the ILP itself. The ILP is the University's way of communicating what barriers to learning a student with a disability experience and/or any recommendations made on the basis of discussions with the Faculty. Its recommendations are adjustments the advisors consider required, in good faith, so that students are able to perform without barriers to their learning.
- 6.3 The advisor will then explain to the student that this document will be shared with the student's Faculty, relevant support team and the Exams Office/Postgraduate Administration Office to ensure that all necessary adjustments can be put in place. Students should be aware that the ILP is a living document and that they will need to be reassessed if their needs change.
- 6.4 The advisor will also give advice about Disabled Students' Allowance where this is relevant.
- 6.5 The advisor will then input the ILP into SRS which then notifies the relevant Faculty, who will then ensure that all those who are teaching the student are aware of the recommended adjustments.
- 6.6 The student is then informed that their ILP is in place and they are requested to review it to ensure it is accurate. The student has 2 weeks to discuss this further with the relevant advisor after which point the ILP is live.
- 6.7 Taught Programmes: The Exams Office will be responsible for all provisions within centrally arranged exams. The Faculty will be responsible for these provisions being organised for any in class tests, or non-centrally organised exams.
- 6.8 The relevant member of staff then makes the recommended adjustments. If it is not possible to make the recommended adjustment then the member of staff should follow the procedure below in section 11.



- 6.9 If a Taught Student does not believe their ILP is being correctly implemented, then they must raise this with the Student Services Hub/Faculty Office, who shall then consider this as an informal complaint as under the [Student Complaints Procedure](#). The Hub Manager shall investigate, as per the Complaints procedure, and respond to the Student within the timescales published in the procedure. The student is able to escalate the matter in line with the Complaints Procedure if they do not receive a satisfactory response.
- 6.10 For a summary of the process for securing Alternative Assessments for taught programmes, please see section [4 above – Reasonable Adjustments](#), and refer to the [Alternative Assessment request, approval and appeals process document](#).
- 6.11 **Postgraduate Research Programmes:** The PGR Administration Office will be responsible for communicating ILPs with the Board of Examiners for all PGR vivas. The Board of Examiners, including the non-examining independent chair (NEIC) will be responsible for these provisions being organised for the viva examination. If it is not possible to make the recommended adjustment then the Board of Examiners should follow the procedure below in section 11.
- 6.12 If a Postgraduate Research Student does not believe their ILP is being correctly implemented, then they must raise this with the PGR Manager for their Faculty (or delegated School), who shall then consider this as an informal complaint as under the [Student Complaints Procedure](#). The PGR Manager shall investigate, as per the Complaints procedure, and respond to the Student within the timescales published in the procedure. The student is able to escalate the matter in line with the Complaints Procedure if they do not receive a satisfactory response.

## 7. Students who are on courses leading to professional qualifications

- 7.1 Some courses leading to awards subject to regulation or approval by PSRBs may include specific 'competence standards' which must be met in order to receive the award. Such courses may involve a Fitness to Practice assessment which may make recommendations in addition to those within an ILP. However, as set out in this policy,

the principle of provision of reasonable adjustments, including alternative assessments, must still apply.

- 7.2 The competence standards/learning outcomes for each module must be explicit. Reasonable adjustments cannot be made to these competence standards but can be made where there is an identified barrier to learning and that barrier is not a competence standard. For more information, please refer to the module's Competence Standards guidance document.

## **8. Postgraduate Research Students**

- 8.1 It is recognised that PGR students' method of engagement in studying is different from that of Taught Students and therefore the types of adjustments are likely to reflect this. PGR Students are also subject to the full range of responsibilities listed above in section 5.8.
- 8.2 An ILP for a PGR Student may suggest specific adjustments to their study space or working pattern. They may also recommend specific tutoring based on their needs assessments, or that the PGR student would benefit from specific software or equipment.
- 8.3 PGR Students need to be aware that whilst an ILP may result in some flexibility with deadlines where appropriate they also need to show adequate progress in their research. They need to be prepared to engage with relevant services to ensure that this is the case.
- 8.4 PGR Students should be aware that should they need an ILP, they should seek to have this drawn up as soon as possible. Indeed, it may be possible to have one put in place prior to registration. PGR students should be aware that their ILP is a living document and should ensure it is kept up to date with any developments.
- 8.5 PGR Students should be aware there are a number of points in the cycle of their study where they may need to seek specific adjustments through the creation or review of an ILP. As supervision agreements are reviewed annually, it is advisable to review the ILP

at the same time, with updates made to the supervision agreement to take into account the ILP as needed. Preparing to submit any work for formal review should also trigger a PGR Student to ensure that their ILP is up to date with any recommended adjustments, this could be a submission for consideration by a Faculty Upgrade Committee, or submission of their work for examination.

- 8.6 The ILP will then be communicated, normally via the Student Record System (SRS) to the PGR Support Team for the student's Faculty, the supervisory team and PGR Pastoral Tutor, and the Postgraduate Administration Office.
- 8.7 Where adjustments are made to the examination process an NEIC (Non-Examining Independent Chair) must normally be appointed, unless a case can be made as to why the NEIC is not needed (e.g. if very minor adjustments only are being made).
- 8.8 Where adjustments are required to the examination process these will be implemented in line with the provisions within the TQA PGR Handbook, Chapter 12: Handbook for Examination of Postgraduate Research Programmes – specifically section 3 Assessing Candidates with Disabilities and section 4 Nomination of the Board of Examiners and the Non-Examining Independent Chair.
- 8.9 All PGR facing staff (e.g. supervisory staff, professional services staff, Faculty DPGRs and or Departmental DPGRs) should also be aware that they need to be prepared to discuss specific student needs with both the individual student and with the relevant advisor to ensure there is no barrier to a student with a disability from achieving their potential.
- 8.10 For PGR Students who are also engaged as members of University staff for any purpose, any adjustments required to their working practice associated with their employment need to be handled by Occupational Health, as notified by the student, and not through an ILP.

## 9. Students who are on Study Abroad

- 9.1 The University offers opportunities for their students to study abroad as part of their programme of study (“outbound”), as well as for students attending Exeter as part of their degrees from other institutions (“inbound”).
- 9.2 For outbound students the University cannot guarantee that any specific adjustments that they have in place at Exeter will be put in place by the host institution, as they are not bound by UK law.
- 9.3 Students should consult with the Wellbeing Service as well, who may be able to provide them with guidance on local support. [Study Abroad co-ordinators](#) may also be able to provide advice about host institutions.
- 9.4 Should the student meet with the Wellbeing Service, and give their consent to share their personal information, then the Wellbeing Service can forward on any additional information to the [Study Abroad co-ordinator](#), who should then make this available to the host institution.
- 9.5 Outbound students need to recognise that they are adults undertaking study abroad, and whilst the University may be able to provide advice on the most suitable placement, it recognises that this is the student’s choice. It is also the student’s choice to select their study abroad option without consultation with the University. Students should also make their host institution aware of their needs in advance of their placement and provide the host institution with a copy of their ILP.
- 9.6 Inbound students will be treated with equivalence to Exeter students, however there maybe limitations if the student is only studying for a term, unless they are in contact with the relevant services prior to arrival.

## 10. Students who have a Temporary/Transitory Illness

- 10.1 The term ‘temporary injury’ applies to students who experience a short term, acute physical injury and require temporary adjustments to continue their studies. The term transitory illness applies to students who are experiencing a short-term, acute physical

or mental health condition, which does not meet the criteria of a disability under the Act but means that they require temporary adjustments to continue their studies. For taught students and any short term/ temporary illnesses which do not require an ILP, please refer to information on the University's Mitigation process. PGR students should contact their [PGR Support Team](#) and may wish to refer to the TQA PGR Handbook, Chapter 18: PGR Student Absence Policy, if they require a short-term absence.

- 10.2 Students who require adjustments due to an injury or transitory illness will be set up with a temporary ILP. Students must contact Wellbeing Services (Mental Health Pathway, AccessAbility and Accessibility) with relevant medical evidence to make arrangements for a temporary ILP to be created. Wellbeing Services (Mental Health Pathway, AccessAbility and Accessibility) will advise the student on the duration of their ILP. A provisional end date will apply to the specific adjustments recommended on a temporary basis. It is a student's responsibility to check their ILP and any recommended adjustments end date. If the injury or illness is likely to continue past this end date, the student should contact Wellbeing Services (Mental Health Pathway, AccessAbility and Accessibility) to arrange a review of their ILP.
- 10.3 **Taught Students:** Students should be aware that temporary assessment adjustments requested after the specific provision deadline will be reviewed on a case-by-case basis. The University will endeavour to put the assessment recommendations of the temporary ILP in place but if the University is unable to facilitate the necessary adjustments in time for a student's exam, given the constraints of the exam timetable, then students should be advised to contact their [Info Point/Hub](#) to discuss applying for mitigation with the aim of deferring the exam.
- 10.4 **Taught Students:** Students who become injured or unwell up to 48 hours before an exam should be directed to contact their [Info Point/Hub](#) to discuss their options including applying for mitigation.
- 10.5 **PGR Students:** PGR students should seek advice from their [PGR Support Team](#) with regard to temporary assessment adjustments as early as possible e.g. for an upgrade or final viva, but should note that depending on the timescale involved and the

adjustment required it may be necessary to reschedule the relevant assessment. See also the provisions within TQA PGR Handbook, Chapter 12: Handbook for Examination of Postgraduate Research Programmes – specifically section 3 Assessing Candidates with Disabilities and section 4 Nomination of the Board of Examiners and the Non-Examining Independent Chair.

## 11. Clarifying the Nature and Content of Individual Learning Plans

- 11.1 If the student does not agree with the content of their ILP then they should write to the Head of the Wellbeing and Student Support (Mental Health Pathway, AccessAbility and Accessibility), and explain why they do not agree with the recommendation(s). The Head of Wellbeing and Student Support will then review the ILP, and then may confirm the appropriate adjustments have been made, or that there should be additional adjustments made.
- 11.2 Faculty and Wellbeing staff should engage in a discussion about ILP recommendations to ensure they will not compromise an intended learning outcome or competence standard, or that the required adjustment is feasible on the student's programme. The aim would be to ascertain whether there is an alternative adjustment that can be put in place and ensure that the student achieves the relevant intended learning outcome.
- 11.3 The Faculty/member of staff and advisor should discuss why the recommendation is not a reasonable adjustment, or not possible or feasible. Where relevant, the [Education Policy Unit](#) (for Taught Students) or [Doctoral College Quality Development Team](#) (for PGR Students) should be included in discussions to provide policy advice. The primary nature of the adjustments should be at the centre of this discussion, i.e. the removal of barriers to learning and teaching which place the student at a disadvantage as a result of their disability. If another method of removing this barrier is proposed and felt by the member of staff and advisor to be reasonable, then a discussion needs to be held with the student, to inform them of this. It may be appropriate for the Faculty to discuss and negotiate alternatives to the recommended adjustment first to see if an agreed alternative can be put in place.

- 11.4 There may also be cases whereby modules have been designed to be accessible from the outset, and therefore adjustments are not required to the module. Should this be the case then the academic responsible for the module should clarify with the advisor that the required adjustment is not applicable due to the way the module is designed, and then inform the student of this.
- 11.5 If an appropriate adjustment cannot be agreed, then the matter should be referred to the DoESE/Department Director of PGR (or nominee) for initial mediation, this should involve discussing any and all options with the student. If the DoESE or Department Director of PGR (or nominee) cannot resolve this matter to the agreement of all parties, then the matter should be referred to the Faculty APVC-E /Faculty Director of PGR (or equivalent). The APVC-E / Faculty DPGR will hear from all parties and may seek legal advice as to the risk to the Faculty from not complying with the adjustment. The APVC-E /Faculty DPGR will have the final decision on whether to implement the adjustment or not, with any exceptions to the TQA Manual outstanding issues being referred to the Dean for Taught Students or Dean of Postgraduate Research.

## 12. Monitoring

- 12.1 The implementation of this policy for Taught students within each Faculty is the responsibility of the APVC-E (or equivalent) and the DoESE. In the case of PGR students, the responsibility rests with the Faculty Director of Postgraduate Research and the Department Directors of Postgraduate Research. Implementation should be monitored through the annual Quality Review processes for taught and postgraduate programmes.
- 12.2 For taught programmes, implementation should be reviewed at Department level Teaching Excellence Meetings (TEMs). Departments should specifically discuss their implementation of the requirements of ILPs, including alternative assessments, and address any issues or actions arising. Any improvements required should be included within in their Department Teaching Excellence Action Plans (TEAPs).

- 12.3 During Faculty level TEMs, the outcomes of Department TEMs and the Department TEAPs should be used to conduct a Faculty-wide review and any cross-Faculty issues requiring action included within the Faculty TEAP.
- 12.4 Faculties should be mindful that at the University TEM, Faculties may be asked to provide further evidence of compliance with this policy, as non-compliance may present a substantial educational and institutional risk.
- 12.5 For Postgraduate Research programmes, implementation should be reviewed by Department Directors of PGR via Faculty-level PGRSG meetings. Departments should specifically discuss their implementation of the requirements of ILPs, including alternative assessments, and address any issues or actions arising. Any improvements required should be included within in their Department/Faculty Action Plans.