

# **Student Reasonable Adjustment Procedure**

# **Section 1 - Purpose**

(1) This Procedure supports the University's <u>Inclusive Access to Education Policy</u> and sets out in detail the University's process for making reasonable adjustments for students.

## **Section 2 - Scope**

(2) The scope of this Procedure is the same as the Inclusive Access to Education Policy.

## **Section 3 - Procedure**

#### General

- (3) The InclusionUC team is responsible for facilitating reasonable adjustments for students in accordance with the <u>Disability Standards for Education 2005</u> and the <u>Inclusive Access to Education Policy</u>.
- (4) If students (including Students at the University of Canberra College) wish to apply for reasonable adjustments for their study, they can <u>register</u> for and access InclusionUC services at any time during their studies. Students studying at Third Party Provider institutions should check with their institution to understand how they can access reasonable adjustments.
- (5) Students can register with InclusionUC if they have a disability as defined in the <u>Inclusive Access to Education</u> <u>Policy</u>.

#### InclusionUC services

- (6) Students can access InclusionUC for the following services:
  - a. registering for a Reasonable Adjustment Plan (RAP);
  - b. reviewing or updating a RAP; and
  - c. receiving referrals from the Inclusion Advisors to various UC Support Services for students registered with InclusionUC.
- (7) Inclusion Advisors can provide referrals to various University support services for students registered with InclusionUC.
- (8) Where needed and where the student provides their written consent, InclusionUC may liaise with unit conveners and assist students to negotiate variations to their reasonable adjustments to suit the learning and assessment tasks in a unit.

### **Reasonable Adjustment Plans**

(9) The Reasonable Adjustment Plan (RAP) documents the measures or actions implemented by the University to

assist a student with a disability with their:

- a. enrolment;
- b. course or program of study; or
- c. use of facilities or services at the University.
- (10) The University also provides assistance to students who require adjustments to engage with the admissions process.
- (11) The University also makes reasonable adjustments for students in situations where they are required to complete Work Integrated Learning (WIL) or Higher Degree by Research (HDR). Where adjustments are made for a student in these situations, the University will provide the student with a Placement Support Letter outlining the specific adjustments for the student attending the WIL site or undertaking a HDR course.

### Registering for a Reasonable Adjustment Plan

- (12) Students requiring reasonable adjustments must <u>register</u> with InclusionUC to be provided with a RAP. Each student's RAP will outline the specific adjustments that the University will make to support the student's studies.
- (13) Where needed, InclusionUC will assist students with the registration process or adapt the process to meet the accessibility requirements of individual students.
- (14) To register for a RAP, students must apply online and attach medical documentation completed by a treating health practitioner (either of the student, or of the person they have caring duties for) that includes:
  - a. details of the diagnosis;
  - b. the nature of the condition;
  - c. the period of validity of the document; and
  - d. the impact of their condition or the condition of the person they have caring responsibilities' for on their studies.
- (15) For some conditions, the University may require a completed Health Practitioner Report, and InclusionUC will provide students with a standard form where necessary.
- (16) Where the student's documentation contains insufficient detail, or where the Health Practitioner Report is required, InclusionUC will request that the student submit additional medical documentation to support the implementation of suitable adjustments. Information on specific requirements can be found under the Appendix A Additional Requirements for Specific Conditions.

#### **Medical documentation**

- (17) Documentation must:
  - a. be in English language;
  - b. be legible and on a professional letterhead that clearly identifies the health professional, their credentials, their provider number and be dated and signed by the practitioner(s);
  - c. state the diagnosis;
  - d. indicate whether the diagnosed condition is temporary, fluctuating or permanent (for permanent conditions, validity of documentation is indefinite);
  - e. indicate how long the health professional deems the document valid before requiring a review (for fluctuating conditions RAP validity will be no more than 12 months);

- f. detail the impact on the student;
- g. be not more than 14 days old for temporary conditions;
- h. be not more than six months old for fluctuating conditions; and
- i. be updated annually for certain conditions as advised by InclusionUC on a case-by-case basis.

#### Inclusion Advisor - assessment and consultation

- (18) When InclusionUC receives an application from a student, the application and medical documentation will be reviewed and assessed by an Inclusion Advisor.
- (19) The Inclusion Advisor reviews the student's application to determine whether adjustments are reasonable in all of the individual circumstances of the student's situation and considering all relevant interests, including the interests of the student, the University and any other person that may be affected by the implementation of an adjustment.
- (20) In making the assessment, the Inclusion Advisor will consider:
  - a. the student's disability (based on the student's medical documentation);
  - b. the views of the student or the student's associate provided through consultation as outlined below;
  - c. the student's ability to achieve the learning outcomes of their course or program of study;
  - d. the student's ability to participate in courses or programs and achieve the academic requirements of the course and other inherent or accreditation requirements;
  - e. the student's ability to be an independent learner;
  - f. the effect of the proposed adjustment on anyone else affected, including the University, staff, other students and members of the public;
  - g. whether the adjustment may need to be changed over the period of a student's education or training; and
  - h. the costs and benefits of making the adjustment.
- (21) Following the assessment, the Inclusion Advisor will discuss the proposed adjustments with the student or their associate. This consultation will include a discussion about:
  - a. the disability;
  - b. the area of study;
  - c. study load and mode of study;
  - d. past experiences, and areas of concern;
  - e. the student's views on whether the adjustment is reasonable and will sufficiently assist them to:
    - i. enrol or be admitted to the University on the same basis as a prospective student without a disability;
    - ii. participate in the courses or programs and use the facilities provided by the University on the same basis as a student without a disability;
    - iii. participate in learning experiences on the same basis as a student without a disability who is enrolled in the course or program;
    - iv. access support services on the same basis as a student without a disability; and
    - v. participate in the activities for which the student is enrolled,
  - f. the student's medical documentation; and
  - g. the inherent requirements of the student's course.
- (22) Where necessary and appropriate, Inclusion Advisors will consult with Course Conveners and Unit Conveners to ensure that any proposed adjustments will enable the student to access content and demonstrate expected outcomes.
- (23) Where all the above considerations result in an assessment that the proposed adjustment balances both the

interests of the student with the interests of the University and any other person or body affected by the proposed adjustment, the Inclusion Advisor will consider the adjustment to be reasonable, and the University will make the adjustment, subject to finalisation of the RAP as detailed below.

### Finalisation of Reasonable Adjustment Plan

- (24) Prior to finalising their RAP, students will sign a consent form that asks the student to:
  - a. agree to the terms and conditions associated with the provision, management and distribution of their RAP; and
  - b. allow InclusionUC to share the RAP with relevant staff within the relevant faculty, student accommodation, and other student support services as relevant or appropriate.
- (25) Where students provide consent, the RAP will be shared with relevant staff, including Unit Conveners. The purpose of providing the RAP to relevant staff is to communicate the reasonable adjustments to relevant staff who will implement the adjustments on a day to day basis.
- (26) Students are at liberty to withhold their consent to provide the RAP to relevant staff, but students must be aware that if they withhold their consent, the University will not be able to implement the adjustments as intended, and the student will not get the full benefit of the RAP.
- (27) Following the finalisation of their RAP, the University recommends that students contact their Unit Convener, HDR supervisor, and any other relevant staff member where relevant to ensure that staff are aware of their RAP.

### Reviewing or updating a Reasonable Adjustment Plan

- (28) The University recognises that judgments about what is reasonable for a particular student with a particular disability may change over time. As such, the validity of student RAPs will be dependent on the nature of the student's condition and their medical documentation.
- (29) InclusionUC reviews current RAPs 3 months prior to their expiry and will notify students via email of the review. Where required, students will be asked for updated medical documentation to extend their RAP. Students may also consult with Inclusion Advisors to review their current RAP or discuss any other needs that arise in relation to their RAP.
- (30) The below indicates how long a RAP could be active for depending on the nature of the student's condition, as determined by their medical practitioner in the student's HPR:
  - a. For fluctuating conditions per document validity with a maximum of 12 months;
  - b. For temporary conditions per document validity with a maximum of 12 months; or
  - c. For permanent conditions per document validity with a maximum of 3 years.

### **Adjustments**

#### Reasonable

- (31) An adjustment will be reasonable where it balances the interests of all parties affected.
- (32) Standard adjustments may include:
  - a. assignment extensions;
  - b. flexibility for attendance and/or participation; and
  - c. exams/in-class tests/online quizzes extra time, small group room or rest breaks.

- (33) For adjustments beyond those listed above, students may be required to provide additional documentation that demonstrates the need for non-standard adjustments. If required, documentation must set out:
  - a. the non-standard adjustment(s) that is required; and
  - b. the specific reasons why the non-standard adjustment is sought.

#### Not reasonable

- (34) Proposed adjustments may not be assessed as reasonable when the adjustments are of such a nature that they have any of the following effects:
  - a. the academic requirements of the course cannot be maintained;
  - b. they will not facilitate the student meeting the inherent requirements of the course; or
  - c. they will not facilitate the student meeting the relevant course accreditation requirements.
- (35) In accordance with the <u>Disability Standards for Education 2005</u>, the University is only required to make adjustments for students where the adjustment is reasonable considering all of the circumstances relating to the individual student's request.
- (36) If proposed adjustments are determined not to be reasonable, the University will work with the student to consider another adjustment that will assist the student while maintaining the integrity of the University's courses and units.

### Work integrated learning

- (37) Work Integrated Learning (WIL) is an educational activity where theoretical knowledge and disciplinary skills are integrated with authentic professional experience.
- (38) The type of WIL a student undertakes is dependent upon their course and learning outcomes. For example, some courses require students to complete a minimum number of hours as part of professional registration requirements, whilst others require the demonstration of workplace competencies.
- (39) For further information please refer to the UC's WIL Supervisor Guidelines or the WIL Policy and Procedure.

#### Reasonable adjustments during WIL

- (40) To foster inclusive practice for all students with disability, the University will facilitate appropriate support and reasonable adjustments on placement.
- (41) If students require reasonable adjustments for WIL, students must contact InclusionUC, who will work with the individual student to determine what reasonable adjustments the student may need in relation to the placement. Following the determination of what adjustments are reasonable in the circumstances, InclusionUC, in collaboration with the student and any other person relevant to the WIL, including the WIL Unit Convenor, will develop a Placement Support Letter (PSL). The PSL outlines the reasonable adjustment(s) the student may need to perform optimally during placement.
- (42) Students may commence discussions with InclusionUC about what adjustments they may require for WIL at any time during their course of study, however any PSL will be finalised no more than 12 months in advance of the beginning of an expected placement.
- (43) A PSL may include specific requirements for:
  - a. type of placement setting (for example, no facilities that may impact on the health and wellbeing of the

student);

- b. location of placement (for example, Canberra-based placements only);
- c. pattern of attendances (for example, part-time hours such as 3 days per week);
- d. individualised supports (for example, specialised software such as voice recognition);
- e. accessibility considerations (for example, wheelchair accessible venue); and
- f. assistive technology (for example, amplified stethoscope).
- (44) To receive a PSL, students must provide sufficient documentation to allow InclusionUC to complete informed assessments specific for WIL. In performing a WIL specific assessment, InclusionUC must consider the student's supporting documentation, and whether any proposed adjustments will negatively affect any of the following:
  - a. the overall Quality Features of WIL documented in the University's WIL Policy and Procedure;
  - b. the expected competencies of the relevant profession; and
  - c. the <u>Inherent Requirements</u> of the course or program of study.

#### (45) Supporting documentation must:

- a. be in English language;
- b. be legible and on a professional letterhead that clearly identifies the health professional, their credentials, their provider number and be dated and signed by the practitioner(s);
- c. describe the reasonable adjustments required while on placement;
- d. explain why the adjustments are needed;
- e. explain what the student will be able to do with the reasonable adjustments in place; and
- f. be completed by a health professional with an appropriate scope of practice, as set out in Appendix A.
- (46) Adjustments for placement will be developed in collaboration with the student. With the student's consent, the University will provide this information (either verbally or in writing) to prospective placement organisations to ensure that reasonable adjustments are tailored to the specific context of that organisation, and to ensure that the organisation is able to make those adjustments. If students do not consent to this information being provided to potential placement organisations, the University may not be able to proceed in sourcing a placement for the student.
- (47) The University encourages students to contact the relevant course convener or discipline lead to discuss the inherent requirements of a chosen course, as well as additional accreditation standards.

# **Section 4 - Responsibilities**

WHO	RESPONSIBILITIES
The Faculty and Professional Practice Convener (PPC) or WIL Unit Convener	<ul> <li>Providing the student with advice, information and support regarding accreditation, inherent requirements, and expectations for the placement.</li> <li>Liaising with InclusionUC for PSL queries or concerns.</li> <li>Informing the student and InclusionUC within 3 business days if they believe any adjustment listed in the PSL contravenes the inherent requirements of the program, compromises the student's capacity to achieve learning outcomes or meet any external accreditation requirements, or does not reflect the interest of the student, university, or relevant external stakeholders.</li> <li>Developing, in collaboration with the student, reasonable adjustments the Student needs to enable their learning and participation at a placement organisation in and sharing this information with the host organisation during the sourcing process with the student's approval.</li> <li>Having due regard for each student's right to privacy and confidentiality when seeking information for the purpose of negotiating reasonable adjustments at a placement organisation.</li> <li>Advise the Careers UC Placement team about specific placement requirements to facilitate appropriate allocation of the placement for that Student.</li> </ul>

WHO	RESPONSIBILITIES
InclusionUC	<ul> <li>Consulting with the student to better understand their WIL requirements.</li> <li>Balancing the needs of the student and faculty by seeking feedback from all parties.</li> <li>Sending a draft PSL to the student and PPC within 3 business days of meeting with the student – this will enable the PPC to consider the request and feedback on possible options for reasonable adjustments.</li> <li>Sending the finalised PSL letter to the student and PPC within 3 business days of being notified that all parties agree.</li> <li>Being aware of the inherent requirements in relation to the student's course of study and whether the adjustment facilitates the student being able to satisfy those.</li> <li>Providing ongoing opportunities for the student to discuss concerns or issues arising on placement.</li> <li>Providing further support and advice where appropriate.</li> </ul>
Students	<ul> <li>Making early contact (preferably at least 12 weeks before reasonable adjustments may be required) with the InclusionUC and Course Convener and the Professional Practice Convener (PPC) (if relevant) to allow optimal time for future planning and increasing the likelihood of the university being able to implement the reasonable adjustment(s) required (all cases will still be considered even if requested in less than 12 weeks).</li> <li>Understanding that different disciplines within Health and Education have varying constraints or limitations in some of the adjustments they can provide; for example, location-based placements within Canberra may not be an option in some disciplines.</li> <li>Considering their proposed adjustment in the context of the course inherent requirements and accreditation standards and whether they will be able to meet those should the adjustment be put in place.</li> <li>Being aware of mandatory reporting requirements as outlined by the Australian Health Practitioner Regulation Agency (AHPRA).</li> <li>Providing appropriate medical documentation as detailed in this Guideline and actively participate in the development of their PSL.</li> <li>Advising their Course Convener, PPC and InclusionUC if the impact of the disability changes, or if the PSL no longer meets their needs.</li> <li>Contacting their Course Convener, PPC and InclusionUC as soon as possible via email if the PSL has not been actioned appropriately.</li> </ul>

# **Section 5 - Definitions**

(48) Refer to the <u>Inclusive Access to Education Policy</u> for definitions.

# **Section 6 - Appendices**

## Appendix A - Additional requirements for specific conditions

To ensure adjustments are substantiated by evidence some conditions must meet requirements further to those listed above. Some of these requirements are outlined below:

CONDITION	APPROPRIATE PROFESSIONAL	DOCUMENTATION MUST INCLUDE
Hard of hearing/deaf	• Audiologist	<ul> <li>Type and degree of hearing loss</li> <li>The use and effects of hearing aids or other technology in improving</li> </ul>

CONDITION	APPROPRIATE PROFESSIONAL	DOCUMENTATION MUST INCLUDE
Physical disability – for example: amputation, arthritis, cerebral palsy, muscular dystrophy, paraplegia, quadriplegia or post- polio syndrome	Chronic conditions:  Specialist  Physiotherapist (with management history)  Occupational Therapist (with management history) Temporary conditions:  General Practitioner  Physiotherapist  Occupational Therapist	Indication of conditions impact on study related tasks such as writing, typing, and speaking.
Intellectual disability – for example, Down's syndrome	• Paediatrician • Psychologist	Diagnostic assessment report that includes results and interpretations of adaptive functioning and IQ
Specific Learning Disability (SLD) – for example, dyslexia, dysgraphia or dyscalculia	• Educational Psychologist • Neurologist • Speech Pathologist (for language-based conditions) • Occupational Therapist (for motor-based conditions)	• Standardised assessment of current levels of aptitude and information processing • Test scores and interpretation of results OR • Diagnostic clinical assessment report completed post age 16 (i.e. 17 years or older)
Mental health condition – for example, anxiety, depression, PTSD or bipolar disorder	Psychologist Psychiatrist General Practitioner (not sufficient by itself to receive comprehensive support)	A clear statement regarding whether current symptoms are mild, moderate, or severe in nature
Acquired brain injury	• Neurologist • Neuropsychologist • Clinical psychologist • Psychiatrist	Whether condition and its impact are mild, moderate or severe in nature
Low vision/Blind	Ophthalmologist Optometrist Orthoptist Ocularist Specialist Service (e.g. Vision Australia, Guide Dogs)	Type and degree of vision loss, including assessment results for visual fields and acuity
Medical condition – for example, cancer, chronic fatigue syndrome, Crohn's disease, cystic fibrosis, asthma or diabetes	• General Practitioner (with management history) • Specialist	Whether the condition is permanent, fluctuating, or short- term and if the condition needs to be reassessed after a period

CONDITION	APPROPRIATE PROFESSIONAL	DOCUMENTATION MUST INCLUDE
Neurological condition – for example, autism spectrum disorder, epilepsy, Alzheimer's disease, multiple sclerosis, Parkinson's disease, brain tumours or ADHD/ADD	• Psychologist • Psychiatrist	• Whether condition is mild, moderate, or severe in nature • Evidence of ADD/ADHD based on DSM-5 (American Psychiatric Association) • Test scores and interpretation of results
Temporary condition or injury - for example, broken bone	• General Practitioner • Physiotherapist • Occupational Therapist • A&E Hospital • Medical specialist	Impact on ability to facilitate daily and study related tasks.
Primary carer	• General Practitioner • Specialist • Centrelink	Confirmation of a carer payment from Centrelink.  Carers ACT card.  A letter from treating doctor or specialist who is treating the person requiring significant care, stating that the person is substantially dependent on the student for their ongoing care, or that the student is the person's 'primary carer'.  Carer Health Practitioner Report.

## Appendix B - Relevant national and international legislation and standards

The following legislation is taken into consideration when determining appropriate adjustments for students.

TITLE	OVERVIEW
Disability Discrimination Act 1992 (Cth)	The Federal DDA provides protection for everyone in Australia against discrimination based on disability.
Disability Standards for Education 2005	The Standards clarify the obligations of education and training providers, and seek to ensure that students with disability can access and participate in education on the same basis as students without disability.
Privacy Act 1988 (Cth)	The principal piece of Australian legislation protecting the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information in the federal public sector and in the private sector.
Fair Work Act 2009 (Cth)	The FW Act governs the employee / employer relationship in Australia. It provides a safety net of minimum entitlements, enable flexible working arrangements and fairness at work and prevent discrimination against employees.

## **Appendix C - Relevant University of Canberra policies**

The following policies are taken into consideration when determining appropriate adjustments for students.

TITLE	OVERVIEW
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TITLE	OVERVIEW
Assessment Policy	This policy sets out the University's principles underlying how student assessment occurs at the University of Canberra.
Inclusive Access to Education Policy	UC's policy to support staff members and students with a disability and to comply with relevant legislation.
Privacy Policy	This Policy outlines the personal information handling practices of the University of Canberra and describes the framework to protect the privacy of all personal information or other data collected by the University in compliance with relevant privacy laws.
Student Mental Health Support Procedure	This Procedure ensures UC provides a coherent and supportive institutional approach when responding to students with mental health problems.
Work Integrated Learning Policy	This Policy provides the University's approach to managing the Work Integrated Learning (WIL) Program.

## **Appendix D - Example Placement Support Letter (PSL)**

01/01/2023

FAO: John Teacher

RE: Jill Student (123456)

Jill is registered with InclusionUC at the University of Canberra (UC) and has provided our office with medical documentation to support the provision of reasonable adjustments. Due to the current impact of their health condition, Jill requires a supportive learning environment and the below adjustments for their placement.

The following have been developed in accordance with medical documentation provided, consultation with the student and as per guidelines for reasonable adjustments under the Disability Standards for Education 2005:

- Part-time placement
  - Preference for part-time placement, preferably 4 days where possible to be discussed with student

Jill recognises that allocation of placement will be subject to the availability of suitable placement opportunities and facilitating this reasonable adjustment may impact the scheduled date on their course.

Please consider the above recommendations as reasonable adjustments for Jill's placement for 6 months, starting from the date above.

If you are unable to facilitate any of the adjustments requested or have any concerns about the impact of the above, please feel free to contact our office to discuss these concerns.

Kind regards,

InclusionUC Email:inclusion@canberra.edu.au Phone: 02 6201 5233

## **Status and Details**

Status	Current
Effective Date	16th September 2024
Review Date	30th August 2029
Approval Authority	Deputy Vice-Chancellor and Vice-President, Academic
Approval Date	30th August 2024
Expiry Date	To Be Advised
Custodian	Michelle Lincoln Deputy Vice-Chancellor
Responsible Manager	Mara Eversons Director, Student Life
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