

Reasonable Adjustments in Academic Assessment Policy

1. Introduction and values

- 1.1. Queen Mary University of London ('QMUL, 'the University', 'our') has an ambition to be 'the most inclusive university of its kind' and is committed to delivering deliver an outstanding, inclusive, world-class education and student experience.
- 1.2. Our values include being inclusive (for example, nurturing talented students, regardless of their background), ambitious (including aiming for excellence in everything we do and seeking out the best available evidence to inform sustainable, timely, robust decisions) and ethical (including acting with integrity and implementing good practice). These values should inform our actions in line with this policy.
- 1.3. Students with disabilities can apply for reasonable adjustments, although both the Equality Act (2010) and the Disabled Student Commitment (which Queen Mary has committed to as part of our 2025 Access Participation Plan) make it clear that this is an anticipatory duty for all Higher Education Providers.
- 1.4. The following is taken from the Disabled Student Commitment and explains that the duty to make reasonable adjustments is made up of three requirements:
 - "The three requirements relate to changing how things are done, changing the built environment to avoid such a substantial disadvantage and providing auxiliary aids and services."
- 1.5. This policy is aimed at covering requests for reasonable adjustments that relate to academic assessments.

2. Purpose

2.1. This policy sets out how students can apply for reasonable adjustments related to academic assessments and how the University considers these applications.

3. Legislative context

- 3.1. The Equality Act (2010) requires Higher Education Institutions to anticipate the needs of disabled students and to implement support, including the provision of 'reasonable adjustments', for students in advance of their arrival at university.
- 3.2. More recently, AdvanceHE's work on the Disabled Student Commitment calls upon providers to ensure that "Inclusive practice is embedded in curriculum design. This will help to ensure that **anticipatory reasonable adjustments** are provided with consistency and certainty in the delivery of learning, teaching and assessment." 1
- 3.3. The Equality Human Rights Commission advice note to the Higher Education sector, published in July 2024, has very clear advice about reasonable adjustment policies:
- 3.4. "Amend reasonable adjustments policies to ensure that staff and students are aware that reasonable adjustments must be made even where a student has not engaged with the Disability Service if there is an urgent or severe need to do so or the circumstances of the case demand it.
- 3.5. Amend reasonable adjustment policies to set out the process to follow in such a situation. This should include who, if anyone, needs to sign off a reasonable adjustment, and the process for communicating that such an adjustment has been made, including to the student."²

4. Scope

- 4.1. This policy is applicable to students with a disability and their requests for reasonable adjustments that relate to academic assessments.
- 4.2. The definition of disability is a "physical or mental impairment that has a 'substantial' and 'long-term' (i.e. longer than 12 months) negative effect on... normal day-to-day activities". ³

5. Principles

5.1. The Disabled Student Commitment recommends that methods of assessment, "will rarely, if ever, amount to a competence standard. They will therefore rarely, if ever, be outside the duty to make reasonable adjustments. A competence standard

¹ The Disabled Student Commitment, published by the Disabled Students' Commission on 24/04/2023

 $^{^2}$ Advice note for the higher education sector from the legal case of University of Bristol vs Abrahart, 10/07/2024

³ https://www.gov.uk/definition-of-disability-under-equality-act-2010

- is an academic, medical or other standard applied for the purpose of determining whether or not a person has a particular level of competence or ability.
- 5.2. The key questions for deciding if part of an assessment is a competence standard are:
 - a) What skill, competence, level of knowledge or ability is being measured?
 - b) What standards are being applied to decide whether a student has met the required level of that competence or ability?
 - c) What parts of the assessment are the method by which the student's ability to meet the standards at (b) is tested?"
- 5.3. Staff in Schools and Institutes should utilise the resources and expertise present in the Queen Mary Academy (QMA) for advice about making curricula, including assessment, as inclusive as possible. However, even with this advice and guidance is it likely that some students will still make requests for reasonable adjustments that relate to academic assessment.
- 5.4. The Office for Students Conditions of Registration Condition B4 requires Higher Education Providers to ensure that assessments are "valid and reliable" and that students are assessed effectively.
- 5.5. Some programmes are subject to external guidance that means certain learning outcomes are essential. These learning outcomes must be met in the way prescribed by this external guidance.
- 5.6. Students are encouraged to apply for other reasonable adjustments, including specialist support, directly through the Disability and Dyslexia Service, which is part of the Student Experience directorate.

6. Roles and responsibilities

- 6.1. The university's Disability and Dyslexia Service is the principal vehicle for communicating details of disabled students' support, including any reasonable adjustments relating to academic assessment. As such, it is their responsibility to proactively offer support to students with disabilities and send on relevant information to Schools, Institutes and Professional Services departments. These will typically take the form of 'Student Support 'Summary' documents being produced by Disability Advisers that are sent to relevant contacts in each School / Institute, as well as being housed on MySIS on specific reports available to relevant staff in real time.
- 6.2. It is the responsibility of staff based in our Schools and Institutes (including those working at Faculty level) to ensure that recommended adjustments relating to

teaching, learning and assessment are implemented. The responsibility lies with both student support contacts (usually known as Student Support Officers), as well as module organisers, programme leads, Directors of Education and other academic staff responsible for delivering programmes.

In instances where requests for reasonable adjustments for assessment arrive directly with staff in our Schools and Institutes those staff should consider those requests as depicted in 8.6 – 8.9 ('Direct applications for academic reasonable adjustments to Schools and Institutes').

6.3. Professional Services staff based in central departments such as Registry Services also have a responsibility to ensure that recommended adjustments are implemented, e.g. staff responsible for the administration and deliver of our oncampus examinations, or Library Services staff handling applications for concessions.

7. Applying for reasonable adjustments in academic assessment

7.1. Queen Mary students are assessed through a variety of methods, both summative and formative. These assessments include examinations and coursework assessments, as well as group work, presentations, vivas and projects.

Examination Access Arrangements

- 7.2. Queen Mary students who wish to apply for what are known at the university as Examination Access Arrangements should do this via the Disability and Dyslexia Service (DDS). Students can apply in person, or online via a specific 'task' on MySIS. Appropriate supporting documentation will be requested as part of the application process; the university is cognisant of the advice following the Abrahart case in terms of it having "constructive" knowledge of a student's disability and having a responsibility to implement adjustments on the basis of this knowledge.
- 7.3. More information on how to apply for these arrangements, are available on Queen Mary's Examination Access Arrangements page.
- 7.4. Where the DDS agrees on Examination Access Arrangements, it must notify the student, the student's school/institute and the Directorate of Registry Services (for in-person exams at the end of each semester).
- 7.5. Information on which students on a module or programme have agreed Examination Access Arrangements in place is available to relevant colleagues through a specific report on MySIS.
- 7.6. Examples of access arrangements include additional time in examinations, provision of assistive technology, separate seating arrangements, and consideration of conditions such as dyslexia and dyspraxia in the marking process

- via the provision of a 'Cover Note'. It is the responsibility of each School or Institute to ensure that the relevant Cover Note is drawn to the attention of the markers of the relevant assessments prior to or at the time of marking.
- 7.7. If applications are made beyond the advertised deadline for end of semester exams they must be processed by the DDS and the university will make its best efforts to implement agreed arrangements. However, it may not always be possible to implement them in time for the next examination period. In this event, students should consider making an application for Extenuating Circumstances if they feel that they cannot take the assessment without the requested adjustments in place.

Alternative Assessments

- 7.8. All students should consider the full array of assessment methods both coursework and examinations on their chosen programme before enrolling. This information should be accessible to students through course handbooks and other literature, such as the webpages of the relevant School, Institute or Department, as available.
- 7.9. In the event that it is not possible to make an adjustment to an existing form of assessment this would typically be after a consultative process involving the student, the School or Institute, and the Disability and Dyslexia Service an alternative assessment request may be made by a student who feels that they are unable to undertake an academic assessment as a consequence of their disability or long-term condition.
- 7.10. The Office for Students Conditions of Registration Condition B4 requires Higher Education Providers to ensure that assessments are "valid and reliable" and that students are assessed effectively.
- 7.11. Some programmes are subject to external guidance that means certain learning outcomes are essential, i.e. the outcomes have to be met in the way prescribed. The General Medical Council's professional capabilities for medical students would be one example ⁴. The Equality Act 2010 defines a competence standard as:
 - 'An academic, medical or other standard applied for the purposes of determining whether or not a person has a particular level of competence or ability.'⁵
- 7.12. AdvanceHE's guidance on competence standards and reasonable adjustments says that while "HEIs are not required to make reasonable adjustments to competence standards themselves... they are required to make adjustments to the ways that competence standards are assessed so that disabled students are not disadvantaged in demonstrating their competence by the assessment method."

⁴ https://www.gmc-uk.org/-/media/documents/outcomes-for-graduates-2020_pdf-84622587.pdf

⁵ <u>https://www.advance-he.ac.uk/guidance/equality-diversity-and-inclusion/student-recruitment-retention-and-attainment/inclusive-learning-and-teaching/competence-standards-and-reasonable-adjustments</u>

7.13. As such, the final decision on whether an alternative assessment is reasonable, i.e. that it assesses the core competencies associated with a particular area of specialism, will always lay with the School or Institute. This ensures that any alternative assessment is credible and accurately assesses relevant competence standards.

8. Process for students requesting an alternative assessment

- 8.1. Students who would like to request an alternative assessment are advised to make an appointment with the Disability and Dyslexia Service to discuss why they feel unable to take the assessment as it is presented by the School or Institute, and what sort of alternative they would like to be considered. They can also make this request in writing; the Disability and Dyslexia Service have a specific form that students can use, but students can also make the request in writing ahead of their appointment.
- 8.2. The relevant member of staff in the DDS must then make contact with the School or Institute, typically including the following people:
 - a) Module organiser or programme director
 - b) Student Support Officer / Manager
 - c) Teaching Services Manager, or similar
- 8.3. The request can then be made to the School. If the requested alternative cannot be agreed over email communication, then the DDS member of staff can request a meeting with the School and, where necessary, the student.

Inputting details of alternative assessments

- 8.4. Staff in Schools and Institutes can enter details of the agreed assessments and their marks onto appropriate university systems (MySIS, at the time of writing). Upon agreement of any alternative assessment this would be carried out on behalf of the student who made the request for an alternative assessment by the School or Institute before it was taken to the Subject Examination Board (SEB).
 - This is covered by the university's Academic Regulations; see below
- 8.5. Exceptionally, Queen Mary may use its discretion to use assessment methods other than those detailed in the module specification for an individual student. This may occur as an adjustment for a student with a registered disability (on the advice of the Disability and Dyslexia Service) or when setting a resit or first sit assessment, subject to the following conditions:
 - a) the alternative assessment must involve some additional assessment activity

- that constitutes a justifiable and efficient assessment of the intended learning outcomes; and,
- b) a full statement of the alternative assessment methods, and the justification for their use, is approved by the Subject Examination Board Chair and submitted to the Directorate of Governance and Legal Services (DGLS).

Direct applications for academic reasonable adjustments to Schools and Institutes

8.6. The advice in the Equality Human Right Commission note to the sector published in July 2024 makes it clear that Schools and Institutes can implement reasonable adjustments without the input of either DDS or other staff working in Student Wellbeing. This is based on the scenario where a student does not engage with university disability services either because they are too unwell to, or else because those services have limited capacity to assess a student's needs prior to an upcoming assessment.

As with 8.4, any agreed alternative assessments would need to be entered onto appropriate university systems by the School or Institute on behalf of the student who has made the application.

- 8.7. Staff working in Schools and Institutes should consult with staff in our Student Experience Directorate before making a decision on a request from a student to agree a reasonable adjustment that relates to an academic assessment.
- 8.8. This is to ensure consistency of provision and to make sure that we make the most appropriate decisions that treat students sympathetically while safeguarding academic standards.
- 8.9. Amongst the staff that can be contacted are:
 - Head of Disability & Dyslexia Service and Inclusive Practice
 - Head of Student Wellbeing
 - Co-Head of Advice & Counselling Service (Wellbeing)
 - Co-Head of Advice & Counselling Service (Welfare)
 - Mental Health Manager
- 8.10. The request for an alternative assessment to that advertised in the course literature may arrive too late for consideration by either the School or Institute, or relevant Professional Services staff.

While the university will use its best efforts to implement appropriate support, it may be that the case that students are advised to apply for Extenuating

Circumstances so that their request can be considered properly ahead of a future assessment period.

9. Appeals and complaints

9.1. Students who are not satisfied with the outcome of their application for reasonable adjustments can request review via the Administrative Appeals Policy, the latest version of which will be available on the Policy Zone web pages. This policy and the appeals process is managed by the Appeals, Complaints and Conduct Office.

10. Review

- 10.1. This policy will be reviewed at least every three years.
- 10.2. Minor updates to this policy that do not affect the rules, principles or intent of this policy may be approved by the Director of Student Experience on behalf of the Senate.

Policy Information and Document Control

Policy title	Reasonable Adjustments in Academic Assessment Policy
Version number	Version 1
Related policies and procedures	Academic Regulations Administrative Appeals Policy Extenuating Circumstances Policy All the above policies are accessible on the Policy Zone webpages.
	Queen Mary Academy (Assessment and Feedback Resources)
Superseded policies	N/A
Approval level	Education Quality and Standards Board (EQSB), Senate
Approval date	21st August 2025
Effective date	September 2025, ahead of academic year 2025/2026
Next review due	June 2028
Policy owner	Simon Jarvis, Head of Student Wellbeing, Student Experience Directorate
Policy contact	Simon Jarvis, Head of Student Wellbeing, Student Experience Directorate

Version Control

Version	Date	Reason for updates/Summary of key changes
1	June 2025	Development of this new policy.