

LSE Policy on Reasonable Adjustments for Disabled Students

1. Introduction

1.1 Commitment to Inclusion

The London School of Economics and Political Science (LSE) is committed to fostering an inclusive learning environment where disabled students have equality of access, experience, and outcomes with their non-disabled peers. The School considers its duty to make reasonable adjustments as fundamental to creating an inclusive, safe, and supportive environment for all. Reasonable adjustments for disabled students, including alternative assessments, should be relevant to their individual needs, appropriate, inclusive and in accordance with the School's policies and procedures as well as equality legislation (including the Equality Act 2010). Our commitment to inclusion ensures that every member of our community is respected and valued, while our dedication to academic standards guarantees that all academic work is conducted with honesty and integrity.

1.2 The School's Anticipatory Duty

The School has an anticipatory duty to make reasonable adjustments for disabled students: it requires the School to plan and anticipate the likely collective needs of disabled students, rather than waiting until adjustments are requested.

Making anticipatory adjustments also helps the School to work towards implementing the Social Model of Disability, which emphasises removing environmental and attitudinal barriers rather than focusing on individual impairments.

The duty applies to:

- Changes to policies and practices (e.g., adapting teaching methods).
- Physical adjustments (e.g., ensuring accessible lecture spaces).
- Provision of auxiliary aids or services (e.g., assistive technology or note-taking support).

1.3 Defining Disability

A student is considered disabled if they have a condition that is:

- Substantial Significantly impacts daily activities and
- Long-term Lasting or expected to last 12 months or more with some exceptions (for example, a person is considered disabled from the day they are diagnosed with HIV infection, cancer or multiple sclerosis).

There is no need for a student to establish a medically diagnosed cause for their impairment to have reasonable adjustments made for them. The School should consider the impact of a disability rather than the cause. However, where a student does not have a diagnosis, but staff are concerned that the student is struggling or failing to engage, staff should refer the student to DHMS, who will always aim to support a student to gain a diagnosis (and any associated support/treatment etc.) which gives the School more information about the specific adjustments required and how these should best be implemented.

1.4 Purpose and Scope

This policy is intended for and applies to:

- LSE staff: To guide the implementation of reasonable adjustments.
- **Students**: To inform them of available support. It applies to all taught and research students at LSE.

2. Implementing Reasonable Adjustments

2.1 Inclusive Learning Approach

- LSE aims to design teaching, learning, and assessment in ways that minimise the need for individual adjustments. The <u>Eden Centre's Assessment Toolkit</u> provides guidance on creating accessible assessments.
- The DMHS has developed a set of <u>inclusive teaching guides</u> which give advice to staff on how to implement adjustments for various impairment types.

2.2 The Role of the Disability and Mental Health Service (DMHS)

The School's Disability and Mental Health Service (DMHS) will work in partnership with disabled students, academic departments and the wider School to ensure that appropriate reasonable adjustments are defined and applied, enabling disabled students to meet their full academic potential. Staff and students are encouraged to contact DMHS if they require any support or advice, at any stage of their academic career at the School.

Individual reasonable adjustments are informed by independent supporting documentation (such as a consultant letter, a diagnostic report, etc.) and determined in collaboration with the student, by comprehensively examining the way disability affects the individual and their experience.

These adjustments are detailed in the LSE My Adjustments system which creates and maintains a plan that confirms and communicates to appropriate staff a disabled student's expected reasonable adjustment/s.

2.3 Implementing reasonable adjustments.

Although the School aims to make teaching, learning and assessment inclusive by design, in some cases reasonable adjustments may be needed to ensure that disabled students are

not disadvantaged in light of the specific impairments of those students.

These may include:

- Adjusted deadlines or additional time
- Lecture recording or captioning services
- Assistive technology
- Alternative assessment methods

More detail on the process for applying for adjusted or alternative exam arrangements is detailed in Annex A.

3. LSE's Duty to Act

LSE must implement reasonable adjustments **regardless of how a disability is disclosed** as soon as is reasonably practical, recognising that some adjustments can be made immediately (e.g. an extension to a deadline) and some may take some time to establish (e.g. where additional resources need procuring). While students are encouraged to engage with DMHS, all staff must ensure that reasonable adjustments are considered whenever they become aware of a student's disability. The School's duty to make reasonable adjustments applies in any case when there is knowledge of a student's disability and is not dependent on a full assessment by DMHS taking place.

The School has a duty to make reasonable adjustments based on 'constructive knowledge' of a student's disability. This means that even if the School does not have a formal record of a student's disability, we must still make reasonable adjustments if we can reasonably deduce the existence of a disability from a student's behaviour or what they tell us. For example, where students are struggling or failing to engage, it is right to consider whether a student may have a disability and need reasonable adjustments to be made. Staff are encouraged to contact DMHS if they need advice on determining or implementing adjustments, and to the Eden Centre for advice on adjustments related to learning and teaching.

In this regard, the School has instituted a staff training course in conjunction with the introduction of this Policy. The training is aimed at educating all student-facing staff on their responsibilities to identify disability and to implement reasonable adjustments for them. There is also training available on supporting student mental health and wellbeing.

3.1 Responsibilities to make adjustments – the School

LSE is responsible for the implementation of this policy and resulting arrangements for reasonable adjustments for disabled students. The School aims to work in an inclusive manner by anticipating the diverse needs of all students wherever possible.

While LSE will make every reasonable effort to apply the principles set out in this policy and to help students to make the best use of available specialist support what is a 'reasonable' adjustment depends on a range of factors. The School may deem an adjustment 'unreasonable' if the proposed adjustments are highly impractical or prohibitively expensive.

Academic and professional service staff involved in teaching disabled students are responsible for ensuring that the reasonable adjustments are put in place for students as

defined in the individual student's 'My Adjustments.' It is therefore important that adjustments agreed in My Adjustments are communicated effectively with all relevant staff. Within academic departments this is the 'departmental circulator' and to the named contacts within relevant professional service divisions (e.g. the Library).

4. Confidentiality and Information Sharing

LSE endeavours to offer an environment that encourages the sharing of disability information but acknowledges that it is the individual's right not to disclose their situation.

The School is mindful that some students may not wish to share information about a disability and some students will have disabilities that are not immediately apparent.

The student's reluctance to share information about their disability must be balanced with the School's aim of minimising the administrative burden on disabled students by reducing the need to repeatedly share disability details and/or documentation with different parts of the School. It is therefore important that adjustments agreed in My Adjustments are communicated effectively with all relevant staff.

In accordance with the law, LSE is deemed to know about a student's disability if one member of staff knows. Therefore, there is an expectation that disclosures are referred to DMHS via the <u>Disability Referral Form</u> in order that support can be offered, and the School can respond to the student's disability as it is required to by law.

If a student requests complete confidentiality with respect to their identification as 'disabled,' the School is required to provide clear advice on any limitations this might have for support and adjustments being provided, to ensure the student is making an informed decision. If opportunities have been given to tell the institution about a disability or long-term condition and a student decides not to, and the student's disability is not apparent from their behaviour or language which would lead the School to construct knowledge of the disability, the School will not be able to offer them individual support or adjustments, nor can they be applied retrospectively.

Medical documentation and disability information is classed as sensitive information and is kept confidentially in accordance with the School's data protection procedures and GDPR obligations - <u>Data protection: The UK's data protection legislation - GOV.UK</u>. Information relating to individual cases is only shared on a strictly 'need to know' basis, for example where information needs to be shared to support the effective implementation of a reasonable adjustment including adjustments to assessments, e.g. adjusted deadlines or additional time.

Information may also be shared to appropriate services within the School where there is a perceived significant risk to the student or others.

4.1 How students can disclose a Disability

The School has the following mechanisms in place to allow students to share information about a disability at any time throughout their programme of study.

- Directly contacting Disability and Mental Health Services (DMHS), either as an applicant or as a current student.
- Sharing information on their UCAS application or LSE application

- Telling a member of staff elsewhere in the School (for example, the student's Academic Mentor or lecturer).
- Sharing information through other academic and non-academic processes (for example, by disclosing needs related to student accommodation or as part of an application for exceptional circumstances, extensions, deferrals, or Short-Term Central Exam Adjustments).

Students identified as disabled through 'constructive knowledge' (as described in section 3) will be treated the same as those students who have shared with the School information about a disability as this is our legal duty, and students should be informed of this and offered support.

Students are encouraged to provide supporting documentation on the nature of their disability (e.g. doctor's letter, psychologist's report), where required. Support with this can be provided by DMHS if needed.

4.2 Mechanisms for staff to share information about a student's disability.

There are various options for staff to provide support and share information lawfully when students disclose a disability to them. You need a student's consent to share information they may have given you in confidence (with the exception of when you have a cause for concern, in that situation you should follow the guidance set out in the School's Cause for Concern procedure), and there are outlined below a number of ways you can do this. You don't need a student's consent to offer or make reasonable adjustments or to contact DMHS for advice or support, or to signpost students to them. In summary staff, depending on the situation, can:

- Contact DMHS to make them aware of a student with a disability. Staff can complete
 a <u>Disability Referral Form</u>. A student's consent should be sought to share any
 information with DHMS and consent for DHMS to contact the student to follow up
 and provide support.
 - If the student does not consent for DHMS to follow up with them, this should be made clear on the referral form and the staff member should not include details of the student's disability, medical diagnosis, or condition.
- Contact DMHS to seek advice, without sharing the student's information/name.
 - If a student does not give consent to share their information with DMHS, a staff member can encourage and signpost the student to share their disability information with DMHS, promoting the benefits of establishing a My Adjustments Plan.
- In the case of a student who does not consent to sharing their information with DMHS, a staff member should seek advice on appropriate reasonable adjustments from DHMS (on an anonymous basis) and should still make adjustments for the student wherever possible, noting that these will be more limited in scope than those made via My Adjustments. Any adjustments made at a local level should be logged on departmental records.
- Without a student's consent to share with DMHS, it is recommended that the staff
 member record in writing directly (using the template provided by DHMS) to the
 student that best endeavours to make adjustments within the department will be
 made, but they may be more limited in scope than if DMHS is co-ordinating these

5. Alternative assessment

For most students, the existing 'My Adjustments' process will be sufficient in mitigating the impact of the student's disability.

The School recognises however, that for a small number of students, the existing 'My Adjustments' process will be insufficient in mitigating the impact of the students' disability. For these students, an alternative assessment should be considered, the process for which is explained in Annex A.

5.1 Implementing an alternative assessment

When determining the nature of an alternative assessment, the following factors should be considered:

- The alternative assessment must assess the same learning outcomes as the original assessment.
- The alternative assessment should be of an equivalent level, standard and weighting/percentage as the original standard assessment.
- If the alternative assessment is provided as a reasonable adjustment for a student with a long-term medical condition or disability, then it must be appropriate for that student's condition.

There may be few circumstances in which it would not be possible to offer an alternative assessment. Additionally, depending on the department and the academic field, there may only be a limited range of alternative assessments that are capable of testing a particular degree's competence standards (for example, in light of the presence and implications of artificial intelligence). Professionally accredited or regulated programmes may have prescribed assessment types. In these cases, the programme leader should contact the relevant Professional and Statutory Regulatory Body (PSRB) to establish whether an alternative is permitted.

It is good practice to design assessments to be as inclusive as possible. This will minimise the need for an alternative assessment in a specific case. In addition, forward consideration of possible alternative assessments will speed up managing requests for these.

5.2 Methods of assessment and competence standards

A 'competence standard' is defined as an academic, medical, or other standard applied for the purpose of determining whether or not a person has a particular level of competence or ability. Competence standards are necessary for academic and/or professional integrity and to ensure the value of qualifications, describing the aspects of a course or programme that **must** be attained by all students. This means they are not subject to the reasonable adjustment duty that may otherwise apply for those who are disabled under the Equality Act 2010.

Ultimately, if a method of assessment is integrally linked to the competence standard of a particular subject matter, there is little latitude in the LSE to provide a reasonable adjustment for that method of assessment. However, this happens rarely in practice, and a reasonable adjustment should usually be found for the method of assessment of a specific competence standard. In considering how an adjustment to or alternative assessment for a competence standard might be made, the School (in collaboration with the relevant academic department

and DMHS) would apply the following considerations:

- The nature and extent of the student's disability
- The resources and methods available for assessing the applicable competence standards
- The impact to academic integrity or standards posed by the alternative assessment

The key questions for distinguishing between a method of assessment and a competence standard are:

- a. What skill, competence, level of knowledge or ability is being measured?
- b. What standards are being applied to decide whether a student has met the required level of that competence or ability?
- c. What parts of the assessment are the method by which the student's ability to meet the standards at (b) is tested? It is not possible to agree to an alternative assessment that fundamentally risks the integrity of a module's and a degree's academic standards.

6. Disagreements regarding decisions around reasonable adjustments, including alternative assessments.

Once 'My Adjustments' are in place, if disabled students have any queries related to the implementation of any reasonable adjustments, including alternative assessments, they should raise them with the key contacts listed on 'My Adjustments,' for example the Academic Mentor, Departmental Manager or DMHS. If a disabled student's support needs change during their studies, disabled students are encouraged to contact DMHS for further assessment.

When a student has 'My Adjustments' but believes these are not being implemented in practice, either within their academic Department or in another area of the School, the following procedure applies:

- 1. Student should approach the Department to raise their concern. If this does not reach a satisfactory solution within five working days, then:
- 2. Student contacts their DMHS Adviser to request they intervene. The DMHS Adviser contacts the department to discuss. If satisfactory agreement on a way forward is not reached, then:
- 3. The department or DMHS will convene a Reasonable Adjustment Review Panel within fourteen days to seek a resolution.

The panel members will include relevant parties from the following list:

- Head of Disability and Mental Health Service (or nominee)
- Deputy Head of Student Services (Wellbeing)
- Deputy Head of Student Services (Operations) (as necessary)
- Department Manager (as necessary)
- Head of Department (or their nominated senior academic departmental representative)

In the rare circumstances where an agreement cannot be reached by this panel, the case will be referred to the Vice President and Pro Vice Chancellor for Education for adjudication and decision.

7. Equality Impact Assessment (EIA)

This policy is accompanied by an **Equality Impact Assessment (EIA)** to evaluate its effects on disabled students with protected characteristics and to mitigate any negative impact for them. Further details are available on LSE's **Equity, Diversity, and Inclusion (EDI) webpages**.

8. Related Policies

This policy should be read alongside other LSE policies, including:

- The <u>Ethics Code</u> which sets out six core principles for behaviour that apply across the LSE community.
- The <u>Discrimination</u>, <u>Harassment and Bullying Policy</u> which sets out the process by which members of the School community may take formal action if they feel that they have been subject to discrimination, harassment or other adverse treatment on the basis of disability.
- The <u>Safeguarding Policy</u> where an individual with a disability may also be considered within a vulnerable group.
- The <u>Student Disability Policy</u> which sets out LSE's commitment to providing an inclusive and equitable learning environment, enabling disabled students to access the same opportunities as their non-disabled peers.
- The <u>LSE Disability Policy</u> which sets out LSE's responsibilities in the context of the Equality Act (2010) as well as the responsibilities that apply to different individuals to ensure a supportive environment for disabled individuals.

Annex A

Process for determining an alternative assessment

If a student or member of staff determines that an adjusted or alternative assessment might be required this should be discussed with a DMHS adviser. They should do this as early as possible in the academic year, so that adjustments can be identified, modified where necessary, and implemented to meet their individual needs and in good time. The deadline for applying for an adjusted or alternative assessment for an exam is the same as the Long-Term CEA deadline - LSE CEAs

Requests for alternative assessments for exams, made after the Long-Term CEA deadline has passed, are unlikely to be agreed and the student is likely to be advised to either apply to defer their exam or submit an <u>Exceptional Circumstances</u> request.

The determination that a student has a disability that requires an alternative assessment for an exam is made by the Central Exam Adjustments (CEA) Panel. In arriving at its decision, the CEA Panel will consider the existing suite of exam adjustments and deem the available offer insufficient to mitigate the impact of the student's disability.

In such cases, the CEA Panel will contact the student, the department and DMHS to confirm that an alternative assessment has been agreed, including details of the relevant programmes and duration (e.g. for the duration of the student's studies or for one assessment only). Agreed adjustments will not include a change to the nature of the assessment e.g. an observed assessment will still be observed.

Where a student has a disability that requires an alternative assessment for any other type of assessment other than a centrally administered examination, this will be agreed with the Department, following input from DMHS, where the existing suite of teaching and learning adjustments will have been explored and deemed insufficient to mitigate the impact of the student's disability.

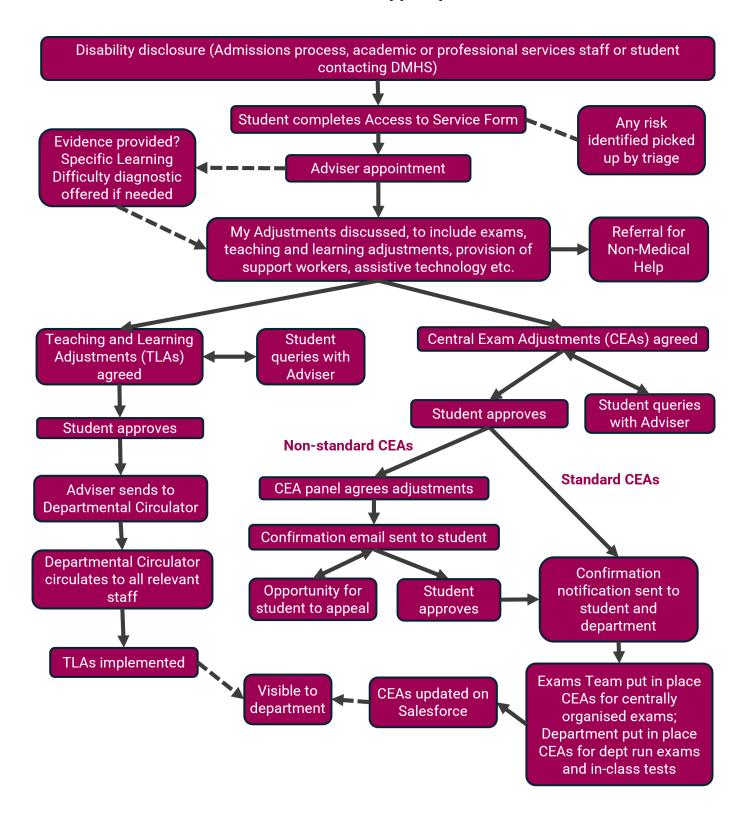
A designated person within the department will contact the student to confirm the agreed format of the assessment.

Eden Centre Departmental Advisers can provide Departments with advice and guidance around possible alternative assessments. DMHS can provide Departments with advice and guidance around the individual student's needs.

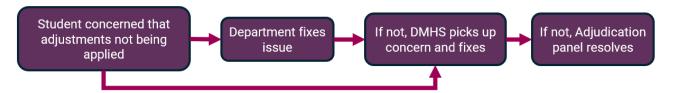
Once so determined and notified, the department will deliver the alternative assessment to the disabled student and follow standard marking and results processes. DMHS will keep a log of these adjustments.

If a disabled student is not satisfied with the CEA Panel's decision regarding their request for an alternative assessment, they can request that the decision be reviewed via the CEA Appeals Panel. If a disabled student is not satisfied with the alternative assessment they have been offered, they can request that the decision be reviewed via the Reasonable Adjustment Panel (see section 7.3 of the Reasonable Adjustments Policy for details).

DMHS student support process



What to do if your adjustments are not being implemented



Review

This policy and its accompanying EIA will be reviewed in one year's time and then in line with LSE's policy review schedule, as well as benchmarking exercises and any legislative changes.

Review schedule

Review interval	Next review due by	Next review start
Annual	March 2028	December 2027

Version history

Version	Date	Approved by	Notes
1	August 2025	Emma McCoy, Vice	
		President and Pro Vic	ce
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Diversity and Inclusion			

Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy?	Yes
If Yes, please give details. Training will be offered via the 'Implementing Reasonable Adjustments for training module.	or Students' online