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## EQPO document cover sheet

<b>Title</b>	Code of Practice: Access and Inclusion for Disabled Students
<b>Purpose</b>	Expectations and requirements across the collegiate university for the educational support of disabled students.
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# Code of Practice: Access and Inclusion for Disabled Students

## About this document

This Code of Practice details the expectations and requirements of the collegiate University for the educational support of disabled students. It is designed to articulate the behaviours, practices, and processes which best meet our legal and regulatory requirements. **Compliance with the Code of Practice is expected**, except where equal or better standards can be demonstrated through alternative practice.

This Code of Practice applies to all award-bearing courses (undergraduate and postgraduate, matriculated and non-matriculated) offered at the University.

While the presentation and format of this document have been updated, its substantive content remains consistent with the previous version. These changes were made to enhance clarity and accessibility, and to better reflect developments in legislation and regulatory guidance. The document has also been updated to more clearly represent the University's developing approach to inclusive practice.

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## 1 What is expected

All academic and support staff who have teaching, assessment, or educational support responsibilities must:

1. **Read, and act on, this Code of Practice.** It is expected that all collegiate University staff will understand this document and adhere to the practices outlined here, except where equal or better standards can be demonstrated through alternative practice. If alternatives are used, this must be documented.
2. **Read, and act on, Student Support Documents** you receive, putting into place any recommended adjustments. Sections 6 and 7 have further information about SSDs and adjustments, including when alternatives may be implemented.
3. **Respond quickly** to resolve any concerns raised by students about the implementation of adjustments, whether or not the student has an SSD.
4. **Consider your educational practice** and whether there are common adjustments you may make in advance, or for all students.
5. **Maintain appropriate records:** If a student discloses a disability to you, a secure written record of the disclosure should be made, and the student should be provided with details of how to contact the Access and Disability Resource Centre (ADRC). More details are available in Section 8.

We strongly encourage staff to:

6. **Complete the University's Moodle course:** [Inclusive Teaching and Learning for all students](#). This course aims to develop an understanding of best practice in the design and delivery of inclusive teaching and learning and was updated in July 2025. It is not mandatory but is strongly recommended, as it provides an excellent overview of how practice can be adapted and enhanced.
7. **Follow the six [Guiding Principles](#)** for Inclusive Teaching and Learning, developed by the Cambridge Centre for Teaching and Learning.
8. **Build considerations of inclusivity and accessibility** into curriculum design and programme review processes. Guidance on doing so is available from the sources above, or from the ADRC.

## 2 About disability

The University of Cambridge follows the [social model of disability](#). The social model says that society creates barriers that disable people, rather than seeing disability as a personal deficit. These barriers could be:

- physical, such as not having accessible teaching spaces or accommodation

- attitudinal, for example having an assumption about what disabled people can achieve at university
- organisational, for example having policies or practices that do not consider accessibility or disadvantage certain groups of students

Most barriers can be removed or their effects reduced.

### 3 Our legal requirement

The University has a legal obligation to ensure that disabled students are not at a substantial disadvantage compared to students who are not disabled. This is defined as more than minor or trivial. The legal duty is also anticipatory. This means that we must consider where substantial disadvantage *might* occur and, wherever possible, adapt policies, procedures, and practices in advance of a student asking for the adjustment. [Appendix 2](#) has further information about the legislative background of this duty.

Where such substantial disadvantage exists, the University must make reasonable adjustments to reduce or eliminate the disadvantage; there is more information about how ‘reasonable’ is assessed in [Section 7](#). The Equality Act states that there is no legal defence for a failure to make a reasonable adjustment. Making these adjustments does not advantage disabled students in comparison to their non-disabled peers; the adjustments allow for equal access to their education.

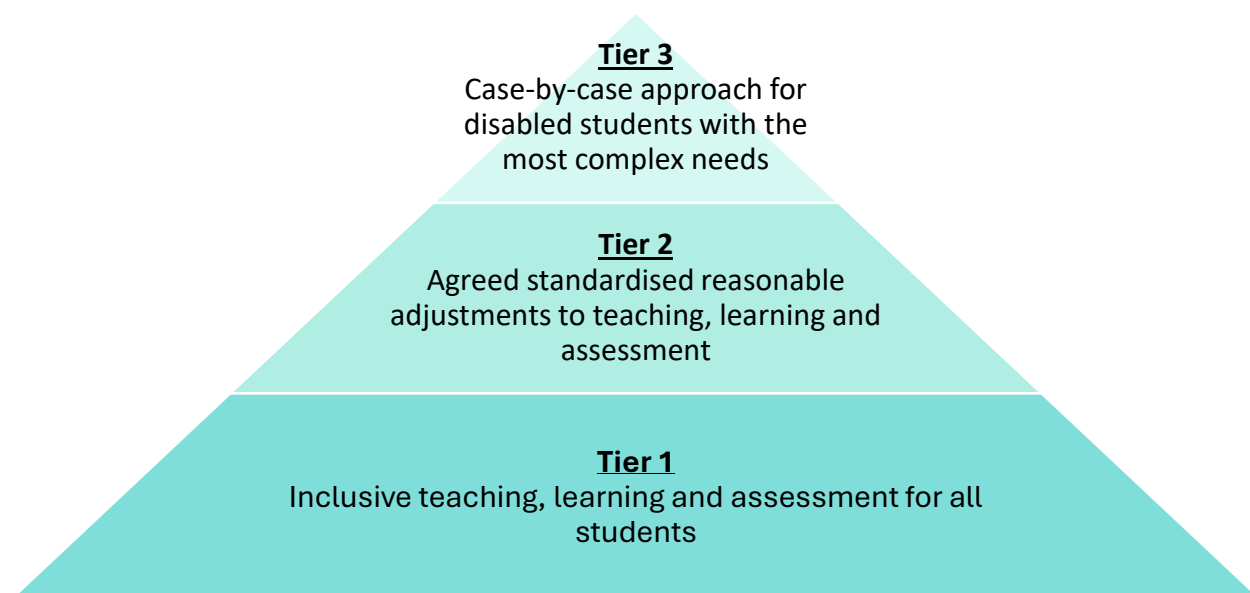
Students who are registered with the ADRC and require adjustments will be provided with a Student Support Document (SSD) which outlines recommended adjustments. This is the result of a formal assessment requiring medical or supporting evidence. **If an adjustment is recommended but is not provided, the University may fail to meet its legal duty.** [Section 7](#) has further information about recommended adjustments.

For the purposes of meeting our legal obligations, “the University” includes all parts of the collegiate University – colleges, faculties, and departments. Provisions of the Equality Act apply equally to international students.

### 4 Inclusive educational practice

Inclusive education is an approach to planning, organising, delivering, and assessing education that is designed to meet the requirements of the widest possible range of students.

The University has committed to increasing inclusive educational practice, and is adopting a pyramid model of disability support:



This is for three reasons:

- Inclusive education empowers all students, not just those with a disability.
- It is far less time-consuming to design educational experiences in an inclusive way, than to make multiple individual adjustments for multiple students.
- We are more likely to fulfil our anticipatory legal duty with inclusive educational practice.

Following an inclusive approach to education won't completely remove the need for individual adjustments, but it will reduce their number and complexity. It also doesn't mean starting from scratch; while building new materials with inclusivity embedded from the start is always of benefit, robust retrofitting of existing content can be just as effective.

The University has produced a Moodle course, [Inclusive Teaching and Learning for All Students](#), which aims to develop understanding of best practice in the design and delivery of inclusive teaching and learning. This course provides detailed guidance on how to implement inclusive teaching and learning at the degree, paper, and session levels. The course also contains insight from disabled students about the difference that inclusive education makes to them, and interactive examples of how SSDs are simplified and reduced as a result. The University strongly recommends that all staff complete this course.

## **5 Responsibilities**

With regard to identifying and implementing support for disabled students, the Accessibility and Disability Resource Centre (ADRC) is responsible for:

- Determining recommended adjustments following assessment of the submitted evidence.
- Compiling the Student Support Document and making it available via CamSIS.
- Maintaining data and records about disabled students, their requirements, and how they can be supported.

- Providing expert advice and support to the institution about its approach to supporting disabled students; it does this through contributing to policy such as this Code of Practice, offering training, consultation and support, and liaising with governing bodies.

Faculties and Departments (through their Faculty Boards or equivalent bodies) are responsible for:

- Ensuring that recommended adjustments to departmental teaching, assessment and library provision are put in place. This includes any necessary physical adaptations to departmentally-managed spaces, and steps to disseminate the SSD to relevant staff.
- Ensuring that teaching staff are aware of their responsibilities for supporting disabled students, and where to find support.
- Normally, designating a member of staff who coordinates support and can act as a point of contact for students, and a more senior member of staff accountable for ensuring that all requirements are met. Where there is no designated member of staff, it will be assumed for the purposes of this Code to be the Head of Faculty/Department/Institution.
- Keeping under review the success of their disabled students in comparison to non-disabled students, in respect of student satisfaction, attainment, retention, and progression to employment or further study. They should identify any gaps as well as steps needed to address them. This should normally be considered and minuted as part of an examiner's meeting or standard course review process.

Colleges are responsible for:

- Ensuring that recommended reasonable adjustments to college teaching, college library provision, and accommodation are put in place, including steps to disseminate the SSD to relevant staff.
- Supporting the student through checking and monitoring that the reasonable adjustments to *both* college and departmental provision have been made. They are required to have systematic processes in place for doing this, usually through the Director of Studies (DoS) or Graduate Tutor.
- Normally, designating a member of staff accountable for ensuring that all requirements are met, and who can act as a point of contact for students. Where there is no designated member of staff, it will be assumed for the purposes of this Code to be the Senior Tutor.

## 6 Student Support Documents (SSDs)

Every student registered with the ADRC who requires support or access arrangements will receive a Student Support Document (SSD). They are how we as an institution communicate the needs of individual students.

The SSD will provide:

- Information about the disability or impairment.

- Details of the effects this may have on study.
- Recommended adjustments to mitigate disadvantage.
- Contact details for the ADRC Adviser assigned to the student.
- A list of people with permission to see the document.

The SSD is generated following a comprehensive assessment with an ADRC Adviser, including analysis of diagnostic and/or medical evidence. So far as is possible, the ADRC works in consultation with the student, the college and the department to ensure recommendations are appropriate and achievable.

### **An SSD is not required to implement adjustments.**

SSDs are available within a student's CamSIS record. You will receive an email if you have access to a student's SSD. [Find out more about viewing the SSD in CamSIS](#). Appropriate distribution of SSDs is important because students expect those teaching and supporting them to be aware of how their disability or impairment impacts their learning, and what can be done to offset this disadvantage.

## **7 Recommended adjustments**

The student's SSD will recommend adjustments to the provision of teaching, learning, or assessment to mitigate the disadvantage the disabled student faces. If an adjustment is recommended, then the ADRC has determined that the student is at a substantial disadvantage and we have a legal duty to address this disadvantage.

Adjustments to mitigate disadvantage are evaluated for whether they are 'reasonable' or not; we are not required to make an adjustment if it would be unreasonable to do so. For example, it is deemed not reasonable to make an adjustment which would affect academic standards (see [Section 10](#) on Competence Standards) or that would put a student at an advantage compared to their peers.

**Where the ADRC has made a recommended adjustment, this adjustment is likely to be deemed 'reasonable'.**

### **Assessing adjustments**

Reasonableness is assessed uniquely in each case. To make this assessment, the ADRC uses formal guidance such as that issued by the Equality and Human Rights Commission and the Office of the Independent Adjudicator for Higher Education. The following points<sup>1</sup> are usually considered:

- Whether the adjustment affects a competence standard (see [Section 10](#)), or is a provision, criteria, or practice of the institution
- Health and safety considerations
- Efficacy of the adjustment

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<sup>1</sup> Summarised from the European Human Rights Commission (2014), *Equality Act 2010 Technical Guidance on Further and Higher Education*, Chapter 7, p.106

- The financial and other costs of making the adjustment, and the resources of the education provider<sup>2</sup>
- Practice across the higher education sector
- Relevant judgements from the courts, or the Office of the Independent Adjudicator for Higher Education
- The relevant interests of other people, including other students
- The extent to which it is practicable to take such steps

It is illegal to pass the cost of making an adjustment on to the disabled person.

Reasonableness can change:

- over time; what was once deemed reasonable may no longer be sufficient (for the student, or for the institution), and vice versa
- by student; what is reasonable for one student may not be appropriate for another, even if they have the same disability.

There are three adjustments which the General Board has deemed will always be “reasonable”, and **must** be implemented whenever they are recommended:

1. permit the student to make an audio recording of lectures, seminars or supervisions for their own use (see Appendix 4 for more information on recording);
2. provide the student with electronic copies of lecture materials in advance, for their own use;
3. provide directed reading lists differentiating between ‘essential’ and ‘desirable’ items.

Appendix 1 includes some examples of reasonable, and not reasonable, adjustments.

### **Am I required to make the recommended adjustments on an SSD?**

Not necessarily. Apart from the three adjustments listed above, you may be able to implement alternatives to the recommendations if these mitigate the disadvantage in an equivalent way. If you have concerns or queries about an adjustment that has been recommended, please [contact your ADRC Adviser](#) (this person is also indicated on the SSD) to discuss; together you may be able to identify alternatives that are equally effective in addressing the disadvantage.

### **A student without an SSD has asked for an adjustment**

An SSD is not a requirement to make an adjustment. Most students will have one, but in some cases they may have requested confidentiality (see below) or may be undergoing assessment. **If we require students to obtain an SSD before implementing an adjustment, we may not fulfil our legal duty.**

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<sup>2</sup> Note that, when considering the cost of a recommended access requirement and the resources of the provider, it is the financial resources of the Institution *as a whole* that are considered, not specific budgets or sources of funds which have been set aside for disability support.



If a student does not have an SSD, but requests an adjustment or displays signs of struggling or failure to engage<sup>3</sup>, staff should take steps to determine whether the student may have a disability and whether to put reasonable adjustments in place. You don't have to be an expert in disability support. The ADRC can support you to identify and take the appropriate action; [contact your ADRC Adviser](#) to discuss.

## 8 Disclosing a disability

Students are encouraged to disclose a disability at the earliest opportunity, so that support can be put in place as quickly as possible. This begins at the application stage, but disclosure may take place at any point during study.

There are a number of reasons for this:

- Students may not feel comfortable disclosing, particularly where they may feel stigmatised or vulnerable in doing so. This may be exacerbated for international students, by cultural differences or national differences in definition of disability.
- The changing demands as students progress through study (particularly the transition between levels of study) may mean that a student who has been coping well suddenly finds they are unable to mitigate the disadvantage through their usual means.
- Students may not be aware of their disability or have a clear understanding of its impact, or what adjustments may help to mitigate its effect.
- The student may be undergoing assessment but not has not yet received a formal diagnosis.

Once a student does disclose, action must be taken - regardless of who the disclosure has been made to. The University is legally bound to act where it is aware of a student's disability. In this case, "the University" includes any part of the collegiate University, for example the college, faculty or department. This means that **all parts of the collegiate University are legally bound to act when one part of it has been made aware of a student's disability** (unless the student requests confidentiality, as below).

As a result, it is important that all parts of the collegiate University have in place appropriate procedures to record, and share, information received about a student's disability.

### What to do if you receive a disclosure

If a student tells you they have a disability, or if you become aware that they might be disabled, it's important to respond supportively and help them to access the right help and information. You don't need to be an expert in disability support; just making the student feel heard and pointing them in the right direction can make a big difference.

The ADRC serves as the central hub for managing disability disclosure and recordkeeping. When a student makes a disclosure they should be asked, in writing, to consider registering

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<sup>3</sup> As examples, their behaviour with regard to lecture attendance, how they present in speaking with staff and peers, submission of work, or discrepancies in behaviour between certain modules or formats of assessment. See also the EHRC Guidance Note on the Abrahart case, linked in Appendix 5.

with the ADRC, as this is the best way to obtain support. Students have a legal right not to disclose their disability, so you cannot refer them to the ADRC yourself.

If you receive a disclosure:

1. Make a note of the disclosure. This does not need great detail; just the date, students' name, and nature of the disclosure. An email will suffice.
2. Signpost the student to the ADRC. The easiest way to do this is to email them with a link to the [ADRC's Student Information Form](#). This form is the first step in getting support.

A template email is available in Appendix 3, or you may direct them to the [ADRC's online consent form](#).

### **A student's right not to disclose**

A student has the right to refuse consent for their information to be shared with the ADRC and to have their disability treated as confidential insofar as the ADRC is concerned. This means that the ADRC will not be informed of the student, or their disability, and will not be able to fulfil its usual role in assessing and ensuring appropriate recommended adjustments.

To enable students to make an informed choice and to understand the potential consequences of their decision, they should be made aware of the ADRC's role and the support they provide. Their request for confidentiality may therefore have an adverse impact on the University's ability to share information appropriately to provide support for them, including our ability to meet duties under the Equality Act. For example, it may not be possible to provide some or all of the adjustments, or it may be possible only to implement alternative or less satisfactory adjustments. Appendix 1 has some examples of this.

## **9 Assessment**

A number of standard adjustments are permitted for assessment. These are called Examination Access Arrangements (EAAs) and are set out by:

- the [Examination Access and Mitigation Committee](#) (EAMC), for undergraduates and postgraduate taught qualifications;
- the Postgraduate Committee, for postgraduate research degrees.

These adjustments are determined on a case-by-case basis, after consideration of the evidence presented and context of the assessments. Colleges have an anticipatory duty to consider what requests need to be made for their students in respect of examination adjustments. Only adjustments approved by EAMC or PC are permitted.

Requests for EAAs are made by the College on the student's behalf. This usually results from recommendations in the SSD, after assessment of specialist or medical evidence. However, because students are not required to register with the ADRC, **a recommendation from the ADRC is not a prerequisite for a request for exam access arrangements**. It is permissible for colleges to make applications in cases where the student has presented evidence to the college that contains a clear justification for them.

## Adjusted Mode of Assessment (AMA)

In addition to adjustments to the length, time, place of examination and use of a computer, the General Board has also agreed that consideration should be given to adjusting the mode of assessment. This will, in most cases, entail the relevant authority (EAMC or PC) setting aside the regulations for the examination where there is no other alternative for effectively mitigating the disadvantage. To preserve the integrity of our awards, it is essential that rigorous arrangements are in place to consult teaching staff, who are experts in the subject area to be assessed. This is done through the Adjusted Mode of Assessment (AMA) process. The policy and procedure for AMAs are set out on the [Exam Operations and Mitigating Circumstances SharePoint page](#) and are the responsibility of the EAMC. Only adjustments approved by EAMC or PC are permitted.

## 10 Competence Standards

A competence standard is a required level of performance which must be attained to achieve a qualification. Each of our degrees imposes a range of requirements and conditions; however, they are not all competence standards.

A competence standard is distinct from the learning outcomes of the course; a learning outcome is what you *believe* students will achieve, whereas a competence standard is what they *must* demonstrate to qualify. There is no legal requirement to make adjustments to competence standards as the achievement of that competency is an absolute requirement. The mode of assessment is very rarely a competence standard.

Competence standards must meet strict criteria. In every case, a competence standard **MUST**:

- **Define a core skill:** is there a specific skill or ability required to obtain the award in question?
- **Be measurable:** can this skill be measured in a reliable and objective way?
- **Have a metric:** is there a clear method or tool used to assess whether the skill is present?
- **Set a standard:** is there a threshold or benchmark that clearly defines what counts as 'competent' (pass/fail)?

**If any of these elements is missing, then it is not a competence standard** and a reasonable adjustment must be applied.

Appendix 1 has examples of competence standards. For more information, see the ADRC's one-page guide to competence standards, or contact your ADRC Adviser.

## 11 Where to find help

If you have queries about SSDs, recommended adjustments, or how to support disabled students, contact the ADRC. Each faculty or department has a [named Adviser](#) who is familiar with disciplinary practice and needs. The ADRC has also produced detailed guidance for [Working with disabled students](#).

If you have queries about educational design or practice, contact the [Cambridge Centre for Teaching and Learning](#). The Moodle course [Inclusive Teaching and Learning for all students](#) is also a helpful resource.

Appendix 5 collates a range of further reading and resources.

Students with concerns about the implementation of recommended adjustments should contact their College in the first instance, or seek advice from the ADRC.

## Appendix 1 Examples

This section contains examples excerpted from the EHRC Technical Guidance and the OIAHE Good Practice Framework (see Appendix 5 for full references and links). They are designed to demonstrate how reasonable adjustments and competence standards are used in practice.

### Competence standards

An individual with dyspraxia [studying biochemistry] is having significant difficulty in following instructions, especially more than one at a time, and has difficulty with concentration. There is also evidence that her poor motor coordination may put other students at risk during practical experiments. The university ... arranges for a support worker in practicals who can carry out the experiments under the disabled student's instruction, but her difficulties with forming and following instructions mean that she is not able to instruct the support worker safely and effectively. Despite making a number of reasonable adjustments, the university recognises that there are continuing risks to the student and others and it is considered that she is unable to continue on the course as it is not possible for her to participate safely.

*EHRC Technical Guidance, p.98*

A provider decides that a competence standard in relation to a course is the ability to reproduce and apply knowledge under timed conditions without access to reference materials. A student has a specific learning disability. The provider requires the student to sit a timed examination under controlled conditions but puts in place adjustments to the examination arrangements including additional time; a separate room; examination papers on coloured paper; and use of a computer (only to record his answers). This ensures that the assessment still tests the student's ability to reproduce and apply knowledge appropriately but minimises the disadvantage to the student.

*OIAHE [Good Practice Guide](#), Case Study 6*

A woman taking a written test ... asks the education provider for extra time for the test because she has dyslexia. This is likely to be a reasonable adjustment for the education provider to make. She also asks if she can leave out the questions asking her to write a business letter and to précis a document, because she feels that these questions would substantially disadvantage her because of her dyslexia. The education provider would not have to make this adjustment because these questions are there to determine her competence at writing and précising, so are part of the competence standard.

*EHRC Technical Guidance, p.114*

### Confidentiality and Information sharing

A student with HIV is on a chemical engineering course. His condition means that he sometimes needs to have time off for medical appointments. His course coordinator offers to speak to his tutors so they can make arrangements for him to catch up on the work he has missed, for example, by providing extra time in the laboratory after hours. However, he has refused this adjustment because he doesn't want his tutors to know about his condition. As an alternative, the course coordinator offers to provide him with extra lecture notes which may be a less effective adjustment but will maintain confidentiality.

*EHRC Technical Guidance, p.110*

A student with a visual impairment can only read clearly if he has text enlarged into 16-point type. He has requested strict confidentiality. Normally his tutors, as a reasonable adjustment, would give a visually impaired student large-print handouts at the beginning of each class. However, because he has asked the tutors not to tell any of his fellow students about his disability or to draw attention to it in any way, they agree to give him his handouts in advance so that he can look at them before the lesson but does not have to be seen reading them during class.

*EHRC Technical Guidance, p. 109*

A student... has chronic heart disease and finds walking up stairs and for long distances tiring. He tells one of the administrators this when enrolling, but she does not realise that this will impact on his ability to go to classes at the top of the building or at the college campus on the other side of town. He is allocated to classes which are on the third floor ... and he finds these classrooms very difficult to access. As a member of college staff is aware of his disability the college would not be able to claim that it did not know he had a disability and therefore cannot avoid liability for any discrimination arising from his disability.

*EHRC Technical Guidance, p.100*

### **Recommended reasonable adjustments**

A person with a visual impairment regularly receives printed handouts in lectures, despite the fact that on previous occasions he has indicated his need for Braille and this has been provided. He finds this repeated need to ask for Braille frustrating and inconvenient as he does not receive the handouts at the same time as other students. This may constitute a failure to make reasonable adjustments if it is judged to have left the disabled student at a substantial disadvantage and there was a reasonable adjustment that could have been made.

*EHRC Technical Guidance, p.107*

A lecturer on an English Literature course [...] does not use slides, handouts or other visual materials, expecting the students to bring the set texts so he can refer to them as needed. However, a blind student who uses audio versions of the texts cannot navigate to the relevant portion of the text while continuing to listen to the lecture. It is likely to be a reasonable adjustment for the lecturer to indicate in advance which passages will be used in the lecture, and to read key passages aloud in the course of discussion.

*EHRC Technical Guidance, p.111*

A disabled student has a reasonable adjustment that causes him to need short rest breaks due to fatigue. For the final 15 minutes of each class, the tutor asks students to complete a written exercise. Before this exercise, the tutor allows the student a short rest break if required. The other students complain that they have to wait an additional few minutes for the disabled student. However, the delay does not significantly adversely affect the group to the extent that it makes the adjustment unreasonable. [...]

*EHRC Technical Guidance, p.131*

## Appendix 2: Legislative background

The Equality Act 2010<sup>4</sup> requires all universities not to discriminate against disabled students. Section 6 of the Act defines disability as follows: “A person has a disability if they have a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities<sup>5</sup>.”

Section 20 of the Act<sup>6</sup> imposes a duty on HE providers to make ‘reasonable adjustments’ for disabled students in relation to:

- **A provision, criterion or practice<sup>7</sup>**, for example teaching and assessment methods
- **Physical features**, for example access to lecture theatres, labs, teaching rooms
- **Auxiliary aids**, whose definition includes auxiliary services, for example hearing loops, information in accessible formats, or the provision of Non-Medical Assistance (NMA) support.

The substance of the duty is: where any of the University provisions puts a disabled student at a substantial disadvantage in comparison with students who are not disabled, the University is required to take reasonable steps. A substantial disadvantage is defined by the Equality Act as one that is more than minor or trivial. The key factor, therefore, in assessing whether adjustments are required is whether the disabled student is put at a substantial disadvantage relative to their non-disabled counterparts. Consequently, the purpose of the duty is not to confer an unfair advantage on disabled students, but to remove barriers to learning and objective assessment, where it is reasonable to do so.

The duty is anticipatory; staff should not wait until adjustments are proposed, rather they look to ensure, where possible, that alterations to policies, practices, and procedures have been made in advance to prevent disabled students experiencing substantial disadvantage. The anticipatory duty would extend to a requirement to anticipate specific adjustments, which might be required for an individual student, without a specific request from them. Examples of such anticipatory adjustments include: providing electronic directed reading lists in advance; electronic and accessible teaching and learning materials in advance (e.g., lecture slides); moving a teaching session to an accessible location; providing recordings of lectures (with closed captions).

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<sup>4</sup> The Equality Act 2010 replaced the Disability Discrimination Act (DDA, 1995, amended 2001, 2005). The Special Educational Needs and Disability Act (SENDA 2001) introduced the concept of ‘reasonable adjustments’ to the provision of higher education. The 2005 revision to DDA placed a ‘positive statutory duty’ on public bodies (including the University) to have due regard to the need to promote equality of opportunity between disabled and other persons, and to avoid disability-related discrimination (among other obligations). All these provisions have been incorporated into the Equality Act 2010.

<sup>5</sup> Further guidance on the definition of disability can be downloaded from the gov.uk website at [Definition of disability under the Equality Act 2010](#).

<sup>6</sup> <http://www.legislation.gov.uk/ukpga/2010/15/section/20>

<sup>7</sup> The phrase ‘provision, criterion or practice’ is not defined by the Act. These concepts should be construed widely so as to include, for example, any formal or informal policies, rules, practices, arrangements, criteria, procedures, activities or provisions. They can cover one-off decisions and actions. In simple terms, they are about the way an education provider does things. (Excerpt from the EHRC Technical Guidance on further and higher education)

Disabled students represent over 25% of the current student population at the University of Cambridge. Therefore it is reasonable that colleges and departments can be expected to anticipate that each year:

- they will have students who use screen-reading software and other assistive technologies and will need to be provided with accessible materials;
- that there will be students with physical or sensory impairments which require teaching and learning environments to be accessible;
- that there will be students with unseen disabilities, such as dyslexia, ADHA, autism and mental health conditions;
- and students with long-term health conditions who will need a range of adjustments and support.

Advice and guidance on [how to anticipate the access requirements](#) of all these cohorts can be found on the ADRC webpages.

There is no legal defence for the failure of an institution to make a reasonable adjustment. This would be interpreted as discrimination under Section 21 of the Act<sup>8</sup>. The current guidance from the Quality Assurance Agency (QAA), Department for Education (DfE), and the Office for Students (OfS) stresses that wherever possible the requirements of disabled students should be anticipated and designed into the curriculum, with an aim to reduce the proportion of adjustments applied in those circumstances where inclusive design has not been possible. As well as improving the experiences of disabled students and their access to learning, this approach also means the removal of time- and resource-intensive administrative processes as well as academic staff having to manage short-notice requests for adjustments to teaching and learning materials and resources.

The implementation of adjustments aims to prevent the disabled student from experiencing substantial disadvantage as a result of their disability and hence to allow them to achieve their maximum potential but, in defining ‘reasonableness’, institutions are not required to compromise competence standards of the courses in question. Within the Act, competence standards are defined as the ‘academic, medical, or other standard(s) applied for the purpose of determining whether or not a person has a particular level of competence or ability’<sup>9</sup>. A competence standard must not in itself be unlawfully discriminatory. It must therefore apply equally to all students, be genuinely relevant to the course, and be a proportionate means of achieving a legitimate aim.

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<sup>8</sup> <http://www.legislation.gov.uk/ukpga/2010/15/section/21>

<sup>9</sup> [Equality Act 2010, Schedule 13, paragraph 4.3](#)



### Appendix 3 Template email for disclosure

As noted in [Section 8](#), if a student discloses a disability to you they should be encouraged to contact the ADRC to register with them. The template below can be used to respond to the student.

Subject: Support from the Accessibility and Disability Resource Centre

Dear [Student's Name],

Thank you for sharing information about your circumstances. I wanted to make sure you're aware that the University has a dedicated service—the Accessibility and Disability Resource Centre (ADRC)—which supports students with a wide range of disabilities, health conditions, and specific learning difficulties.

If you haven't already been in touch with them, the best next step is to complete the ADRC's [Student Information Form](#).

This form helps the ADRC understand your access/support requirements and begin the process of putting appropriate support in place.

If you have any questions or would like to talk further, I'm happy to help where I can.

Best wishes,

[Your Name]

[Your Role/Department or College]

### Appendix 4: Recordings of teaching sessions

Access to recordings is a commonly recommended adjustment to teaching and learning. It can remedy the disadvantage experienced by students with a wide range of disabilities. Disabled students may also require recordings in lieu of a designated note-taker, or they may struggle to be physically present at all sessions. Providing access to recordings for all students is the most inclusive and accessible method of approaching recordings; however, it is recognised that there may be pedagogical reasons for not providing wider access and so recordings may be restricted only to students with a formal recommendation for this adjustment.

**In all cases, students must be given clear guidance on what will, and what will not, be available to them and how to access it.**

Where recordings are provided, it is normally anticipated that this be managed by the Department utilising central lecture capture equipment, whether or not the recording is provided to all or restricted only to disabled students.

If the session itself is not suitable to be recorded – for example, if it is highly interactive or contains sensitive material – then **alternative provision must be made for students who have a recommended adjustment for access to recordings**. These alternatives will vary depending on the students' needs and the type of session, but examples may include the following, or a combination thereof:

- a. Providing an edited recording, removing any elements which may not be suitable.
- b. Before the session, providing a summary of what students are expected to obtain from it; this may be provided as notes, a set of slides, or a short, pre-recorded video of key concepts to be covered. This can assist all students in notetaking and revising, but may be particularly helpful for disabled students.
- c. Providing annotated or extended handouts or notes, highlighting the key learning outcomes from the session.
- d. Designing recap or repetition across subsequent lectures or classes, to help students regularly consolidate learning; this can assist all students in making connections across sessions, but may be particularly helpful for disabled students.
- e. Providing the disabled student with note-taking support.

The University's [Guidance on Recording](#) provides reasons why the burden of making a recording should not be passed on to the student. However, in some rare cases it may be appropriate to permit students to make their own recordings. In such situations students should be directed to agree to the ADRC's [Agreement for the Recording of lectures, seminars, and supervisions](#).

## Appendix 5: Reading and resources

- Accessibility and Disability Resource Centre; [Working with Disabled Students](#)  
These pages contain general information about supporting particular types of disability, creating accessible documents, and inclusive practice.
- Office of the Independent Adjudicator for Higher Education (2017) [Good Practice Framework: Supporting Disabled Students](#)  
This sets out principles and operational guidance intended to guide providers in developing their approach, issued by the body which reviews student complaints and appeals.
- Office for Students, [Supporting Disabled Students](#) resources  
This page collates a range of resources and information for higher education providers.
- Equality and Human Rights Commission (2014), [Equality Act 2010: Technical guidance on further and higher education](#) (specifically Chapter 7, pp.102-134)  
This is a comprehensive document which interprets the Equality Act and its applicability in a range of scenarios.

- Equality and Human Rights Commission (2024), [\*Advice note for the higher education sector from the legal case of University of Bristol vs Abrahart\*](#)  
This guidance note provides a summary of the landmark legal case of Abrahart v Bristol, and its impact on what legal compliance with the Equality Act looks like. This should be read in full by all staff, with particular emphasis on the section on what we think compliance with the law now looks like. The guidance focuses particularly upon the anticipatory duty to make reasonable adjustments and also on the requirement to use competence standards.
- Cambridge Centre for Teaching and Learning (2021), [\*Guiding Principles\*](#) for inclusive teaching and learning.  
These principles have been approved by the General Board's Education Committee (GBEC) as a framework for the development of inclusive practice.