

# Disability Policy & Procedure FDI

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## 1 Introduction

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- 1.1. FIDI is committed to ensuring equality of opportunity for its students and understands the value that diversity brings to the institution. The College aims to ensure that all students achieve their academic potential and that no student is unreasonably disadvantaged because of a disability when applying to and studying at the College. This policy sets out the College's commitment to its disabled students. It is written primarily to ensure all departments are clear on their responsibilities and how to enact them. The policy is available to students so that they can understand how the College enacts its responsibilities.
- 1.2. Whilst 'disability' is being used in terminology because of the European Accessibility Act (EAA), the overall direction of travel is towards inclusion and related terminology.
- 1.3. This policy cover a large numbers of students who may not identify with the term 'disability' e.g., some students with dyslexia, mental health difficulties, Autistic Spectrum Conditions.

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## 2 Our Principles/Values

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- 2.1 The College celebrates its diverse student population and is committed to delivering an inclusive environment conducive to every single student discovering and fulfilling their academic excellence.
- 2.2 This policy helps the College enact the social model of disability. The social model draws on the idea that people are disabled by the way the society is organised rather than by their impairment or difference. There is a recognition within the social model that there is a great deal that society can do to reduce, and ultimately remove, some of these societal barriers that are disabling, and that this task is the responsibility of society as a whole, rather than the disabled person.
- 2.3 The College's inclusive approach is underpinned by the legal framework of the EAA, wider equality duties and by the College's strategic and operational plans.
- 2.4 When applied to an education setting, the social model of disability and equality legislation mean that Professional Services and Academic Departments will need to look for inclusive practice in all aspects of service and programme

design and delivery. The commitment is to offer a learning environment which is as barrier-free as possible.

- 2.5 When it is not possible to remove all barriers to the College environment by inclusive design and delivery, the College makes the commitment, in line with its duties under European Accessibility Act (EAA), to put in place reasonable adjustments so that disabled students are not put at a disadvantage in relation to their non-disabled peers.
- 2.6 The duty to provide an accessible environment and reasonable adjustments is owed to all disabled students who undertake a course at the College, whatever the level or duration of their course, and whichever their country of origin.
- 2.7 The type and level of adjustments and support will differ between students depending on:
  - the impact of individuals' disability on their studies
  - whether the student is in attendance or not (see point 8.11)

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## 3 Disclosure and Confidentiality

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- 3.1 A student can communicate to the College that they have a disability at enquiry, application stage, during their programme, on graduation.
- 3.2 When disclosing their disability as part of the application process, the student will be automatically directed to the Quality Risk Manager, or nominated staff, who will follow up with the student to provide information and guidance about support or to set up the formal disability support process.
- 3.3 A student may disclose their disability to anybody in the institution.
- 3.4 In line with the European Accessibility Act (EAA), when a student discloses a disability to any member of staff, then the College is deemed to know about that student's disability and has a duty to act on this disclosure with a formal offer of support.
  - 3.4.1 In all cases, the member of staff receiving the disclosure will point the student in the direction of Quality Risk Manager where the formal offer of support can take place.
- 3.5 Quality Risk Manager, or nominated staff member, will offer of adjustments for all disabled students who have declared and provided evidence of their disability, as agreed by the College and understood by all departments and services (see section 4).
- 3.6 The Quality Risk Manager registration and assessment process involves recording the level of disclosure agreed by the student and depending on the level of adjustments needed (see section 4):
  - If the student wants the set of Universal Reasonable Adjustments offered to all registered disabled students to be implemented, departments responsible for implementing those adjustments will know that this student has registered a disability with the College.
  - If the student has needs that go beyond the Universal Reasonable Adjustments offered and requires a RASA, they can choose to include additional information on the RASA itself:
    - The name of the disability, medical condition or Specific Learning Difficulty (SPLD)
    - The impact that this has on their studies

- If the student does not wish to disclose their disability beyond Quality Risk Manager, or nominated staff, the information will remain confidential and no adjustments will be able to be put in place.

3.7 Students may at any point withdraw consent for the disclosed information to be shared at any point but this will limit the College's ability to implement support and adjustments.

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## 4 Reasonable Adjustments

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4.1 The European Accessibility Act (EAA) imposes a duty on the College to make Reasonable Adjustments to remove the barriers that have persisted despite inclusive design and practices.

4.2 The duty to make reasonable adjustments applies to three instances:

- where a provision, criteria or practice places a disabled student at a particular disadvantage compared to non-disabled students
- where a physical feature puts a disabled student at a disadvantage
- where a lack of auxiliary aids puts a disabled person at a disadvantage

4.3 This duty is anticipatory and means that the College will take certain measures for disabled students that it would not have to take for their non-disabled peers. Equally, some reasonable adjustments will apply to some disabled students but not to others, depending upon what is considered reasonable in their particular circumstances

4.4 Students who wish to receive adjustments and support for their disability will need to formally register with the Quality Risk Manager by providing supporting documentation which confirms their disability.

4.4.1 This documentation can take the form of be:

- a note from a medical practitioner confirming that that the impact of the condition is substantial and long-term.
- For Specific Learning Difficulties (SpLDs), such as dyslexia, dyspraxia, Attention Deficit and Hyperactivity Disorder (ADHD), a post-16 diagnostic assessment.

- For Autistic Spectrum Conditions (ASC) and ADHD, a full report or a note from GP confirming the diagnosis or confirming that a referral has been made for a full-assessment which students are awaiting for.

4.4.2 It is the student's responsibility to provide the correct supporting documentation of their disability, officially translated in English.

4.5 Once supporting documentation is received, reasonable adjustments will be implemented by Quality Risk Manager, via a dual system of Universal Reasonable Adjustments offered to all registered disabled students and, when necessary, an individual support plan.

4.5.1 Through the offer of a set of Universal Reasonable Adjustments. The Universal Reasonable Adjustments offered will include (but may not be limited to):

- a 10 working-day deadline extension following the terms set in 7.19
- 25% extra time in timed exams or take-home papers following the terms set in (unless the exams/take home paper have been set to be inclusive – i.e. time already added)
- Where recording is not made available by the department, the permission to record lectures for their sole personal use using their own device, except when the content of the lecture contains confidential information which cannot be anonymised or is subject to confidentiality rules set by an external Professional Body validating the course. In those cases, the student will be referred to Quality Risk Manager, or nominated staff, for note-taking support.
- pre-course information to be made available the week before teaching starts on all modules (module overview, information about module leader, office hours, assessment details, reading list, class schedule)
- All assessments to provide an overview, type, rubric/marketing scheme and say which learning outcomes are assessments, including feedback due-by date. They specify if spelling, grammar and a fluid structure are assessed and therefore not subject to the marking guidelines.
- Assignments should be evaluated for ideas and knowledge, rather than presentation. As far as possible, discounting errors in spelling, grammar and punctuation and instead mark for content and ideas and critical acumen with allowances made for unorthodox narratives and for problems with structure/organisation where these do not hinder understanding of the content.
- All teaching resources (at the very least the structure of a session) to be made available 48hrs / 2 working days before sessions

- Word, PowerPoint and PDFs are made fully accessible to screen readers and possibility to request further support from the staff nominated by Quality Risk Manager when coding, maths and Latex formats cannot be made accessible at the outset.
- 4.5.2 Where those standard adjustments are insufficient to remove disadvantage and all the barriers to learning, additional and bespoke reasonable adjustments and support will be discussed and agreed with the student. These additional adjustments will be summarised in a document called the Reasonable Adjustments and Support Agreement (RASA).
- 4.6 Universal Reasonable Adjustments and RASAs are valid for the duration of the student's course.
- 4.7 It is the student's responsibility to inform the Quality Risk Manager of any changes to their programme that might impact the effectiveness of the reasonable adjustments that have been put in place through their RASA.
- 4.8 The student can request the RASA to be created or updated at any point, should there be any changes in their circumstances or if the identified adjustments no longer meet the student's needs.
- 4.8.1 The student may be required to provide updated supporting documentation when requesting a change to their RASA.
- 4.9 It is the Quality Risk Manager's responsibility to oversee the communication of Universal Reasonable Adjustments and the production of the RASA from first disclosure to distribution of RASA to the relevant departments.
- 4.10 It is the responsibility of the named departments receiving the RASA from Quality Risk Manager, or nominated staff, to ensure that they have access to this information in order to implement the adjustments.
- 4.11 Training on Accessible resource creation, accessible teaching and Reasonable Adjustments can be sought via VLE/Moodle and Staff Development.

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## 5 Recruitment and Admissions

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- 7.3 Disabled people have a legal right to access and benefit from learning opportunities offered by the College.
- 7.3 Quality Risk Manager, or nominated staff, will participate in open days and open evenings and encourage disabled applicants to visit where possible to find out about the facilities and support available at the College.
- 7.3 Disabled applicants will be evaluated for admission using the same academic criteria and where required, evidence of motivation and suitability for the intended study, as all other applicants for the same course.
- 7.3 Support requirements will be addressed separately.
- 7.3 In line with inclusive design principles, the College will regularly review admissions criteria to ensure that they create no unnecessary barriers for disabled people.
- 7.3 Applicants will be made aware of the standard adjustments available via a registration with Quality Risk Manager, or nominated staff member.
- 7.3 Applicants who declare a disability on their application to the College will be contacted to initiate the drawing up of a RASA. They can also approach Quality Risk Manager, or nominated staff member directly.
- 7.3 There may be a need to make reasonable adjustments to some selection activities that applicants have to take part in before being offered a place (i.e., interviews) in order not to put the prospective student at a disadvantage due to a disability.
- 5..1 The applicant will be able to indicate a need for adjustments when they confirm their participation in any required selection activity.
- 7.3 The staff member organising the activity can seek advice from Quality Risk Manager, or nominated staff member, as to the appropriate adjustment required. Such adjustment will be determined on a case-by-case basis.
- 7.3 No academically-qualified applicant will be refused a place at the College on the grounds of disability alone. Every opportunity will be provided for full consideration of the specific support or facilities required for disabled applicants and all reasonable adjustments will be made.
- 7.3 Admissions Tutors are expected to seek advice from Quality Risk Manager whenever there is a concern about the impact of a disability on a student's opportunity to follow a course. In discussion with the disabled applicant, the



College will do all it can to make reasonable adjustments and to make available any necessary provision, to allow students to accept the offer of a place.

- 7.3 The College may, very rarely, reject an application after considering all adjustments needed if:
- The Competence Standards of the course could not be maintained as a result of making all adjustments needed. In such instances, the College will demonstrate that the “competence standards” are objectively justifiable.
  - The only adjustments possible and necessary to enabling full access creates unavoidable health and safety concerns.
  - When barriers caused by professional requirements and/or by regulations of professional bodies preclude membership by people with specific impairments. These barriers will need to be objectively justifiable,
- 7.3 Disabled applicants may apply for all scholarships and bursaries for which they meet eligibility requirements and will be considered on an equal basis with other eligible applicants.
- 7.3 Disabled applicants will be evaluated for scholarships or bursaries using the same selection criteria and where required, evidence of criteria such as residence in a qualifying area or family income, as all other applicants for the same scholarship or bursary. Where there are selection activities additional to the award application form (such as an interview), reasonable adjustments will be made to remove any barriers for disabled people.

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## 6 Attendance

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- 6.1 Where a student’s attendance or punctuality are impacted by a disability-related reason, an attendance/punctuality adjustment may be put in place for this student.
- 6.2 An attendance adjustment would not be possible where:
- the level of absence requested would put the student at a substantial disadvantage in relation to those who can attend;
  - there is a core competency requiring attendance;
  - there are external attendance-related competencies dictated by Professional Body accreditation;
  - there are other legislative requirements such as immigration

- 6.3 An attendance adjustment may also cover a student needing to enter/leave the class late/early and/or for a short break.
  - 6.3.1 It is the student's responsibility not to disturb the class or the learning of others when leaving or re-joining the cohort
  - 6.3.2 In some rare instances, students may be refused re-entry if they have missed key instructions designed to ensure everybody's safety. In this case, the tutor taking the class should make all reasonable attempts to forewarn the student of this before the session start and to arrange alternative ways for them to catch up on the learning the student would have missed
- 6.4 If a student misses an occasional taught session for a disability-related reason, they must notify the class Tutor of their absence in accordance with the arrangements set out in the College's Student Attendance Policy. The tutor can then offer advice on ways to catch up with the sessions missed.
- 6.5 If a department is concerned that a student's absence or punctuality is reaching a level that compromises their progression or retention on the course, they may initiate a Fitness to Study meeting under the Fitness to Study policy.

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## 7 Assessments

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- 5.1 Some exams adjustments will be made available to all disabled students registered with Quality Risk Manager (see section 4) and can recommend further adjustments to both formative or summative assessment via the RASA.
- 7.1 A distinction is made between the method of assessment and the competence standards which are being assessed.
- 7.2 The duty to make reasonable adjustments applies to the method and/or format, but not to the competence standard
- 7.3 Where the particular method of assessment – such as an exam – presents in itself a disadvantage because of the specific disability of a student, the arrangements for the assessment will be adjusted so that the disadvantage is removed to the extent that is reasonable to do so.
- 7.4 All requests for adjustments to arrangements for examinations must be supported by appropriate documentary evidence of a disability.
- 7.3 It is the responsibility of the student to provide this documentary evidence as part of their registration with Quality Risk Manager, or nominated staff member.
- 7.5 Recommendations for adjustments to examination arrangements and the required supporting documentation will be evaluated by a staff member nominated by the Quality Risk Manager.
- 7.6 These adjustments to examination arrangements may include:
- 7.6.1 Assistive Technology and software may be made available to the student during the examination.
- 7.6.2 Additional time allowances:
- The extent of additional writing time allowance which will depend on the needs of the individual student and recommendations made by the Quality Risk Manager.
  - Rest breaks – supervised if the exam is to be held on site - may be recommended in addition to additional writing time allowances.
- 7.6.3 Use of specific personnel (as described below) in written examinations:
- 7.6.3.1 Scribes may be available for onsite examinations for students who require an alternative format to handwriting/typing/dictation software.
- 7.6.3.2 Where a scribe is used, students can request the opportunity to practise with

the scribe before an examination and should contact Quality Risk Manager, or nominated staff member to arrange this.

- 7.6.3.3 Additional time will be allocated for on-site examinations dictated to a scribe and a separate room will be provided
- 7.6.4 Readers (on site exams) or screen-reading software (remote, at-home exams) may be made available to disabled students to read out exam questions and to have the student's own scripted answers re-read.
- 7.6.5 AI Sign Language Interpreters or voice transcription technology can be provided for students whose first language is Sign Language and who may require an Sign Language Interpreter to sign instructions and exams questions.
- 7.7 Specific furniture (ergonomic chair or an adjustable height table/bench) may need to be available to the student in an on-site examination.
- 7.8 Specific room allocations for on-site written examinations may be arranged for some disabled students.
- 7.9 Alternative Examination Scheduling – such as appropriate spacing out of exams, alterations in exam start and finish times – can be provided where appropriate and required.
- 7.10 Quality Risk Manager, or nominated staff member, must notify the Assessments Team of all on-site examination adjustments prior to the release of the final exam timetable.
- 7.10.1 In exceptional circumstances, it may be possible to make some reasonable adjustments after this date where these adjustments do not affect the scheduling of examinations.
- 7.10.2 Where this is not possible, the student will be advised to defer the assessment.
- 7.11 Academic departments are responsible for implementing reasonable modifications or adjustments for examinations and other forms of assessment held outside the main College examination period or not held on site. This includes the organisation of all alternative exams arrangements mentioned above.
- 7.12 Quality Risk Manager will provide appropriate training for Examination Invigilators who will be invigilating on-site examinations where there are specific arrangements for disabled students.
- 7.13 In some cases, it will not be reasonable to make the above exam arrangements as recommended by Quality Risk Manager it may be that:
- the integrity of the examination will be compromised by the alternative exams

adjustments

- It will be materially impossible to implement the reasonable adjustment
- The combination of the adjustments recommended may exacerbate the disadvantage posed by the exam. For example, the amount of extra time recommended, combined with that of rest breaks, makes the exam too long
- The additional measures brought to the existing method of assessment will not be sufficient to remove the disadvantage

7.14 In those cases, Quality Risk Manager, and the department will organise an alternative form of assessment where possible under 7.15 and 7.16 below

7.15 Any alternative assessment method should take into account the requirement to ensure that the published learning outcomes of the course are met and that competence standards are not compromised. Therefore, a conversation between the academic department, Quality Risk Manager and the student will be needed to propose a suitable alternative.

7.16 The decision on whether to agree to an alternative assessment rests with the Chair of the Learning, Teaching and Student Experience Committee.

7.17 A coursework deadline extension of two calendar weeks (10 working days) will be made available to all disabled students registered with DIS.

7.17.1 Except in the following circumstances:

- where the original amount of time provided to complete the assessment is less than two calendar weeks (10 working days),
- where a student is required to present a degree show or give a performance on a specific date,
- where group work is involved;
- where keeping to a deadline is part of the assessed learning outcomes
- where the completion of the work is linked to external deadlines, e.g. placements or clinical settings.

7.17.2 Academic Departments may wish to consult with Quality Risk Manager, or nominated staff member to establish a reasonable proportionate extension as close as possible to the maximum of 10 working days for any of the circumstances listed above.

7.18 Such disability-related Coursework extension will not be applied to timed examinations (whether these are held onsite or take the form of take-home exam papers). A time adjustment of 25% or whatever individual RASA recommends will be applied to all students with a registered disability.

7.19 If a disability-related extension needs to exceed 10 days, the student in question will be advised to defer their deadline to the next assessment period.

- 7.20 A reasonable adjustment made to a deadline, exam or take home paper does not prevent a disabled student from additionally applying for extenuating circumstances in line with the Extenuating Circumstances Policy that is - where the extenuating circumstances are not related to the student's disability unless the need for a further extension results from a sudden exacerbation of symptoms relating to a fluctuating disability (for example, epilepsy).
- 7.21 To ensure that students whose disability impact on the presentation of their work are not treated less favourably than other students for reasons of their disability the College has developed a guidance on how to ensure fair marking for those students: marking for content over grammatical fluency and accuracy in spelling where this does not interfere with the communication of a student's ideas or the learning outcome of the assessment.
- 7.22 It should be noted that some subject areas (e.g., languages) or accrediting Professional Bodies may assess competence with grammar, spelling and written expression, more explicitly than others.
- 7.22.1 In those cases, it may not be possible to follow this guidance.
- 7.22.2 In those cases, this should be clearly stated to the student and appear in the student handbook.
- 7.23 Departments will be responsible to make markers aware of those guidelines and expectations related to the learning outcomes.

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## **8 Support from specialist personnel: Non-Medical Helpers**

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- 8.1 Where appropriate, disabled students will have access to specialist personnel, or "Non-Medical Helpers", in order to support them in carrying out study-related tasks. Non-Medical Helpers are categorised into Support bands:
- Band 1 – Support Assistants who will assist students to carry out practical study-related tasks (library support assistants, readers, scribes, workshop/lab assistants, sighted guides, proofreaders)
  - Band 2 – Enhanced Support Assistants who will help students to acquire or maintain their study-related independence and autonomy (study assistants, examination support workers, note takers)
  - Band 3 – Specialist Enabling Support workers who make use of specialist expertise and training in a particular access area in order to facilitate a student's access and navigate themselves independently around the educational environment (Communication Support Workers, electronic note takers, specialist transcription services, mobility trainers)

- Band 4 – Specialist Access and Learning Support workers who will make use of specialist skills and training in order to understand the particular barriers to learning experienced by individual disabled students; work with the student in order to identify strategies to help address these barriers and to enhance student's autonomy within their learning context; interpret the language of delivery, giving real-time access, into another language accessible to the student (Specialist Mentor, Specialist One to One Study Skills Support, BSL Interpreter, Language Support Tutor for deaf students , Assistive Technology Trainer)

8.2 The College will fund and organise the support for the Band 1 and 2 Non-Medical Helpers as appropriate for the student's support needs, requests whether students are eligible for a disabled students allowance or not.

8.2.1.1 Students are responsible for setting up their own Band 3 and 4 support. FIDI Admissions can assist students with making these requests.

8.3 For students who are not eligible for a disabled students allowance will carry out its own assessment of needs to identify the type of Non-Medical Help Needed.

8.4 Non-Medical Helpers will therefore be allowed on College premises in order to carry out their duties when accompanied by the student that they support.

8.5 College timetable will be published well in advance by Timetabling. Where Academic departments are responsible for the organisation of their own space, it is imperative that they release room booking information in a timely manner. This is to ensure that accurate College timetable can be published well in advance and in time for in-class non-medical help support to be booked and organised by the Quality Risk Manager, or nominated staff.

8.6 Students are responsible for communicating their timetable to Non-Medical Helpers support agencies for in-class Non-Medical Help support.

8.7 In-class support can only be delivered if the student is in attendance with the support worker.

8.7.1 Exceptionally, the support can be provided in the absence of the student if demonstrable disability-related extenuating circumstances have prevented the student from attending an individual session.

8.7.2 This will need to be agreed by the Quality Risk Manager, or nominated staff, in advance of the session.

8.8 Students are responsible for arranging the timing and frequency of the 1-2-1 support sessions.

- 8.9 Students are responsible for booking rooms for 1-2-1 Non- Medical Help support sessions.
- 8.10 Students are responsible for attending their 1-2-1 Non- Medical Help support sessions or cancelling within the timeframe indicated by the external agency.
- 8.11 Sessions not attended without being cancelled within the appropriate timeframe will not be replaced unless there are demonstrable disability-related extenuating circumstances which prevented the student from attending an individual session and cancelling within the specified timeframe.

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## **9 Equipment and Assistive technology**

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- 9.1 The College recognises that technology – both hardware and specialist software - plays a central part in enabling full access for disabled students.
- 9.2 Students can access specific training and equipment (hardware and software) and relevant training either via their Disabled Students Allowance and/or via Quality Risk Manager, or nominated staff member.
- 9.3 Quality Risk Manager, or nominated staff member, Library and IT Services – through the Assistive Technology Centre - work collaboratively to recommend and provide specific software and equipment to students.
- 9.4 The College may also make available specific furniture (such as office chairs, ergonomic cushions, height adjustable desks) for a student where this has been recommended in the RASA .



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## 10 Accommodation

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- 10.1 The Admissions will assist applicants in finding accommodation as a result of having a disability in non-College owned apartment.
- 10.2 The College expects students to be proactive in informing Accommodation Services of their disability-related needs by using the application process.
- 10.3 It is the applicants' or students' responsibility to check the proposed accommodation and its suitability and identify specific accommodation needs, as far in advance as possible.
- 10.4 Accommodation provided by College accommodation partners is not to be considered "sheltered accommodation" and is suited for independent living.
  - 10.4.1 Some students may need the assistance of carers to achieve the level of independence required to live safely and comfortably in halls.
  - 10.4.2 It is student's responsibility to arrange their own carers/caring arrangements

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## 11 Building accessibility

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- 11.1 The College recognises that physical access to the estates and buildings is a crucial aspect of this policy.
- 11.2 The College is continuously updating the signage and wayfinding to ensure adequate and appropriate signage and wayfinding across campus.
- 11.3 The College is working towards ensuring that all premises are accessible for disabled students, staff and visitors. It is recognised that this has to occur within the constraints of existing listed buildings.
- 11.4 Where access is limited, the College will instigate reasonable alternative arrangements, for example, by changing venues, altering timetables or sometimes bringing physical modifications to the building.
- 11.5 Outside of any reasonable adjustments already put in place, Disabled students are encouraged to feedback on physical access to premises and services, by communicating directly with the Quality Risk Manager.
- 11.6 All practicable steps will be taken to ensure the safe access and adequate working conditions for all students on campus.

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## 12 Health and Safety and Disability

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- 12.1 The College has duties under the relevant Health and Safety legislation to ensure the health and safety and welfare at work of all staff, students and visitors and that its operations do not expose, staff, students and visitors to risks to their health and safety. As far as is reasonably practicable, the College seeks to establish and maintain an environment for students and visitors that is safe and without risks to health.
- 12.2 As such the normal principles contained within the College's Health & Safety Policies and measures will apply.
- 12.3 It may be necessary, on occasion where standard First Aid and emergency procedures are insufficient to meet the College's Health and Safety duties when they relate to a disabled person, to make specific provision.
- 12.4 The need for these individual Health and Safety arrangements may be highlighted by the disabled student themselves, or by any member of the College taking the disclosure.
- 12.5 It is then the responsibility of that member of the College to link the individual to the Quality Risk Manager, or nominated staff member, who will discuss the standard first aid, evacuation and other relevant health and Safety procedures with the student and, where necessary, refer them to the Health and Safety team for a fuller assessment.
- 12.6 Specific individual egress means and routes will also be arranged where a disability makes it impossible, unsafe or undignified for a student, or member of staff to use the standard evacuation processes and routes. The details of these will be collated in a Personal Emergency Evacuation Plan .

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## 13 Assistance pets

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13.1 As a general premise, the College prohibits individuals from bringing animals inside any College-owned, leased or controlled buildings, vehicles or structures. However, the College recognises that a dog kept and used by a disabled person (as defined by the European Accessibility Act (EAA) wholly or mainly for the purpose of assisting that person to carry out day to day activities (an “Assistance Dog”), will require access to the College’s estate, relevant buildings and student accommodation.

13.2 This policy defines assistance dogs as highly trained working dogs which assist a disabled person performing day-to-day tasks and which are qualified by one of the organisations registered as a member of [Assistance Dogs \(UK\)](#) (or an equivalent organisation in another country). These include:

- Guide dogs – assisting people who are blind or are visually impaired.
- Hearing dogs – assist people who are deaf or are hearing impaired.
- Support dogs/Dogs for Disabled – who provide support for many tasks that their owners may find difficult, such as:
  - Opening and closing doors
  - Calling an ambulance
  - Picking up objects
  - Assisting with dressing and undressing
  - Accompanying their owner whilst undertaking chores such as shopping
  - Action as a physical support
  - Raising an alarm
  - Operating control buttons
  - Switching lights on and off
  - Carrying items
  - Loading and unloading a washing machine
  - Fetching the telephone and other items
- Seizure alert dogs – trained to behave differently when they detect a potential seizure, which may appear as misbehaving to others.
- Autism Assistance Dogs

13.2.1 Registered Assistance Dogs are required to have:

- a formal identification in the form of branded jackets or lead slips
- a yellow ID booklet containing information about the Assistance Dog and its owner, and details of the training organisation who trained the Assistance Dog
- Formal training to perform their day-to-day tasks safely and appropriately
- necessary vaccinations
- appropriate insurance

13.3 Assistance Dogs may be brought into teaching spaces as a reasonable adjustment detailed on a student's RASA. A Disability Adviser will make the adjustment in line with the Pets and Animal Restrictions Policy, detailed below.

13.4 When Assistance Dogs are on College premises, their owners must comply with the following guidelines:

13.4.1 **Information:** Assistance Dog owners shall provide information about the animal and its tasks/duties, when reasonably requested by College staff.

13.4.2 **Identification:** Assistance Dog owners must ensure that their Assistance Dogs are clearly identifiable by the use of special collars, harnesses and/or ID tags when on duty. - dogs approved by Quality Risk Manager will also be issued with an ID card.

13.4.3 **Insurance:** Assistance Dog owners are responsible for ensuring that their Assistance Dogs are covered by a level of public liability insurance that must include the workplace and/or place of study.

13.4.4 **Access restrictions:** Assistance Dog owners must respect access restrictions established by the College on grounds of health and safety. Assistance Dog owners must ensure that Assistance Dogs do not enter staff and students' privately assigned spaces, such as bedrooms and flats within residences, without permission. Assistance Dog owners must ensure that there is a safe and suitable emergency evacuation plan in place for their dog and themselves. Emergency responders will be trained to make every effort to ensure that Assistance Dogs are kept with their owners in an emergency evacuation situation, but the responder's priority should be towards the safety of the owner.

13.4.5 **Animal misbehaviour:** Preventing and correcting Assistance Dog misbehaviour is the owner's responsibility. Assistance Dog owners must make sure that their Assistance Dogs do not cause harm or injury to others or damage to College property.

13.4.6 **Cleanliness:** Registered blind people are not required to clean up after their Assistance Dogs, but they are expected to have received the appropriate training to avoid dog waste on campus. Assistance Dog owners must take responsibility for the clean-up of the animal's waste, consistent with reasonable capacity.

13.4.6.1 Assistance Dog owners shall use reasonable endeavours to use the designated 'spending' (toileting) areas identified by the College.

13.4.6.2 In order to support Assistance Dog owners who are students or staff, the College will provide toileting facilities in an appropriate location for the Assistance Dog owner, as soon as is practical, once a need has been identified and communicated to the College.

13.4.6.3 In the unlikely event that the Assistance Dog does 'spend' outside of these designated areas, the Assistance Dog owner must report this to the Estates Helpdesk who will make arrangements for the area to be cleaned and sanitised.

13.4.7 **Animal care and supervision:** Animal care is primarily the Assistance Dog owner's responsibility, and the College is not responsible for the loss, ill health or death of an Assistance Dog.

13.4.7.1 The owner ensures regular health checks, vaccination and an adequate standard of grooming of the Assistance Dog.

13.4.7.2 Assistance Dog owners must ensure the Assistance Dog has its requirements in relation to feeding, watering and toileting fully met.

13.4.7.3 Owners must ensure that Assistance Dogs are kept on a lead at all times when walking around the College's estate or are safely restrained when unsupervised for short periods of time.

13.4.8 **Animal training:** Assistance Dog owners are responsible for any additional training needs for their Assistance Dogs and for the correct and safe performance of their duties.

13.5 Assistance Dogs from other countries: There may be occasions where students, staff members or visitors to the College from other countries request that their Assistance Dog accompanies them. As long as evidence can be provided that the dog has been trained to an equivalent standard as of the member organisations of Assistance Dogs, that the dog is vaccinated and insured, then requests will be considered.

- 13.5.1 Conflicting health issues and/or disabilities: where an Assistance Dog poses adverse health risk to another person (staff or student), the College will seek medical documentation from the affected party/parties to determine suitable alternative and equitable arrangements for either or both parties.
- 13.5.2 Religious or cultural conflicts: Religious or cultural beliefs cannot be used to prohibit access to Assistance Dogs and their owners.
- 13.5.3 Complaints: Any issues in relation to Assistance Dogs on College premises that cannot be resolved informally should be raised in accordance with the College's complaints handling procedure. For issues in College accommodation managed by a private provider, complaints should be raised in line with the provider's complaints procedure.
- 13.5.4 Emotional support animals/therapy pets are not covered by the organisations registered as members of Assistance Dogs UK and do not have the same status in law. Therefore, applications for the permission to bring an Emotional Support Animal will be considered on a case-by-case basis and may be refused.
- 13.6 Students requesting their dogs to be brought onto FIDI's premises will need to provide the following documents the Quality Risk Manager before their requests is considered:
- A letter from the student's medical practitioner explaining the role the dog/has in helping the student carry out day-to-day activities
  - A proof of registration to an official body such as Assistance Dogs UK or international equivalent
  - Proof of applicable training
  - Proof of insurance
  - Proof of up-to-date vaccination

A risk assessment will then be carried out by the Quality Risk Manager, or nominated staff, and reviewed by FIDI Health & Safety Team to assess whether the dog can be safely brought onto the College premises.

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## 14 Offsite Activities: Work Placements

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- 14.1 The College has a responsibility not to discriminate when arranging or finding placements relating to a programme of study.
- 14.2 Where students are required to find their own placements, information on potential placement providers should be made available as early as possible to enable disabled students to begin their preparations early and clarify support issues.
- 14.3 Staff who are aware of students with significant support needs should not assume that the placement will have seen the adjustments included in the RASA into account.
- 14.4 Students should also be advised to seek early advice from Quality Risk Manager, or nominated staff, who can work with them and the department where the placement activity is being arranged/supported to identify the adjustments required and the funding available to implement them.
- 14.5 If students are required to attend placements, the departments supporting/arranging the placement are responsible for ensuring placement providers are aware of their responsibilities under disability legislation.
- 14.6 Students are encouraged to discuss their disability-related needs for placements with the placement provider, using the RASA as supporting document to inform this conversation.
- 14.7 Quality Risk Manager, or nominated staff, is responsible for producing a specific section for placement on the RASA indicating the adjustments and support that will be needed on a specific placement.
- 14.8 The academic department is responsible for sharing the Placement RASA with the provider as early as possible to ensure that the provider can implement reasonable adjustments or seek further information about the adjustments being requested.
- 14.8.1 The academic department shall contact Quality Risk Manager, or nominated staff, for advice and consider with the student whether the Placement start date should be delayed, if the recommended adjustments cannot be put in place.

14.9 The Placement RASA sections will cover:

- Physical access requirements and provision
- Responsibility for assessing disabled students' support needs
- Details of the adjustments needed for individual students
- Procedures for responding to health emergencies where appropriate, e.g., if a student with epilepsy has a seizure.
- Confidentiality procedures regarding the student's impairment, where applicable.
- Details of who will pay for the adjustments where appropriate, i.e., the College, the placement provider or another external source.

14.10 The provision and cost for supporting a disabled student on placement therefore needs to be carefully worked out well in advance - both the costing for the support during placement as well as the dates and duration of the placement.



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## **15 Off-Site Activities: Fieldtrips and Academic visits**

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- 15.1 The College has a responsibility not to discriminate when arranging fieldtrip or academic visits.
- 15.2 The College will factor in the needs of disabled students at the planning stage. Making anticipatory adjustments should mean fewer individual adjustments are needed.
- 15.3 Therefore, it will have to check the accessibility of the venues visited and the activities undertaken.
- 15.4 The Department will also have provided advance information about offsite activities, field trips to the student.
- 15.5 It is the responsibility of the organising department to liaise with the student and with Quality Risk Manager in order to assess the adjustments required.
- 15.6 Quality Risk Manager, or nominated staff, will then be able to assess the support and source the support needed. E.g., taxi travel, support worker arrangements.

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## **16 Off-site Activities: Study Abroad**

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- 16.1 With students' consent, Quality Risk Manager can liaise with the Study Abroad team to share the student's RASA with the host institution, and advise on further adjustments that are required.
- 16.2 Students will also be made aware that the host institution will work in accordance with their country's disability legislation.
- 16.3 Students will be made be aware that the types of services and adjustments available in the foreign institution may differ from those at the College.
- 16.4 The Study Abroad team is responsible for highlighting extra funding available to students with disabilities wishing to study abroad and for assisting them with this application.
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## **17 Temporary Support**

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- 17.1 The College recognises that temporary impairments may impact on academic progress (e.g., difficulties getting to class, taking notes, taking exams etc.) and can provide some support.
- 17.2 Quality Risk Manager, or nominated staff, can support students who have a temporary injury or medical condition which last longer than a month (for example, students who are pregnant, students who face physical impairments as a result of a medical procedure).
- 17.3 Temporary impairments are not regarded as disabilities; therefore, the type and level of temporary adjustments and support may differ from that offered to a disabled student.
- 17.4 Students may register with Quality Risk Manager, or nominated staff, in the usual way and will need to provide evidence of their temporary impairment, the likely impact on studies, with expected duration dates.
- 17.5 A short-term Reasonable Adjustment Support Agreement can be put in place to help with accessing teaching, learning and assessment.
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## **18 Feedback and complaints**

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18.1 All informal feedback and complaints should be provided to the Quality Risk Manager in the first instance at [admin@florence-institute.com](mailto:admin@florence-institute.com)

18.2 Students raising concerns under the Disability Policy should seek to resolve concerns under 19.1 where possible. However, Students can also use the Student Complaints Procedure if they are dissatisfied with any aspect of this policy.

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## 19 Appendix A: Related Policies and Procedures:

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Student Attendance Policy

Student Appeals and Complaints Procedure

Fitness to study Policy and Procedure

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## 20 Appendix B: Definitions

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Below are key definitions in relation to this policy document.

**Disability:** A disability is defined as a physical or mental impairment that is likely to have a substantial and long term effect on an individual's ability to carry out day to day activities. Long term is defined as a condition that has lasted for a year and a day, a condition that is likely to last for a year and a day or a condition that will last for the duration of the individual's lifetime.

**Reasonable Adjustment:** A Reasonable Adjustment ensures that students with disability can access and participate in Higher Education on the same basis as students without disability. See 3 for further information on Reasonable Adjustments.

**College:** the institution of FIDI.

**Student:** a registered student on a credit bearing course

**Non-Medical Helper:** a specialist worker who works with disabled students to ensure equal access to teaching and learning and/or who helps a student develop study strategies to gain equal access to teaching, learning and all other opportunities offered by the College.