



BUCKINGHAMSHIRE
NEW UNIVERSITY

EST. 1891



Reasonable Adjustment Procedure

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Purpose

- 1 Buckinghamshire New University (BNU) embraces the diversity in our community and aims to create a learning environment where equality is promoted, diversity is valued, equity is facilitated, and individuals are respected. The University seeks to provide equal access for its disabled learners through inclusive design and reasonable adjustments where appropriate.
- 2 The University is committed to providing an inclusive learning environment where all students can thrive. Wherever possible an inclusive design model is used so barriers to learning are minimised when programmes of study are developed.

Applicability and Scope

- 3 Under the Equality Act 2010 Universities must make adjustments in anticipation of the needs and requirements of disabled students so that the student is not treated unfavourably due to their disability. In certain situations, the Act does allow disabled students to be treated more favourably. This requirement relates to all facilities and services provided by the university that contribute to the students learning environment. This Policy sets out how the University meets its requirements under the Equality Act 2010 to ensure that Disabled Students are not discriminated against.
- 4 The word 'Disabled' throughout the policy is used as defined by the Equality Act 2010. Someone is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. This encompasses individuals with physical and/or sensory impairments, mental ill health, specific learning difficulties, and a range of chronic or fluctuating conditions. Someone does not need a diagnosis to be considered 'disabled' under the Equality Act 2010.
- 5 A 'Reasonable Adjustment' is a change or modification that is made to minimise or eliminate the impact that someone's disability has on their ability to engage with a task, provision or service. The student still needs to meet the competency standards of the course. There is no requirement for the competency standards to be modified to accommodate a disabled student. However, there is a duty to make reasonable adjustments to how a competency standard is assessed so that disabled learners are not disadvantaged because of their disability.
- 6 The Policy is applicable to all applicants and learners at BNU, who have or develop a disability as defined by the Equality Act 2010. Partner institutions are expected to have their own policies that comply with the Equality Act 2010. The policy applies to apprentices whilst in the education setting but not in the workplace. The implementation of reasonable adjustments for placements and apprentices in the workplace are the responsibility of the placement provider or employer, the Disability and Inclusion Service will make recommendations where appropriate. The Policy does not apply to students who have short term conditions such as a

broken limb or acute short-term illness that does not leave any ongoing substantial difficulties, e.g. cold, flu.

Policy

7. All information provided by applicants and students will be treated in accordance with the Data Protection Act (1998) and General Data Protection Regulation (2018).
8. Where a Learner does not declare or places limitations on consent to share information about their disability, it may not be possible to implement reasonable adjustments. In most instances a learner has autonomy over whether to declare a disability, however there will be circumstances where competence standards necessitate sharing of information. In the event a Learner's disability status poses a health and safety risk, staff have an obligation to share this information with the Head of Health & Safety. Any member of staff has a duty to disclose information if there is a safeguarding concern.
9. Learners are not required to provide medical evidence to 'prove' their disability. Instead, we request supporting documentation to help inform an assessment of need. In the event no supporting evidence is currently available, a learner will be asked to complete a Self-Declaration Form (Appendix A), or a staff member is able to complete a Observation Form (Appendix B) to help inform the assessment of need.
10. Students should be aware that Reasonable Adjustments can be considered from the point at which information about their disability is shared with the University. Reasonable Adjustments cannot be applied retrospectively.
11. The duty to make reasonable adjustments is anticipatory: it requires the University to plan and anticipate the needs of disabled learners, rather than waiting until adjustments are proposed. The University should therefore ensure, where possible, that adjustments to policies, practices, and procedures have been made in advance to reduce or remove the barriers to disabled learners.
12. The duty to make reasonable adjustments arises in relation to all aspects of the student experience.
13. There is no set definition for what is considered reasonable. In deciding what is 'reasonable' staff should refer to the **Reasonable Adjustment Decision Making Form** (Appendix C) and seek guidance from the Disability & Inclusion Services.
14. The university should take reasonable steps to ascertain whether someone has a disability, for example asking at application stage. As soon as any member of staff has actual or constructive knowledge of a disability then the university is required to take action to ensure that reasonable adjustments are put in place within a reasonable timeframe. All staff are expected to follow the process outlined in Figure 1.

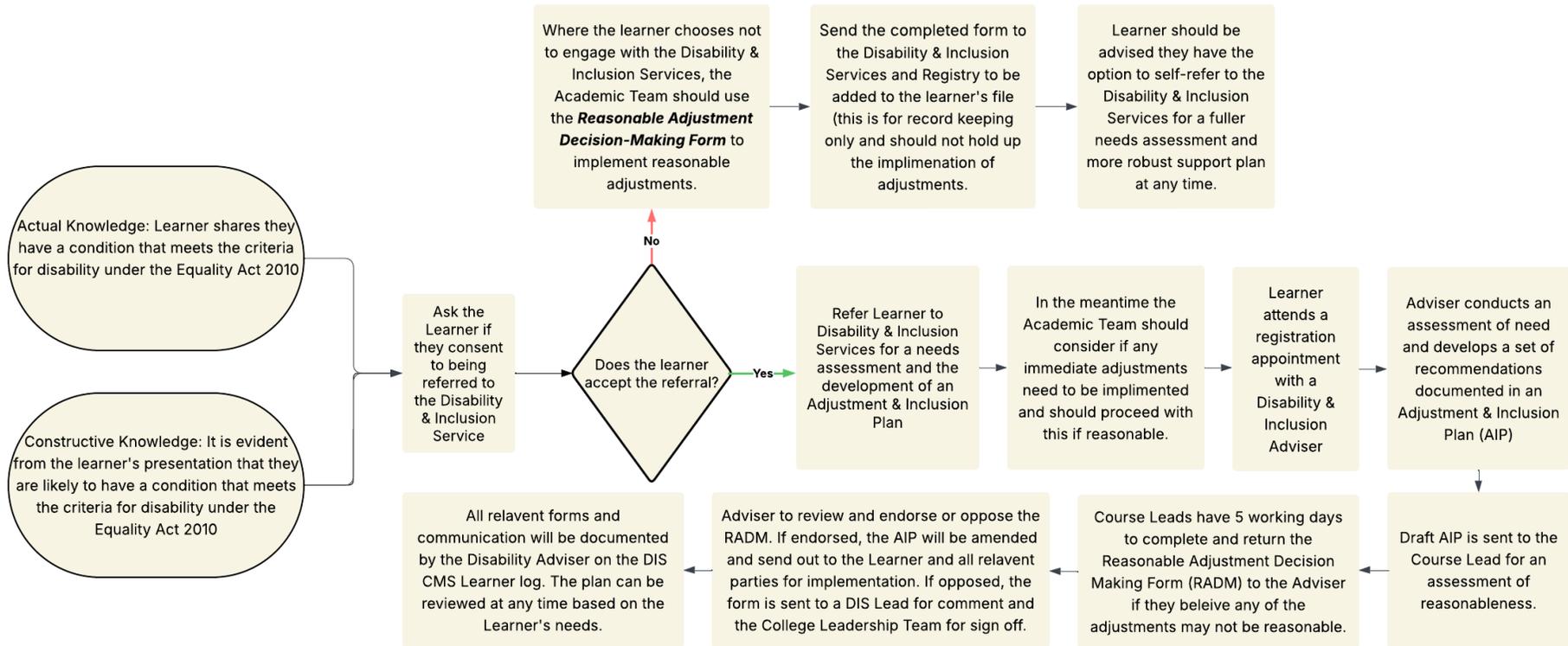


Figure 1. Reasonable Adjustment Implementation Process

Alternative Written format for Figure 1. Reasonable Adjustment Implementation Process

1. Determine Knowledge

- All staff are responsible for documenting actual or constructive knowledge of a learner's disability by contacting the Disability & Inclusion Services.
- Actual Knowledge: Learner explicitly discloses a condition that meets the Equality Act 2010 definition of disability.
- Constructive Knowledge: Learner's presentation suggests they are likely to have such a condition.

2. Initial Action by Academic Team

- Ask the learner if they consent to be referred to the Disability & Inclusion Services.
- If the learner accepts:
 - Refer them to DIS for a needs assessment and Adjustment & Inclusion Plan (AIP).
 - Consider and implement any immediate adjustments that are reasonable in the meantime.
- If the learner declines:
 - Complete the Reasonable Adjustment Decision-Making (RADM) Form based on available information.
 - Send completed form to Disability & Inclusion Services to be added to the learner's record (do not delay implementation while awaiting confirmation).
 - Inform the learner they can self-refer to Disability & Inclusion Services at any time for fuller assessment and support.

3. Disability & Inclusion Services Actions

- Schedule a registration appointment with the learner.
- Conduct a needs assessment.
- Develop and document an Adjustment & Inclusion Plan (AIP).
- Log all forms and communication in the Learner record.
- Share the draft AIP with the Course Lead for assessment of reasonableness within 5 working days of the initial student appointment.

4. Course Lead Review

- Review the draft AIP and complete the RADM form within 5 working days if any adjustments are believed to be unreasonable.
- Return the completed RADM to the Adviser.

5. Adviser Evaluation

- If RADM is endorsed: AIP is updated and sent to learner and relevant parties for implementation.
- If RADM is opposed: RADM is referred to a Disability & Inclusion Services Lead for comment.

- Final decision escalated to the College Leadership Team for sign-off.

Responsibilities

15 Roles and responsibilities of all BNU staff are outlined in Figure 1.

16 Learners are responsible for:

- Meeting the professional and competence standards relevant to their programme of study,
- sharing disability details at the earliest opportunity,
- providing existing evidence to support an assessment of need (such as a diagnostic assessment for learning impairments, medical or GP's letters/reports for physical or mental health conditions, or existing DSA needs assessment),
- engaging in meetings as requested to facilitate the implementation of reasonable adjustments and other support, such as Personal Emergency Evacuation Plans (PEEPs)

Table of Definitions

Disability	A person is disabled under the Equality Act 2010 if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities
Equality	For different groups to have the same treatment and similar opportunities.
Equity	Everyone is treated fairly according to their needs
Substantial (in reference to the above definition)	'Substantial' is more than minor or trivial, e.g. it takes much longer than it usually would to complete a daily task like getting dressed.
Long-term (in reference to the above definition)	'long-term' means 12 months or more, e.g. a breathing condition that develops as a result of a lung infection.
Working diagnosis	A working diagnosis is a label for a considered condition that one or more professionals assess as the most probable diagnosis and that could be concluded following further observations.
Competence standard	A competence standard is a particular level of competence or ability that a student must demonstrate to be accepted on to, progress within and successfully complete a course or

	programme of study
Actual knowledge	'Actual Knowledge' is where there is clear and direct knowledge of something
Constructive knowledge	'Constructive knowledge' is knowledge that an individual should have if reasonable care and diligence was carried out. It does not matter if the individual has this knowledge or not.
Non Medical Helper (NMH)	A non-medical helper is the human support put in place to help a student to access their studies. There are various specialist roles for example Study Skills Support, Mentor or BSL interpreter.
Disabled Students Allowances (DSA)	Disabled Students Allowances are a fund of money that can provide support to disabled students. The funding can pay for software, hardware, equipment and non-medical helper support such as mentoring. Eligibility criteria apply and there are variations in how each of the home nations and crown dependencies implement the DSA.
ESFA	Education Skills Funding Agency executive agency of the Department for Education (DfE) responsible for funding education and skills providers in England. Some disability support for apprentices is funded via the ESFA. There are recent changes to this which mean that the ESFA has been disbanded.
Safeguarding	Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It's fundamental to high-quality health and social care.
Vulnerable Adults	In general terms, an adult (a person aged 18 or over) is classed as vulnerable when they are receiving one of the following services: <ul style="list-style-type: none"> • Health care; • Relevant personal care; • Social care work; • Assistance in relation to general household matters by reason of age, illness or disability; • Relevant assistance in the conduct of their own affairs; or • Conveying (due to age, illness or disability in prescribed circumstances)
Empowerment	Empowerment is 'the process of becoming stronger and more confident, especially in controlling one's life and claiming one's rights' Oxford Languages The Home of Language Data People with disabilities should have their own voice, advocating for their rights and entitlements and be able to have control over their lives.

Appendices

Appendix A. Disability Self-Declaration Form

Full Name:	
Student ID:	
Course:	
Do you have any medical documentation that explains or details your disability?	
Are you in receipt of any financial support for your disability?	
Describe how your disability affects you and your ability to conduct daily activities.	
How long have you experienced these symptoms?	
What previous support have you had at School/College/University/Work?	
When you are experiencing the symptoms, how frequently do they occur?	
How does your disability impact your ability to conduct reading and research?	
How does your disability impact your ability to write and review academic work?	
How does your disability impact your ability to take notes in lectures and seminars?	
How does your disability impact your ability to manage time and organise your work?	
How does your disability impact your ability to engage with practical sessions, placements and/or additional course activities?	
How does your disability impact your ability to complete examinations and timed assessments?	

Hoes does your disability impact your social interaction and communication?	
How does your disability impact your access to campus?	
Is there anything else you would like to tell us about your disability?	

Appendix B. Disability Observation Form

Observer Name:	
Observer Role:	
Student Name:	
Student ID:	
Course:	
What symptoms, behaviours or presentation is the learner exhibiting?	
What are your observations about the impact this is having on the learner's ability to study?	
<p>Would you consider this impact to be substantial?</p> <p>'substantial' is more than minor or trivial, e.g., it takes much longer than it usually would to complete a task.</p>	
Is it likely that the presentation has lasted, or is likely to last more than 12 months?	
Additional notes or information	
<p>Disability & Inclusion Adviser Declaration:</p>	<p>Based on the above information I believe it is likely the learner in question meets the criteria for the definition of disability as defined in the Equality Act 2010.</p> <p>Signed:</p>

Appendix C. Reasonable Adjustment Decision-Making Form

How to use this form

This form would be completed when reasonable adjustment recommendations made by the Disability & Inclusion Services might not be considered reasonable locally and alternative options need to be identified. This document will help stakeholders with a legal obligation to make an evidence-based decision about whether an adjustment is ‘reasonable’ and establish alternatives where necessary. Once completed, this form should be sent to the Disability & Inclusion Services.

The process for deciding if an adjustment is ‘reasonable’

The law does not require BNU to make adjustments that are not reasonable. However, to determine whether a requested adjustment is reasonable, you need to go through some steps to ensure that you have considered this thoroughly. There are three parts to doing this: (1) deciding if the duty to make a reasonable adjustment is required, (2) identifying possible adjustments; (3) deciding which (if any) of those adjustments are reasonable. This form will take you through these steps.

Decision-Making & Rationale

<p>Name of individual or case identification: The name of the individual or the way in which this case is identified (e.g., student ID number)</p>
<p>Identified barriers and discussion with individual: Enter a brief description of the barrier that has been identified and how the individual feels about the support they need. See accompanying AIP.</p>
<p>Considered Adjustments: Provide list which adjustments you are assessing.</p>
<p>Reasonability Assessment:</p> <ul style="list-style-type: none"> • Effectiveness – how well does the adjustment in question remove or at least minimise the disadvantage? • Practicability – how practical is the adjustment? For example, how long will it take to implement, will anyone need extra training, are there enough resources etc.? • Cost – for example, how much will it cost, what financial resources are available (including schemes such as Disabled Students Allowance), can your organisation afford it? • Disruption – how disruptive to the business, to others, and to the needs of the organisation would it be to make this adjustment? • Risk – would making this adjustment cause any risk to others? (Note: An adjustment will not be ‘reasonable’ if anyone’s health and safety would be compromised by making that adjustment.)

- Competence Standard – would this adjustment undermine or remove a competence standard? We do not need to adjust competence standards; however, we do have an obligation to adjust how we assess them.

Additional evidence to support decision:

List the evidence that was considered to help reach the decision (e.g., Professional Registration Standards).

Alternative Adjustments:

List alternative adjustments that would be reasonable and meet the learner’s need.

Completed by	
Job title	
School/Department or Directorate	
Date	

Disability & Inclusion Services Review:

To be completed by the Disability & Inclusion Services, reviewing the above rationale and the decision made. Formal advice from the Disability & Inclusion Services should be provided on whether the decision is endorsed or opposed.

Completed by:	
<input type="checkbox"/> Decision endorsed	Rationale:
<input type="checkbox"/> Decision opposed	Rationale:

Disability & Inclusion Lead Comments:	
Job title:	
Date Signed:	
Date sent to College Leadership:	

Appendices: Equality Impact Assessment

As a university, we are committed to enhancing equality, diversity and inclusion (EDI). We have a legal (Equality Act 2010) and ethical obligation to ensure our policies, systems and processes are fair, inclusive and ensure every member of the BNU community can thrive.

Whilst we all have protected characteristics, we know there are certain characteristics and communities that are marginalised and underrepresented in Higher Education and the workplace. These are: different ethnicities (including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers) Disabled individuals; neurodiverse individuals; pregnancy (including maternity and paternity impact); the LGBT+ community; carers; people of different faiths; people impacted by menopause and individuals from a range of backgrounds including: socio-economic disadvantage, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex-armed forces, looked after children and care leavers. We also know individuals have multiple intersectional experiences and different points in their lives and careers.

1. With reference to the above characteristics, in what ways does this policy enhance equality and the access of opportunity at BNU?

Anticipatory Adjustments: Emphasising anticipatory duty under the Equality Act 2010 ensures proactive barrier removal. This is especially impactful for disabled and neurodiverse students who often encounter access delays in reactive systems.

Non-medical evidence pathways: Allowing self-declaration and staff observation reduces barriers for individuals facing medical gatekeeping, financial hardship, or systemic exclusion from diagnostic services (e.g. asylum seekers, care-experienced students, socio-economically disadvantaged).

Equitable assessment practices: Clarifying that competence standards may not be altered but assessment methods must be adjusted directly supports access for Disabled Students without undermining academic integrity.

Holistic integration: Applies to all applicants and learners, including apprentices within education settings, helping to protect transitions into higher education for care leavers, mature students, and other underrepresented entrants.

Safeguarding Integration: Embeds obligations to act on disability disclosures if safeguarding risks are present. This is important for survivors of domestic/sexual violence and vulnerable adults requiring wraparound care.

2. In what ways does the policy adversely impact individuals from marginalised and underrepresented communities?

Limitations in workplace settings: Exclusion of workplace responsibility for adjustments for apprentices may disadvantage marginalised learners in vocational pathways, especially those dependent on non-traditional routes into HE.

3. How does this proposal work towards achieving the BNU Equality Objectives as outlined in the [Equality Strategy 2023-2028](#)? Please signpost objectives and actions in the BNU Equality Strategy.

Equality Objective	How the Policy Contributes
Objective 1: Remove barriers to access and participation for underrepresented groups	By applying anticipatory adjustments and allowing self-declaration, the policy helps identify and reduce access barriers before harm occurs.
Objective 2: Improve outcomes and progression for students from marginalised groups	Adjustment of assessment practices contributes to equitable academic outcomes and combats structural disadvantage.
Objective 4: Build confidence in reporting and disclosure mechanisms	The explicit safeguarding and health-and-safety protocols, and non-punitive disclosure processes, support trauma-informed engagement.
Objective 5: Embed EDI into all institutional systems and decision-making	The RADM form and adjustment protocols require evidence-based, documented rationale, creating transparency and institutional accountability.

Signed: 

Name: Charlotte Stewart

Date: 22/7/25



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