



**Royal College of Art**  
Postgraduate Art & Design

## **Royal College of Art** **Student Disability Policy**

<b>Version</b>	1.0 FINAL
<b>Date</b>	13.02.2024
<b>Reviewed</b>	No less frequently than every 3 years.
<b>Approved by</b>	SMT, Senate
<b>Target audience</b>	All students, All staff
<b>Cascaded to</b>	PSG, ASC, EDI Centre, Student's Union, Senate
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<b>Owner</b>	Deputy Head of Student Experience
<b>Department</b>	Student Experience

### **General statement on anti-discrimination**

The Royal College of Art (the College) is firmly against unlawful discrimination in all its forms against staff, students and visitors with protected characteristics as set out in the Equality Act 2010 (age, sex (gender), sexual orientation, race, religion or belief, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity).

### **Related Policies**

[Support to Study Policy](#)

## **1. Introduction**

The College is committed to ensuring equality of opportunity for its students and understands the value diversity brings to the institution. We aim 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 our commitment to our Disabled students. The policy aims to ensure all members of our community are clear on their responsibilities and how to enact them. The policy is available to all staff and students so they can understand how our responsibilities are fulfilled, placing Disabled students' experience at the institution's heart.

The College aligns itself with the social model of disability. This is a model in which people are disabled by how society is organised rather than by their impairment or difference. There is a recognition within the social model that institutions can act with responsibility to reduce, and ultimately remove, some of these disabling barriers. This task is the duty of society as a whole, rather than the Disabled person. The College celebrates its diverse student and staff population and is committed to delivering an inclusive and sustainable environment conducive to students thriving and being part of a nurturing academic community. This pledge is underpinned by four community values: curiosity, inclusion, collaboration and integrity.

## **2. Aims and scope of the policy**

The aims of this policy are:

- To highlight the support available to applicants, offer holders and students.
- To describe the reasonable adjustment provision that applicants, offer holders and students can expect from the College.
- To ensure all students benefit from being a member of the College community and can participate in their chosen postgraduate art and design programme, to give them the best opportunity to thrive and achieve the award.
- To ensure, where possible, that all students can participate in their planned and validated assessment, subject to learning outcomes and competence standards.

The College will strive to ensure its environmental, social and institutional practices and attitudes are inclusive of all Disabled students, eliminating discrimination through 'less favourable treatment', victimisation or harassment.

The College will commit to recognising the effects of a disability, rather than focussing on the disability or condition itself. The College will do its best, within our resources, to actively seek to think ahead and predict reasonable and proportionate steps to overcome barriers which potentially impede or disadvantage Disabled people. The College will encourage full declaration of disability, as greater disclosure will help the College improve support for disabled students.

This policy applies to any Disabled student who reasonably requires adjustments and support to assist with their studies regardless of whether they are a UK or overseas student.

Personal care needs for students are not provided for by the College, or covered by this policy (e.g. carers to assist with personal care needs).

### **Background information**

The Equality Act 2010 prohibits unlawful discrimination against Disabled people, provides rights to Disabled people, and protects Disabled people from discrimination and harassment.

The Act determines the presence of a disability if:

a) A person has a physical or mental impairment, and  
b) The impairment has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities. This may include:

- Mobility impairments
- Sight or hearing loss
- Specific Learning Difficulties (SpLDs) such as dyslexia, dyspraxia, dyscalculia, ADHD, and other diagnosed neurodiverse conditions
- Autism Spectrum Condition (ASC)
- Mental illness or mental health difficulties
- Invisible, long-term medical conditions such as cancer, HIV/Aids, epilepsy, diabetes
- Progressive or fluctuating conditions characterised by several cumulative effects such as pain or fatigue

The College uses these definitions but recognises that *disability* holds different meanings for everyone. Our Student Experience Team can support students in understanding whether they have a disability, and explore the best approach to addressing their needs.

The College's inclusive approach adheres to the legal framework of the Equality Act (2010), wider equality duties, and strategic and operational plans. When applied to an education setting, the social model of disability and equality legislation means that Professional Services and Academic Departments must seek inclusive practice in all service and programme design and delivery aspects. The commitment is to offer a learning environment which is as barrier-free as possible. 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 Section 20 of the Equality Act 2010, to put in place reasonable adjustments so that Disabled students are not placed at a disadvantage in relation to their non-disabled peers. The duty to provide an accessible environment and reasonable adjustments is owed to all Disabled students who undertake a course at the College, regardless of the level or duration of their course, and their country of origin.

The words *neurodiversity*, *neurodivergence*, and *neuroatypical* are broad terms for the infinite number of ways the human brain operates, leading to diverse ways of thinking, attention styles, interacting with the environment, communicating, and retaining memories. Individuals can choose to self-identify using these terms however, to be considered Disabled and access support from the College beyond the universally available resources, there is a requirement to provide the Student Experience Team with diagnostic or medical information that confirms the existence of a disability according to the Equality Act.

## **RCA Values**

The RCA values provide a framework for how we work and operate as a community.

**Curiosity:** We have a tenacious commitment to innovation and openness to change. We positively interrogate ideas, assumptions and plans and welcome the honest scrutiny that is alive in a learning community.

**Inclusion:** We celebrate diversity and we embrace difference as a source of strength. We strive for an inclusive RCA community, removing barriers and challenging exclusionary and discriminatory practices.

**Collaboration:** We value what happens together and we help and support each other to achieve our collective goals. We work in partnership with our students, staff, alumni, institutions, and communities across the globe to make a lasting difference.

**Integrity:** We are always willing to listen, we offer constructive feedback and we promote accountability, building relationships of mutual trust and respect.

We are resilient in the face of challenges, pursuing outcomes with individual, cultural, societal and economic impact.

## **2. Reasonable Adjustments and Inclusion Plans**

Where a Disabled student experiences or may experience a substantial disadvantage, the College must make reasonable adjustments to overcome that disadvantage. The type and level of reasonable adjustments and support will differ between students depending on the impact of the disability on their studies and advice from clinical practitioners.

Medical evidence of a disability is required to access support, which must be available in English. Unfortunately, the College cannot accept reports written in other languages and cannot provide a translation service.

We ask that the evidence provided is ideally dated within a year. The Student Support team can request an up-to-date assessment to understand current needs. Interim support will be organised while medical evidence is collated.

The College offers all Disabled students an Inclusion Plan. This is a document co-created by the student and usually the Disability Adviser, which articulates the inclusive action required to ensure participation in teaching, learning, assessment and other key areas of the student experience.

For postgraduate research students undertaking their viva voce, a tailored summarised Inclusion Plan covering disability adjustments specific to this assessment and to inform the viva examiners.

The Inclusion Plan intends to advise academic departments and other relevant services across the College on how best to support and provide recommended reasonable adjustments to the student's engagement, learning and assessment to ensure a positive and inclusive student experience. The document assigns responsibility to each department or service involved in implementing the support.

The recommended reasonable adjustments will cover teaching, learning and assessments, field trips, exhibitions, public events, and engagement with external partners if it is an embedded component of the course curriculum.

Inclusion Plans are shared with a nominated service or academic programme contact. The student will receive a copy of their Inclusion Plan, which can be given to any staff member.

The Student Advice and Wellbeing Service, which includes the Disability Adviser, are responsible for assessing the disability-related needs of prospective and current students; discussing, preparing and agreeing to the content for Inclusion Plans; co-ordinating access to resources; and anticipating and reviewing the support offer to ensure it is suitable.

A student can request reviews at any time; for students managing complex health conditions or where there are external support agencies involved in the support package offered, a minimum of one review each term with the Disability Adviser will be arranged.

The Dyslexia Coordinator and a Dyslexia Tutor provide services for students with specific learning difficulties, ADHD and autism. Students can access one-to-one support covering academic support, study skills and strategy workshop sessions, support for organisational difficulties and individual tutorial support with essay writing, time management and presentation techniques.

### **3. Extensions to coursework submission**

The reasonable adjustment as additional time will be captured in an Inclusion Plan. The College will strive to offer students a two-week extension where possible, with a one extension week as a minimum offer.

### **4. Disabled Students' Allowance (DSA).**

Postgraduate students from the UK (full-time or part-time) can apply for Disabled Students' Allowances (DSA). The allowance, managed by the UK government, is intended to cover extra costs or expenses that may arise whilst studying.

International students, including EU students who do not qualify for statutory student support, are not eligible for DSAs and will receive support from internal College resources, including access to study skills and strategies support.

For students who are not eligible for DSA, the Student Support team, usually the Disability Adviser, will carry out its assessment of needs to identify the type of assistance needed.

The College will organise and pay for the assistance needed.

Study skills support is guaranteed for all Disabled students not eligible via the DSAa; access to support is not means-tested. Screening tests for specific learning difficulties (SpLD) are available to offer-holders and students.

A referral for a full adult diagnostic assessment for specific learning difficulties can be made via the Student Experience team on the recommendation of the Dyslexia

Coordinator, following an initial screening. The College maintains a system of funding subsidies for an adult diagnostic assessment.

## **5. Academic Assessments**

The Royal College of Art is committed to embedding accessibility into the curriculum. The College strives to make programmes inclusive by design and to ensure that every aspect of existing programmes embraces inclusive learning, teaching and assessment practices. The College distinguishes between the method of assessment and the competence standard being assessed. Any reasonable adjustments will apply to the provision and delivery of learning, teaching and assessment activity, but will not apply to the expected competency standards. These apply to all students equally.

A competence standard determines whether a student has met the required level of knowledge or ability to pass the programme. Where a method of assessment, such as a viva or collaborative group work, presents itself as a disadvantage because of a particular disability, the arrangements of the assessment will be adjusted so that the disadvantage is removed as reasonably possible.

The Disability Adviser (or nominated Advisor) can recommend reasonable adjustments to formative and summative assessments through the student Inclusion Plan.

The adjustments to assessment arrangements may include:

- Additional time allowance
- Rest breaks
- Sign language interpreters for students whose first language is British Sign Language
- Specific furniture (ergonomic chair or height adjustable table)
- Alternative assessment scheduling, either staggered assessment dates or altered start and finish times.
- Alternative submission formats (e.g audio rather than written submission)
- Academic departments are responsible for implementing reasonable modifications or adjustments to assessments.

In some cases, it may not be possible to make the proposed adjustment recommended by the Disability Adviser, if:

- The integrity of the assessment will be compromised by the reasonable adjustment or alternative form of assessment recommended
- It will be materially impossible to implement the reasonable adjustment

- The combination of the adjustment recommended might be disadvantageous to the student. For example, the combination of additional time plus rest breaks might mean the assessment is too long.

Any alternative assessment method should account for the need to ensure that the published learning outcomes of the course are met, and the competency standards are not compromised. It should also avoid creating an unfair advantage for the student, by design or timing. The Academic Board of Concessions and Discipline (ABCD) will approve alternative assessments after considering a proposal submitted by the Disability Adviser or nominated member of the Student Support Team and the Head of Programme or module lead.

## **6. Disclosure, confidentiality and data protection**

The College complies with current data protection legislation, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. We treat all personal and special category data (e.g. data relating to students' health) confidentially and in line with data protection legislation.

The Student Experience Team will ask for permission to disclose information about a student's disability and support requirements to staff members who need to know. Information may also need to be disclosed to relevant members of staff who would reasonably need to be aware of such information to implement any or all of the adjustments identified.

In exceptional circumstances, information may be shared without permission if the student's consent cannot be sought or where the College has a legal obligation, for example, if we become aware of a serious risk to health or safety matter affecting the student or others.

A student can declare to the College the existence of a disability at the application stage or during their programme. An applicant, offer-holder or registered student can contact the Disability Adviser to discuss any aspect of the disclosure process or to learn more about the support on offer.

A student may disclose their disability to anybody in the institution. In line with the Equality Act, when a student discloses a disability, the College is considered to know about that student's disability and must act on this disclosure with a formal offer of support.

Recording a formal disclosure ensures staff understand the disability and planning for support can begin. Offer-holders or registered students can restrict the information that is recorded or passed on. However, students should be aware that

this may mean it is not possible to offer the full range of support which would otherwise have been available.

In all cases, the staff member who has received the disclosure should direct the student to the Student Experience team so the formal offer of support can happen and the assessment of reasonable adjustments can be made.

The student is invited to record their disclosure at any time.

## **7. Attendance**

Where a disability-related reason impacts a student's attendance or punctuality, reasonable adjustment may be put in place through an Inclusion Plan.

An attendance adjustment is not 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, for example, RIBA
- there are other legislative requirements related to our immigration sponsorship

An attendance adjustment may also cover a student needing to enter/leave the class late/early and/or for a short break.

It is the student's responsibility not to disturb the class or the learning of others when leaving or re-joining the cohort

Students may be refused re-entry if they have missed essential 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 starts and to arrange alternative ways for them to access the learning the student would have missed.

If academic staff are concerned that a student's absence or punctuality is reaching a level that compromises their progression in the course, they may initiate a Fitness to Study meeting under the Cause for Concern and Fitness to Study Policy.

## **8. Extenuating circumstances**

Extenuating Circumstances are events which are sudden, unexpected, significantly disruptive and beyond your control and which may affect performance in an assessment. A disability is not considered an extenuating circumstance. The Inclusion Plan will make recommendations to mitigate the cumulative impact of a health disadvantage. For an unexpected short-term illness or where a disability diagnosis was received too late for an Inclusion Plan to be prepared, a claim for extenuating circumstances can be made.

The existence of an Inclusion Plan does not prevent a Disabled student from additionally applying for extenuating circumstances. Please refer to the Extenuating Circumstances Policy.

## **9. Timetabling**

The College academic timetable will be published by the Timetabling team well in advance of the course commencing. They must release room booking information promptly. This ensures that an accurate College timetable is available when coordinating the bookings of in-class assistance or communication support.

Students, with the assistance of Programme Administrators and the Disability Adviser, are responsible for communicating their timetable to support agencies for on-campus or remote support.

Support can only be delivered if the student is in attendance with the support worker. There may be exceptions which will need to be agreed upon by the Disability Adviser in advance of the session.

## **10. Estates**

Some of the estate and physical environment at the RCA, in particular, the Kensington campus is not fully accessible to wheelchair users or people who have difficulties using stairs. The College will have accessibility considered at the design stage of our newer buildings.

Practical information about the buildings and campus is published to support Disabled students, staff and visitors in planning their way around the campus. The College has commissioned a service with AccessAble to deliver an accessibility programme consisting of an all campus estate survey and the creation and maintenance of detailed access guides published on the internet.

Where there are access issues due to buildings being listed, or issues with facilities, the College ensures that Disabled students, staff and visitors are advised so that they can make informed decisions about the navigability of the campus spaces and gain knowledge of the facilities available.

Where access is limited, the College will instigate reasonable alternative arrangements, for example, changing venues, altering timetables or bringing physical modifications to the building.

The College shuttle bus is available for staff and students, providing free transport between the South Kensington, White City and Battersea campuses. The shuttle service includes a regular accessible vehicle.

Disabled students are encouraged to provide feedback on physical access to campus and premises services by communicating directly with the Estates or Student Experience Team and student representation structures. The College expects students to proactively inform the Estates or Student Experience Team if adaptations or access considerations are needed. The College will take all reasonable steps to provide safe access for all students on campus.

The College continuously updates the signage and wayfinding to ensure adequate and appropriate wayfinding across campuses.

## **11. Emergency Evacuation**

Disabled students prevented from fully participating in evacuation procedures will require a Personal Emergency Evacuation Plan (PEEP) arranged by the Health and Safety Manager.

A PEEP documents how students will be evacuated when they have difficulty responding to a fire alarm or escaping from a building unaided in an emergency.

## **12. Assistance Animals**

An assistance animal, commonly a dog, is specially trained to assist a Disabled individual. Guide dogs are the most common type of assistance dog, used by individuals who are blind or visually impaired. Other medical conditions may require assistance dogs: hearing loss, mental health conditions, physical impairments, epilepsy or seizure-related disorders, and autism spectrum conditions.

A pet or a therapy/emotional support animal is not an assistance animal.

Assistance animals must be registered with a member organisation of Assistance Dogs UK.

Registered assistance animals are allowed into College buildings under the control of their owner, subject to local arrangements and following consultation to support colleagues who may have animal allergies.

### **13. Digital accessibility, including web accessibility and Inclusive Software**

The College is committed to ensuring that all digital services and content are accessible to disabled students.

- The College has worked towards meeting its obligations of the [Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#) through a thorough review of the College website by [AbilityNet](#). The audit assessed accessibility status and provided guidance to ensure the website is fully accessible to those using screen readers, keyboard navigation and other assistive technologies. The College's accessibility statement can be viewed [here](#).
- Universally available assistive software including MindMapping and literacy support software
- Learning systems, such as [Moodle](#), [Panopto](#) and [Padlet](#) used as part of enhancing teaching and learning at the College are assessed carefully for their commitment to accessibility and their compliance with Web Content Accessibility Guidelines ([WCAG](#)) which currently inform the UK's Accessibility Regulations.
- Zoom provides Live Captioning and Closed Captions for recorded meetings/classes stored within Panopto. Where recordings are made without captions as default, the TEL- team offers transcription and captioning services where required.

### **14. Library Services**

The Library is informed of students with an Inclusion Plan. A Librarian will then contact these students about their options. Students who do not have an Inclusion Plan may contact the Library to enquire about additional support.

The Library offers the following supplementary support services:

- **Designated Librarian:** A single point of contact throughout their studies if preferred.

- **Individual inductions:** Introductions to the physical library to gain familiarity, a sense of safety and confidence to visit independently. Assistance is provided for finding a suitable study space if there are particular access requirements.
- **RCA Library searches:** Assistance in searching RCA Library Search (the library catalogue) and the College's online resources. This is offered online via Zoom or in person in the Library.
- **Accessible formats:** Students can be registered on the [RNIB Bookshare](#) site, which provides books in formats such as PDF, epub, DAISY, MP3
- Where books or other readings are unavailable on the RNIB Bookshare platform the Library can supply high quality PDFs via email.
- Students can also use the [Sensus Access](#) tool to convert existing files into a format that is accessible.
- Book collections are conducted by Library staff if students need help to retrieve items from the library shelves independently. These can be requested and made available to collect from the reservations shelf at Kensington, Library desk, or the collection lockers at Battersea and White City.
- Extra reservation allowance: Disabled students can reserve up to 10 books simultaneously.
- Free postal book returns: via the CollectPlus parcel service.
- Universal access to tinted overlays and a hand-held video magnifier to aid text reading

## 15. Application process

A course application will be considered based on academic merit and potential for your chosen course, and no presumptions are made about a disability and how it may impact the applicant in relation to the chosen course.

When a candidate is invited for an interview, we will usually provide further details of the location and format of the interview in your invitation. We encourage a discussion about access arrangements and a request for reasonable adjustments as soon as possible.

## 16. Leave of absence

When a student returns to the RCA following a study break for health and wellbeing reasons, an assessment of whether it is appropriate for the student to re-engage will be undertaken. A crucial part of our decision-making is the recommendations from the professional responsible for their care during a period of absence from education.

## 17. Complaints

The College strives to offer an outstanding student experience. If at any point the experience is deemed unsatisfactory or you have concerns about the College, you are entitled to make a complaint. All informal feedback should be provided to the Deputy Head of Student Experience, and we encourage students to, in the first instance seek a local informal resolution by contacting their Head of Programme, Supervisor or the lead for the respective service that has caused the complaint. Disability and Wellbeing in the first instance.

## 18. Disability Awareness Training

There is a commitment to ensuring staff have access to regular training in disability inclusion that supports their working knowledge and practical strategies to impact the experience of the student and staff community positively. Training opportunities are advertised in the HR Hub.

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## Appendices

Related Policies, Strategies and Toolkits

Student Experience / Student Support Confidentiality Policy

<https://docs.google.com/document/d/1HzEs8ziHrvL4CkM2bo5ED81FQalbM-hPPh7HBe-hrGw/edit?usp=sharing>

RCA Academic Recording Policy

[https://rca-media2.rca.ac.uk/documents/RCA\\_Academic\\_Recording\\_Policy.pdf](https://rca-media2.rca.ac.uk/documents/RCA_Academic_Recording_Policy.pdf)

RCA Strategy 2022-27

[https://rca-media2.rca.ac.uk/documents/RCA\\_Strategic\\_Plan\\_2022-27.pdf](https://rca-media2.rca.ac.uk/documents/RCA_Strategic_Plan_2022-27.pdf)

Post Graduate Research ToolKit

<https://intranet.rca.ac.uk/research-knowledgeexchange/research-students/pgr-toolkit/>