Guide for Disabled Students

This guide is intended for potential applicants to the College, applicants (undergraduate and graduate) and current students. It provides you with information on all aspects of support for disabled students, including in the application process, arrival in College, accommodation and College facilities, as we as adjustments for examinations. Whether you have a specific learning difficulty – such as dyslexia or AD(H)D – or a long-term mental or physical health condition, this guide contains important information for you.

The information here is correct as of 18 March 2021. In 2020-21 and possibly 2021-22 the College and the University will be operating under social distancing guidelines in line with our commitment to the health and well-being of staff and students during the ongoing Covid-19 public health emergency. How these guidelines will operate, and how exactly they will affect disabled students, is yet to be fully determined. This guide will be updated when the information is available, but inquiries can be directed to the Welfare & Disability Officer (contact details page 2)

Contents

page

2 Introduction
2 Disclosure

2 Applicants
3 Graduate applications
3 Undergraduate applications

4 Students on course
4 Disability Advisory Service
5 Adjustments in Course and Examination Arrangements
6 Financial Support

6 Accessibility
6 Parks Road (main) site
6 Hall
7 Accommodation
8 Library
8 H B Allen Centre

9 Appendices
9 1. Students with specific access requirements: policy and procedure
13 2. What is reasonable?
15 3. Request for reasonable adjustment (template form)
Introduction

The Equality Act defines disabilities as ‘a physical or mental impairment that has a “substantial” and “long-term” negative effect on your ability to do normal daily activities.’ Around twelve per cent of the students at Keble declare a disability. Half, around thirty people, report a specific learning difficulty such as dyslexia. These levels are comparable with other colleges. What this means is that colleges, including Keble, and departments have good experience of addressing the needs that arise for disabled students. We do, however, also recognise that each person’s needs and circumstances will be different and that there is always more that we can do to make the College a more inclusive environment.

The University has a Common Framework on Support for Disabled Students approved by colleges in departments in 2014, and the College has a strong commitment to promoting equality of opportunity for disabled students. Two college officers have particular responsibilities:

Dr Alisdair Rogers, is the Senior Tutor (senior.tutor@keble.ox.ac.uk) and he acts as Disability Lead with strategic oversight for provision for students with disabilities.

Mrs Trish Long is the Welfare & Disability Officer (welfare@keble.ox.ac.uk) and the Disability Coordinator; her responsibilities include the implementation of policies and coordination with departments.

Full information on support offered across the collegiate University is available on the website of the Disability Advisory Service.

Disclosure

You don’t have to disclose whether you are a disabled student. However, there are benefits to disclosing. If we are aware in advance of any particular difficulties, we can provide you appropriate support and make reasonable adjustments, including to the admissions process. Applicants who are disabled are therefore strongly advised to contact the University Disability Advisory Service and the College Disability Coordinator in advance to discuss their needs. All such matters are covered by the College’s code on Confidentiality and the Circulation of Welfare Information.

Applicants

The information in this section is addressed at anyone thinking of applying to the University and to Keble, whether for an undergraduate or a graduate degree. There are two main issues: (1) how does
the application process take account of particular disabilities and (2) how far can Keble accommodate your particular needs.

The University’s policy on admissions is this:

*The University of Oxford and its colleges welcome applications from people with disabilities and are committed to making reasonable adjustments to enable students to participate fully in student life.*

*The University and colleges view applications from students with disabilities on the same grounds as those from other candidates. All applications are assessed purely on academic merit and potential, according to the published selection criteria for the course you have applied for.*

**Graduate applications** are dealt with by Departments in the first instance, although you can express a preference for a particular college on your application form. Information on graduate applicants – including financial support - can be found on the University’s website [here](#).

If you can, it’s recommended that you try to visit the Department and/or College before making your application. The University has open days, but you can generally arrange visits to suit your schedule. That’s not always possible, but at the very least we recommend that you contact the Disability Coordinator to discuss your needs before applying. Please note that:

*College reallocation on disability grounds will only be possible in exceptional cases and you will be required to provide supporting medical evidence about your disability and its impact. Normally this kind of reallocation extends only to those with a severe disability that requires substantial adjustments to living accommodation, a significant sensory impairment or those who have personal daily care needs.*

You may want to read the section on **Accessibility** below before deciding whether Keble is the right place for you.

**Undergraduate applications** are handled by colleges in the first instance but it can also be helpful to contact the University early in your planning – go to the University’s website [here](#). There’s a wall of videos in which students with disabilities talk about their experience of Oxford for example.

Because undergraduate admissions generally involve interviews – in person or, under certain circumstances, via Teams – it’s important to let us know in advance about any needs arising from a disability. If the subject you’re applying for has a pre-interview test, your school Exams Officer, or open centre administrator can advise you on what to do. If you are called for interview, reasonable adjustments can be made to the timing, location, format and conduct of interviews if you’ve given us sufficient notice. That might be via your UCAS application – in which case we will pick it up - or by contacting the Disability Coordinator directly – and in good time.
You may want to read the section on Accessibility below before deciding whether Keble is the right place for you. If you think it would help you, we recommend that you visit the College before making your application. There are three Open days in the summer, but if for any reason you can’t make one of them, contact the Disability Co-ordinator and we’ll try to arrange a personal tour.

If you are offered a place at Keble – or at another Oxford college, please contact the Disability Advisory Service as soon as possible, without waiting for confirmation of your offer. If you’re a UK student, they can advise you on how to apply for Disabled Student Allowance, which is the main source of government financial support.

If you are offered a place at Keble but applied to a different college, you might want to contact us and – if it’s appropriate – come and see the facilities. We hold a special session for offer-holders who did not originally apply to Keble at one of our early summer Open days (we’ll be in touch with you about that) but if that’s not convenient, contact the Disability Co-ordinator.

If Keble presents difficulties due to your disability, the Disability Advisory Service will work with you and us to establish whether reasonable adjustments can be made to accommodate you. If the situation cannot be satisfactorily resolved you should contact the Undergraduate Admissions Office to request a change of college. Such changes are made only in exceptional circumstances and you will be required to provide supporting medical information about your disability.

**Students on course**

Although you are not obliged to disclose any disabilities, we can obviously only help you if you do so. Such things as alternative examination arrangements or support for learning can take a lot of time to sort out – they inevitably involve paperwork and can also require liaison within the College, and between the College and departments and the Disability Advisory Service. The sooner you make us aware of any issues or needs, the quicker they can be addressed.

It does also happen that students only become fully aware of disabilities – for example Specific Learning Difficulties – while on course. If you – or sometimes your tutor – thinks that you might need an assessment, it’s sensible to act without delay.

**Disability Advisory Service**

We recommend that if you have not contacted the University’s Disability Advisory Service (DAS) before making an application or before taking up your offer, that you do so once you arrive. The
College relies upon the expertise of the DAS to make your personal assessment and come up with your Student Support Plan (SSP). They can assess your study needs for:

- Teaching adjustments, e.g. lecture capture
- Human support (also known as non-medical help)
- Reasonable adjustments to the built environment, for example in your labs or department
- IT equipment and study technology
- Travel between study sites
- Examinations and assessments
- Libraries

The DAS does not deal with such issues as college accommodation, but we rely upon their advice to sort out what’s best for you. The DAS will send a copy of your SSP to the Disability Co-ordinator, Trish Long.

**Adjustments in Course and Examination Arrangements**

The University is able to make appropriate and reasonable adjustments to both teaching and assessment (examining) while on course. The College can do the same for college teaching and exams. If you have informed us and University in good time, the relevant Disability Coordinators can meet to agree a statement of support tailored to your individual needs.

Disabled students, including students reporting specific learning difficulties or a medical condition and who need to apply for special study or examination arrangements will need medical or other independent, specialist evidence to support their requests for those arrangements. Examinations arrangements are authorised by the University, not the College. Depending on individual needs, the kind of adjustments that may be possible include extending your period of study, providing readers/scribes or Braille texts, allowing a different mode of assessment, rescheduling of examinations, providing extra time in examinations and extensions to submission deadlines, sitting examinations in College and allowing you to use word processors in examinations.

*This is important.* Just because you had an adjustment before you came here, for example extra time in examinations, it does not necessarily follow that you’ll have the same while at Oxford. You’ll be contacted by the Disability Co-ordinator early in the academic year to prompt you about making an application. It’s vital that you respond right away. The University may not agree to adjustments that
are requested late in the day – for example once examination timetables are set or papers are prepared.

If an adjustment is agreed for you by the University, we will also apply it to college examinations. But we won’t allow you extra time or the use of a computer until and unless that adjustment is agreed by the University for your University exams.

Financial Support

There is some funding available to meet any additional costs arising from a disability. Home students, undergraduate or graduate, may be eligible for Disabled Students’ Allowances (DSAs). These are provided by Local Authorities or the Student Awards Agency for Scotland. Some graduate funding bodies also provide an equivalent to DSA. The UK government has recently revised the terms of the DSA and the level of support may change at short notice. The University and the College also have funds available to assist students with specific study-related needs. Because the situation is changing, you should contact the Disability Advisory Service for up-to-date details.

Accessibility

You are strongly encouraged to consult the Keble entry in the detailed University Access Guide, which has more detailed information (including photographs).

Keble’s main site is a combination of 19th century and late 20th century buildings, to which many changes have been made to adapt them to the needs of students and staff with disabilities. The newer H B Allen Centre, where the main graduate accommodation and facilities are located, was completed in 2019 and is generally more accessible. Some parts of the College are more accessible to individuals with specific mobility, visual or other needs than others. There is a rolling programme of improving the buildings to make them more inclusive.

It is a good idea to attend an Open Day if you can or contact the Disability Coordinator. What’s in this guide is only a brief summary and it does not take account of any adjustments that will need to be made in response to the social distancing and safety requirements associated with the Covid-19 pandemic.
Parks Road (Main) site

The main entrances and the Porters’ Lodge are accessible by wheelchair users. Access to the Lodge is via a manual door. The Lodge has an induction loop.

The Hall is accessible to wheelchair users via a new purpose-built lift. Anyone wishing to use the lift on a regular basis should contact the Steward (emile.hernandez@keble.ox.ac.uk) for training on its use. They will be given a fob-key to activate the lift. Other, occasional users (for example for friends, guests, and family) should speak to the Lodge Porters or contact the Hall Stewards (deputy.steward@keble.ox.ac.uk) for assistance with operating the lift. There is an induction loop in the Hall.

The Library can be accessed from the ground floor (the main entrance is on the first floor and involves steps) by arrangement with the College Librarians. It may also be possible to arrange books and materials to be delivered to your college room. See section below.

The Junior Common Room (JCR) is accessible via removable ramp.

The Middle Common Room (MCR) is accessible by wheelchair users; step-free access is by ramp from Hayward Quad, which is operated by a device obtained from the Porters Lodge.

The Chapel is accessible via removable ramp; it has an induction loop.

The O’Reilly Theatre has wheelchair access and an induction loop

Teaching rooms in the Sloane Robinson Building and ARCO basement are accessible to wheelchair users.

The bar and pizza bar accessible to wheelchair users via a separate entrance.

The gym on the main site is accessible via stairlift.

Car parking may be available in College for students with disabilities.

The fire safety systems in student rooms can be readily adapted to meet the needs of individuals with impaired hearing or vision.

Accommodation

There are a number of ground-floor study bedrooms in Liddon quad, all of which have en-suite facilities. There is also one study-bedroom with purpose-built, en-suite facilities, suitable for a wheelchair user; a carer could be accommodated nearby, linked by a telephone. Study bedrooms in
Sloane Robinson and ARCO are accessible via lift. All study-bedrooms have data points to both the College and University networks.

We may be able to arrange for you to either stay in or retain your college accommodation outside term-time, provided that it is a reasonable adjustment to your needs.

**H B Allen Centre**

The facilities in the H B Allen Centre for graduates (completed 2019) have been designed to meet the needs of students with disabilities, although there is still a programme of improvements to be completed. Access to all rooms is step-free although some involve passing through fire doors which are currently manually operated. Thirteen study bedrooms are configured for use by residents with a disability.

Contact the Facilities Manager, Zdenka Miseje ([hbac.accommodation@keble.ox.ac.uk](mailto:hbac.accommodation@keble.ox.ac.uk)), for further information on the Allen Centre.

**Keble Library: Readers with Disabilities**

Keble Library is committed to providing the best access possible for all members of College. Readers with disabilities are invited to contact the College’s Welfare Officer or the Deputy Librarian directly to discuss their needs before they start their course or at any stage during their time at Keble.

If the staircase presents a problem, arrangements can be made for readers to study in the Lower Reading rooms. Books can be delivered to pigeonholes, left with Lodge staff or delivered directly to student rooms. Disabled users may also nominate a person to check out books on their behalf.

It may be possible to purchase extra copies of books for those for whom it would be difficult to visit other libraries and who find it easier to read in their rooms. On request, the College may be able to supply ergonomic chairs for students with back or neck problems; book/laptop rests are also available.

Permission may be given by the Librarian for a helper, approved by the University's Disability Advisory Service, to accompany a student when using the Library.

Information about the Bodleian Libraries for disabled readers is available on the [Oxford LibGuides site](http://guides.lib.ox.ac.uk/disability). A key point of contact is the [Accessible Resources Unit of the Bodleian Libraries](http://www.bodleian.ox.ac.uk/learning-and-accessibility/accessibility) (ARACU), which provides support for students with disabilities and advises on access issues for all Bodleian Libraries. ARACU has a variety of assistive technology – including magnifiers, screen readers, recorders and
ergonomic equipment – available for borrowing or for testing on site. ARACU’s manager is also the Bodleian’s Disability Librarian (teresa.pedroso@bodleian.ox.ac.uk; 01865 283861).

We want you to make the most of your time at Keble and Library staff will do their best to provide a service that meets your individual needs.

Keble contact: Fiona Wilson, College Librarian, library@keble.ox.ac.uk, Tel: (01865) 272728
Students With Specific Access Requirements:
Policy and Procedure

Introduction

This document sets out the policy and procedure for managing adaptations for students with specific access requirements.

It should be read in conjunction with the Common Framework for Supporting Disabled Students, adopted across the collegiate University in 2014. The Common Framework sets out two guiding principles:

i. That the collegiate University will seek to demonstrate exemplary inclusive practice in relation to disabled students.
ii. That the collegiate University will comply with all applicable legislation\(^1\), and follow the guidance outlined in University policies and relevant external publications, noting the requirement to make reasonable adjustments insofar as they do not compromise the integrity of academic competence standards.

These guiding principles inform a set of operational principles:

i. That the collegiate University will adopt an anticipatory approach, in line with requirements of the Equality Act, and think ahead about the range of adjustments that might reasonably be made for potential students without needing reference to individual student cases.
ii. That the collegiate University will use and further develop efficient communication systems to share information about disabled students in order to provide coordinated support. This will be carried out in accordance with the Data Protection Act 1998 and will also recognise the requirement to respect confidentiality and the need for sensitivity during the legitimate sharing of information.
iii. That the Disability Advisory Service (DAS) will play a central role in assessing student need and making recommendations for reasonable adjustments to remove disability-related barriers including working in collaboration with, and providing advice and guidance for, students, colleges, departments and other relevant sections of the collegiate University.
iv. Each College and faculty/department should designate a senior member of staff to take a lead role in disability-related matters (known as the ‘Disability Lead’). This person should have strategic oversight of provision for disabled students within their college or department and will report to the relevant responsible body...Each college and faculty/department may also appoint one or more members of staff to coordinate and oversee implementation of provision for disabled students (the ‘disability coordinator’).

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\(^{1}\) In this case, the relevant legislation includes the Equality Act (2010) and Part M of the Building Regulations (2010)
v. That a collaborative approach will be adopted by those staff supporting disabled students to facilitate the smooth and coherent implementation of reasonable adjustments. Within this collaborative context, the lead responsibility for maintaining oversight throughout a student’s studies will be taken by colleges in the case of undergraduates, and by departments/faculties in the case of graduates, in close consultation with DAS.

Disability Lead - Dr Alisdair Rogers, Senior Tutor: ali.rogers@keble.ox.ac.uk
Disability Coordinator - Mrs Trish Long, Welfare and Disability Officer: trish.long@keble.ox.ac.uk

The policy and procedure in this document refer to both residential sites of the College, a Parks Road and the H B Allen Centre.

Identifying students with specific access requirements

Individuals holding offers for either undergraduate or graduate places are invited to disclose disabilities, including specific access requirements, to the Welfare and Disability Officer at the following points:

- Undergraduate application, i.e. on the UCAS form – on which case the College is notified by the Undergraduate Admissions Office
- Invitation for admissions interview – via a paragraph in the letter inviting applicants to interview
- The offer letter to graduates
- The accommodation preference form to graduates accompanying the offer letter
- The accommodation preference form to undergraduates sent in March following the offer
- During confirmation of undergraduate offers, in the August preceding arrival in Michaelmas term

Arrangements during admissions interviews

The College will follow the Disability Advisory Service’s good practice guidance on facilitating access to admissions for candidates with disabilities (see appendix 3). The Welfare and Disability Officer is responsible for coordinating arrangements for applicants in liaison with the College Office and the relevant subject admission tutors.

Arrangements during the offer stage

The Admissions Officer will notify the Welfare and Disability Officer of offer-holders who disclosed disabilities during or after the admissions process.

The Welfare and Disability Officer will direct offer holders (undergraduate and graduate) to the Disability Advisory Service. Offer-holders are strongly encouraged to make early contact with the DAS, who in turn will coordinate provision with the relevant University department(s)

The Accommodation Managers will notify the Welfare and Disability Officer of incoming students who disclosed disabilities or make reference to specific requirements in their accommodation forms. A form asking for further details will then be sent.
Offer-holders who notify the College of needs that might entail major adjustments (for example in terms of time or resources) will be invited to visit the College before the start of term to discuss what arrangements might be required.

In unusual or exceptional circumstances the College may wish to consult with other colleges, the DAS, and/or Graduate Accommodation Office about the possibility of alternative provision where the College cannot reasonably meet the necessary requirements. There is a procedure for migration between colleges in the University Regulations. Migration is not an alternative to making reasonable adjustments and it can only happened with the consent of the student and both colleges.

**Responding to students with specific access requirements**

Notification of any special requirements related to either teaching or accommodation must be made to the Welfare and Disability Officer. It is the responsibility of the Welfare and Disability Officer to ensure that any such requests are addressed in accord with the relevant legislation, frameworks, guidance and regulations.

Students with special requirements may disclose or make requests at any point. The College will inform offer-holders and students that it is in their interests to make disclosures as early as possible, but their requests will be treated no differently if they choose not to do so.

Notification of special requirements should be made by the individual student, preferably in writing and following a meeting with the Welfare and Disability Officer. A student may be accompanied by a parent/guardian.

On being informed by a student (or parent/guardian of student) of a disability that might require adjustments to accommodation and/or facilities, or on receiving a request for such an adjustment, the Welfare and Disability Officer (in consultation with the Disability Lead) will make an initial assessment. They will determine whether a case is either:

- major, requiring independent professional assessment and verification of needs and advice on meeting them, or
- minor, requiring self-assessment of needs and lying within the scope of routine adjustments

In major cases, the College will consult the Disability Advisory Service on the appropriate sources of professional advice and assessment. The student will be kept informed about the progress of the procedure.

Rooms will only be fitted out, as required, in response to individual student needs. Arrangements for bed and breakfast guests will be managed accordingly, typically using a proprietary ‘clip-on’ equipment systems. The managers note any requirements in initial correspondence and book students and guests in appropriate rooms within the accommodation whenever possible.
Reasonable adjustments

The College is required to make reasonable adjustments to meet the needs of students. The definition of what is reasonable is provided by the Equality and Human Rights Commission (appendix 1). Examples of adjustments include the following:

- to cater for the needs of a student with a visual impairment would be the installation of a vinyl ‘halo’ in a contrasting colour around any white switches and sockets mounted on a white wall to increase the visual contrast to the required 30 points
- to cater for the needs of a student with a hearing impairment, a vibrating pillow alarm will be provided. The alarm will be connected to the fire alarm system and is designed to wake a person in the event of the fire alarm being activated.

The Welfare and Disability Officer will record requests using the form ‘Requesting Reasonable Adjustments’ (appendix 2), a copy of which will be made available to the student making the request following the assessment/decision.

The Welfare and Disability Officer will consult with the relevant College Officers and staff and keep a brief record of their discussions.

Consultation and assessment will proceed in as timely a manner as practical and reasonable; the student should be informed if there are any delays.

The assessment/decision will be communicated to the student by the Welfare and Disability Officer in writing. The student will be informed of the College’s Complaints Procedure should they not be satisfied with the decision or associated action.

The Welfare and Disability Officer will inform the relevant College Officers or staff of the action to be taken in response to a request for reasonable adjustment, setting a timeframe for completion. The student will be informed if there is any delay.

The Welfare and Disability Officer will contact the student within no more than 4 weeks of the action being undertaken to establish whether the arrangements are satisfactory or not. If not, they will take the necessary steps to ensure that the adjustment is consistent with the assessment.

APR 22.2.19
Appendix 1

What is reasonable?²

You only have to do what is reasonable.

Various factors influence whether a particular adjustment is considered reasonable. The test of what is reasonable is ultimately an objective test and not simply a matter of what you may personally think is reasonable.

When deciding whether an adjustment is reasonable you can consider:

- how effective the change will be in avoiding the disadvantage the disabled worker would otherwise experience
- its practicality
- the cost
- your organisation’s resources and size
- the availability of financial support.

Your overall aim should be, as far as possible, to remove or reduce any disadvantage faced by a disabled worker.

Issues to consider

- You can treat disabled people better or 'more favourably' than non-disabled people and sometimes this may be part of the solution.
- The adjustment must be effective in helping to remove or reduce any disadvantage the disabled worker is facing. If it doesn’t have any impact then there is no point.
- In reality it may take several different adjustments to deal with that disadvantage but each change must contribute towards this.
- You can consider whether an adjustment is practical. The easier an adjustment is, the more likely it is to be reasonable. However, just because something is difficult doesn’t mean it can’t also be reasonable. You need to balance this against other factors.
- If an adjustment costs little or nothing and is not disruptive, it would be reasonable unless some other factor (such as impracticality or lack of effectiveness) made it unreasonable.
- Your size and resources are another factor. If an adjustment costs a significant amount, it is more likely to be reasonable for you to make it if you have substantial financial resources. Your resources must be looked at across your whole organisation, not just for the branch or section where the disabled person is or would be working. This is an issue which you have to balance against the other factors.
- In changing policies, criteria or practices, you do not have to change the basic nature of the job, where this would go beyond what is reasonable.
- What is reasonable in one situation may be different from what is reasonable in another situation, such as where someone is already working for you and faces losing their job without an adjustment, or where someone is a job applicant. Where someone is already working for you, or about to start a long-term job with you, you would probably be expected

to make more permanent changes (and, if necessary, spend more money) than you would to make adjustments for someone who is attending a job interview for an hour.

- If you are a larger rather than a smaller employer you are also more likely to have to make certain adjustments such as redeployment or flexible working patterns which may be easier for an organisation with more staff.
- If advice or support is available, for example, from Access to Work or from another organisation (sometimes charities will help with costs of adjustments), then this is more likely to make the adjustment reasonable.
- If making a particular adjustment would increase the risks to the health and safety of anybody, including the disabled worker concerned, then you can consider this when making a decision about whether that particular adjustment or solution is reasonable. But your decision must be based on a proper assessment of the potential health and safety risks. You should not make assumptions about risks which may face certain disabled workers.

If, taking all of the relevant issues into account, an adjustment is reasonable then you must make it happen.
Appendix 2

Request for Reasonable Adjustment

Case:
Considered by:
Date:

This form should be used to address requests for reasonable adjustment on the grounds of disability and in accord with The Disability Discrimination Act 1995 as amended by the Special Educational Needs and Disability Act 2001. Reference should also be made to the Common Framework for Supporting Disabled Students. The information recorded in the form is subject to the College’s code on confidentiality.

In making a decision on a request, the following criteria should be considered:

- whether taking any particular steps would be effective in overcoming the difficulty that disabled people face in accessing the student services in question
- the type of service being provided
- the nature of the institution or service and its size and resources
- the effect of the disability on the individual disabled person or student
- the extent to which it is practicable for the education provider to take the steps
- the financial and other costs of making the adjustment
- the financial resources available to the education provider
- the availability of grants, loans and other assistance to disabled students (and only disabled students) for the purpose of enabling them to receive student services (such as Disabled Students’ Allowances)
- the extent to which aids and services will otherwise be provided to disabled people or Students
- health and safety requirements; and
- the relevant interests of other people including other students.

Without attempting to be exhaustive, these are factors that might be taken into account when considering what is reasonable. These factors make a useful checklist, particularly when considering more substantial adjustments. The effectiveness and practicability of a particular adjustment should be considered first. If it is practicable and effective, the financial aspects should be looked at as a whole – the cost of the adjustment and resources available to fund it.

The request

Where possible a request for reasonable adjustment should be made in writing by the junior member, giving reasons for the request and noting any supporting evidence.
Assessment and Decision

*Note whether the request is supported by or consistent with an assessment by the Disability Advisory Service. Record which College Officers were consulted and what their assessments were. Give reasons for the decision.*

Action

*Record any specific actions to be undertaken, together with a proposed timeframe*

Communication

The decision was communicated to _______ on _____________ by _________________. _______ was also informed of the procedure for appeal (to the Warden) and complaint (the College Complaints Policy and Procedure).