

# **Herefordshire College of Art & Design**

## **Disability Equality Scheme**

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## 1 Foreword from the Principal

*Our mission is to be recognised as a leading specialist arts college providing outstanding education in the creative arts.*

Since the introduction of the Disability Discrimination Act 1995 and more recently, the Special Educational Needs and Disability Act 2001, the College has striven not only to improve access to its physical environment, but also to thoroughly review the whole student experience, from open days and application through to final assessment and graduation, to ensure that everyone receives the same quality of teaching and support – irrespective of disability or non-disability.

At Herefordshire College of Art and Design, we view the new Disability Equality Duty as a great opportunity to further underpin our aim to give disabled people the same opportunities as non-disabled people.

We are still quite a way off from achieving true disability equality but I believe that the production of the Scheme is an important starting point and will be invaluable in helping the College to meet its mission. I am therefore pleased to give it my full endorsement.

Richard Heatly

## 2 Introduction

2.1 Currently, disabled people do not have the same opportunities or choices as non-disabled people. Neither do they enjoy equal respect or full inclusion in society. This document will explain how Herefordshire College of Art and Design will systematically promote equality for disabled people by challenging discrimination and proactively removing the barriers to participation. The disability equality scheme is all encompassing, relating to all College policy, practice and procedure. Every member of the College's staff has responsibility for ensuring equality within their sphere of work. This scheme sets out how Herefordshire College of Art and Design intends to challenge inequalities and to eliminate attitudinal and environmental barriers which have led to disabled people being disadvantaged and excluded. This document explains the ways in which the College will:-

- Involve disabled people in the development, planning, monitoring and evaluation of the Scheme.
- Assess the impact that policy, practices and procedures have in relation to challenging discrimination and promoting the equality and participation of disabled people.
- Demonstrate measurable, year on year outcomes, via targeted and transparent action planning.
- Enhance arrangements for monitoring, evaluating and reporting against the actions taken each year to promote equality and participation.
- Develop facilities to gather and use information about the ways in which the College interacts with disabled people, in particular, developing information systems which review the effectiveness of the action plan and inform the preparation of subsequent schemes.

### 3 Legislation and College Strategy

#### 3.1 Overview

From December 2006 the Disability Discrimination Act (DDA) 1995 will be amended by the Disability Discrimination Act 2005 ("the Act"). The Act is designed to ensure comprehensive and enforceable civil rights for disabled people by introducing a new duty on public bodies to promote equality of opportunity. By imposing a positive duty to eliminate discrimination and harassment, the Act requires that institutions move away from risk avoidance activities to establishing practices which proactively embrace the diverse needs of disabled people and therefore promote equality of opportunity.

The onus is no longer on disabled people to enforce their own rights by making a complaint and proving that discrimination has occurred because reasonable adjustment was not made. Rather, the onus has shifted to institutions which must proactively and routinely incorporate disability provision within all policy, practice and procedure in order that the environment is systematically improved for disabled people year on year.

#### 3.2 The General Duty

The overarching goal of the general duty is to promote equality of opportunity. The College is required to adopt a proactive approach, mainstreaming disability equality into all decisions and activities. More specifically, when carrying out its many functions the College will have a duty to pay due regard to the need to:-

- promote equality of opportunity between disabled persons and other persons;
- eliminate discrimination that is unlawful under the Act;
- eliminate harassment of disabled persons that is related to their disabilities;
- promote positive attitudes towards disabled persons;
- encourage participation by disabled persons in public life;
- take steps to take account of a disabled person's disabilities, even where that involves treating disabled persons more favourably than other persons.

#### 3.3 The Specific Duties

The specific duties are designed to assist public bodies to meet the general duty. They set out a framework to help in the planning, delivering and evaluating action necessary to meet the general duty, and to report on these activities. The specific duties are to:-

- publish a Disability Equality Scheme (the "Scheme") demonstrating how it intends to fulfil its general and specific duties;
- involve disabled people in the development of the Scheme;
- include in the Scheme a statement of:
  - the way in which disabled people have been involved in the development of the Scheme;
  - the methods for impact assessment;
  - how the College will fulfil its general duty (the "action plan");
  - how the College will gather information in relation to employment and its delivery of education and its functions;
  - how the information gathered by the College will be used, in particular to review the effectiveness of its action plan and preparing subsequent schemes.
- to ensure that within three years of the Scheme being published, the steps outlined in the action plan are carried out, and arrangements for gathering and utilising the information are set in motion;
- publish a report containing a summary of the steps taken under the action plan; the results of its information gathering and how the information has been used.

Proportionality means that the weight given to disability equality should be in proportion to its relevance to a particular function. Greater consideration and resources should go to functions or policies which have most effect on disabled people. Disability equality will be more relevant to some functions than others. Yet, the College will need to take a broad view when trying to assess relevance, as many functions are relevant to disabled people. It is not possible for the College to fully understand the impact of all its functions on disabled people at the outset. Therefore the College must concentrate in the first instance on those aspects of its functions which have most relevance for disabled people.

A guide to the legislation is available in Appendix A.

### 3.2 Commitment of Herefordshire College of Art and Design

The College seeks to mainstream disability equality into the culture and ethos of the institution, thereby integrating all the equality strands within strategic and operational activity. The College will continue to eliminate unlawful or unfair discrimination and place a greater emphasis on actively promoting equality for disabled people. The College is committed to:-

- creating an environment which will encourage disabled people to work and study at the College;
- training employees at all levels to enable them to recognise and challenge all forms of disability discrimination and promote the rights of disabled people;
- ensuring that work policies and practices do not alienate or disadvantage disabled employees or prevent them from having access to jobs, promotion and training;
- taking prompt and decisive action to address any complaints of disability discrimination;
- consulting with our employees, students and the wider community in order to promote awareness of their needs and views in the development and implementation of policies and practices;
- promoting ownership of the Scheme by all those who work or study at the College.

#### 3.2.1 The Board of Governors is responsible for:-

- ensuring that Herefordshire College of Art and Design complies with all DDA legislative requirements, including the general and specific duties arising from the Act;
- ensuring that the Scheme and action plan are implemented and that staff receive appropriate training according to the needs of their function.

#### 3.2.2 The Principal is responsible for:-

- providing a high profile lead on issues covered by the Scheme;
- promoting general awareness of the Scheme both internally and externally;
- ensuring that the members of the College Management Group implement the Scheme and action plan.

#### 3.2.3 The College Management Group are responsible for:-

- the implementation of the Scheme and action plan;
- ensuring that all staff are made aware of their responsibilities with regard to promoting disability equality and eliminating discrimination;

- ensuring that procedures for dealing with discrimination are well publicised and that the reporting of incidents is encouraged;
- taking appropriate action against staff or students who discriminate on grounds of disability.

3.2.4 The Vice Principal is responsible for:-

- ensuring that disability equality provisions are integrated into all appropriate academic functions, particularly as they relate to the curriculum of HE courses.

3.2.5 The Vice Principal, with responsibility for Marketing & External Affairs, is responsible for:-

- ensuring that disability equality provisions are considered in all publicity and marketing materials.
- ensuring that the College does not discriminate in the development and enhancement of its relationships with regional stakeholders.

3.2.6 The Assistant Principal is responsible for:-

- ensuring that disability equality provisions are integrated into all appropriate academic functions, particularly as they relate to the curriculum of FE courses and to overall College quality assurance and improvement processes.

3.2.7 The Finance Director is responsible for:-

- ensuring that there is no discrimination in the provision of Student Finance, e.g. Loans, Grants, Fees etc.

3.2.8 The Finance Director, with responsibility for the management of Personnel issues, and for the College Registry is responsible for:-

- co-ordinating the implementation of the Scheme and action plan across all curriculum areas and departments;
- ensuring that appropriate information gathering and monitoring, as identified in the Scheme and action plan, is carried out;
- ensuring that the results of the information gathering and monitoring are published on an annual basis.

3.2.9 The Estates Manager is responsible for:-

- ensuring that all contractors and service providers are aware of their responsibilities in terms of complying with the College's Disability Equality Scheme.
- Ensuring that the physical environment of the College is made as accessible as is reasonably possible to disabled people.

3.2.10 All staff are responsible for implementing the Scheme within their function (following appropriate training) through the following actions:-

- dealing with incidents of bullying, harassment and victimisation and being able to recognise and challenge negative attitudes and behaviour towards disability;
- promoting disability equality and avoiding discrimination against anyone for reasons of disability;
- keeping up to date with discrimination legislation by taking up training opportunities.

### 3.2.11 Contractors and service providers are responsible for:-

- Complying with the College's Disability Equality Scheme and any other equality conditions in contracts or agreements.

## 3.3 Herefordshire College of Art and Design

### 3.3.1 Students and Staff

The Learning Support Manager is responsible for co-ordinating support for disabled students and applicants. Appendix B shows the breakdown of disclosures received by the Learning Support Manager based on the nature of the disability and by curriculum area. As of November 2006, two members of staff had disclosed a disability to the Personnel Officer. The College recognises the likelihood of under-disclosure of disability amongst both staff and students and has therefore set clear targets, within the Disability Equality Scheme Action Plan, to review and enhance the disclosure systems for disabled students and staff.

### 3.3.2 Mission and Vision

*Our mission is to be recognised as a leading specialist arts college providing outstanding education in the creative arts.*

In our statement of values, we are committed to

- *Putting our students, their needs and their learning first*
- *Providing teaching and learning of the highest quality*
- *Continually raising standards in everything that we do*
- *Being active in widening participation in education and the arts*
- *Offering opportunities for progression to higher level study or employment*
- *Valuing, supporting and investing in our staff*
- *Extending innovation through creative practice*
- *Valuing diversity and respecting individuality and difference*
- *Engaging with business and cultural partners*
- *Making a difference to the cultural and creative quality of lives throughout the region*
- *Contributing towards economic regeneration in the region*

Hereford's Strategic Plan identifies three strategic aims, and outlines a number of objectives in support of these aims. The Disability Equality Scheme is seen as supporting both the Mission and Values statements of the College. The strategic aims are shown below with bold emphasis where there is a particular significance for disability equality.

## 1 Stability

*The College aims to achieve long-term sustainability: in relation to its finances; by continuing to raise the quality of academic provision; and by making more effective use of resources*

To achieve this we will:

- 1.1** *sustain and improve academic quality and standards*
- 1.2** *recruit and retain students*
- 1.3** *maintain and develop reputation*
- 1.4 *develop organisational strength and effectiveness*
- 1.5 *achieve and maintain healthy and secure financial status*
- 1.6 *maintain specialist focus*

## 2 Expansion

*The College aims to expand through planned growth in student numbers, in resources and by developing its reputation*

To achieve this we will:

- 2.1** *deliver useful strategic forecasting and planning*
- 2.2** *sustain F.E. student numbers in the changing demographic context*
- 2.3** *engage with the implementation of the 14-19 delivery agenda*
- 2.4** *increase H.E. student numbers in line with reputation, demand and resources*
- 2.5** *match accommodation and staffing to need*
- 2.6** *develop and deliver attractive and viable new academic programmes*
- 2.7** *market the College and its courses effectively*

### 3 Connection

*The College aims to develop and improve connections both internally and externally*

To achieve this we will:

- 3.1** *increase internal progression from F.E. to H.E.*
- 3.2** *develop close strategic links with H.E.I. partners*
- 3.3** *develop linkages to schools and colleges throughout the region*
- 3.4** *contribute towards regional economic development*
- 3.5** *attract and retain learners in the region*
- 3.6** *help to create and sustain cultural activity in the region*

### 4 Base level data

- 4.1 The College recognises that data collection is an essential component of the Scheme as it represents the means through which the College can obtain a clear picture of its current position in relation to disabled people and thereby provide a solid foundation from which to develop its action plan. In order to achieve focused, relevant and measurable outcomes for disabled people within the action plan, the College needs to know where it is starting from in order that it can show progress towards measurable outcomes. The College will use current data to inform the action plan while part of the Scheme will be used to improve the systems for collecting data for future action plans.

The College's actions for developing base level data will focus on:-

- Incorporating disability focused questions within mainstream evaluations and surveys.
- Involving disabled people in the collection of data and in assessing how useful the data is, whether it should be collected and whether alternative methods should be used. The Staff Forum on Disability will be essential to this process, and efforts will be continued to attract students and their parents to a Disability Forum.
- Seeking a clear explanation as to the current impact of policy and provision has on disabled people by undertaking initial screening and impact assessment of priority areas such as student and staff recruitment, retention, development and access to educational / promotion opportunities.
- A recognition of the key role of Personnel in generating base level data in relation staff disclosure and staff issues, such as recruitment, progression and retention of disabled staff.
- Tasking the Equality and Diversity Working Group with the key role of acting as the Steering Group for the delivery and monitoring of the Disability Equality Scheme, reporting to the College Management Group.
- Addressing the presumed under disclosure by disabled people to ensure the College is better able to draw upon the experience of disabled people. The College

recognises that disabled peoples' experience of the College can differ depending on the impairment and is mindful that a representative sample of disabled people should be engaged in all involvement activities.

- Enhancing quantitative data with qualitative feedback via the Staff Forum on Disability and service evaluations in order to gain an insight of how the statistical data relates to the personalised experiences of disabled people in specific, localised situations.
- Ensuring data can be interrogated on a departmental basis in order that data becomes locally owned, with managers having an awareness of how the data relates to their function, thereby engendering more targeted, localised action plan.
- Collaboration between the Equality and Diversity Working Group, and Registry, to enhance the availability and departmental usage of information relating to:-
  - Recruitment and retention of staff
  - Equality of access to staff development
  - Job security
  - Bullying and harassment
  - Recruitment and retention of students
  - Recruiting a representative number of disabled students
  - The split between programme areas in terms of their ability to attract disabled staff and students
  - Course completion rates between disabled and non disabled students
  - Levels of academic success for disabled students
- The College action plan will seek data relating to the above as outlined in the action plan.

## **5 Involving Disabled People**

5.1 Given the current under representation of disabled people in positions which determine the policies and priorities of public bodies, the College recognises the importance of actively involving disabled people in the planning, prioritising, monitoring and evaluation of provision. By drawing upon the experiences of disabled people the College is better able to ascertain what the barriers to participation actually are and thereby establish the order and manner in which these barriers should be dealt with. In developing a strategy for the involvement of disabled people in the planning, prioritising, monitoring and evaluation of provision, the College recognises:-

- That the involvement of disabled people is more than simply consultation. Disabled people must be involved in the development, the prioritising of areas for improvement, the monitoring and the evaluation of the Scheme.
- Those involvement activities must strive to be straightforward and effective, recognising that survey fatigue can influence people's motivation to be involved.
- That involvement should not concentrate solely on the generation of quantitative data but should seek to uncover perceptions of the College and to learn from the personal, individual experiences of disabled people.
- That during involvement activities, the College must focus firstly on those activities which are most likely to affect disabled people, such as admissions, progression, and the physical environment.

To achieve this, the College will:-

- Seek to mitigate the effects of survey fatigue by building involvement activities, in the first instance, around the Staff Forum on Disability, and the proposed Disabled Students and Parents Forum if this can be successfully convened. The Forums will:-
  - Meet twice per year.

- Receive a Disability Equality Scheme briefing and update.
  - Invite participants to share experience of the College.
  - Invite participants to forward ideas for development and issues of concern.
  - Submit minutes and recommendations to the Equality and Diversity Working Group, which is tasked with monitoring the Disability Equality Scheme.
  - Where appropriate, invite participants of the forums to raise issues of concern or ideas for development at the Equality and Diversity Working Group.
- Consider the implementation of an annual questionnaire to complement the involvement opportunities available via the forums.
  - Ensure that mainstream evaluation tools, such as staff and student feedback forms, seek information about the experience of disabled people.
  - Establish focus groups to examine specific issues raised via the Fora, on-line questionnaire and local evaluation and feedback tools.
  - Seek information about the views and experiences of disabled people when undertaking market research in relation to curriculum and service development.
  - Ensure that involvement activities are influential and transparent by publicising annually the results of involvement activities and stating clearly how these activities influenced the Disability Equality Scheme action plan and evaluation.
  - Ensure, when the College is not able to act upon the results of involvement, that the reasons for this are explained.
  - Seek to develop involvement activities in order that they include the public, former, prospective and current students.
  - Seek to involve the full range of disabled people, in terms of the type of impairment, in order that action plans are informed by the widest possible experience.
  - Enhance the disclosure procedure for staff to ensure that under declaration of disability by staff does not become a barrier to involvement, causing the data to be unreliable.

The results of the 2006 involvement activities are available in Appendix D.

## **6 Initial Screening of Policies and Impact Assessment**

### **6.1 Impact Assessment**

The Specific Duty of the Act requires the College to assess the impact of policies and practices on the experience of disabled people in order to establish whether current policies and practices help to achieve disability equality or whether they have an adverse impact. Initially, the College will undertake a screening exercise to prioritise areas of activity by determining which functions are “relevant functions”, i.e. activities, services, procedures that are most likely to have an impact on disability equality. This will enable the College to establish a rolling programme through which existing College policy and practice will be assessed in relation to the impact, and potential impact it has on disability equality. In addition to the rolling programme of initial screening and impact assessment, all new policies will undergo initial screening and impact assessment prior to their implementation. The initial screening and impact assessment templates are available in Appendix E.

The objectives of the initial screening and impact assessment are to:-

- Establish measures to assess the impact of the College’s policies and procedures on the experience of disabled people
- Identify barriers to progress for disabled people and take action to remove the barriers
- Identify areas in which positive action might result in the promotion of disability equality

In order to ensure impact assessment is undertaken in a timely and effective manner, the College will ensure:-

- That all initial screening and impact assessment is undertaken via the College initial screening and impact assessment tool.
- That the Personnel department will provide training in the use of the tool at the point at which departments undertake impact assessment.
- That the impact assessment tool is integrated within all policy development activity.
- That the impact assessment tool is integrated within curriculum development via the procedures for programme approval, validation, incremental change and re-validation.
- That departments will be asked to report the results of their initial screening activities during the first year of the Scheme in order that these results inform the strategy for involvement and impact assessment in the second year of the Scheme.

During the first year of the Disability Equality Scheme priority will be given to the assessment of the following relevant functions, as any discrimination arising in these areas is deemed as having an immediate and potentially damaging impact on disability equality:-

## 6.2 Relevant Functions – Students

- Student admissions; including:
  - Applications
  - Media used for advertisement
  - Offers
  - Acceptances
  - Choice of subject
  - Home or international status of applicants
  - Any allegations of discrimination, harassment, victimisation, bullying or exclusion during the admissions process
- Student progress; including:
  - Achievement of award
  - Placements (if applicable)
  - Student withdrawals
  - Academic Regulations
  - Any complaints of discrimination, harassment, victimisation, bullying or exclusion during their period of study
- Curriculum development; including:
  - Course design, teaching and assessment
  - Teaching arrangements with third parties

## 6.3 Relevant Functions - Staff

- Staff Recruitment and Selection; including:
  - Media used for advertisement
  - Applications
  - Offers
  - Acceptances
  - Department or programme area
  - Any allegations of discrimination, harassment, victimisation, bullying or exclusion during the recruitment process
- Staff employment; including:

- Terms and conditions
  - Benefits or facilities
  - Training and development
  - Promotion
  - Application of Disciplinary or other procedures
  - Termination of employment
  - Any complaints of discrimination, harassment, victimisation, bullying or exclusion during their employment
  - Data collection and analysis
- The physical environment
    - Procedures to ensure the needs of disabled people are accounted for during new development
    - Incorporating the views of disabled people during procedures for the development and review of the physical environment

Following the assessment of these initial priority areas, further impact assessments will be carried out in the following areas by designated individuals over the coming year:-

- Learning Support
- Leisure and recreational facilities
- Catering facilities
- Library & Information Technology
- Student data analysis and monitoring
- Procurement
- Partnership, Community and Business links

#### 6.4 Procurement

Procurement is deemed to be a 'relevant function' for the purposes of the Act and therefore disability equality must be taken into account when procuring goods, works or services from external providers. Consequently, an initial screening of procurement policies and procedures at the College will be undertaken by designated individuals.

#### 6.5 Marketing

The Marketing Department will review all marketing materials (prospectus, website, course leaflets, press releases, newsletters and other promotional literature) to ensure that they are inclusive and accessible, and reflect the policy aims of equality and diversity at Herefordshire College of Art and Design. All publications, print and online, will attempt to reflect the diversity of prospective students and other relevant parties in clear, informative and accessible formats, and will also provide alternative formats, on request. The new external website is meeting WC2 standards for accessibility, and is currently working towards WC3.

#### 6.6 Publication of impact assessment and findings

Under the Act, the 'duty to publish' also applies to the results of impact assessments. The aim of publication is to emphasise institutional commitment to equality and to highlight the work being carried out in this area. Consequently, a Report will be produced by the Equality and Diversity Working Group at the end of the academic year, summarising the assessment process undertaken on policies and any amendments made to policies or procedures as a result of the assessment. The Disability Equality Scheme action plan outlines when this will be carried out and by whom. This information will then be used to influence and instil good institutional policy and practice via the Disability equality Scheme. The updated Disability Equality Scheme will be publicised annually to all staff, students and visitors by the following methods:

- Publication on the Intranet

- Copies will be circulated to Programme Managers, Course Leaders, College Management Group,
- Copies will be placed in the Library and at Reception
- The Policy is included in the Staff Handbook and a summary of the policy, with an intranet link to the full policy, in the Student Handbook
- The Annual Monitoring Report will be published on the Intranet and copies circulated to programme areas

The DES will be publicised to the wider community by the following methods:

- Via the College's website for interested external parties
- Copies will be sent to the Higher Education Funding Council for England (HEFCE), the Learning and Skills Council (LSC), NATFHE, UNISON, the Equality Challenge Unit (ECU), Herefordshire Council Race Equality Officer, Disability Rights Commission.
- A summary of the report will be included in the Principal's report to Governors from 2007 onwards.

This information will be made available in Braille and audio on request .

## **7 The Action Plan**

The Action Plan is in Appendix E.

## **8 Monitoring and Reporting Structure**

### **8.1 Reporting Structure**

The Equality and Diversity Working Group, chaired by the Principal, exists to address the College's obligations under the Disability Equality Scheme and also to monitor and provide advice and guidance on Equal Opportunities and Diversity generally.

The Group meets three times per year and includes representatives from curriculum areas and support departments at all levels, together with a representative from the Students' Union. The Group is also viewed as a means of consultation with staff and students on equality issues. Other groups, such as the Staff Forum on Disability will produce reports from each meeting which will be fed back to the Equality and Diversity Working Group for consideration of any recommendations made.

The Disability Equality Scheme will be reviewed and revised by the Equality and Diversity Working Group on an annual basis. Members of CMG will be instructed to submit an annual Diversity Report to the Group outlining progress against the actions ascribed to them within the Disability Equality Scheme action plan 2006/2009. Information within these annual Diversity Reports will be used to inform the institutional action plan and the College Diversity Report. The College Diversity Report is submitted by the Equality and Diversity Working Group to the College Management Group prior to publication.

## 9 Appendix A

### Definition of Disability

#### Disability Discrimination Act 1995 –

*“A person has a disability for the purposes of this Act if he has a physical or mental impairment which has a substantial and long-term adverse effect on his ability to carry out normal day-to-day activities.” [2]*

This means that -

A person must have an impairment that is either physical or mental;  
That impairments must have adverse effects that are substantial;  
That substantial adverse effects must be long term;  
That long term substantial effects must be effects on normal day-to-day activities. [1]

#### **Impairment.**

A disability can arise from a wide range of impairments such as:

- Sensory impairments
- Impairments with fluctuating or recurring effects (e.g. rheumatoid arthritis, myalgic encephalitis (ME), chronic fatigue syndrome (CFS), fibromyalgia
- Progressive impairments such as motor neurone disease, muscular dystrophy, forms of dementia and lupus (SLE)
- Cardiovascular diseases including thrombosis, stroke and heart disease
- Developmental impairments such as autistic spectrum disorders (e.g. Autism, Asperger syndrome), dyslexia, dyspraxia
- Severe disfigurement
- Mental impairments including mental illnesses such as depression, schizophrenia, eating disorders and some self harming behaviour [1]

The DDA 2005 removes the requirement for mental illness to be “clinically well recognised”. [3] This was something not previously required when establishing whether or not a person had a physical impairment. The requirement that a mental illness be “clinically well recognised” in the DDA (1995) limited recognition of mental illness to those “recognised by a respected body of medical opinion.” [7] The focus is now placed more on the adverse effects experienced by individuals rather than meeting a medical diagnosis for specific conditions.

#### **Substantial.**

A substantial effect is defined as one which is more than “minor” or “trivial”. The requirement that an effect must be substantial reflects the general understanding of disability as a limitation going beyond the normal differences in ability which might exist among people. [4]

#### **Long term.**

Long term effects are those defined as –

having lasted for a period of at least twelve months;

or

where the total period for which it lasts (from the time of onset) is likely to be as least twelve months;

or

which is likely to last for the rest of the life of the person affected. [4]

**Normal day-to-day activities.**

In terms of the above, at least one of the following areas must be badly affected:

- Mobility
- Manual dexterity
- Physical Co-ordination
- Continence
- Ability to lift, carry or move everyday objects
- Speech, hearing or eyesight
- Memory or ability to concentrate, learn or understand
- Understanding of the risk of physical danger [5]

An Impairment may not directly prevent someone from carrying out one or more normal day-to-day activities, but it may still have a substantial adverse long term effect on how they carry out those activities. [1]

**Effects of Treatment.**

The Act provides that where an impairment is being treated or corrected the impairment is to be treated as having the effect it would have without the measures in place. [1]

**Additional factors.**

If a person has previously experienced a disability that had a substantial affect on their ability to carry out normal day-to-day activities, but doesn't any more, it [the disability] will still be regarded as having that effect if it is likely to do so again. [5]

People who have had a disability within the definition are protected from discrimination even if they no longer have a disability. [4]

People with cancer, multiple sclerosis (MS) or HIV infection are all now deemed to be disabled persons for the purpose of the DDA (2005). A person who certified as blind or partially sighted by a consultant ophthalmologist, or registered as such as a local authority are also deemed to meet the definition of disabled. [4]

Progressive conditions, such as HIV infection or MS, that will badly affect a persons ability to conduct normal day-to-day activities in the future will be treated as having a bad effect in the present. [5]

**Exclusions.**

The following are specifically excluded from the DDA:

- Tendency to set fires
- Tendency to steal
- Tendency to physically or sexually abuse others
- Exhibitionism
- Voyeurism
- Addiction to or dependency on alcohol, nicotine or any other substance (other than in consequence of the substance being medically prescribed)

- The condition known as Seasonal Allergic Rhinitis (e.g. Hayfever), except where it aggravates the effect of another condition.
- Lifestyle choices such as tattoos, non-medical piercings or something attached through such a piercing. [4]

**References:**

[1] Department for Work and Pensions: *Disability Discrimination Act, Consultation Document - Guidance on matters to be taken into account in determining questions relating to the definition of disability*. September 2005.  
<http://www.dwp.gov.uk/publications/dwp/2005/dda/dda.pdf>

[2] Disability Discrimination Act, 1995  
[http://www.opsi.gov.uk/acts/acts1995/Ukpga\\_19950050\\_en\\_1.htm#end](http://www.opsi.gov.uk/acts/acts1995/Ukpga_19950050_en_1.htm#end)

[3] Disability Discrimination Act, 2005.  
<http://www.opsi.gov.uk/acts/acts2005/20050013.htm>

[4] Disability Rights Commission: *DDA 1995 part 4 - Code of Practice for providers of Post 16 education and related services*  
<http://www.drc-gb.org/education/media/documents/DDA%20Pt4%20Code%20of%20Practice%20for%20Post%2016%20education.doc>

[5] Disability Rights Commission: *What counts as a disability according to the law?*  
<http://www.drc-gb.org/askdrc/category/show.asp?id=114>

[6] Disability Rights Commission: *Code of Practice for providers of post 16 education and related services*.  
[http://www.drc-gb.org/uploaded\\_files/documents/4008\\_280\\_post-16%20Part%202.pdf](http://www.drc-gb.org/uploaded_files/documents/4008_280_post-16%20Part%202.pdf)

[7] Disability Rights Commission: *Legal Commentary – Is the DDA failing people with mental impairments?*  
<http://www.drc-gb.org/thelaw/lawdetails.asp?id=382&title=la>

## 10 Appendix B

### Staff Disclosures

As at November 2006 **2** members of staff have disclosed a disability (both Learning Difficulty).

Applications for staff employment received between March and November 2006: **274**.

Out of these 274 applications **11** disclose a disability.

These 11 are broken down as follows:

- **Gender** = 6 female/5 male
- **Age Group** = 3 (18-25yrs), 3 (26-35yrs), 1 (36-45yrs), 4 (46-55yrs)
- **Ethnicity** = 9 White British, 2 White other.

Further information will require a staff survey/questionnaire (see Action Plan)

## Base Level Data

**Herefordshire College of Art & Design**

## Special Requirements Data

<b>2006/ 2007</b>	<b>Number of students enrolled as at 1st November</b>	<b>Number of students with special requirements</b>	<b>Number of students with learning difficulties</b>	<b>Number of students with disabilities</b>	<b>Number of students withdrawn</b>	<b>Number of students withdrawn with learning difficulties/disabilities</b>
FE	547	122	93	62	23	9
HE FT	278	42	34	12	2	0
HE PT	32	5	1	4	1	1
	<b>857</b>	<b>169</b>	<b>128</b>	<b>78</b>	<b>26</b>	<b>10</b>

<b>2005/ 2006</b>	<b>Number of students enrolled as at 1st November</b>	<b>Number of students with special requirements</b>	<b>Number of students with learning difficulties</b>	<b>Number of students with disabilities</b>	<b>Number of students withdrawn</b>	<b>Number of students withdrawn with learning difficulties/disabilities</b>
FE	447	100	83	41	89	13
HE FT	239	12	13	2	19	1
HE PT	44	2	0	2	15	1
	<b>730</b>	<b>114</b>	<b>96</b>	<b>45</b>	<b>123</b>	<b>15</b>

## 12 Appendix D

### Involvement activity

1. The first Staff Forum on Disability was held on 15<sup>th</sup> November 2006 at 12.30pm.

The forum was asked to consider the following questions:

- 1) How satisfied do you feel with the College's environment in terms of supporting people with disabilities? E.g. clear signage, door ways, car parking.
- 2) Do you feel the College provides sufficient support to assist people with disabilities in their day to day work?
- 3) Do you consider the College's promotion of its Equality and Diversity Policy as positive and effective in the recruitment and retention of staff and students?

It was reported that following a recent by Ofsted it had been acknowledged that the College had made significant progress in terms of improving access within the building.

A number of issues were raised:

- the height of the reception phone at the HEC building.
- whether students were aware of the process for reporting a disability.
- how the information captured in health records should be disclosed.
- an older age profile on some courses was more likely to offer feedback.
- students should be clear that they would not be penalised by reporting a disability.
- whether there was an area in the College Library allocated to disabilities.
- how students should report any problems they may have with the physical environment.
- how the College should embed the DED in its curriculum.
- whether it would be possible to appoint a disability officer.

It was proposed that:

- more information is provided at inductions about disclosing disabilities and further clarification about what is considered a disability
- a suitable DVD re: disabilities could be shown at student inductions
- staff give presentations re: disability within their areas of expertise.
- students should initially report issues with the physical environment to Tutors/Course Leaders who in turn should report the matter to Estates
- the DED should be introduced into the curriculum on a systematic basis to ensure that every course is represented in future training

It was confirmed that

- the College has a Special Requirements form which students complete on arrival at the College.
- there was the opportunity to raise awareness and for students to disclose disabilities during tutorials.

Further action was agreed in the areas of:

- Gathering of information
- Processes
- Guidance
- Sharing good practice

It was agreed that it would be useful to initially maintain the staff forum and subsequently meet with students and parents where appropriate. It was proposed that the College have a forum meeting on the sixth week of every academic year in order to establish a cycle and address specific issues for that year.

2. The first Parents Forum on Disability was held on 15<sup>th</sup> November 2006 at 6.30pm.

The forum was asked to consider the following questions:

- 1) How satisfied do you feel with the College's environment in terms of supporting people with disabilities? E.g. clear signage, door ways, car parking.
- 2) Do you feel the College provides sufficient support to assist people with disabilities in their day to day work?
- 3) Do you consider the College's promotion of its Equality and Diversity Policy as positive and effective in the recruitment and retention of staff and students?

The following issues were raised:

- Difficulties of disclosing issues that draw attention to the individual or require special adaptation.
  - o Online disclosure?
  - o Pastoral Tutor outside course?
  - o Another known individual?
- Better induction procedures to portray and communicate disability to students.
- Adjustment of workloads, type of work and time allowed for work (e.g. time between lectures and handing in essay) to suit abilities of students.
- Support for students in managing work/time management and difficulties (are we too dependent on parents for support?)
- Better information or training on particular conditions for staff and other students?
- Direct discussion with students, parents and staff about issues and specific needs.
- Students' need to ensure that work is their own rather than reliant on support.
- Ensure briefs present stages/criteria and assist with prioritisation and time management. Need to think through reasons for certain tasks.

Way Forward

- Make it a discussion at Parents' Evenings?

3. The first Students' Forum on Disability was held on 20<sup>th</sup> November 2006 at 12.30pm, however no students attended although two had indicated that they would be doing so.

## 13 Appendix E

### Initial Screening and Impact Assessment

#### 1 Initial Screening

1. Name of Policy
2. Aim or Purpose of Policy
3. Person responsible for Policy
4. Specific stakeholder groups that the policy impacts upon
  - 4.1. Groups of disabled people the policy impacts upon
  - 4.2. Parts of the policy specifically affecting disabled people
5. Data currently available to facilitate screening of policy
6. Evidence of higher or lower participation/take-up by:
  - 6.1. Age
  - 6.2. Disability
  - 6.3. Gender
  - 6.4. Marital Status
  - 6.5. Racial group
  - 6.6. Religious group
  - 6.7. Sexual orientation
7. Evidence that different groups have different needs, experiences, issues and priorities in relation to this policy:
  - 7.1. Age
  - 7.2. Disability
  - 7.3. Gender
  - 7.4. Marital Status
  - 7.5. Racial group
  - 7.6. Religious group
  - 7.7. Sexual orientation
8. Previous consultation or feedback indicating specific problems with policies of this type:
  - 8.1. Age
  - 8.2. Disability
  - 8.3. Gender
  - 8.4. Marital Status
  - 8.5. Racial group
  - 8.6. Religious group
  - 8.7. Sexual orientation
9. Risk assessment of policy as priority for impact assessment
  - 9.1. High
  - 9.2. Medium
  - 9.3. Low
10. Date/Person undertaking screening

#### 2. Impact Assessment

1. Groups to be consulted about impact, and extent of consultation
2. Methods to be adopted – these could include:
  - 2.1. Focus groups
  - 2.2. Surveys
  - 2.3. Pilot projects
  - 2.4. Interviews
  - 2.5. Feedback requests
  - 2.6. Review of previous evaluations
3. Assessing impact
4. Direct/indirect discrimination caused by policy and possible justification e.g.
  - 4.1. Professional requirements
  - 4.2. Positive action
5. Promotion of equality by policy, incorporating the positive duty of the Act

6. Elimination or reduction of adverse impact
7. Report
  - 7.1. Aims of policy
  - 7.2. Assessment based on data
  - 7.3. Mitigation of adverse impact
  - 7.4. Results of consultation
  - 7.5. Amendments to policy with reasons
  - 7.6. Timetable for review
8. Publication of impact assessments
9. Future monitoring plans
10. Date/Person undertaking impact assessment

## 14 Appendix F

### The Action Plan - (October 2006 to September 2009)

The action plan has been developed with reference to:-

1. The Equality and Diversity Working Group
2. Staff Forum on Disability
3. Quality Assurance Agency Code of Practice: Students with Disabilities
4. Equality Challenge Unit Guidance notes
5. Herefordshire College of Art & Design SENDA Compliance Project.
6. The Disability Discrimination Act 2005

<b>1. General Principles</b>			
<ul style="list-style-type: none"> <li>• Institutions should ensure that in all their policies, procedures and activities, including strategic planning and resource allocation, consideration is given to the means of enabling disabled people participation in all aspects of the academic and social life of the institution.</li> </ul>			
<b>Action</b>		<b>Timescale Source</b>	<b>Person Responsible</b>
<b>1.1</b>	To identify clearly the locus of senior management responsibilities in relation to arrangements for students with disabilities.	QAA December 2006	<b>Principal</b>
<b>1.2</b>	To ensure that senior managers and other key staff have an adequate understanding of the legal framework concerning disabled people.	QAA June 2007	<b>Finance Director (Personnel)</b>
<b>1.3</b>	That the Equality and Diversity Working Group will be involved in the development of the Disability Equality Scheme.	ECU June 2007	<b>Principal</b>
<b>1.4</b>	That students be involved in the development of the Disability Equality Scheme via the Students and Parents Forum for Disability.	ECU June 2007	<b>Principal</b>
<b>1.5</b>	That staff be involved in the development of the Disability Equality Scheme via the Staff Forum for Disability and staff questionnaires	ECU	<b>Principal</b>
<b>1.6</b>	To ensure the views and experiences of disabled people are used within the monitoring and reviewing of the impact of all institutional policies, procedures and practices via:-  <ul style="list-style-type: none"> <li>i) The identification of policy areas for initial screening by the members of CMG with responsibility for the policy area.</li> <li>ii) The initial screening of policy areas for equality relevance.</li> <li>iii) The impact assessment of</li> </ul>	QAA ECU  <ul style="list-style-type: none"> <li>i) June 2007</li> <li>ii) June 2007</li> <li>iii) June 2008</li> </ul>	<b>Principal</b>

	policy which, as a result of the initial screening, has been rated as having high relevance to disability equality.		
<b>1.7</b>	To ensure that management systems include the gathering of information to monitor participation and progression of disabled Students.	QAA ECU  June 2008	<b>Finance Director (Registrar)</b>
<b>1.8</b>	To consider the implications for disabled students of collaborative provision and review the arrangements involving study in more than one institution and/or other partner organisation (e.g. 14-19 development)	QAA ECU  June 2008	<b>Assistant Principal</b>
<b>1.9</b>	To implement procedures which ensure that the needs of disabled people are addressed at all stages and levels of academic and resource planning	QAA  June 2009	<b>Principal</b>

<b>2. The physical environment</b>			
<ul style="list-style-type: none"> <li>Institutions should ensure that disabled students, staff and visitors can have access to the physical environment in which they will study, learn, live and take part in the social life of their institution.</li> <li>Institutions should ensure that facilities and equipment are as accessible as possible to disabled students, staff and visitors.</li> </ul>			
<b>Action</b>		<b>Timescale</b>	<b>Person Responsible</b>
<b>2.1</b>	To ascertain the views of disabled people in relation to the development and review of the physical environment, e.g., a procedure which ensures staff and students are periodically asked to highlight any issues they may have encountered regarding the accessibility of rooms or equipment.	QAA ECU SENDA Compliance Project  June 2007	<b>Estates Manager</b>
<b>2.2</b>	To establish a procedure through which difficulties with the physical environment can be reported to the Estates department and dealt with in a timely manner.	Staff forum	<b>Estates Manager</b>
<b>2.3</b>	To establish a procedure to ensure reliable, systematic and documented consideration of disability equality in the planning and implementation of all building works.	QAA, SENDA Compliance Project  June 2008	<b>Estates Manager</b>

<b>2.4</b>	To establish procedures to enable alternative means of participation where physical access is impossible or unreasonably difficult , e.g., a procedure to ensure flexibility regarding where classes are held, including moving teaching from inaccessible lecture theatres/classrooms to more accessible ones.	QAA, SENDA Compliance Project  June 2008	<b>Estates Manager</b>
<b>2.5</b>	To establish procedures for informed timetabling arrangements which ensure that there is enough time between classes to enable students with mobility impairments to travel between them.	QAA  June 2008	<b>Estates Manager</b>
<b>2.6</b>	To produce a guide to the accessibility of rooms on campus.	SENDA Compliance Project  June 2008	<b>Estates Manager</b>

<b><u>3. Information for applicants, students and staff</u></b>		
<ul style="list-style-type: none"> <li>The institution's publicity, programme details and general information should be accessible to people with disabilities and describe the opportunities for disabled students to participate.</li> </ul>		
<b><u>Action</u></b>	<b><u>Timescale</u></b>	<b><u>Source</u></b>
<b>3.1</b>	To ensure that College publicity, programme details and general information portrays disabled people in a positive way that is designed to actively encourage their participation.	ECU  June 2007
<b>3.2</b>	To develop and report the ways in which marketing strategies actively encourage participation by disabled people.	QAA  June 2007
<b>3.3</b>	To ensure the accessibility of the College web pages, including best practice in user interface (e.g. prominent accessibility statement; quick links to adjustable text size, and backgrounds and colours, with a link from the home page).	QAA SENDA Compliance Project June 2007
<b>3.4</b>	To ensure responses to enquiries from disabled people are prompt and candid and include advice from appropriate staff	QAA  June 2007
<b>3.5</b>	To ensure details of the designated contact (Learning Support Manager) for disabled students is widely publicised.	QAA  June 2007
		<b>Vice Principal  (Marketing Manager)</b>
		<b>Vice Principal  (Marketing Manager)</b>
		<b>Vice Principal  (Marketing Manager)</b>
		<b>Finance Director</b>
		<b>Vice Principal</b>

<b>3.6</b>	To ensure that all College regulations, including complaints and appeals policies and procedures are available in accessible formats and are communicated to students in a timely and relevant way.	QAA June 2007	<b>Assistant Principal</b>
<b>3.7</b>	To develop and report the ways in which Personnel actively encourages participation by disabled people.	ECU June 2007	<b>Finance Director (Personnel Officer)</b>
<b>3.8</b>	To establish a procedure to ascertain the views of disabled people with reference to the development and review of the College's publicity, programme and general information.	QAA ECU June 2008	<b>Vice Principal</b>

#### **4 The selection and admission of students**

- In selecting students institutions should ensure equitable consideration of all applicants.
- Disabled applicants' support needs should be identified and assessed in an effective and timely way, taking into account the applicant's views.

<b><u>Action</u></b>	<b><u>Timescale</u></b>	<b><u>Source</u></b>	<b><u>Person Responsible</u></b>
<b>4.1</b>	To ensure the College is able to offer appropriate support to applicants attending interview and other selection activities by including a prompt to disclose a disability within the invitation to interview.	QAA June 2007	<b>Vice Principal/Assistant Principal</b>
<b>4.2</b>	To ensure the views of disabled people are incorporated in the development and review of the selection and admission procedures for students.	QAA ECU June 2008	<b>Vice Principal</b>
<b>4.3</b>	To evaluate the process through which students/applicants are encouraged to make a disclosure of disability.	Staff Forum June 2008	<b>Finance Director (Registrar)</b>
<b>4.4</b>	To provide disability awareness/equality guidance and training for all tutors and administrative staff involved in selection and admissions.	QAA June 2008	<b>Finance Director (Personnel Officer)</b>

<b>5. The selection and admission of staff</b>		
<ul style="list-style-type: none"> <li>In selecting staff institutions should ensure equitable consideration of all applicants.</li> <li>Disabled applicants' support needs should be identified and assessed in an effective and timely way, taking into account the applicant's views.</li> </ul>		
<b>Action</b>	<b>Timescales</b>	<b>Person Responsible</b>
<b>5.1</b>	To undertake an initial screening of policy and procedure relating to staff recruitment, staff development events, disability policy, sickness and absence policy, performance management and capability procedures.	ECU June 2007
<b>5.2</b>	To ensure transparent arrangements for keeping records of selection decisions, such as the outcome of interviews in the event that a disabled applicant were to request to see records.	ECU June 2007
<b>5.3</b>	To review and enhance the systems through which disabled staff and applicants are encouraged to make a disclosure of disability.	ECU Promoting Abilities Forum June 2007
<b>5.4</b>	To provide disability awareness/equality guidance for all tutors and administrative staff involved in selection and admissions.	ECU June 2008
		<b>Finance Director (Personnel Officer)</b>
		<b>Finance Director (Personnel Officer)</b>
		<b>Finance Director (Personnel Officer)</b>
		<b>Finance Director (Personnel Officer)</b>

<b>6. Enrolment, registration and induction of students</b>		
<ul style="list-style-type: none"> <li>The arrangements for enrolment, registration and induction of new entrants should accommodate the needs of disabled students.</li> </ul>		
<b>Action</b>	<b>Timescale</b>	<b>Person Responsible</b>
<b>6.1</b>	To develop enrolment procedures that take into account the access requirements of disabled people.	QAA June 2007
<b>6.2</b>	To develop induction events that fully inform all students about issues relating to equality and diversity including disability, and that facilitate the process of disclosure of disabilities	Staff forum QAA June 2007
<b>6.3</b>	To ascertain the views of disabled people in relation to the College's procedures for enrolment, registration and induction of students.	QAA ECU June 2008
		<b>Finance Director (Registrar)</b>
		<b>Vice Principal</b>
		<b>Vice Principal</b>

### **7. Learning and teaching**

- Programme specifications should include no unnecessary barriers to access by disabled people.
- The delivery of programmes should take into account the needs of disabled people or, where appropriate, be adapted to accommodate their individual requirements.
- Academic support services and guidance should be accessible and appropriate to the needs of disabled students

<b>Action</b>	<b>Timescale</b>	<b>Source</b>	<b>Person Responsible</b>
<b>7.1</b>	Library staff to provide adequate study area for disabled students within the College library	Staff forum June 2007	<b>Assistant principal (Librarian)</b>
<b>7.2</b>	IT staff to raise the awareness and availability of assistive software amongst staff and students.	QAA June 2007	<b>Finance Director (ILT Manager)</b>
<b>7.3</b>	To enhance the procedures whereby staff know, and understand the learning implications of any disabilities of the students whom they teach, e.g. by evaluating the process of generating and communicating disclosure to relevant staff.	QAA Staff forum June 2008	<b>Assistant Principal</b>
<b>7.4</b>	To produce guidance which encourages the planning and employment of teaching and learning strategies which makes the delivery of the programme as inclusive as is reasonably possible.	QAA June 2008	<b>Assistant Principal</b>
<b>7.5</b>	To ensure Programme areas and Departments consider ways to enhance communication with students, e.g., by posting all programme handbooks on the intranet.	SENDA Compliance Project June 2008	<b>Vice Principal Assistant Principal Finance Director Estates Manager</b>
<b>7.6</b>	To ensure programme specifications and descriptions give sufficient information to enable disabled people to make informed decisions about their ability to complete the programme.	QAA June 2008	<b>Vice Principal</b>
<b>7.7</b>	To ensure that, wherever possible, disabled students have access to academic and vocational placements including field trips and study abroad.	QAA June 2008	<b>Vice Principal Assistant Principal</b>

### **8. Examination, assessment and progression**

- Assessment and examination policies, practices and procedures should provide disabled students with the same opportunity as their peers to demonstrate the achievement of learning outcomes.
- Where studying is interrupted as a direct result of a disability-related cause, this should not unjustifiably impede a student's subsequent academic progress.

<b><u>Action</u></b>		<b><u>Timescale</u></b>	<b><u>Person Responsible</u></b>
		<b><u>Source</u></b>	
<b>8.1</b>	To ensure that consideration is given to supplying adequate information in project briefs to support time-management and prioritisation for students with a range of disabilities.	Parents forum	<b>Assistant Principal</b>
<b>8.2</b>	To ensure the views of disabled people are ascertained in relation to the University's provision for the planning, approval and implementation of differentiated assessment methods.	QAA ECU SENDA Compliance Project  June 2008	<b>Principal</b>

### **9. Staff development**

- Induction and other relevant training programmes for all staff should include disability awareness/equality and training in specific services and support.

<b><u>Action</u></b>		<b><u>Timescale</u></b>	<b><u>Person Responsible</u></b>
		<b><u>Source</u></b>	
<b>9.1</b>	To provide staff development sessions which enable academic members of staff to understand and accommodate the requirements of students with additional learning needs.	QAA Parents forum Staff forum June 2007	<b>Assistant Principal</b>
<b>9.2</b>	To provide guidance for staff on disability awareness/equality and sources of support.	QAA Parents forum June 2007	<b>Finance Director (Personnel Officer)</b>
<b>9.3</b>	To provide disability training as part of induction and development programmes for all staff, including part-time and contract staff.	QAA  June 2008	<b>Finance Director (Personnel Officer)</b>

<b>10. Access to general facilities and support</b>		
<ul style="list-style-type: none"> <li>Students with disabilities should have access to the full range of support services that are available to their non-disabled peers.</li> </ul>		
<b>Action</b>	<b>Timescale</b>	<b>Person Responsible</b>
<b>10.1</b>	To ensure disabled students, staff and visitors are able to participate in ceremonial events.	QAA June 2007 <b>Principal</b>
<b>10.2</b>	To ensure support and welfare services (and information about these) are as accessible as possible.	QAA June 2007 <b>Assistant Principal</b>

<b>11. Additional specialist support</b>		
<ul style="list-style-type: none"> <li>Institutions should ensure that there are sufficient designated members of staff with appropriate skills and experience to provide specialist advice and support to disabled applicants and students and to the staff who work with them.</li> <li>Institutions should identify and seek to meet the particular needs of individual disabled students.</li> </ul>		
<b>Action</b>	<b>Timescale</b>	<b>Person Responsible</b>
<b>11.1</b>	To establish an effective procedure for ensuring early contact with disabled applicants, especially those with complex academic and/or daily living support needs, in order to identify appropriate sources or systems of support.	QAA June 2007 <b>Finance Director (Registrar)</b>
<b>11.2</b>	To establish internal communication systems that ensure appropriate staff receive information about the particular needs of disabled students in a clear and timely way.	QAA Staff forum June 2007 <b>Assistant Principal</b>
<b>11.3</b>	To establish a clearly defined policy on the confidentiality and disclosure of information relating to a person's disabilities that is communicated to applicants, students and staff.	QAA Staff forum June 2007 <b>Assistant Principal</b>

<b><u>12. Monitoring and evaluation</u></b>			
<ul style="list-style-type: none"> <li>• Institutional information systems should monitor the applications, admissions, academic progress and nature of impairment of disabled students.</li> <li>• Institutions should operate systems to monitor the effectiveness of provision for students with disabilities, evaluate progress and identify opportunities for enhancement.</li> </ul>			
<b><u>Action</u></b>	<b><u>Timescale</u></b>	<b><u>Person Responsible</u></b>	
	<b><u>Source</u></b>		
<b>12.1</b>	To monitor and report the number of student complaints that arise from disability related cause.	ECU June 2007	<b>Principal</b>
<b>12.2</b>	To monitor and report the number of staff complaints that arise from a disability related cause.	June 2007	<b>Principal</b>
<b>12.3</b>	To monitor and report the progression and retention rates for disabled staff.	ECU June 2008	<b>Finance director (Personnel Officer)</b>
<b>12.4</b>	To establish systems to monitor and report the application to enrolment ratio for disabled people in relation to individual academic programmes.	ECU June 2008	<b>Finance director (Registrar)</b>
<b>12.5</b>	To establish systems to monitor and report the application to offer ratio for disabled people in relation to employment opportunities.	ECU June 2008	<b>Finance director (Personnel Officer)</b>
<b>12.6</b>	To establish systems to monitor and report the progression and retention rates for disabled students.	ECU June 2008	<b>Finance director (Registrar)</b>
<b>12.7</b>	To monitor and report the feedback that has been gathered from disabled applicants, both successful and unsuccessful, regarding the student and staff recruitment processes.	ECU June 2008	<b>Finance director (Personnel Officer)</b>
<b>12.8</b>	To ensure that academic evaluation tools generate and report feedback from disabled people, e.g., student feedback questionnaires.	ECU June 2008	<b>Assistant Principal</b>