



City & Guilds of London Art School

Policy on Inclusive Learning & Participation

## **1. Introduction**

### **1.1 Purpose of this Policy**

- 1.1.1 At the Art School we believe that everyone should be treated as individuals who have the ability to make a profound and valuable contribution to our community and to wider society. The purpose of this Policy is to ensure that the Art School provides a welcoming and inclusive environment which enables all our students and staff to participate fully in Art School academic and social activities. Its aim is to ensure that anyone who has a permanent or temporary physical/mental disability or a learning difficulty, is a vulnerable person or has other special needs such as religious observance or medical requirements, can benefit from a learning environment which is, as far as reasonably practical, comparable with that of her/his peers.
- 1.1.2 The Art School acknowledges its duty under the Equality Act (2010) to avoid discrimination in respect of any of the 'protected characteristics' listed there. This Policy document therefore describes the types of measures we are taking to ensure that this duty is taken seriously and its overall requirements met; however, detailed guidance for staff, students and visitors on the specific ways in which we make 'reasonable adjustments', and the procedures for initiating their implementation will be provided in separate ancillary documents. A list of these is provided in section 2.1.3 below [to be agreed and completed].
- 1.1.3 In applying this policy, the Art School acknowledges that ensuring accessible and appropriate provision for all our community is core to our mission, and that our endeavours to achieve this need to pervade all aspects of the student, staff and visitor experience.

### **1.2 Audience and Scope**

- 1.2.1 This Policy applies equally to applicants to the Art School, its current and former students, its permanent, temporary and visiting staff, its trustees, and everyone who supports our work by attending our public events. It encompasses all recruitment, learning, teaching, administration, communications, public events and social activities undertaken either on Art School premises or at other locations where the Art School is responsible for the activity.
- 1.2.2 In accordance with our enhanced duty of care towards young and vulnerable adults as articulated in our Safeguarding Policy, we will ensure that we take account of our

obligations to safeguard them at all times, whilst protecting their right to full inclusion in Art School activities wherever this does not contravene current legislation.

- 1.2.3 We will aim to extend our application of the duty to make 'reasonable adjustments' for those with a physical or mental disability as required by the Equality Act (2010), to those with any of the 'protected characteristics' covered by the Act, i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief (including lack of belief), sex (gender) and sexual orientation.

## **2. Context and compliance**

### **2.1 Relationship to legislation, statutory guidance and Art School policies and guidance**

2.1.1 This Policy draws upon, and is informed by, the following:

- the Indicators of Sound Practice described in Chapter B3: Learning and Teaching, and Chapter B4: Enabling Student Development and Achievement, of the *Quality Code for Higher Education 2013*
- The Equality Act 2010
- Safeguarding Children: Guidance for English Higher Education Institutions (DIUS, 2007)
- The 'Prevent' Duty Guidance for higher education institutions in England and Wales 2015 (in particular with regard to information-sharing)

2.1.2 The Policy should be read in conjunction with the following other Art School policies and procedures:

- Equality & Diversity Statement and Policy
- Protecting Dignity & Respect Policy
- Admissions Policy
- AP(E)L Policy & Procedure [to be written]
- Learning & Teaching Strategy
- Freedom of Speech Policy
- Safeguarding Policy
- Tutorial Policy
- Student Complaints Procedure

2.1.3 The Policy is supplemented by Guidance documents for students and Briefing Notes for staff on:

- 'Reasonable adjustments' [to be updated]
- Support for students at risk: mental health & wellbeing [to be updated]
- Safeguarding children and vulnerable adults [to be written]
- Other(s) to be agreed

### **2.2 Implementation and responsibilities**

2.2.1 This Inclusive Learning & Participation Policy is owned and endorsed by the Art School Board of Trustees, which has corporate responsibility for the Art School's

Equality duties and for ensuring that an inclusive culture is promoted throughout the Art School.

- 2.2.2 The Principal is responsible for leading on inclusivity and for ensuring implementation of this policy, and that appropriate action is taken against breaches of this policy.
- 2.2.3 Practical implementation of the Art School's inclusivity duties is managed by Academic Board for student-related matters and the Senior Management Team for staff-related matters.
- 2.2.4 All students, staff and visiting teachers have an individual responsibility to support and foster the aims of this Policy.

### **2.3 Breaches of this Policy**

- 2.3.1 Any person who believes that the provisions of this Policy (as enacted through its ancillary guidance documents) has been breached, may make a complaint via the Applicant Appeals Procedure, the Student Complaints Procedure, or the Staff Grievance Procedure, as appropriate.

## **3. Art School Inclusivity Policy statement**

### **3.1 General principles**

- 3.1.1 The Art School's Equality & Diversity Policy articulates the over-arching principle that we are "committed to providing an inclusive and positive environment for [our] students and staff based on the principles of equality, dignity and respect, and to the integration of this ethos into all areas of policy and practice."<sup>1</sup>
- 3.1.2 In accordance with that principle we believe that everyone should be treated as an individual both in our approach to learning and teaching, and also in our understanding of their physical, cultural and pastoral needs and entitlements.
- 3.1.3 We further believe that all our students, members of staff and visitors to our premises should be able to take a full part in the events and activities for which they are enrolled, employed, or are otherwise invited to participate. We will therefore ensure that as far as possible all activities undertaken in our name or under our auspices are inclusive in their nature and accessible to all who either wish, or are required, to take part in them.
- 3.1.4 We will do this by
  - providing confidential, sensitive and efficient support for all our students and staff to use if they need it
  - making appropriate 'reasonable adjustments' to our current provision (see section 3.2 below) in order to ensure that as far as possible no-one with a protected characteristic (as defined by the Equality Act 2010) is put at a substantial disadvantage in terms of opportunities to participate, when compared with the ability of their peers to do so
  - embedding anticipatory consideration of inclusivity in our strategic planning and policy-making, in order to 'mainstream' as far as possible, these

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<sup>1</sup> City & Guilds of London Art School Equality & Diversity Statement & Policy, Section 2.1 (approved November 2015)

adjustments in our future provision of educational activities and services and the environment in which they take place

- involving affected students and staff in consultation and decision-making on issues of inclusivity

3.1.5 Adhering to this policy means that inclusivity and accessibility will always be considered a priority:

- In learning and teaching activities: i.e. curriculum design, delivery, and assessment, including the provision and content of teaching materials
- In the provision of personal tutorial and other pastoral and counselling support
- In our admissions/recruitment processes for both students and staff
- In the processes designed to facilitate the declaration of a disability, requests for reasonable adjustments, or the reporting and handling of other inclusivity issues
- In the arrangements we make for public events, exhibitions and social activities
- In the provision of information in handbooks and on the Art School website
- In the design of any improvements to the Art School's estate, and the configuration and use of the current spaces
- In the purchase of any IT hardware and software, and the design, user interface and content of our website
- In the design and operation of our regulations and policies; and any systems, procedures and processes which affect the student, staff or visitor experience

## **3.2 'Reasonable adjustments' and the protection of standards and competencies**

3.2.1 The Equality Act (section 20) confirms the following requirements for reasonable adjustments:

- (i) "where a provision, criterion or practice of [an institution] puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
- (ii) where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
- (iii) where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid."

3.2.2 In addition to their statutory application to students, staff and visitors with disabilities, the Art School will also seek to apply their principles, in particular those in (i) above, to the treatment of people with other protected characteristics in order to ensure that inclusivity is considered holistically.

3.2.3 When considering requests for reasonable adjustments we will not, under any circumstances, implement any adjustment to any of our recruitment or admissions criteria, our teaching delivery, or our assessment/examination processes, which has the effect of altering or compromising our expected academic standards or competency levels.

**3.2.4** Notwithstanding the statement above, we will make every effort, without compromising those standards or competency levels, to eliminate any disadvantage attributable to a disability by all appropriate and lawful means.

## **4. How the Art School will implement this Policy**

### **4.1 Recruitment and admissions**

4.1.1 In our recruitment procedures for staff, and our admissions process for students, we will ensure that applicants with disabilities are given an equal opportunity to succeed in gaining employment or a place to study at the Art School, by:

- Encouraging the disclosure of any disability or special circumstances at an early stage in the application process, to enable us to support all applicants fairly throughout the process
- Ensuring that our recruitment and selection criteria do not unfairly disadvantage any applicant with a disability, learning difficulty or other protected characteristic
- Applying 'reasonable adjustments' where appropriate, in any of the areas listed in section 3.2.1 above
- Applying the Art School's AP(E)L Policy [to be written] to enable applicants from a wider range of educational backgrounds and life experiences to take advantage of the education we offer

### **4.2 Art School employees**

4.2.1 All Staff employed at the Art School are covered by the provisions of this Policy and are entitled to request reasonable adjustments to their working environment, their contract of employment, or the provision of auxiliary aids as appropriate, in accordance with relevant legislation, their terms & conditions of appointment and in accordance with guidance provided in the Staff Handbook.

### **4.3 Learning and Teaching**

4.3.1 In accordance with our Learning & Teaching Strategy, we will use pedagogies which are student-centred and which celebrate individual differences in both our students and our teaching staff, in order to encourage, empower and facilitate each individual's creative 'voice'.

4.3.2 We will ensure that the design, delivery and assessment of our programmes and modules address the learning needs of all students; connecting with their lives and engaging their interests, aspirations and passions as individuals from a wide range of cultural, educational and socio-economic backgrounds.

4.3.3 We will create a safe, respectful learning environment in which both individual and collaborative creativity can thrive, and take the time to get to know our students and encourage them to articulate their thinking, without fear of ridicule, through the acquisition of fully contextualised practical skills.

4.3.4 We will provide sensitive, confidential and efficient support to students who declare a disability or special need in relation to their ability to take part in the learning activities offered by the Art School, and do our best to meet their requirements by making reasonable adjustments as necessary to delivery and/or assessment methods,

without compromising our expected academic standards or competencies. Details of this support are available in the Guidance documents produced by the Head of Student Support.

- 4.3.5 We will explore, in consultation with students, alternative forms of assessment which can be included in the design of future programmes and modules where appropriate, in order to minimise the need for special assessment/examination arrangements which may cause physically or mentally disabled students to feel marginalised.

#### **4.4 Teaching materials**

- 4.4.1 We will ensure that all teaching materials are presented in clear English with key terminology explained, that their content is inclusive and avoids both stereotyping and assumptions as to what is 'normal', and that they are available in various formats and at the times appropriate to the needs of all individuals which make up the class for which they are intended.

#### **4.5 Timetable planning**

- 4.5.1 We will ensure, when planning the timetable for classes and assessments, that issues of inclusivity such as the right to carry out religious observance, parenting activities, known medical conditions (e.g. those which are affected by particular environmental factors or dietary needs), as well as the physical accessibility of teaching rooms, are anticipated and incorporated into the mainstream timetable as far as possible.
- 4.5.2 In cases where an issue is notified to us too late for incorporation into the main timetable, we will make reasonable adjustments to the arrangements for the affected individual(s) wherever this is possible.

#### **4.6 Student support**

- 4.6.1 Support for all students who need it is coordinated by the Head of Student Support, who can call upon the following resources:
- 4.6.2 A Support Tutor is responsible for agreeing a Personal Learning Plan with any student who declares a physical or mental disability, or learning difficulty such as dyslexia or dyspraxia, and for facilitating effective support with the student's Personal Tutor and/or Head of Department.
- 4.6.3 The Head of Student Support is the designated Responsible Person for the Art School's Safeguarding duties, and will ensure that any adjustments put in place for young and vulnerable adults with inclusivity issues adhere to the requirements of the Safeguarding legislation and of the Art School's Safeguarding Policy.
- 4.6.4 The Vice-Principal is the designated point of contact for the Art School's duties under the 'Prevent' legislation, and will liaise with the Head of Student Support and/or the Academic Registrar in cases where the intention to promote inclusivity may conflict with those duties.
- 4.6.5 All staff with responsibility for providing pastoral support or advice to students, i.e. tutors and support staff, as well as the Head of Student Support, have a responsibility

to offer support to any student with an issue related to inclusivity and to seek to eliminate any disadvantage to that student.

- 4.6.6 Measures to ensure inclusivity in practical activities are led by the Head of Student Support, with the assistance of the Art School's Site Manager.

#### **4.7 Public and social events**

- 4.7.1 Art School events that are open to the public will be arranged and conducted in ways that promote inclusivity for all who organise, exhibit and attend them. This will include, where necessary, balancing audience access to potentially conflicting views which may be entitled to expression under the Equality Act. The Art School's Freedom of Speech & Creative Expression Policy provides the framework under which we will operate in these circumstances.
- 4.7.2 Social activities held under the auspices of the Art School, whether part of a public event or an internal function, will be organised with due regard for the likely social, cultural and religious requirements of a diverse group of attendees, e.g. with regard to food and alcohol. No pressure will be brought to bear on an attendee to take part in any aspect of such an event unless they wish to do so.
- 4.7.3 In order that we can maintain a welcoming and inclusive environment for our public and social events, the Art School requires that all individuals who organise and attend them adhere to the principle of respect for other people, their lawfully held opinions, their property and the physical environment, as laid out in our 'Protecting Dignity and Respect' Policy.

#### **4.8 The Art School Estate**

- 4.8.1 The Art School's premises are old buildings which inevitably means that access to some areas can be problematic for people with a physical disability. The Art School's Development Programme aims to provide incremental improvements to the estate generally, and incorporates accessibility elements providing equality compliance. However, accessibility will continue to be an issue for the foreseeable future, and while this is the case, we undertake to mitigate problems for disabled applicants and students as far as possible by ensuring that appropriate arrangements are made to hold interviews, classes, workshops, tutorials, exhibitions and social events in accessible spaces.
- 4.8.2 In addition to physical accessibility, we aim to provide an environment which is welcoming to all, ensuring that applicants, students, staff and visitors are not disadvantaged by the configuration of our estate, for example by providing spaces for parenting needs; WC facilities suitable for all genders, etc.
- 4.8.3 While the Art School currently has no dedicated prayer/faith room, we will arrange facilities for religious observance at the request of individual students or staff.

#### **4.9 IT provision, Moodle and the Art School's website**

- 4.9.1 When purchasing new IT equipment or software for use by students or staff, the Art School will ensure that it is, or can be, enabled to provide assistive technology if required, and this will be available to any student or member of staff who is assessed as needing this resource to enable them to learn or to carry out the duties of their employment, on either a temporary or permanent basis.

4.9.2 Both the Art School's website and its Moodle platform will conform to, and be updated in accordance with, approved usability standards for disabled people. The Art School's Style Guide will ensure the accessibility and readability of all uploaded content.

#### **4.10 Information provided to students, staff and visitors**

4.10.1 We will ensure that the information, guidance and instructions that we provide to our students, staff and visitors is up-to-date, written in plain English in accordance with the Style Guide with explanations of key terminology, is not discriminatory in content or tone, and is available in appropriate formats on request.

#### **4.11 Art School regulations, policies and processes**

4.11.1 We will do everything we can to ensure that our regulations, policies, systems and processes are inclusive and anticipatory, and do not either deliberately or inadvertently constrain students from diverse cultural, social or educational backgrounds, or who have special needs, from participation in any learning or social opportunities offered by the Art School; or limit the ability of tutors to provide innovative, inclusive teaching or assessment.

4.11.2 We will do this by:

- Including an inclusivity impact assessment of regulations, policies, systems and processes as they are approved or come up for review
- Involving students and staff who are qualified by direct experience to represent potentially affected groups in assessing the impact for inclusivity of new and reviewed regulations, policies, systems and processes.

### **5. Disclosure and confidentiality**

#### **5.1 Disclosure of a disability**

5.1.1 It is only possible for the Art School to provide appropriate support if those who can provide that support, or have responsibility for approving and implementing 'reasonable adjustments', are permitted to receive, and act on, the relevant information. Therefore, applicants, students and members of staff who disclose a physical or mental disability or learning difficulty to a tutor or other member of Art School staff will be advised that by doing so they are obliging the Art School to make appropriate adjustments in accordance with the Equality Act. Individuals will also be advised that disclosure information will automatically be shared with the relevant Head of Department and the Head of Student Support to the minimum extent necessary to ensure that appropriate adjustments can be arranged. The explicit consent of the individual will be sought before the sharing of any information which exceeds this minimum, unless it is judged that there is a possibility of harmful consequences, in which case the Art School's Duty of Care will override this requirement.

#### **5.2 Disclosure of other inclusivity issues**

5.2.1 We will respect the confidential nature of other inclusivity issues at the request of the person making the disclosure (unless doing this would contravene our Duties under either the Safeguarding or Prevent legislation). Again, in order for us to be able to



provide effective support and/or reasonable adjustments it may be necessary to share information with others; if this is the case, the information required to enable the provision of support will be passed to the relevant Head of Department and the Head of Student Support. Any further sharing of information will require the express consent of the affected person.

### **5.3 Confidentiality and the sharing of personal information**

5.3.1 The Art School will ensure that all personal data, including sensitive personal data regarding any of the 'protected characteristics', is recorded and held securely in accordance with the requirements of the Data Protection Act, and subsequently archived and destroyed in accordance with the Art School's Retention Schedule.

5.3.2 The Art School will only disclose personal information to others in the following circumstances:

- As required by validating institutions under their Regulations (i.e. Birmingham City University and UALAB)
- Under statutory reporting requirements (HESA)
- In accordance with legislative requirements, e.g. Safeguarding and 'Prevent' legislation
- In connection with a criminal investigation (i.e. a formal data request from the Police)

## **6. Internal reporting and monitoring**

### **6.1 Reporting requirements**

6.1.1 We will compile anonymised reports for both internal monitoring and external compliance requirements on various aspects of inclusivity, for example numbers and distribution of disability disclosures, implementation of 'reasonable adjustments', Personal Learning Plans vs outcomes, and other issues as required to help us monitor the effectiveness of this Policy, improve our services and provide evidence for the Equality Action Planning section of the Annual Art School Monitoring & Evaluation Report.

### **6.2 Review of this policy**

6.2.1 The Policy will be re-approved every 5 years by the Board of Trustees via Academic Board and the Senior Management Team; it will additionally be reviewed on an annual basis by the Academic Registrar to ensure that any changes to legislation or institutional requirements are incorporated in a timely way, any such changes being reported to the Academic Board and the Board of Trustees.

6.2.2 The Policy was adopted in September 2016 and will be fully reviewed in the academic year 2021/22 (delayed due to covid-19)