

## Reasonable Adjustments and Inclusive Learning Plans (ILPs) Policy Statement and Procedural Guidelines Student Support and Wellbeing

The University of Kent is committed to providing an inclusive learning environment, in which all students have an equitable opportunity to demonstrate their full potential.

Inclusive teaching practices are encouraged, and, at the University of Kent, we are committed to the delivery of the [Kent Inclusive Practices](#) as a minimum standard. Such practices help to reduce the workload on academic staff as inclusive working practices incorporate many reasonable adjustments. This allows more time to respond to the individual needs of those students who may require further and more specific adjustments. Links to further information and resources relating to inclusive teaching practices are at the end of this document.

### What is an ILP?

Where a student requires reasonable adjustments to be made, an Inclusive Learning Plan (ILP) will be created, which will ensure that the University meets its legal obligations, as required by the Equality Act 2010.

ILPs set out the reasonable adjustments that are **required** to:

- a. Enable students to access programmes of study and course materials.
- b. Ensure that appropriate assessment methods are implemented for coursework and assignments, thereby minimising the impact of an impairment.
- c. Ensure specific arrangements are made for student examinations (to include extra time, use of computer, or other specific requirements)

### What is a reasonable adjustment?

As a University, we are required by the Equality Act (2010) to make reasonable adjustments for disabled students. These are defined by the Equality and Human Rights Commission as the duty to put in place ways to 'avoid substantial disadvantage where a provision, criterion or practice puts disabled students at a substantial disadvantage'.

A disadvantage that is more than minor or trivial is called a 'substantial disadvantage'. The level of disadvantage created by a lack of reasonable adjustments is measured in comparison with what the position would be if the disabled student in question did not have a disability.

A higher education institution will need to take into account a number of factors when considering what a substantial disadvantage might be, such as:

- the time and effort that might need to be expended by a disabled student
- the inconvenience, indignity or discomfort a disabled student might suffer
- the loss of opportunity or the diminished progress a disabled student might make in comparison with his or her peers who are not disabled.

Most reasonable adjustments in an ILP are very straightforward to deliver and should be a matter of routine. In the exceptional situations where there may be particular reason why an adjustment as stated in the ILP cannot be delivered, it is important that this is not simply disregarded but that a discussion is had between the relevant parties as soon as possible, with a view to ensuring that

alternative adjustments are identified that would achieve the same aim of removing any barriers that a student might otherwise experience on the course.

### Procedural Guidelines

1. Inclusive Learning Plans are developed and written by Specialist Advisers in Student Support and Wellbeing (SSW) after a student has registered with the Service and has given their informed consent for their support information to be shared. ILPs are created in dialogue with the student concerned and take account of subject-specific considerations that are identified by the Schools.
2. ILPs are based on a combination of evidence provided by one or more of the following:
  - Letters or reports from medical practitioners, psychologists, psychiatrists and other clinical evidence
  - Diagnostic assessment reports from Educational Psychologists / Specialist Teacher Assessors
  - Reports from Disabled Students' Allowance (DSA) Assessment Centres.
  - Education Health Care Plans
  - Professional judgement of SSW staff

As evidence is unlikely to cover the range of support a student might need e.g., academic, social, emotional, health and residential support needs, consideration is given to the student's personal experience, such as support that has worked for them in the past and any strategies they have developed to mitigate the difficulties they might experience.

3. Once the ILP is created and accepted by the student, SSW will make the ILP live on KentVision. A weekly report is generated by Kent Vision that is sent to the Engagement Support team highlighting new or updated ILPs.
4. The Engagement Support Officer will access the weekly report and can run the report on an ad hoc basis if needed
5. Engagement Support Officers will:
  - a. Ensure that students with ILPs are aware of how these will be put into practice. This could initially be done by email or by directing the student to a relevant web-page. For students with more complex requirements, the Engagement Support Officer might also find it helpful to invite the student to meet with them, but this should not be required for all students, as most reasonable adjustments are very straight-forward to implement.
  - b. Every member of academic staff can securely access Kent Vision for ILP information, as part of their teaching preparation. Students should not be expected to separately inform individual staff of their requirements as this is the purpose of the ILP.
  - c. Inform SSW if there is any reason why a particular reasonable adjustment needs further consideration in the context of a particular course/programme. Where possible, an alternative means of making an adjustment should be suggested that will enable the student to meet the learning outcome (i.e. the identified barrier to a student's full participation needs to be removed, even if this cannot be done using a routine approach).
6. If a member of staff in the School has raised a query in relation to the ILP, the appropriate SSW Adviser/Head of Section will engage in further dialogue with the student and the

relevant staff member to seek an agreement of how the student's needs will be met. The ILP will be updated to reflect those agreements, and all parties will be informed of any changes.

7. ILPs are not static documents. A student may find that their support need develops over their degree, whether that is due to new diagnosis, a fluctuating or deteriorating condition, or a change in module/course that affects the impact their disability has on them. Therefore, SSW will contact all students on an annual basis to remind them to contact SSW if their ILP requires updating. In addition, ILPs can be reviewed at any time as follows:
  - Students can contact SSW at any time, to request a review and update of the ILP, or to discuss any aspect of the ILP that appears not to be working effectively;
  - Professional Service and/or academic staff in Schools can contact SSW at any time to request a review of any element of the ILP that might not be compatible with the academic requirements of a particular module or activity. In these situations, staff are expected to suggest an alternative reasonable adjustment which would mitigate against the identified difficulty. On the rare occasions where no reasonable adjustment can be made without compromising the core competencies and/or professional requirements of the course, the Engagement Support Manager and Head of Accessibility, Disability and Neurodiversity should be alerted to this, to ensure that all possible alternatives have been explored, both internally and taking advice from appropriate external experts. Every effort should be made to resolve any queries within 10 days. It should be noted, however, that unless a particular module/programme specification document identified a course not to be accessible to all students, regardless of disability, the expectation is that a suitable adjustment can be identified and implemented to ensure that a student does not experience less favourable treatment on disability-related grounds.
8. For students with complex needs where the standard reasonable adjustments listed will not be sufficient the ILP allows for free text to be inserted via the SSW Adviser. In some instances, the Head of Disability will convene an interdepartmental meeting with the school including module convenors, engagement support and academic leads to discuss and agree in advance further adjustments that may be required. Notes for these meetings will be kept on file with each department having agreed the adjustments in advance.
9. In rare circumstances where agreement concerning the content of the ILP cannot be reached between the student, the SSW Adviser and the Disability Contact or academic staff member, the case should be referred to the Head of Student Support and Wellbeing for an initial review. If resolution is not achieved, the Head of SSW will escalate to the Director of Student Services who will convene an ILP Review Panel and include the Director of Education for the school and Head of SSW. Any of these members may nominate a deputy, if they themselves are unavailable.

### Reasonable adjustments for a disabled student who does not have an ILP

There may be occasions where a disabled student discloses a disability, medical or mental health condition to a member of academic or professional services staff and does not have an ILP in place. We would encourage all staff to refer the student to Student Support and Wellbeing, to ensure that an ILP is put in place for other long term support needs. On some occasions a student may not wish to speak with SSW or may not use the terminology of disability or long-term health condition.

It is important to recognise that once a student discloses a condition and the School has sufficient evidence of a student's disability (which include observation of behaviour that evidences the need (either by the staff member or colleagues), previous evidence submitted to the School through a mitigation circumstance process, or additional evidence provided directly to the School at the time), this is the point that the student is eligible for reasonable adjustments regardless of whether an ILP is in place. This means that immediate reasonable adjustments should be put in place by the School/academic staff to recognise the disclosure that has been made and remove any immediate academic barriers and disadvantages. You must never promise confidentiality to a student, and you should pass on the disclosure and temporary adjustments made to SSW.

In these situations, staff members can contact Student Support and Wellbeing for guidance and might find it helpful to use the list in the glossary as a starting point for common adjustments.

### Implementation of the ILPs

Successful implementation of ILPs requires a constructive 3-way relationship between Student Support and Wellbeing (SSW), the relevant School and the student. Students and staff are encouraged to contact SSW at any time if they have any concerns or queries about the content or implementation of an ILP.

It is recognised that similar adjustments might be delivered in different ways, depending on the nature of the academic subject and the teaching style of individual members of staff, amongst other things. Hence, although SSW Advisers are responsible for advising on what adjustments are required, the Schools (or relevant professional service departments) are responsible for determining how exactly this will be implemented. Further guidance on reasonable adjustments can be accessed via a link at the end of this document.

SSW Advisers are available to advise academic staff on how to implement the requirements listed in an ILP at any time.

### Data Sharing and Consent

Staff members should never promise a student confidentiality. Once a student has disclosed a disability to a member of staff, or a member of staff suspects that a student might have a disability, then that information should be sent to SSW along with any detail about temporary adjustments that have been put in place. This is so that the University can process its legal obligation under the Equality Act to offer and provide support to the disabled student, as well as store that data in an appropriate place against the students record.

### Resources

[Top Tips for Creating Accessible Resources Including:](https://www.kent.ac.uk/studentsupport/accessibility/index.html)<sup>1</sup>

#### **Kent Inclusive Practices**

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<sup>1</sup> <https://www.kent.ac.uk/studentsupport/accessibility/index.html>

[Reasonable Adjustment Guidance and ILP Guidance for Students](#)<sup>2</sup>

[SSW Privacy Statement](#)<sup>3</sup>

Reasonable Adjustment Glossary

**Student Services**

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<sup>2</sup> <https://www.kent.ac.uk/student-services/policies.html>

<sup>3</sup> <https://www.kent.ac.uk/student-support/privacy/privacy.html>

## ILP FRAMEWORK

