

1. Purpose

BCPC is committed to providing an inclusive, accessible and supportive learning environment in which disabled applicants and students can participate fully in their studies and realise their learning and professional objectives.

The purpose of this policy is to:

1. explain BCPC's responsibilities towards disabled applicants and students;
2. provide a clear framework for identifying, considering, implementing and reviewing reasonable adjustments;
3. promote an open and supportive approach to disclosure of disability and support needs;
4. identify and address barriers to participation in BCPC's courses and trainings;
5. ensure that disability-related information is handled appropriately and in accordance with applicable data protection requirements;
6. support BCPC's commitment to equality, diversity and inclusivity.

This policy should be read alongside BCPC's Equality, Diversity and Inclusivity Policy (EDI), BCPC Data Protection Policy, BCPC Safeguarding Policy, BCPC Complaints and Grievance Procedure and BCPC Guidance for Foundation Students with Additional Needs and BCPC Guidance for Professional Training Students with Additional Needs.

2. Scope

This policy applies to:

- prospective applicants
- applicants to BCPC courses;
- enrolled students;
- students undertaking our entry level courses; professional training or continuing professional development programme.

3. Legal and regulatory framework

BCPC will comply with applicable equality and data protection legislation and relevant regulatory or awarding-organisation requirements e.g. UKCP, BACP, Middlesex University.

The principal legislation underpinning this policy includes the *Equality Act 2010*, together with applicable provisions of the *UK General Data Protection Regulation (UK GDPR)* and the *Data Protection Act 2018* (as amended from time to time).

This policy will be reviewed when there are material changes to relevant legislation, regulatory requirements or recognised good practice.

4. Definition of disability

For the purposes of the Equality Act 2010, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Disability may include, where the statutory definition is met, physical, sensory or neurological conditions, long-term health conditions, mental health conditions, neurodivergence and specific learning differences.

BCPC recognises that a person may require support or an adjustment even where they do not identify as disabled or where it has not been established that they meet the legal definition of disability. BCPC will therefore consider support needs on an individual basis while applying the legal requirements of the Equality Act where relevant.

5. Principles

BCPC will:

- a) promote an inclusive and supportive learning environment for disabled applicants and students;
- b) treat applicants and students fairly and with dignity and respect;
- c) take reasonable steps to prevent disabled people from being placed at a substantial disadvantage compared with people who are not disabled;
- d) take an anticipatory approach to accessibility and reasonable adjustments by considering the needs of disabled people in the design and delivery of its training, learning materials, communications, facilities and assessment arrangements;
- e) consider individual reasonable adjustments where an applicant or student identifies a disability or support need;
- f) consider adjustments on an individual basis rather than relying solely on standardised arrangements;

- g) encourage applicants and students to disclose support needs where they feel able to do so, while recognising that disclosure is voluntary unless information is required for a specific lawful purpose;
- h) avoid making assumptions about a person's abilities or support requirements on the basis of a disability or medical condition;
- i) involve the applicant or student in discussions about adjustments wherever reasonably practicable;
- j) maintain appropriate confidentiality and handle disability-related information in accordance with data protection requirements;
- k) provide appropriate training and awareness opportunities for staff; and
- l) regularly review the effectiveness of reasonable adjustments and accessibility arrangements.

6. Reasonable adjustments

BCPC will consider and, where required by law, implement reasonable adjustments to avoid substantial disadvantage experienced by disabled applicants and students. Adjustments will be considered on an individual basis, taking into account the nature of the disadvantage, the effectiveness and practicality of the proposed adjustment, the resources available to BCPC, and any relevant academic, professional, competence or qualification requirements.

7. Professional standards and assessment requirements

BCPC recognises that professional training may involve assessment of knowledge, skills, competence or professional standards.

Reasonable adjustments will not normally be permitted where they would remove or materially alter a competence, learning outcome or essential assessment requirement that the assessment is legitimately designed to measure.

BCPC will seek to distinguish between:

- an adjustment to the way in which a learner accesses or demonstrates learning; and
- an alteration to an essential competence, learning outcome or professional standard.

The purpose of a reasonable adjustment is to remove or reduce disability-related disadvantage, not to confer an unfair advantage.

8. Disclosure and support

Applicants and students are encouraged to inform BCPC of any disability, health condition, specific learning difference or other support need.

Early disclosure can assist BCPC in identifying and implementing appropriate adjustments before training or assessment begins.

However, BCPC recognises that an individual may disclose a disability or support need at any stage of their training. A failure to disclose at application or enrolment will not prevent BCPC from considering reasonable adjustments at a later stage.

Students should not be required to repeatedly disclose the same information unnecessarily.

Where appropriate, BCPC may request information or evidence that is reasonably necessary to understand the disadvantage and determine appropriate adjustments. BCPC will avoid requesting excessive or irrelevant medical information.

10. Procedure for agreeing a reasonable adjustment

Where an applicant or student identifies a disability or support need:

Step 1 – Initial discussion

The applicant or student are encouraged to discuss their needs in their initial individual interview. The discussion will focus on the impact of the disability or condition on participation in training and assessment and on the adjustments that may reduce or remove any disadvantage.

Step 2 – Consideration of adjustments

For students entering the Foundation Course, a further discussion may be held with the Foundation Course Leader before the course begins and additional support can be discussed further in line with [BCPC Guidance for Foundation Students with Additional Needs](#).

For students entering into the professional training, in discussion with their tutor in the Term 1 tutorial, a Learning Support Agreement will be created so that it is clear what can be provided by BCPC, as a small training organisation, and what the student may need to resource for themselves. Please see [BCPC Guidance for Professional Training Students with Professional Needs](#).

Step 3 – Agreement and recording

Any agreed adjustments will be recorded in an appropriate format and communicated to staff who need the information to implement the adjustment. Only information necessary for implementation will normally be shared.

Step 4 – Implementation

Relevant staff will be responsible for implementing agreed adjustments within their area of responsibility, in consultation with the appropriate Course Leader and Management Team as needed.

Step 5 – Review

Adjustments will be reviewed where:

- the student's circumstances change;
- the course or assessment criteria changes;
- an adjustment is not proving effective;
- the student requests a review; or
- BCPC otherwise considers a review appropriate.

11. Confidentiality and data protection

Information concerning a person's disability or health is sensitive personal information and may constitute special category personal data under UK data protection legislation.

BCPC will process such information lawfully, fairly and transparently and will apply appropriate safeguards to its collection, storage, access, use and disclosure.

BCPC will identify an appropriate lawful basis for processing personal data and, where special category data is processed, an appropriate additional condition under Article 9 of the UK GDPR and any applicable requirements under the Data Protection Act 2018.

Information will only be accessed or shared where there is a lawful basis to do so and where it is necessary and proportionate for the relevant purpose.

Where appropriate, BCPC will seek the individual's agreement before sharing disability-related information with staff or external organisations. However, consent is not

necessarily required in every circumstance where information may lawfully be processed or shared.

Information may be shared without the individual's consent where this is required or permitted by law, including where necessary for safeguarding or other lawful purposes.

BCPC will follow its Data Protection and Privacy Policy for further information concerning the handling and retention of personal data.

12. Accessibility

BCPC will seek to improve accessibility proactively rather than relying solely on individual requests.

This includes, where reasonably practicable:

- considering accessibility when designing courses.
- providing accessible information and learning materials.
- considering digital accessibility.
- considering physical access requirements.
- ensuring staff understand how to respond appropriately to disability-related requests; and
- reviewing barriers identified by applicants and students.

13. Staff responsibilities

All staff

All staff have a responsibility to support BCPC's commitment to equality, inclusion and accessibility and to treat disability-related information appropriately.

Senior management

The Senior Leadership Team is responsible for ensuring that BCPC has appropriate arrangements to implement this policy and comply with its legal and regulatory obligations.

Course Leaders / Management Team

Course Leaders/ Management Team are responsible for:

- supporting tutors to provide an inclusive learning environment;
- advising staff on reasonable adjustments;
- identifying opportunities to improve accessibility.

Tutors

Tutors are responsible for:

- supporting an inclusive learning environment;
- implementing agreed adjustments within their responsibilities;
- maintaining appropriate confidentiality;
- avoiding assumptions about disability;
- referring complex or uncertain cases to the Course Leader/ Management Team;
- raising concerns with the Course Leader/ Management Team where an agreed adjustment cannot be implemented;
- maintaining appropriate tutorial and Learning Support Agreement records.

14. Students and applicants

Applicants and students are encouraged to:

- provide information about support needs where they feel able to do so;
- participate in discussions about reasonable adjustments;
- inform BCPC where an agreed adjustment is not effective;
- inform BCPC where circumstances change;
- comply with reasonable requirements associated with the implementation of an adjustment.

Nothing in this section removes BCPC's legal responsibilities under the Equality Act 2010.

15. Refusal or inability to implement an adjustment

Where BCPC considers that a requested adjustment is not reasonable, cannot lawfully be implemented, or would conflict with an essential professional, ethical, competence, qualification or assessment requirement, the decision should be explained to the applicant or student.

Where practicable, BCPC will consider alternative adjustments or support measures.

Where an applicant or student disagrees with a decision, they may raise the matter in the first instance through [BCPC's Resolving Your Concerns](#) process.

16. Complaints

Applicants and students who believe that they have been disadvantaged because of disability, or that a reasonable adjustment has not been properly considered or implemented, may raise the matter informally through BCPC's Resolving Your Concerns Process as above or formally through [BCPC's Complaints and Grievance Procedure](#). Complaints relating to discrimination will be handled in accordance with BCPC's Equality, Diversity and Inclusion Policy and relevant complaints procedures.

17. Monitoring and review

BCPC will monitor the implementation and effectiveness of this policy, and it will be reviewed at least every 24 months or sooner where there are significant changes to legislation, regulation or BCPC's provision.

Policy Title	BCPC Disability and Reasonable Adjustments Policy
FAO	BCPC Senior Leadership Team
Review date	October 2026
Next review date	October 2028