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Intercollegiate Halls Reasonable Adjustments Policy and Procedure

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Reasonable Adjustments Policy

Introduction

The University of London seeks to observe the rights and respect the dignity of staff, students, visitors and others with whom the University has contact, and to create a positive, inclusive and diverse working, learning and social environment, free from unfair discrimination, prejudice, intimidation and all forms of harassment.

Under the Equality Act 2010, the University must ensure that our services are accessible to disabled people. This can mean making adjustments so that a person is not substantially disadvantaged when using our services.

The University of London is committed to making the necessary adjustments to support disabled people wherever possible. We welcome our duties under the Equality Act, as part of our proud tradition of commitment to ensuring equality of opportunity for all.

What is a disability?

A disability is a physical or mental impairment that has a substantial and long-term negative effect on a person's ability to perform normal daily activities within the social context in which they live. Disabilities can include, but are not limited to:

- long-term health conditions, such as cancer, HIV or diabetes
- mobility difficulties
- mental health conditions, such as depression, bipolar disorder, psychosis and eating disorders
- autism spectrum conditions
- sensory impairments, such as hearing or visual loss
- specific learning differences, such as dyslexia or dyspraxia

The social model of disability helps us to understand that people are disabled by barriers in society, not by their impairment or difference. Barriers can be physical, or they can be caused by people's attitudes to difference. Removing these barriers creates equality and offers disabled people more independence, choice, and control.

What is a reasonable adjustment?

A reasonable adjustment is a change to a process, practice, procedure or environment (including physical layouts, equipment, support) that helps remove, reduce or prevent the obstacles faced by a disabled person.

Reasonableness

There is no set definition of what is "reasonable". An assessment of whether a proposed change is reasonable might take into account several factors, including, amongst others:

- what is needed, what difference it will make, and likely effectiveness
- practicality, potential for disruption, and health & safety considerations
- cost

The following are just a few examples of adjustments that might be considered reasonable in relevant circumstances:

- making arrangements to assist a student in the event of an emergency or building evacuation
- allowing a student to keep items in their room that would not normally be allowed
- making physical changes to a room or access route
- allocating a specific room, type of room, or building
- providing information in a different format
- allowing a student to participate in a disciplinary procedure remotely, or only in writing
- making exceptions to guest rules
- waiving normal limits on how many years a student can live in halls
- guaranteeing availability of accommodation in the summer
- allowing a student additional time to respond to correspondence related to a complaint or disciplinary procedure⁴

This list is not exhaustive.

Exclusions

Nothing in this Reasonable Adjustments Policy and Procedure shall exempt a student from:

- paying accommodation fees according to the required or agreed schedule; or
- requirements of the Licence Agreement, Hall Handbook or Student Disciplinary Procedure that relate to –
 - interpersonal behaviour (e.g. bullying and harassment),
 - theft or vandalism,
 - smoking or drug use,
 - fire safety, or
 - any misconduct that may also constitute a criminal offence.

For students: How to request adjustments

Before arriving in hall

If you have a disability that might require you to occupy a specific type of accommodation, or any adaptations to your room or access routes, please let us know as soon as possible by emailing the Allocations Team at

info.halls@london.ac.uk. You should also contact the Allocations Team *as far in advance of your arrival as possible* if you wish to request permission for an assistance animal (see appendix II for more information about this).

The Allocations Team can help ensure you are housed in the right type of accommodation, and they will be able to connect you with the Hall Manager and/or Hall Warden as required.

After arrival

If you have a disability that may present barriers to your use of hall facilities or participation in hall life, please let us know by contacting your Hall Warden or Hall Manager. They will arrange to meet with you (or communicate in another way, if you prefer) to gain an understanding of your situation and what your needs might be.

What you can expect

- We will listen to you and try to understand your concerns.
- We may ask for evidence of your disability. This could be a letter from a doctor, other registered healthcare professional, or a student support / disability advisor.
- We will involve you in decisions about what reasonable adjustments may be necessary.
- We will deal with your request in a timely manner, without undue delay.
- If we cannot make any adjustments that you request, we will give you an explanation why.

If you are dissatisfied

If you are not satisfied with the way we have managed or responded to your request for reasonable adjustments, you may choose to follow the [Student Complaints Procedure](#).

Reasonable adjustments Procedure

Guidance for staff

Staff are always expected to support students in a person-centred, respectful manner, to help them uphold their rights, and to foster an inclusive University community. These principles must guide and underpin all interactions with students about any disability or medical condition.

Inviting disclosures

The Student Health & Wellbeing team will email all students in early September, late October, and mid-January to invite disclosures of any medical conditions or disabilities, and encourage students to discuss any requirements with their Hall Manager or Hall Warden. Students will also be encouraged to reconfirm their general practitioner details on the [Accommodation Portal](#).

A request is not always required

A student is not required to make a formal request for “reasonable adjustments”. If a student contacts the University with any concerns about barriers to their full and active participation in hall life or use of hall facilities, and those barriers may be related to a disability, the matter must be considered under this Policy.

In some cases, it will be obviously apparent that a student has a disability and may need reasonable adjustments to be made. In such a case, the Hall Warden or Hall Manager should take the initiative and reach out to the student, offering support and the option of a meeting to discuss any possible needs. If any other member of staff or Resident Advisor notices a possible need for an adjustment, they should inform the Warden and Hall Manager of their observations or concerns.

Evidence

A member of staff who is considering a student’s request for an adjustment should normally ask for evidence of a student’s disability. This could be a letter from a doctor, other registered healthcare professional, or a student support / disability advisor. Evidence may not be required if the disability is obviously apparent. Evidence should not be requested if – in rare circumstances – doing so would cause the student significant distress or difficulty.

A template email for requesting medical evidence may be found on page 8.

Senior support and advice

The following senior staff are available to advise on disabilities and reasonable adjustments:

- Student Health & Wellbeing Manager
- Residential Life Manager
- Residential Operations Manager
- Head of Health & Safety
- Director of Residential Accommodation

Empowering staff to make adjustments

Where a required adjustment meets all four of the following criteria, Hall Managers and Wardens are empowered to proceed with making the adjustment:

1. the nature of the adjustment falls within the scope of their role;
2. any associated costs are within their budgetary authority;
3. appropriate evidence has been presented (or evidence is not required according to the guidance on evidence above); and
4. the adjustment is, in their view, “reasonable”.

Mandatory referral of declined adjustments

Adjustments declined as out of scope or budget

If a Hall Manager or Warden is unable to approve a requested or required adjustment because the nature of the adjustment is outside the scope of their role or the associated costs are outside their budgetary authority, they must seek the student's consent to refer the matter to the appropriate colleague or manager. If consent is given, they must refer the matter within 3 working days.

Adjustments declined due to failing evidence or reasonableness tests

If a Hall Manager or Warden decides not to make an adjustment because they are not satisfied with the evidence presented (either of the need for or the likely efficacy of any proposed adjustment), or because they consider the requested adjustment to fail the "reasonableness" test, they must seek the student's consent to refer the matter to the Reasonable Adjustments Panel. If consent is given, they must refer the matter within 3 working days.

Reasonable Adjustments Panel

Referrals

A member of staff may refer a case to the Reasonable Adjustments Panel by email to the generic inboxes for Residential Operations and Residential Life (both should be included in the email). The Panel will normally meet within 10 working days of receiving a referral, and inform the student and referring member of staff of the outcome within a further 5 working days.

Panel membership

- Director of Residential Services (or their nominated deputy)
- Residential Operations Manager (or their nominated deputy)
- Residential Life Manager (or their nominated deputy)

Consideration by the Reasonable Adjustments Panel

The Panel will consider the student's case based on written information provided by the student, any supporting evidence provided, and feedback from the on-site halls team about what may be practicable in the specific hall environment.

If initial evidence of the disability has not been provided, the Panel should request the referring member of staff to use the email template on page 8 to obtain this initial evidence.

If insufficient information or evidence is provided for a decision to be made, the Panel may request that the student supplies further written information or evidence.

The Panel will reconsider the case within 10 working days of receiving further information.

Medical advice

The Panel may seek advice as required about medical conditions and treatments from the Student Health & Wellbeing Manager, who shall *not* be a decision-making member of the Panel.

Recording adjustment requests and decisions

Any requests for reasonable adjustments and the decision-making on the case should be recorded on the student's StarRez entry.

Appendix I

Medical evidence request email

Staff may use this template to request medical evidence from a resident.

Dear <Name>

As you know, we are currently reviewing what support or adjustments would be helpful to reduce any barriers to your enjoyment of life in halls of residence, in the context of your disability. We are considering how we can best help under our Reasonable Adjustments Policy and Procedure, which you can find at www.london.ac.uk/halls/useful-documents.

As part of the policy and procedure, we require independent professional documentation of the nature of your disability and any recommendations for adjustments that would be directly beneficial for you. This documentation must be a letter in English, on headed paper, from a doctor, other registered healthcare professional, or a student support / disability advisor. An electronic (pdf) version is acceptable.

Please would you be able to obtain such a letter and forward a copy to me at this address?

It is then for the University to determine what adjustments are to be considered reasonable, taking into account the factors outlined in the policy and procedure.

Once we are in receipt of the required documentation, we will resume consideration this matter and aim to provide you with a response within 10 working days.

Kind regards

<Sign off>

Appendix II

Assistance animals

Definitions

An **assistance animal** is an animal that is trained to do work or perform tasks for a person with a disability. Examples of such work or tasks include guiding people with visual impairments, alerting people with hearing impairments, pulling a wheelchair etc. The work or task an assistance animal has been trained to provide must be directly related to the person's disability.

A **therapy animal** (also known as an emotional support animal) is an animal that provides emotional support or passive comfort that alleviates one or more of the identified symptoms or effects of a disability. Unlike an assistance animal, a therapy animal does not assist a person with a disability with activities of daily living, nor does it accompany a person with a disability at all times.

A **pet** is an animal kept for ordinary use and companionship.

Permission to bring an assistance animal into halls

Pets are **not** allowed in University housing.

Therapy animals are **not** allowed in University housing.

Assistance animals **may be** accommodated, subject to permission being granted under this procedure.

If you wish to bring a trained and registered assistance animal with you, please contact the Allocations Team at info.halls@london.ac.uk as far in advance as possible. We have only a small, strictly limited supply of accommodation that is suitable for housing assistance animals.

Please provide evidence that the animal has been specifically trained and placed with you for one of the following purposes, and that your condition cannot be adequately controlled by alternative measures:

- Assisting with daily living tasks
- Working as a medical alert to support the management of a medical condition

This documentation must be a letter in English, on headed paper, from a doctor or other registered healthcare professional. An electronic (pdf) version is acceptable. Please note that we will not be able to consider your request without the required evidence.

If your request is approved

We may need to allocate you to a specific building, area, or room type that is suitable for accommodating an assistance animal. This might mean a change from your originally allocated hall or room type.

Your responsibilities

If you bring an approved assistance animal into our accommodation:

- The animal must be properly trained.
- You must maintain control of the animal at all times.
- You must ensure that the animal is vaccinated as is relevant.
- You must not leave the animal in our accommodation overnight while you are away.
- Where applicable, you must ensure the animal wears a collar, leash and visible identification.
- You are responsible for ensuring that the animal does not interfere with the routine activities of the hall, nor cause difficulties or disturbance for other residents.
- You are responsible for the actions of the animal including any financial implications this may have (e.g. any additional cleaning or repairs for soiling or damage to the accommodation, etc.)
- You are responsible for the care and supervision of the animal including feeding, exercise, health, safety, wellbeing and cleaning of the animal and associated equipment.
- You are responsible for cleaning up after the animal including the sanitary disposal of animal wastes.

Removal of assistance animals

We will work with you to help ensure that the inclusion of an animal living in halls runs smoothly. However, there may be times when the presence or behaviour of the animal may cause difficulties. We may require you to remove an assistance animal from our accommodation as follows:

- If the animal is not under your direct control or the animal is disturbing or disrupting other students in the hall. Except in cases where injury has occurred, you will be given a final opportunity beforehand to bring the animal under control. If the disruption or disturbance continues, then you will be required to remove the animal.
- If the presence, behaviour or actions of the animal constitute an immediate risk to people or property, we will require you to remove the animal immediately.





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