



UCFB*

Disability Policy

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Version Number:	5.0
Approved By:	Academic Board
Approved Date:	10 June 2026
Date of Commencement:	01 September 2026
Date of Last Review:	May 2026
Date for Next Review:	May 2027

*UCFB is a trading name of University Campus of Football Business Limited.

1. Introduction

- 1.1.1. At UCFB we are committed to the promotion of equity, diversity and a supportive environment for all. We aim to ensure that members of the UCFB community get the most from their experience in an inclusive environment.

1.1. Purpose

- 1.1.1. This policy seeks to set out a framework to ensure people with disabilities can fully participate, where practicable, in our academic and social courses and workplace environment.
- 1.1.2. UCFB ensures that members of the community with disabilities or long-term conditions, like neuro-diverse conditions such as dyslexia and autism, or physical disabilities, have access to both facilities and a learning and working environment that is, wherever reasonably possible, comparable to that of their non-disabled peers.
- 1.1.3. UCFB complies with its legal requirements under the Equality Act 2010.
- 1.1.4. UCFB outlines the standards and expectations of the processes regarding disclosure and reasonable adjustments.

1.2. Scope

- 1.3.1. This Disability Policy applies to all students registered on any UCFB course of study.
- 1.3.2. Where relevant, this Policy also applies to staff, visitors, former students where there is a continuing relationship and applicants who have accepted an offer to study at UCFB. This policy is not contractual in nature.
- 1.3.3. The remit of this policy includes:
- Definitions
 - Disability Policy
 - Disclosure and Confidentiality¹
 - Reasonable Adjustments Policy

2. Principles

- 2.1. UCFB aims to create a safe, supportive and inclusive environment that enables disabled people to fully participate in the campus life experience and where reasonably practicable, one that is comparable to non-disabled people.
- 2.2. Staff and students with disabilities are an integral part of the UCFB community; accessible and appropriate provision is central to the values of the institution.
- 2.3. UCFB will have a zero tolerance towards, and eliminate, unlawful discrimination, harassment, bullying and victimisation.

¹ See the *Student Disability Disclosure Policy and Procedure* for full details.

- 2.4. UCFB will promote equality of opportunity and foster good relations between disabled people and others.
- 2.5. UCFB will take proactive steps in making reasonable adjustments and in taking proportionate steps to overcome barriers which potentially impede or disadvantage people with disabilities.
- 2.6. UCFB will take anticipatory action to enhance the accessibility of our facilities and services.
- 2.7. UCFB will provide training and support for the UCFB community to promote disability awareness.
- 2.8. UCFB is committed to supporting disabled staff and students and will be proactive in making reasonable adjustments to remove barriers for individuals. What is reasonable depends on a range of factors. These include the effectiveness of adjustments, the size of the organisation, how practicable the changes are, the cost of making changes and the resources available. UCFB will also work with Disability Assessors, Occupational Health and external organisations such as Access to Work if further support is needed.

3. Definitions

3.1. Definition of a Disability

- 3.1.1. According to the Equality Act 2010, disability is defined as having a physical or mental health impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities. We will use this definition as standard. The term 'Mental Health Impairment' covers only clinically recognised conditions.
- 3.1.2. In addition to physical and mental health impairments, the Act also covers sensory impairments and specific learning difficulties (SpLDs) such as dyslexia or dyspraxia and long-term medical conditions such as epilepsy and asthma.
- 3.1.3. A disability is defined as having a substantial and long-term effect on an individual's ability to carry out day to day activities. Long-term is defined as a condition that has lasted for a year and a day, a condition that is likely to last for a year and a day or a condition that will last for the duration of the individual's lifetime.
- 3.1.4. Whilst this policy is framed around the legal definition of disability, staff are not expected to focus on establishing whether a condition qualifies as a disability and should instead focus on removing barriers and making reasonable adjustments to create an inclusive work and study environment for our staff, students and visitors, including alumni.

3.2. Definition of Reasonable Adjustments

- 3.2.1. The Equality and Human Rights Commission (EHRC) defines 'reasonable adjustments' as: "Reasonable is what most people would agree is fair and sensible, when they think carefully about it. Adjustments means you are changing something". 'Reasonable adjustments' are about responding to

individual cases by taking account of circumstances without necessarily setting precedents.

- 3.2.2. A Reasonable Adjustment is defined as a decision taken by UCFB to allow changes to be made to standard arrangements for staff and students in relation to their work and study at UCFB. Some staff and students may become disabled during their working lives or studies and the need to make reasonable adjustments is important to allow them to continue in their employment or studies.
- 3.2.3. Reasonable adjustments will also apply to those applying to UCFB for employment, study or visiting.

4. Legal Context

4.1. Equality Act 2010

- 4.1.1. The Equality Act 2010 consolidates, harmonises and replaces all previous legislation with respect to the nine protected characteristics, one of which is disability. Within the context of disability, the act sets out the types of direct and indirect discrimination that may occur within an institution, including harassment, victimisation and failing to put in place reasonable adjustments.
- 4.1.2. As disability is a protected characteristic under the Equality Act 2010 public bodies must, in the exercise of their functions, have due regard to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
 - make reasonable adjustments to work and study arrangements or physical features of premises which place the disabled person at a substantial disadvantage in comparison with others who are not disabled.
 - integrate consideration of equality and good relations into their day-to-day business and to consider how a function can affect different groups in different ways.
- 4.1.3. People who are concerned that they have received less favourable treatment because of their disability should raise those concerns through the relevant Complaints Procedures.

4.2. Governance Requirements

- 4.2.1. Early sharing of a disability is encouraged so that all reasonable adjustments can be put in place as early as possible to meet any individual's work-related and study needs.

- 4.2.2. UCFB will continue to collect and monitor statistics and encourage sharing as part of its commitment to the provision of an inclusive and equitable working environment.
- 4.2.3. Reporting on disability data will be of a statistical nature and individuals will not be identified. Statistics on staff and students will be reported in the annual DEI Report and HESA student returns.
- 4.2.4. Information on staff and students who share information with us on their disability will be kept confidentially on the appropriate Staff or Student Information System, in line with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

5. Policy

5.1. Disability Policy

- 5.1.1. UCFB will ensure that in all policies, procedures, regulations, functions and activities, including strategic planning and resource allocation, consideration is given to reasonable means of enabling disabled staff and students' full participation in all aspects of the academic and social life of the institution.
- 5.1.2. Applicants who disclose a disability are provided with advice on the services available to them as outlined in the Admissions Policy.
- 5.1.3. Individuals are given every opportunity to disclose a disability throughout the duration of their time with UCFB.
- 5.1.4. Where a student chooses to disclose a disability after the point of enrolment, there is a clear process outlined in the Student Disability Disclosure Policy and Procedure which staff must follow to ensure that the student is made aware of the options available to them.
- 5.1.5. On disclosure UCFB will work with the student to assess their level of need and put reasonable adjustments in place at the earliest opportunity in line with the Learning Support Registration process.
- 5.1.6. Where an individual chooses to decline additional support they are made aware of the consequences of this decision and their right to change this at any time in the future.
- 5.1.7. Records will be kept and retained in line with UCFB records management.
- 5.1.8. UCFB will manage the process of information sharing and will treat all personal data in accordance with the Data Protection Act 2018 and General Data Protection Regulation (GDPR).

5.2. Disclosure and Confidentiality

- 5.2.1. 'Sharing information about a disability' is the formal term given to informing UCFB that you have a disability, long-term medical condition or specific learning difficulty (SpLD), such as dyslexia, that has a substantial effect on your day-to-day life and may affect your ability to study.

- 5.2.2. Sharing information about a disability is not compulsory and many staff and students with disabilities find that they are able to manage the demands of their work or course of study without support, or by using the anticipatory adjustments that UCFB has in place for all staff and students.
- 5.2.3. However, all prospective and current students and employees of UCFB are encouraged to disclose their disabilities so that their needs can be discussed, and appropriate support can be made available to them.
- 5.2.4. All information and documentation regarding an applicant's or student's condition will be used exclusively for the purpose of planning and implementing appropriate support in order that the individual may gain the maximum benefit from their educational opportunity at UCFB.
- 5.2.5. All information and documentation regarding an applicant's or staff member's condition will be used exclusively for the purpose of planning and implementing appropriate support through the People and Culture Team in order that the individual may gain the maximum benefit from their role at UCFB.
- 5.2.6. Where absolute or limited confidentiality has been requested, UCFB may not be able to make adjustments that would otherwise be reasonable, particularly in relation to disabilities that are hidden and/or complex or where the related needs are specific to the individual.

5.3. Reasonable Adjustments

- 5.3.1. Reasonable adjustments made by the Learning Support Team or the People and Culture Team are intended to promote the maintenance of positive wellbeing.
- 5.3.2. Staff are encouraged to discuss their support needs and any required adjustments with their Line Manager and/or the People and Culture.
- 5.3.3. Students who have informed us of a support need are invited to register with the Learning Support Service to discuss support and individual reasonable adjustments.
- 5.3.4. Students will be able to discuss recommended adjustments and agree them with a member of the Learning Support Team as part of the registration process. Where there are issues with the implementation of reasonable adjustments, students can arrange to discuss this with a Learning Support Advisor.
- 5.3.5. All additional needs and reasonable adjustments are recorded on the student's record on the UCFB Student Information System and made available only to relevant staff as is necessary to put in place support and reasonable adjustments.
- 5.3.6. Reasonable adjustments will be considered on an individual basis, which means that a broad and diverse range of adjustments may be recommended. However, there are a number of standardised reasonable adjustments that can be put in place to help to overcome common barriers. In the case of standardised reasonable adjustments, it is the expectation that the relevant team will implement these when agreed

and they will be documented by the Learning Support Team.
Standardised adjustments may include:

Learning and teaching considerations

- Providing electronic copies of lecture material at least 24hrs in advance (e.g. lecture slides, handouts, or lecture notes provided in advance via Online Hub);
- Providing recommended reading lists which differentiate between essential or core texts and desirable texts.
- Allowing use of learning aids in the classroom and/or during online delivery.
- Integrated accessibility tool through the Online Hub.

Library services

- Extended library loans
- Book fetching service
- Use of personal assistive equipment in libraries

Reasonable Adjustments in Assessments

Reasonable adjustments in respect of feedback and marking, and the identification of work from students with disabilities affecting written expression:

Students may label their work using Learning Support Certificates whereby guidelines are incorporated into a cover sheet for students to upload to their written assessments. The certificate includes individualised guidance for the marker to consider how the student's support needs may affect their work. These will be provided to students who have a confirmed SpLD, such as dyslexia, ADHD, dyspraxia and dyscalculia (only where numbers are present), Autism Spectrum Disorders (ASDs), visual impairment and/or hearing impairment. **It is the student's responsibility and choice to implement this certificate in their assessments.**

Where Learning Support Certificates are applied to work, SpLD Feedback and Marking guidelines may be used.

A number of reasonable adjustments to examinations are already permitted as standard on the basis of a needs assessment being received and/or supporting evidence of a working diagnosis being provided. Some examples of standardised examinations adjustments are:

- Extra time
- Rest breaks
- Use of a scribe and/or reader
- Use of a computer
- Exam scripts to be flagged to marker
- Alternative format for exam papers
- Use of own equipment

- Provision of an adjustable chair/desk/footrest/writing slope.

Auxiliary Aids

Reasonable adjustments in the form of auxiliary aids may include:

- Support Workers
- Specialist Mentors and Study Skills Tutors
- Mental Health Mentors.

Use of Assistive Technology

Reasonable adjustments may include the use of assistive technologies, including digital tools designed to support learning and written expression (for example, spelling and grammar support software, text-to-speech tools, and AI-supported study tools), where appropriate to the individual's needs. The use of such tools must align with UCFB's Academic Integrity and Academic Misconduct Policy, Assessment and Feedback Policy, and any relevant awarding body requirements.

- 5.3.7. Where the mode of assessment puts a disabled student at a substantial disadvantage when compared with students who do not have that disability and the standardised adjustments to assessments are not effective in preventing the disadvantage, UCFB will consider other alternative modes of assessment, where it does not impact on the competency standards.
- 5.3.8. Requests for consideration of an alternative mode of assessment will be for exceptional cases and will be considered on a case-by-case basis by the Learning Support Team who will liaise the Academic Quality Team, Academic Team and/or Needs Assessors to determine what is possible, and reasonable, and does not compromise competency standards.
- 5.3.9. Individuals are responsible for requesting any reviews of implemented reasonable adjustments, if such adjustments are not proving to be effective in meeting their entitlements.
- 5.3.10. Requests for additional or changes to existing learning and teaching adjustments will be considered on a case-by-case basis by the Learning Support Team who will liaise the Academic Quality Team, Academic Team and/or Needs Assessors to determine what is possible, and reasonable, and does not compromise competency standards.
- 5.3.11. In deciding on the appropriateness of an alternative mode of assessment or changes to existing adjustments, the Academic Team will need to be guided by the competency standards for the course. The course specification should provide the basis for determining these.
- 5.3.12. It may not always be possible to provide an alternative mode of assessment, for example, where the mode of examination and the competency standards are inextricably linked, or where the course is accredited by a Professional, Statutory or Regulatory Body (PSRB). However, where a request is declined, the reasons for this decision will be

clearly communicated with reference to the key competencies of the course.

- 5.3.13. UCFB is not obliged to offer the student their preferred adjustment when an alternative reasonable adjustment would be equally effective.
- 5.3.14. Extension requests and Extenuating Circumstances are not automatically granted based on disability. All students will need to follow the correct processes for accessing these.
- 5.3.15. It is the responsibility of the student to ensure that information pertaining to their needs and adjustments are shared with relevant internal and external parties, especially when sessions are delivered by new or substitute staff, or where students may need adjustments on placements. On request, the Learning Support Team can help to facilitate this.
- 5.3.16. Where auxiliary aids or Non-Medical Helper services are provided by external providers and not UCFB, the individual is responsible for the management and implementation of these services. The Learning Support Team can advise and/or help to facilitate with consent from the student, however the student remains responsible for ensuring that they follow the DSA and provider guidance.
- 5.3.17. UCFB can provide advice and information on the types of funding that may be available. UK students are encouraged to apply for Disabled Students' Allowance (DSA). Where funding, aids or services are available to disabled students from other sources, UCFB will not be obliged to pay for an adjustment.
- 5.3.18. DSA is not available to EU/International Students, or if a student is getting equivalent support from another funding source. However, UCFB will work in partnership with EU/International Students to agree reasonable adjustments specific to their individual case. EU and International students are encouraged to investigate funding which may be available to them from their home country and/or sponsors and provide confirmation to UCFB of the outcome.

5.4. Accommodation

- 5.4.1. UCFB works in collaboration with student accommodation providers who have accessible rooms for disabled students.
- 5.4.2. UCFB does not own or manage any student accommodation within the institution. All accommodation across Wembley and Manchester Campuses are the property of leading private student accommodation providers. Should students wish to secure a room, the student must enter into a legal tenancy agreement with the accommodation provider. This is a separate standalone agreement between the student and the private provider (e.g., UNITE Students or IQ) and is entered into freely and independently of the institution (UCFB).

- 5.4.3. The UCFB Accommodation Team can provide advice and support on how to apply for adjustments in accommodation and will work together with the student and provider to make every reasonable attempt to accommodate individual needs.
- 5.4.4. Accommodation places are limited and made available on a first come, first served, basis and cannot be guaranteed.

5.5. Health and safety

- 5.5.1. UCFB has duties under the relevant legislation to ensure the health & safety and welfare at work of all staff, students and visitors and that its operations do not expose, staff, students and visitors to risks to their health & safety. As such the normal principles contained within UCFB's Health & Safety Policies will apply. It may be necessary, on occasion, to make special arrangements to ensure that a person's impairment, or an issue relating to it, does not create a hazard for themselves or for others.
- 5.5.2. In cases where staff and students have disclosed disabilities that affect their ability to exit the building in an emergency, they will be consulted by the Health & Safety function within the Facilities Department about their individual needs for evacuating the building in a safe and dignified manner. This will be in advance of any emergency and a personal emergency evacuation plan (PEEP) produced. Training regarding assisting staff, students and visitors with evacuation is provided by Facilities.
- 5.5.3. Full details of relevant Health & Safety Staff are circulated by the Facilities Team, along with site-specific evacuation guidance.

6. Related Policies and Procedures

- 6.1. This policy should be read in conjunction with UCFB's broader policies and procedures. All current and approved policies are published on [UCFB's Policies and Documentation webpage](#). Staff are responsible for ensuring they refer to the most up-to-date versions available on this page.
- 6.2. [Disabled Student Allowance \(DSA\) Guidance \(External Link\)](#)
- 6.3. [People and Culture related policies and Procedures](#) (staff access only)