

# **UEL's Disability Policy**

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# **Accessibility Statement:**

This Policy can be made available in alternative formats (large print, braille or audio). Please contact Office for Institutional Equity (oie@uel.ac.uk or 0208 223 6990) for alternative formats.

# **Disability Policy**

# 1.1 Purpose of the Policy

The purpose of this policy is to:

- I. Set out a framework to ensure that staff and students with disabilities can fully participate, where practicable, in the University's academic and social programmes.
- II. Ensure that members of the UEL community with disabilities or long-term conditions, like neuro-diverse conditions such as dyslexia and autism, or physical disabilities have access to both facilities and a learning and working environment that is, wherever reasonably possible, comparable to that of their non-disabled peers.
- III. Ensure that the University complies with its legal requirements under the Equalities Act 2010

## 1.2 Guiding Principles

- Staff and students with disabilities are an integral part of the UEL community; accessible and appropriate provision are core to the values of UEL;
- UEL will provide an inclusive, safe and supportive environment for all staff and students, including those with disabilities to study within;
- UEL will have zero tolerance towards discrimination, harassment and bullying of staff and students with disabilities;
- UEL will promote equality of opportunity and foster good relations between people with disabilities and others;



 UEL will take proactive steps in making reasonable adjustments and in taking proportionate steps to overcome barriers which potentially impede or disadvantage people with disabilities.

#### 1.3 Scope of the Policy

Current staff and students (where relevant the policy will also apply to prospective staff, students and visitors). This policy is not contractual in nature.

# 2 Policy

# 2.1 Sharing information about a Disability and Confidentiality

'Sharing information about a disability' is the formal term given to informing UEL that you have a disability, long-term medical condition or specific learning difficulty, such as dyslexia, that has a substantial effect on your day-to-day life and may affect your ability to study.

Sharing information about a disability is not compulsory and many staff and students with disabilities find that they are able to cope with the demands of their work or course of study without support, or by using some of the supports like the anticipatory adjustments that the University has in place for all staff and students.

However, all prospective and current students and employees of UEL are encouraged to disclose their disabilities so that appropriate support can be made available to them.

All information and documentation regarding an applicant or student's condition will be used exclusively for the purpose of planning and implementing an appropriate support provision by Student Support and Wellbeing in order that the individual may gain the maximum benefit from working at UEL or from their educational opportunity at UEL.

Here is the full student disability sharing policy and procedure.

There is more information on the <u>UEL's Data Protection Policy here</u>.



# 3 Prospective and Current Staff

It is the aim of the University to recruit, retain, train and develop people with disabilities based on their abilities. We are committed to ensuring that our working environment is accessible and promotes a positive working experience for people with disabilities.

# 3.1 Prospective Staff: Recruitment

We will use positive recruitment initiatives to attract candidates with disabilities; ensure our documents are non-discriminatory, only including criteria that are objectively necessary to ensure success in a role. We will reach recruitment decisions based solely on an individual's ability to undertake the role.

We will facilitate reasonable adjustments to enable candidates with disabilities to fully engage with recruitment and selection processes and so will also encourage candidates to share information about their disability during the application process in order to make these adjustments effective.

We will guarantee interviews to all candidates with disabilities who meet the minimum essential criteria for the role.

The University's Recruitment and Selection policy

#### 3.2 Current Staff

#### 3.2.1 Retaining

We recognise that some staff will become disabled during their employment with the University and we are committed to supporting and working with those members of staff to enable them to both adjust to their change in circumstances and remain in work. We will also work with specialist advisors, including, but not exclusively, Occupational Health and Access to Work, and will seriously consider all reasonable adjustment recommendations, recognising that adjustments can take many forms and will be individual to each situation.

If it is not possible for an employee to remain in their current role, we will explore redeployment opportunities before any decision is taken in relation to continuing employment.



#### 3.2.2 Induction

We will, through line managers, and in consultation with the employee, ensure that all reasonable adjustments are made so that the employee is able to work safely and effectively with secure equal access to all benefits of employment.

The corporate Induction programme will be fully accessible to all employees with disabilities.

#### 3.2.3 Training and Development

The University recognises the importance of training and development activities in enabling all employees to reach their full potential. All employees will have equal access to training and development activities, including promotion and other aspects of career development, based solely on their abilities.

The University will make reasonable adjustments to all training and development activities, including promotion and career development opportunities, where practical to do so.

The University's Learning & Development, including Induction intranet pages

#### 3.2.4 Monitoring

We will analyse equality data provided during the recruitment process and during employment to ensure the effectiveness of our policies and to understand the support and adjustments that may be required for candidates with disabilities. This information is for monitoring and statistical purposes only and is not seen by recruiting or line managers.

#### 3.2.5 Reasonable Adjustments

Consideration will be given to statutory requests for flexible working and/or special contractual arrangements in order to assist people with disabilities to continue in their employment.

Our objective is to retain staff who are, or who become disabled. Every effort will be made to retain staff through reasonable adjustments such as acquiring or modifying equipment or allowing absences during working hours for rehabilitation and to seek advice from local DEAs, specialist advisers and the OH Advisor.

Where it is not possible for the staff member to continue in their current role we will make every effort to identify suitable alternative employment. This will entail HR Services meeting



with the staff member and seeking advice from the DEA, specialist organisations and the OH Advisor as appropriate. The DEA and JobcentrePlus may be able to provide training for staff towards a suitable alternative post.

HR Services will review any proposed termination of employment of an employee with a disability to ensure that it does not unjustifiably relate to disability.

Where it is not possible to retain or redeploy a member of staff with a disability their employment will be terminated. HR Services in conjunction with the staff member will contact the DEA and other specialist organisations so that outplacement advice and assistance can be given to the member of staff after they have left UEL's employment.

## 3.2.6 Further Information

The University's Occupational Health Service intranet page

Disability Confident Employer scheme

Government Access to Work scheme

#### 4 Prospective and Current Students

#### 4.1 Prospective Students: Application

UEL welcomes applications from students who have a disability or long-term condition. Disability covers a broad range of physical and sensory conditions, medical conditions, specific learning difficulties and mental health conditions that can impact upon work and study. This can include, but is not limited to:

- a sensory (e.g. visual/hearing) impairment;
- a mental health condition;
- a mobility impairment;
- Neurodiverse conditions such as autism, Asperger's syndrome;



- chronic medical conditions (e.g. diabetes, epilepsy, asthma);
- chronic pain/chronic fatigue;
- specific learning difficulties (e.g. dyslexia, dyspraxia);

We encourage applicants to tell us if they have a disability or long-term condition on their application and provide an outline of their support needs, in order that we can make them aware of the range of support and guidance that is available and to also plan ahead for any reasonable adjustments.

Admissions decisions are based on academic suitability and where applicable, the requirement of professional bodies. Information regarding disability on applications is separated from the admissions decision process.

In Student Support, the Disability Services and Mental Health and Wellbeing teams offer advice and guidance to prospective applicants with disabilities on the range of support available in order to help them make informed decisions. In addition to sharing information about a disability via UCAS applications, full time undergraduate applicants may also provide additional information about their circumstances.

Applicants who tell us they have a disability or long-term condition, including a mental health difficulty receive information from Disability Services and the Mental Health and Wellbeing team about potential support available and they are asked to provide more information about their support needs in advance in accordance with our anticipatory legal duties. Where appropriate, applicants are encouraged to visit the campus when individual support needs can be discussed. Information provided to UEL is held in confidence and is shared with colleagues only with students' permission in order to facilitate appropriate support.

## 4.2 Reasonable adjustments

The University will endeavour to provide appropriate reasonable adjustments dependant on the individual's needs, this will include assisting a student to obtain relevant evidence so that we can provide appropriate support and address any issues relating to academic or professional competency standards. Once the level of need has been established, and with permission, information can be disseminated to relevant departments to arrange support. This will be done by:

I. A Learning Support Agreement (LSA) – formulated with the agreement of the student.



II. A Teaching and Learning Support Requirement (TLSR) – which will be circulated to relevant staff, with the students consent, advising on appropriate adjustments.

The University will also endeavour to consider the requirements of students with disabilities in the following areas:

- I. Inclusive and accessible programme design;
- II. That, where practicable, all learning and teaching materials are accessible as standard;
- III. That, where practicable, students with disabilities have equal opportunities to access academic and vocational placements;
- IV. That appropriate exam adjustments are implemented within the constraints of University policy, to ensure that assessment and examination practices should provide the same opportunities as non-disabled peers.

The <u>Disability and Dyslexia Service</u> provides support and advice for students with disabilities and those with specific learning differences (SpLDs), including dyslexia.

There is information on support provided for exams and assessments arrangements here.

You can also read the entire policy here:

Student Disability Policy

Student Disability Sharing Policy & Procedure

**Anticipatory Adjustments** 

#### 5 Visitors

UEL has a limited number of accessible parking spaces at each campus. Parking spaces must be authorised by a member of UEL staff.

Visitors with disabilities to the university are encouraged to inform their host of impeding disabilities in order for the necessary reasonable adjustments to be made or put in place prior to and while on campus.



The full UEL visitor parking guide is available here.

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#### 6 Sources of Help

- Line Managers and Heads of Departments/Services/Schools could provide immediate guidance or help where possible and point in the right direction where necessary.
- HR Services including the OH Advisor, and the Mentoring and Equality Unit will provide
  advice and guidance about disability issues, sources of assistance both financial and in
  terms of equipment as well as our obligations under the DDA and Equality Act.
- Our OH team can also undertake work-related assessments.
- The Office for Institutional Equity (OIE) is able to provide advice and support as well as point in the right direction where necessary.
- Our recognised Trades Unions can provide advice and support on disability issues to their members.

#### 6.1 Links to other Policies and Procedures

- Accident, Incident and III-health Reporting Procedure
- Dyslexia Guidance for Staff
- Staff Grievance Procedure
- Fire Policy
- Personal Emergency Evacuation plans PEEP (Guidance)
- Personal Emergency Evacuation Plan PEEP (Form)
- First Aid
- UEL Health and Safety Handbook
- Occupational Health

#### 6.2 Definitions

#### **Disability**

According to the Equality Act 2010, disability is defined as having a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities. We will use this definition as the standard when applying to employment policy.



In the definition above, 'substantial' means more than minor or trivial, e.g. it takes much longer than it usually would to complete a daily task like getting dressed and 'long-term' means 12 months or more.

A disability can also include progressive conditions, such as multiple sclerosis or cancer; conditions which recur, such as epilepsy and people with a history of disability who have recovered but still find their job prospects diminished by fears of a relapse.

Severe disfigurement and HIV status are specifically included in the Act. The term "mental impairment" covers only clinically recognised conditions.

Whilst this policy is framed around the legal definition of disability, staff are not expected to focus on establishing whether a condition qualifies as a disability and should instead focus on removing barriers and making reasonable adjustments to create an inclusive work and study environment for our staff, students and visitors, including alumni.

#### **Reasonable Adjustment**

A Reasonable Adjustment is defined as a decision taken by UEL to allow changes to be made to standard arrangements for staff and students in relation to their work and study at UEL. Some staff and students may become disabled during their working lives or studies and the need to make reasonable adjustments is important to allow them to continue in their employment or studies. Reasonable adjustments will also apply to those applying to UEL for employment, study or visiting.

UEL is committed to supporting staff and students with disabilities and will be proactive in making reasonable adjustments to remove barriers for individuals. What is reasonable depends on a range of factors. These include the effectiveness of adjustments, the size of the organisation, how practicable the changes are, the cost of making changes and the resources available. UEL will also work with Occupational Health and external organisations such as Access to Work and if further support is needed.



# 7 Appendices

# **Appendix A: Equality Analysis**

DISABILITY	Inequality and under- representation – things to avoid	Specific needs – factors you need to consider	Challenge stereotypes – positive messages to promote
People with physical and mental disabilities	<ul> <li>Criteria or arrangements that could exclude or limit participation if a person has a disability</li> <li>Presenting disability/having a disability as a negative thing or using negative language to describe disability</li> <li>Underrepresentation – do you need to include measures to address this?</li> <li>Assumptions that look at only physical disabilities.</li> </ul>	<ul> <li>Is this accessible to all? Basic accessibility should be built in from the start. Think about your service and how people access it. Would those arrangements still work if someone has a disability? Do you need to introduce alternative arrangements?</li> <li>Always have a contact point for people who need to discuss their specific requirements/queries.</li> <li>Provide useful access information where appropriate (such as the 'flat level' route from A2B), location of accessible toilets and parking spaces</li> <li>Provide information on student and staff</li> </ul>	Images and examples that include people with disabilities     Identify opportunities to present people with disabilities as high achievers and positive role models



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disability support	
services as appropr	iate.



# Appendix B: Disability Support Process - Staff

Process	Responsible	Responsible for
Pre-employment Health Questionnaire is sent out with the Employment Contract once an offer is in place	HR	Sends out the employment contract package to include the Health Questionnaire
Return Health Questionnaire to Occupational Health (OH) for OH Adviser to screen	Potential Employee	Returns completed Health Questionnaire to the OH Team.
OH Adviser, screens and passes questionnaire, then sends out a Fitness Sheet to HR which will include comments and advise/recommendations to the responsible Line Manager based on what's been declared on the form by the employee	OH Team	Sends Fitness Sheet to HR with comments and advice for line manager
HR passes the Fitness Sheet and information to the relevant line manager alongside other new employee package documents	HR	Passes the Fitness Sheet and contents to the relevant line manager
Line Manager to follow up on all the advice and recommendations given in the Fitness Sheet. The OH team is available to provide any additional support and assistance required.	Line Manager	To follow up/action recommendations provided by the OH Adviser so as to ensure the staff member has all required support available
If extra support is needed, the staff should speak with his/her line manager about this. Also, the DSE/VDU checklist should be completed by the staff as part of the staff induction process. An appointment could be arranged to meet with the OH Adviser as	Staff	Requests for extra support if needed support is not provided or initially recommended.



Self-referral or Management referral
(completed and sent by the line manager).



# Appendix C: Position statement on accessibility and inclusion

The number of students with disabilities entering higher education has grown significantly over time. This is a positive development; it has also served to brighten the spotlight on the challenges and barriers faced by students with disabilities.

This position statement sets out the scope of those challenges, setting a context for this policy for the medium and long-term. Observance and implementation of this policy will progress UEL's aim of becoming an institution that is genuinely accessible to everyone, and inclusive of all.

# Accessibility and inclusion:

#### I. Access to teaching and learning

Accessibility and inclusion mean ensuring that physical access to lecture rooms and other academic spaces is made as straightforward as possible. This will be enabled through measures such as step-free access, assistive technologies such as lecture capture, and the resourcing of reasonable adjustments set out in support plans.

The growing significance of virtual delivery of teaching and learning was accelerated by the COVID pandemic and will remain a feature of provision in future. Disability-proofing online delivery will benefit students with disabilities, whilst also easing access and take-up by students who experience challenges with this mode of delivery for reasons unrelated to impairments.

Professional services staff engaged in direct student support – work in partnership with academic colleagues in order that reasonable adjustments set out in students' support plans are in place, reviewed and maintained.

#### II. Living and social factors

UEL aim to ensure accessibility of social activities, clubs and societies on campus maximising the quality of the overall university experience for students with disabilities.

Delivery will focus on:

 ensuring that information & adverts for student union or club activities and events is widely available in a range of formats



- accessibility adjustments are provided when requested, and actively considered when planning events/activities.
- building awareness and empathy among the wider student cohort in relation to the presence of students with disabilities and the ways in which they can be supported, befriended, and included.

An intersectional approach, recognising that disabled identity sits alongside gender, ethnic, and class identification will be adopted.

# III. Transitions and employment

'Transitions' relates to the journey into and through university, onto employment or further study. UEL will adopt the social model of disability which emphasises the dismantling of attitudinal and structural barriers in contrast to a medical model which frames 'disability' through a lens of 'special needs' and can serve as a disincentive to students with disabilities to disclose their life circumstances and therefore access the support to which they are entitled.

Careers support will be 'disability-confident' to enhance the quality of support available to students with disabilities, and to facilitate access to experiences such as work placement, highlighting the need for effective employer engagement. Alongside success gaps in degree attainment and employment that relate to ethnicity, there is a pre-existing context of disadvantage that shapes the employment prospects of people with disabilities in the wider labour market. Effective careers support is a vital mitigating measure in this respect.

# **Appendix D: Legal Framework**

## **Equality Act 2010**

As disability is a protected characteristic under the Equality Act 2010 public bodies must, in the exercise of their functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.



Public bodies are required to integrate consideration of equality and good relations into their day-to-day business and to consider how a function can affect different groups in different ways. This enables UEL to reasonably anticipate the needs of staff, students and visitors with disabilities and to address the potential impacts of any proposed changes to ensure they do not have an adverse effect.

The Act imposes a duty on us to make reasonable adjustments to working arrangements or physical features of premises which place the person with a disability at a substantial disadvantage in comparison with others without a disability.

Under the Act there is a clear expectation that we will make reasonable adjustments to recruit or retain people with disabilities.

If a prospective or existing member of staff believes that they have been discriminated against on grounds of disability, the staff should, in the first instance, raise their concerns with their line manager. If this is not possible because their line manager is part of the concern, they should raise them with their line manager's manager.

Prospective candidates who are concerned that they have received less favourable treatment because of their disability should raise those concerns initially with the recruiting manager (or Resourcing Manager).

In the event the issue has been escalated to the HR Services, HR Services will then endeavour to resolve complaints through our internal procedures.

#### Appendix E: Health & Safety Implications: Fire Safety

UEL has duties under the relevant legislation to ensure the health & safety and welfare at work of all staff, students and visitors and that its operations do not expose, staff, students and visitors to risks to their health & safety. As such the normal principles contained within UEL's Health & Safety Policies will apply. It may be necessary, on occasion, to make special arrangements to ensure that a person's impairment, or an issue relating to it, does not create a hazard for themselves or for others.

Arrangements, for example, for the safe evacuation of persons identified as being especially at risk from fire can be found within the <u>Fire Safety Policy</u>.



In cases where staff and students have disclosed disabilities that affect their ability to exit the building in an emergency, they will be consulted by the PEEP Co-ordinator of their School or Service about their individual needs for evacuating the building in a safe and dignified manner.

This will be in advance of any emergency and a personal emergency evacuation plan (PEEP) produced. Training regarding assisting staff, students and visitors with evacuation is provided by Security.

You can find a full contact list for UEL's <u>Safety Co-ordinators</u>, <u>Designated First Aiders</u>, <u>PEEP</u> Co-ordinators and Mental Health First Aiders here.

# Appendix F: Governance Requirements Monitoring and Reporting

UEL is legally required under the Equality Act 2010 to monitor and report annually its disability sharing figures for staff and students. These figures are collected via the personal staff record forms, student admission data and student records.

Early sharing of a disability is encouraged so that all reasonable adjustments can be put in place as early as possible to meet any individual work-related and study needs.

UEL will continue to collect and monitor these statistics and encourage sharing as part of its commitment to the provision of an inclusive and equitable working environment.

All reporting will be of a statistical nature (no individuals will ever be identified). Statistics on staff and students will be reported in the annual University EDI Report and HESA student returns.

Information on staff and students who share with us information on their disability will be kept confidentially on the appropriate HR or student data system, in line with the Data Protection Act.

#### Responsibilities

All staff, irrespective of seniority have responsibility for the fair and equal treatment of others with a disability. UEL Management Team is responsible for actively promoting the employment and retention of people with disabilities and is responsible for making the necessary reasonable resources available to support this objective.



This policy will be monitored on an ongoing basis and will be formally reviewed in March 2024.