

# ITALIA CONTI

## **Disability, Additional Learning Support (ALS) and Reasonable Adjustments Policy**

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This policy will be reviewed by the Policy Steering Group and AQB annually.

# ITALIA CONTI

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## 1. Purpose

- 1.1. The purpose of this policy is to set out Italia Conti's approach to supporting disabled students, students with additional learning needs, and students who experience barriers to learning. It explains how students may access Additional Learning Support, how reasonable adjustments are considered and implemented, and how Italia Conti promotes inclusive learning, teaching and assessment across its FE and HE provision.
- 1.2. This policy is designed to ensure that students receive support and adjustments in a fair, timely and proportionate manner, so that they are not unreasonably disadvantaged or advantaged in accessing their course, participating in learning, or demonstrating their achievement.
- 1.3. The policy recognises that disability, additional learning needs and barriers to learning are related but not identical. Some students may be disabled within the meaning of the Equality Act 2010. Some students may require Additional Learning Support without having a formal diagnosis or identifying as disabled. Some students may need temporary, targeted or anticipatory support in response to specific barriers to learning.
- 1.4. Italia Conti is committed to enabling students to participate as fully as reasonably practicable in academic, practical, vocational and wider student life, while maintaining legitimate academic standards, professional competency standards, safety requirements and essential course outcomes.
- 1.5. This policy provides a framework for identifying support needs, considering reasonable adjustments, coordinating Additional Learning Support, and ensuring that staff understand the appropriate routes for referral, escalation, implementation and review.
- 1.6. This policy should be read alongside the **SEND Policy and Information Report**, the **Support Through Studies Policy**, the **Student Support and Wellbeing Policy**, relevant assessment regulations, and any applicable partner university or awarding body requirements. It does not replace those policies or create parallel processes where a more specific policy route applies.

## 2. Scope

- 2.1. This policy applies to students enrolled on Italia Conti FE and HE courses. Where relevant, it also applies to applicants, prospective students, and students who are in the process of admission, audition, enrolment, induction or transition onto a course.
- 2.2. This policy applies to disabled students, students with additional learning needs, students who experience barriers to learning, students who have previously received learning support, and students who may require reasonable adjustments or Additional Learning Support in order to access their course.
- 2.3. This policy applies whether or not a student has a formal diagnosis, medical evidence, diagnostic assessment, Education, Health and Care Plan, previous support record, or formal disability disclosure. Where evidence is required for a specific adjustment, funding route or external process, this will be explained to the student.

2.4. This policy also applies to staff involved in admissions, audition, enrolment, induction, teaching, learning, assessment, rehearsal, performance, student support, wellbeing, course management, quality assurance and academic leadership, insofar as they have responsibilities for identifying, referring, implementing, recording, reviewing or escalating support needs and adjustments.

2.5. This policy covers:

- disability-related support and reasonable adjustments;
- Additional Learning Support;
- inclusive teaching, learning and assessment practice;
- routine adjustments to support access to learning;
- referral and self-referral routes for learning support;
- coordination between ALS, SEN, academic, wellbeing and quality assurance staff;
- the distinction between routine support, significant adjustments, SEND-specific processes, wellbeing support and other formal policy routes.

2.6. This policy does not lower or remove academic standards, professional competency standards, safety-critical requirements, assessment criteria or essential course outcomes. Reasonable adjustments and Additional Learning Support are intended to support access, participation and fair opportunity to demonstrate achievement.

### 3. Relationship with Other Policies and Procedures

3.1. This policy should be read alongside relevant Italia Conti policies and procedures, partner university regulations and awarding body requirements. It does not replace or override more specific policy routes where those routes apply. Where more than one policy may be relevant, staff should identify the appropriate lead policy route based on the nature of the concern, the level of risk, the type of support or decision required, and any statutory, regulatory, academic, safeguarding or professional training requirements.

3.2. Staff must avoid creating informal, parallel or contradictory processes. Where support needs cross more than one policy area, the relevant teams should coordinate support through the appropriate lead policy route, with clear ownership, communication and record-keeping.

#### 3.3. SEND Policy and Information Report

This policy should be read alongside the **SEND Policy and Information Report**, where applicable. The SEND Policy and Information Report remains the primary policy for matters relating specifically to statutory SEND provision, including SEND identification, the graduated response, SEN monitoring, Education, Health and Care Plans, annual reviews, and liaison with parents, carers, local authorities or external agencies. This policy does not replace, duplicate or amend the SEND Policy and Information Report.

#### 3.4. Support Through Studies and Fitness to Train

This policy should be read alongside the **Support Through Studies Policy** and, where relevant, the **Fitness to Train Panel**. Where a student requires significant adjustments to engagement, attendance or learning experience, these must be considered under Stage 2 of the Support Through Studies Policy and recorded through an Individual Learning Plan where agreed. Where a concern relates to a student's ability to participate safely, appropriately or professionally in training, rehearsal, performance, placement, industry-facing activity or other course-related activity, the Fitness to Train Panel may also need to be considered.

### 3.5. Safeguarding and Child Protection

Where a concern gives rise to an immediate or significant safeguarding issue, the **Safeguarding and Child Protection Policy** must be followed. This policy must not be used as an alternative to safeguarding referral, reporting or escalation, and safeguarding requirements take precedence where there is a risk of harm or a statutory safeguarding concern.

### 3.6. Student Support and Wellbeing Policy

This policy should be read alongside the **Student Support and Wellbeing Policy**, which sets out Italia Conti's wider approach to student wellbeing, pastoral support, signposting, external referral and support outside the teaching, learning and assessment relationship. Where the primary concern relates to wellbeing, pastoral support, mental health support or external support needs, the Student Support and Wellbeing Policy will normally be the more appropriate policy route.

### 3.7. Assessment, Partner University and Awarding Body Requirements

Where reasonable adjustments or Additional Learning Support relate to assessment, the relevant assessment policy, academic regulations, partner university requirements and awarding body requirements must be followed. Reasonable adjustments to assessment must support fair access to assessment without compromising assessment integrity, academic standards, course learning outcomes, professional competency standards or awarding body requirements.

## 4. Policy Principles

- 4.1. Italia Conti is committed to the principles of inclusion and equal opportunities for all. The institution aims to create an inclusive, safe and supportive environment in which disabled students, students with additional learning needs and students who experience barriers to learning can participate as fully as reasonably practicable.
- 4.2. Italia Conti will seek to ensure that students receive support and adjustments in a fair and timely manner and are not unreasonably disadvantaged or advantaged in accessing their course, participating in learning, or demonstrating their achievement.
- 4.3. Italia Conti recognises that not all students with additional needs will have, or be able to provide, formal evidence of a disability or diagnosis. Lack of formal diagnosis does not automatically prevent a student from accessing appropriate Additional Learning Support.
- 4.4. Italia Conti will take anticipatory action, where reasonably practicable, to enhance the accessibility of its facilities, services, learning environments and academic processes.

Inclusive teaching, learning and assessment practice will be the first step in reducing barriers to learning.

- 4.5. Support and adjustments will be considered on an individual basis, taking account of the student's circumstances, the nature of the course, available evidence where required, operational feasibility, health and safety, and relevant academic, professional or regulatory requirements.
- 4.6. Support and adjustments are intended to enable fair access and participation. They must not compromise legitimate academic standards, professional competency standards, safety requirements or essential course outcomes.
- 4.7. Italia Conti will not tolerate unlawful discrimination, harassment and victimisation, promote equality of opportunity, and foster good relations between disabled people and others.
- 4.8. Italia Conti will not tolerate discrimination, harassment or bullying of disabled students, students with additional learning needs, or staff with disabilities. Concerns will be addressed through the appropriate institutional policy or procedure.

### 5. Definitions

- 5.1. A **disability** is a physical or mental impairment that has 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, or is likely to last, for at least twelve months, or for the duration of the individual's lifetime.
- 5.2. **Additional Learning Support (ALS)** refers to academic-focused support for students who experience barriers to learning. This may include students with learning differences, students without a formal diagnosis, students who have previously received support, students with alternative educational backgrounds, students experiencing temporary barriers to learning, and students who require targeted support to access aspects of their course.
- 5.3. A student may have **additional learning needs** where they experience barriers to learning or participation that may require additional, different or targeted support. This can include, but is not limited to, English as an additional language, a learning need or difference without formal diagnosis, personal challenges with academic study, personal challenges with mental health, short-term illness leading to absence, or students with alternative qualifications.
- 5.4. A **reasonable adjustment** is an adjustment to a policy, procedure, practice, learning environment, assessment arrangement or method of communication that removes or reduces a specific disadvantage or barrier and enables a disabled student, or a student with an additional learning need, to participate more fully in their course. For students who are not disabled within the Equality Act definition, similar practical support may be considered as Additional Learning Support or learning access support. This policy should not be read as treating every ALS request as a statutory reasonable adjustment duty; Italia Conti may still provide appropriate, fair and proportionate support where the student is experiencing barriers to learning.

- 5.5. An **anticipatory adjustment** is an adjustment or inclusive practice introduced in advance to reduce barriers to access, learning or participation, rather than waiting for an individual student to request support. Anticipatory adjustments may benefit disabled students, students with additional learning needs and the wider student body.
- 5.6. A **competency standard** is an academic, practical, professional, technical, safety-critical or vocational requirement that a student must demonstrate in order to meet the learning outcomes, professional expectations or essential requirements of their course. Reasonable adjustments may support the way a student accesses learning or assessment, but they do not require Italia Conti to remove legitimate competency standards.
- Where a course, assessment, rehearsal, performance, placement or professional requirement is treated as a competency standard or essential course outcome, the relevant course team must be able to identify the standard, explain why it is essential, distinguish the standard from the method of assessment or demonstration, and record where an adjustment to the method has been considered but the standard itself cannot be removed. Relevant information should be made available through approved course, assessment or applicant/student information where practicable.
- 5.7. **Individual Learning Plan (ILP)** is the formal written document used by Italia Conti to record significant agreed adjustments to a student's engagement, attendance or learning experience. ILPs are devised under **Stage 2 of the Support Through Studies Policy** and may draw on relevant input from course staff, wellbeing staff, learning support staff, safeguarding staff, medical practitioners, specialist practitioners or other appropriate professionals.
- 5.8. **Additional Learning Support Plan (ALSP)** is a record of a student's additional learning support needs and agreed support strategies. It may include information about a student's learning profile, recommended teaching approaches, assistive technology, communication preferences, sensory considerations, or other learning-related support.
- 5.9. Special Educational Needs and Disabilities, or **SEND**, refers to the statutory framework for students who have a learning difficulty or disability which calls for special educational provision to be made for them. Matters relating specifically to statutory SEND provision are governed by the SEND Policy and Information Report.

## 6. Disability and Equality Act Duties

- 6.1. Italia Conti is committed to meeting its duties under the Equality Act 2010. The Equality Act identifies disability as a protected characteristic and includes duties relating to discrimination, harassment, victimisation and reasonable adjustments.
- 6.2. For the purposes of this policy, disability is defined in Section 5.1. Italia Conti aims to create an inclusive environment that enables disabled students to participate as fully as reasonably practicable in academic, practical, vocational and wider student life.
- 6.3. Italia Conti will make reasonable efforts to identify and respond to disability-related needs, including through:
- admissions and audition processes;
  - disclosure opportunities;
  - enrolment and induction;

- teaching, learning and assessment;
- student support and wellbeing routes;
- reasonable adjustment processes.

- 6.4. For applicants and prospective students, reasonable adjustment requests connected with admissions, audition, enrolment, induction or transition should be considered through the relevant admissions or audition route, recorded with the rationale for the decision, and escalated to academic leadership, Safeguarding / Wellbeing / SEN, AQB or partner routes where the request may affect academic standards, assessment of entry requirements, professional competency expectations, health and safety or regulatory compliance risk.
- 6.5. Italia Conti will consider reasonable and proportionate anticipatory adjustments wherever practicable. These may include adjustments to:
- facilities and services;
  - learning environments;
  - teaching, learning and assessment practices;
  - communication and access to information;
  - support routes and referral processes.
- 6.6. Italia Conti will take account of a disabled person's disability, which may involve treating a disabled person more favourably where this is necessary to ensure they are treated fairly.
- 6.7. Italia Conti will seek to eliminate unlawful discrimination, harassment and victimisation, promote equality of opportunity, and foster good relations between disabled people and others.
- 6.8. Staff with responsibilities under this policy must receive proportionate induction or refresher guidance on referral routes, implementation of agreed adjustments, confidentiality, escalation, record keeping and the distinction between Additional Learning Support (ALS), reasonable adjustments, SEND, Support Through Studies / Fitness to Train, safeguarding and complaints routes. Completion and effectiveness of this guidance should be capable of being evidenced through staff records, team briefings, committee reports or quality assurance activity.
- 6.9. Reasonable adjustments are intended to support access, participation and fair opportunity to demonstrate achievement. They do not require Italia Conti to remove legitimate academic standards, professional competency standards, safety requirements or essential course outcomes.

## **7. Additional Learning Support (ALS)**

- 7.1. Additional Learning Support (ALS) provides academic-focused support for students who experience barriers to learning. Students may benefit from ALS whether or not they have a formal diagnosis, disability disclosure, formal evidence or previous support record.
- 7.2. Additional Learning Support (ALS) may support students with a range of learning needs or barriers, including but not limited to:

- learning differences;
- literacy, numeracy, organisation, concentration, processing or memory;
- academic study skills or confidence;
- previous educational experience or alternative qualifications;
- English as an additional language;
- short-term illness;
- mental health-related barriers to learning.

7.3. Italia Conti recognises that not all students with additional needs can provide evidence to support a disability or formal diagnosis. Lack of formal diagnosis does not automatically prevent a student from accessing appropriate Additional Learning Support (ALS), although evidence may be required for some adjustments, funding routes or external processes.

7.4. At enrolment, students are asked to share any additional learning needs that they may require support for. Upon declaring this support need, the student is asked to complete a Study Skills Questionnaire to identify their support needs and to inform their Additional Learning Support Plan (ALSP).

7.5. Students who identify a need after enrolment or during training, can self-refer for additional learning support by contacting the wellbeing team.

7.6. ALS is intended to support students to access learning, develop effective study strategies, build confidence and participate more fully in their course. Support should be provided in a fair and timely manner, be proportionate to the student's needs, and aim, wherever possible, to develop independence and self-management.

7.7. Students may be referred to Additional Learning Support (ALS) by:

- academic staff;
- course teams;
- course administrators;
- the Wellbeing Team;
- ALS, SEN or specialist support staff;
- other relevant staff.

Students may also self-refer using the contact routes provided by Italia Conti, including information published in student handbooks, induction materials or on the website.

7.8. Additional Learning Support (ALS) may include:

- one-to-one support;
- small-group support;
- study skills advice;
- targeted short-term intervention;
- support at key pressure points in the academic year;
- advice on assistive technology;
- screening conversations or study skills questionnaires;
- guidance on strategies for accessing learning materials, preparing for assessment and managing academic work.

7.9. Additional Learning Support (ALS) should complement, not replace, inclusive teaching, appropriate differentiation and accessible learning practices. Where a student's needs fall within any of the following areas, the relevant policy route must be followed:

- statutory SEND provision;
- significant adjustments to engagement, attendance or learning experience;
- assessment adjustments or assessment integrity;
- safeguarding or child protection;
- wellbeing or external support;
- fitness to train or professional suitability.

### 8. Reasonable Adjustments and Individual Learning Plans

8.1. Reasonable adjustments are intended to remove or reduce barriers that may prevent a disabled student, or a student with an additional learning need, from accessing learning, participating in their course, or demonstrating their achievement fairly.

8.2. Reasonable adjustments may relate to:

- teaching, learning and assessment arrangements;
- access to learning materials or information;
- communication methods;
- use of assistive technology;
- physical access or access to facilities;
- rehearsal, performance, studio or practical learning environments;
- timetable access or participation arrangements, where appropriate.

8.3. Additional Learning Support, and/or routine or low-level reasonable adjustments may be considered and implemented through this policy where they support access to learning and do not require significant changes to a student's engagement, attendance, timetable participation or wider learning experience. An **Additional Learning Support Plan (ALSP)** will be created by a member of the additional learning support team, uploaded to ProMonitor, and made accessible to the student's tutors.

8.4. Where a student requires significant adjustments to engagement, attendance or learning experience, these must be considered under Stage 2 of the **Support Through Studies Policy** and recorded through an **Individual Learning Plan**.

8.5. An Individual Learning Plan is the formal mechanism for recording significant agreed adjustments to engagement, attendance or learning experience. No separate or parallel "support plan", "learning plan", "student support plan" or equivalent mechanism should be created under this policy for those adjustments.

8.6. In considering whether an adjustment is reasonable, Italia Conti may take account of:

- the student's individual circumstances and support needs;
- available evidence, where required;
- the nature and purpose of the requested adjustment;
- the requirements and learning outcomes of the course;
- academic standards, professional competency standards and assessment integrity;
- health, safety, safeguarding and fitness to train considerations;

- operational feasibility and available resources;
- the impact of the adjustment upon the wider student and staff body;
- relevant partner university or awarding body requirements.

8.7. Reasonable adjustments support fair access and participation, but they do not require Italia Conti to remove legitimate academic standards, professional competency standards, safety requirements or essential course outcomes.

8.8. Where an adjustment is agreed, partly agreed or not agreed, the decision must be recorded, including the adjustment requested, evidence or advice considered, the rationale for the decision, any alternative support offered, the review point where relevant, and how the outcome was communicated to the student and relevant staff. Decisions must be proportionate, case-by-case and capable of being evidenced if reviewed through complaint, appeal, partner university or regulatory assurance routes.

8.9. Agreed adjustments should be reviewed where appropriate, particularly where the student's needs change, the course context changes, the adjustment is no longer effective, or the adjustment affects engagement, attendance, assessment, safety, professional training or the wider learning experience.

8.10. Where support or adjustments relate to rehearsals, productions, performances, showcases, placements or other industry-facing activity, the relevant course or support team must consider the arrangements in advance, agree with the student what information may be shared with internal staff or external hosts on a need-to-know basis, record the agreed arrangements, and check whether the adjustment has been implemented. Health and safety, safeguarding, fitness to train, assessment or partner-regulation implications must be escalated through the relevant policy route.

### **9. Inclusive Teaching, Learning and Assessment**

9.1. Italia Conti will aim to provide an inclusive learning environment at all times. Inclusive teaching, learning and assessment practice is the first step in reducing barriers for disabled students, students with additional learning needs, and students who experience barriers to learning.

9.2. Inclusive practice should be embedded, wherever reasonably practicable, in curriculum design, teaching delivery, learning materials, assessment communication, and classroom, studio, rehearsal and performance environments.

9.3. Staff should support inclusive access through clear communication, appropriate differentiation, accessible learning materials where practicable, and awareness of the different ways in which students may access, process and demonstrate learning.

9.4. Inclusive teaching, learning and assessment practice may reduce the need for individual adjustments, but it does not replace reasonable adjustments, Additional Learning Support, SEND provision or Individual Learning Plans where these are required.

9.5. Assessment arrangements should provide students with fair opportunity to demonstrate achievement while maintaining academic standards, assessment

integrity, course learning outcomes, professional competency standards and relevant partner university or awarding body requirements.

### 10. Wellbeing, Student Support and External Support

- 10.1. Disabled students and students with additional learning needs may also require wellbeing, pastoral or external support during their course. Where this is the case, Italia Conti will seek to coordinate support appropriately while maintaining a clear distinction between learning access, reasonable adjustments, ALS and wider wellbeing support.
- 10.2. The Wellbeing Team may provide advice, support and signposting where matters sit outside the teaching, learning and assessment relationship, including signposting to external services or specialist support where appropriate.
- 10.3. Where a student's disability or additional learning need affects learning access, teaching, assessment, engagement or participation, the relevant ALS, reasonable adjustment, SEND or Support Through Studies route should be used. Where the primary concern relates to wellbeing, pastoral support, mental health support or external referral, the Student Support and Wellbeing Policy should be followed.
- 10.4. Wellbeing support and learning support should be coordinated where both are relevant but not conflated. A wellbeing concern should not automatically be treated as an ALS or disability matter, and a disability or ALS need should not automatically be treated as a wellbeing concern.

### 11. Disabled Students' Allowance (DSA)

- 11.1. Higher Education students may be able to apply for **Disabled Students' Allowance (DSA)** from Student Finance England if they have an eligible condition that affects their ability to study. General information about DSA, including eligibility criteria, is available at: <https://www.gov.uk/disabled-students-allowance-dsa>.
- 11.2. Italia Conti may provide advice and signposting in relation to DSA, but DSA is an external support route and is subject to the eligibility, evidence and assessment requirements of the relevant funding body.

### 12. Partner University Support

- 12.1. For Higher Education students, further support for disability-related needs or Additional Learning Support needs may also be available from Italia Conti's partner universities, where applicable. Information about this support is provided at induction, signposted in the relevant Course Handbook, and can be obtained from Italia Conti's Additional Learning Support (ALS) or relevant student support team.

### 13. Roles and Responsibilities

#### 13.1. Students

Students are encouraged to disclose disabilities, additional learning needs or barriers to learning as early as possible so that support can be considered in a timely way. Students are expected to engage constructively with support processes, provide relevant evidence

where available or required, attend agreed meetings where appropriate, and make reasonable use of agreed support, adjustments and strategies.

### 13.2. **ALS, SEN and specialist support staff**

ALS, SEN and specialist support staff are responsible for receiving referrals, meeting with students where appropriate, reviewing relevant information, advising on support or adjustments, maintaining appropriate records, and liaising with academic, wellbeing or other relevant staff where this is necessary to support access to learning.

### 13.3. **Teaching staff**

Teaching staff are responsible for contributing to an inclusive learning environment, implementing agreed support or reasonable adjustments that have been communicated to them, and referring students through the appropriate route where they identify potential barriers to learning.

### 13.4. **Course teams and academic leadership**

Course teams and academic leaders are responsible for supporting consistent implementation of this policy within courses, considering support and adjustments in relation to course requirements, and escalating matters where there may be implications for academic standards, professional competency standards, assessment, engagement, attendance, health and safety or fitness to train.

### 13.5. **Wellbeing Team**

The Wellbeing Team is responsible for providing advice, support and signposting outside the teaching, learning and assessment relationship, and for liaising with other staff where appropriate and necessary to support disabled students or students with additional learning needs.

### 13.6. **Quality Assurance**

Quality Assurance is responsible for advising on policy alignment, academic standards, assessment implications, partner university requirements, awarding body requirements, record-keeping expectations and the appropriate escalation of matters that may affect course delivery, regulatory compliance or student outcomes.

### 13.7. **Senior Leadership Team (SLT)**

The Senior Leadership Team (SLT) has overall responsibility for ensuring that appropriate provision is made for disabled students and students with additional learning needs through institutional policy, admissions, teaching and learning, support structures, governance and review.

### 13.8. **Principal / Chair of Academic Quality Board (AQB)**

The Principal (Chair of AQB) is the senior academic accountable lead for the academic impact of SEN, ALS, reasonable adjustments, Support Through Studies / Fitness to Train and student-facing decisions affecting academic standards, assessment, progression, continuation, student outcomes or regulatory academic compliance. The Principal will ensure relevant themes, risks and assurance are received by AQB and escalated to SLT, the Board or partner university route where required.

### 13.9. **Academic Quality Board (AQB)**

AQB receives thematic assurance on academic-impact matters arising from this policy, including adjustments affecting assessment, progression, student experience, academic standards, student outcomes and regulatory academic compliance. AQB does not normally determine individual case outcomes unless required by its terms of reference or partner requirements.

### 13.10. **Board and Accountable Officer route**

Material risks, serious incidents, reportable-event considerations, resourcing issues or matters requiring governing-body oversight must be escalated through SLT, the CEO, the Principal or the Board route in accordance with the Accountability Matrix, Terms of Reference and Scheme of Delegation.

## **14. Records, Communication and Review of Support**

14.1. Italia Conti will maintain appropriate records relating to disclosures, support needs, Additional Learning Support, reasonable adjustments and agreed support arrangements, in accordance with institutional record-keeping expectations and data protection requirements.

14.2. Information about a student's disability, additional learning need or support arrangements will be shared only with staff who need the information to support access, learning, assessment, wellbeing, safeguarding, health and safety, or effective course delivery.

14.3. Agreed support and adjustments should be communicated clearly to relevant staff so that they can be implemented consistently. Staff should avoid informal, unrecorded or individualised arrangements that create uncertainty, inconsistency or inequity.

14.4. Support and adjustments should be reviewed where appropriate, particularly where the student's needs, course context, assessment requirements, engagement, attendance, progress, safety or professional training requirements change.

14.5. Where a review identifies that a student requires significant adjustments to engagement, attendance or learning experience, the matter must be considered under Stage 2 of the Support Through Studies Policy and recorded through an Individual Learning Plan where agreed. In exceptional circumstances, the matter may be considered directly at Stage 3 of the Support Through Studies Policy.

## **15. Monitoring, Assurance and Reporting**

15.1. The operation of this policy will be monitored through anonymised and/or aggregated evidence, including referral volumes, timeliness, implementation of agreed adjustments, review completion, non-agreed or partly agreed requests and reasons, complaints and appeals themes, student feedback, equality themes, student outcomes and any academic-impact risks.

15.2. Relevant themes and risks will be reported through Safeguarding, Wellbeing & SEN, Support Through Study / Fitness to Train, EDIC, AQB, SLT and Board routes in

accordance with the Terms of Reference and Accountability Matrix. Individual case details must not be reported beyond those who need them.

- 15.3. Quality Assurance, MIS/Data and Student Services will ensure that data used for monitoring, partner reporting or regulatory evidence is accurate, evidenced and subject to appropriate checking

### **16. Consideration of Support, Adjustments and Requests**

- 16.1. Italia Conti will consider requests for support, adjustments or changes to engagement in a fair, student-centred, reasonable and proportionate way. Wherever possible, the institution will work with the student to understand their circumstances, identify relevant barriers, and consider appropriate support.
- 16.2. In considering a request, Italia Conti may take account of available evidence, professional or specialist advice, course requirements, learning outcomes, assessment requirements, professional training expectations, health and safety, safeguarding, available resources, and the rights, safety and wellbeing of other students and staff.
- 16.3. Not all requested support or adjustments will be appropriate, reasonable, practicable or compatible with the requirements of the course or training environment. Where a request cannot be agreed, or can only be partly agreed, Italia Conti will provide a clear explanation and, where appropriate, consider alternative support, adjustments, signposting or the fitness to train process.
- 16.4. Where a student is dissatisfied with the way a request for support or adjustments has been considered, or with the handling of a support-related matter, they may raise the matter under Italia Conti's Complaints Policy. The Complaints Policy includes the relevant internal complains and appeal route.
- 16.5. Once the internal process has been completed, Italia Conti will issue a Completion of Procedures letter, where required.
- 16.6. Where the matter relates to an HE student on a partner-awarded or partner-approved programme, the applicable next stage will depend on the relevant partner university regulations, the partnership agreement and the nature of the issue.
- 16.7. Italia Conti will give the student accurate information about the applicable route, including whether the matter may be escalated to the academic partner, the stage at which it will be considered, the submission route, applicable deadline and documents required.
- 16.8. Where the academic partner is responsible for the final stage, the Completion of Procedures Letter will normally be issued at the end of that process. Where Italia Conti is responsible for the final stage, Italia Conti will issue the Completion of Procedures Letter where required.

- 16.9. Following receipt of a Completion of Procedures Letter, a student may be able to refer an eligible complaint to the Office of the Independent Adjudicator for Higher Education, normally within 12 months of the Completion of Procedures Letter.

## 17. Appendix: Procedure for declaring a disability or additional support need

### 1. Introduction

Students may disclose a disability, long-term health condition or additional support need at application, enrolment, or at any point during their studies. Disclosure enables Italia Conti to consider appropriate support, including reasonable adjustments and Additional Learning Support (ALS) provision.

Italia Conti is committed to ensuring that all students can access, participate in, and succeed in their studies on an equitable basis.

This procedure sets out how students can disclose a disability, long-term health condition or additional learning support need, and how Italia Conti will respond.

It aims to:

- provide a clear, supportive, and accessible process for disclosure;
- ensure that disclosures are handled consistently;
- ensure that students are referred appropriately for support;
- provide a clear operational process so that reasonable adjustments and Additional Learning Support (ALS) can be considered in a timely manner.
- provide procedures to enable staff to manage disclosures; and
- enable relevant and proportionate information gathering at admissions and throughout the student lifecycle.

This procedure seeks to encourage and promote equality of opportunity and fair access and is a positive step towards inclusivity from the point of enrolment. It should be read in conjunction with the Italia Conti Disability, Additional Learning Support and Reasonable Adjustments Policy. This procedure should be read alongside the **Disability, Additional Learning Support and Reasonable Adjustments Policy**, which sets out the institutional framework and principles.

### 2. Scope

This procedure applies to:

- Applicants to Higher Education programmes;
- Students registered on HE programmes;
- Diploma students aged 18 and over (where relevant).

For the purpose of this document, “student” refers to all individuals within this scope.

### 3. Key Principles

## 3.1 Disclosure Points

Students may disclose a disability or support need at:

- application or audition;
- enrolment or induction;
- any point during their studies.

3.2 The same process applies regardless of when disclosure is made:

- Applicants who disclose a disability are provided with information on the support available to them;
- students are given opportunities to disclose a disability or support need after admission, the same processes apply and support will be considered as early as possible;
- where a student chooses to disclose a disability after admission, the same processes apply and support will be considered as early as possible;
- on disclosure, Italia Conti will work with the student to assess their level of need and implement appropriate support and reasonable adjustments;
- Italia Conti will comply with its duties under the Equality Act 2010 and the Data Protection Act 2018.

## 4. Disclosure Process

The process for managing disclosure is as follows:

1. Applicant or Student discloses a disability or support need
2. Staff member responds and records the disclosure
3. Referral is made to the Wellbeing and ALS Teams
4. Student completes a disclosure form
5. Wellbeing / ALS arranges a discussion of support needs
6. Support and/or reasonable adjustments are considered and implemented
7. Ongoing review takes place where required

### 4.1 Disclosure at Admissions

Where a student discloses during the admissions process:

- the information will be shared with the Wellbeing / Additional Learning Support Teams;
- the student will be contacted and offered an opportunity to discuss support needs;
- early support planning will be initiated where appropriate.

## 4.2 Disclosure During Study

Students may disclose at any time during their course.

All staff who receive a disclosure will:

- respond supportively and appropriately;
- ensure the disclosure is recorded;
- refer the student to the Wellbeing and ALS Teams promptly.

## 4.3 Staff Referral Process

Students may be referred to the ALS Team through:

- self-referral by the student;
- direct referral by staff;
- referral via course leaders or coordinators.

Staff must ensure that:

- the student is informed about the referral;
- relevant information is passed to the Wellbeing and ALS Teams promptly;
- a record of the disclosure is made in line with institutional procedures.

## 4.4 Disclosure Form

Students may request support at any point during their studies.

Students accessing Additional Learning Support (ALS) will be asked to complete a [Study Skills form](#) and to

- confirm their disclosure;
- provide information about their support needs;
- inform discussion and planning of support.

The Study Skills form is sent to applicants at application and enrolment; it is also available in the disclosure [here](#) and as a link on the student ProPortal site.

## 4.5 Students Who Decline Support

If a student chooses not to access support:

- this decision will be respected;
- the student will be informed how to access support in the future;
- a confidential record may be made to confirm that support was offered.

### **4.6 Initial Support Without Formal Evidence**

Where a student does not have formal evidence immediately available initial support may be provided based on identified need, with further adjustments informed by supporting evidence where appropriate.

Students will be offered **proportionate and appropriate levels of support**, depending on identified need, which may range from general study support to specific agreed adjustments.

Although Italia Conti do not fund any diagnostic assessments, any student at any point can access support from the Additional Learner Support (ALS) department and may benefit from anticipatory adjustments which can be considered for all.