

| Reference | Concern | Action taken | Rationale | Old paragraph reference | New paragraph reference |
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| J - Gen - 1 - Oct | There are hardly any examples (as opposed to illustrative categories) | No action taken. | We do not think further (necessarily hypothetical) examples are required. Some of those we reviewed in other documents appear facile and some raise more questions than they answer. This was not an issue for the OEs that reviewed the draft. In addition, some OEs were not particularly comfortable about citing specific examples which, in a small profession, could be identified with particular individuals. | | |
| J - Gen - 2 - Oct | It would help to have numbered paragraphs | Paragraphs now numbered | clarity of reference | | |
| J - Gen - 3 - Oct | It could do with more headings - whole pages (or sometimes more than one) without headings are difficult to read and makes the document harder to navigate. | No action taken. | The reformatting has minimised the gaps between sub-headings so we do not think that more are required. In many cases there are already several headings per page making navigation more straightforward. | | |
| J - Gen - 4 - Oct | Some of the sentences are extremely long - 40 or 50 words (even 80 words in one place) are not helpful. | A number of longer sentences have been broken - up or redrafted. | clarity. | | |

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| J1 - Oct | requirements and duties' - for the purposes of the Act, these are the same thing. | Drafting amended to remove the tautology to read 'This guidance covers our expectations and the requirements and duties that arise from the Equality Act 2010. | clarity | page 3 | 3 |
| J2 - Oct | replace 'by' with 'on' | No action taken. | by' not 'on' is intended and has not been amended. Some OEs offer degrees validated by a university (which has degree awarding powers). Standards and requirements are specified by the validating university as a condition of validation. | | |
| J3 - Oct | Is a glossary necessary or helpful? Some of the terms aren't relevant to this guidance, and if the explanations were simpler, they would be more useful in the text. | The glossary has been deleted. | Terms incorporated into guidance for clarity. | | |
| J4 - Oct | Clarity about wording for a health reference for GOsC registration. | TO DO: Wording to be amended to say as follows: 'On first registration a prospective applicant for registration must submit a health reference from a doctor who has known them for four years. If the applicant is unable to obtain a reference from a doctor, they should obtain advice from the GOsC.' | Consistency in wording. | page 4 | para 12 |

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| J5 - Oct | The new duty is to 'advance' (slightly stronger) but perhaps it was felt 'promote' was easier to understand. | No action taken. | We have left the word 'promote' in place in preference to 'advance' as we believe it is the more common usage, but this is a matter of stylistic preference and could easily be amended. | page 6 | 19 |
| J6 - Oct | I'm not sure I follow the split between the different types of OEI. They're all service providers when they provide services to the public. | The offending sentence has been removed. | This was an attempt to distinguish between university OEIs and independent OEIs but of course all are subject to obligations as providers of services to the public. | page 6 | 19/20 |
| J7 - Oct | Is this what OEIs have been advised ie that they act as agents of universities. | TO DO - need to clarify legal advice position on this with Barrister. | This is our understanding but is not necessarily what all OEIs have been advised. The paragraph has therefore been amended to state only what is the case as a matter of fact, sufficient to ensure that non-university based OEIs offering university degrees do not think they are exempt. | page 7 | 20 |

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| J8 - Oct | Not sure what this is saying because the reference to 'equality duties' is confusing because 'equality duty' is used as a shorthand for the public sector equality duty under the Act (replacing DED). I thin here it's meant to refer to the education duties under the Act. | Equality duties removed so that this now reads 'Much of this document is drawn from the equality duties that apply to <i>advice provided to</i> further and higher education institutions but it should nevertheless be used as a source of guidance by all Osteopathic Educational Institutions.' | This was an attempt to accommodate the different types of OEI by recognising that not all are universities and that some do not wish to be treated as such. We acknowledge that reference to 'equality duties' in this context may be misleading and have removed it. Nevertheless the guidance cited in the footnote is - we think - useful, so the sentence has been amended but the reference retained. However, this could be amended if the Code of Practice is published in time. | page 7 | 22 |
| J9 - Oct | This would include discrimination arising from disability - first bullet and third bullet are the same. | Paragraph rewritten as follows: The Equality Act 2010 consolidates previous equality legislation. Much of what it requires will already be familiar to you from previous legislation. The new Act protects students from discrimination or harrassment on the basis of a 'protected characteristic' and also from victimisation, Disability is a protected characteristic. | The deletion and reordering of the bullet points rendered the value of a list redundant not least because of the explanation that would have been required to indicate which are new and which are additional. As a consequence that para has been substantially rewritten. | Page 7 | 23 |
| J10 - Oct | pregnancy and maternity is covered in new protected characteristics. | removed and inserted as a footnote | clarity | page 7 | 23/24 |

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| J11 - Oct | <p>This could be simplified - replace 'The Equality Act protects students from discrimination or harrassment based on a list of what it refers to as protected characteristics and also from victimsation to 'on the basis of a 'protected characteristic' After the next sentence you could add 'The others are age etc.... see comment on glossary</p> | <p>Included as a footnote so as not to disrupt flow.</p> | <p>In the absence of a glossary, the full list of protected characteristics is included as a footnote so as not to disrupt flow. On a related point, one of the drafinf challenges has been to confine the guidance to disability and health impairments when the Act is of course much broader in scope.</p> | page 7 | 23 |
| J12 - Oct | <p>Unlawful discrimination isn't 'defined' suggest it says 'includes'.</p> | <p>Amended as suggested - defined deleted and includes replaced. Now reads 'Unlawful discrimination is defined as includes</p> | clarity | page 7 | 24 |

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| J13 - Oct | This should be deleted, the government is not bringing combined discrimination into effect. | The reference to combined discrimination has therefore been omitted. | We acknowledge that 'the government has decided not to bring forward the dual discrimination provisions in the Equality Act 2010', a decision included in the budget statement , and note that 'People who have experienced discrimination because of a combination of protected characteristics, eg a black woman or a Mislim man, will still be able to bring one or more single characteristics claims'. | page 7 | 24 |
| J14 - Oct | I doubt that the OEIs would look at the Act. It would be more useful to refer to the Government's statutory guidance on the definition of disability. | No action taken. | We would prefer to leave the footnoted reference on the assumption that some OEIs may well wish to consult the Act in preparing or redrafting their regulations, policies and procedures, but it can easily be deleted if GOsC considers it unhelpful or unnecessary. | page 8 | para 26 |

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| J15 - Oct | Even though this guidance is for OEs and not students I think this could be more simply stated around direct discrimination | Removal of some of the detail re 'protected characteristic' to read as follows: 'Direct discrimination occurs if you treat a student less favourably than you treat, or would treat, another student because of the disability. For a student to show that they had been directly discriminated against they would have to compare what happened to them with what happened, or would happen, to a student without their disability. However, it is not direct discrimination against a non disabled student to treat a disabled student more favourably because it is never unlawful to treat disabled students or applicants more favourably than non disabled students or applicants.' | Simplified as requested, but we are concerned that the OEs do indeed require the fullest of explanations. | page 8 | 28 |
| J16 - Oct | Section on combined discrimination should be deleted. | Section deleted | Combined discrimination not being brought into force. | page 8 | na |

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| J17 - Oct | <p>I don't think the OEs will find these explanations easy to follow. Phrases are used that will not be familiar (eg 'justified' and 'a proportionate means of achieving a legitimate aim'. They could be a lot simpler - see revised GMC Gateways guidance as example. If provisions, criteria or practices are mentioned it would be helpful to indicate that they are explained further down.</p> | <p>Simplified as requested although terms remain in as this is what the OEs expect.</p> | <p>Simplified as requested ... but we see no alternative but to mention proportionate means and legitimate ends so as to provide the level of explanation we think the OEs expect and require.</p> | page 9 | 29 |
| J18 - Oct | <p>I'm not sure the OEs will understand the point here about 'However, there may be cases where the adjustments are unrelated to the unfavourable treatment in question.'</p> | <p>Offending sentence deleted now reads 'If you show that you did not know and could not reasonably be expected to know that the disabled student had the disability, the unfavourable treatment may not amount to unlawful discrimination arising from disability. However, you should make every effort to ensure that students are able to disclose information about disability and you should be alert to any indications that a student may be encountering difficulties resulting from a health impairment or disability.'</p> | Avoiding confusion | page 10 | 32 |

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| J19 - Oct | OEs will not understand what 'provision, criterion or practice' mean. | Further reference to 'see below' to reference the section where this is more fully explained. (See paragraphs 40 to 45). | Connection made to another part of the guidance where this is explained more fully. | page 10 | 35 |
| J20 - Oct | The phrase 'you should not expect disabled students to suggest adjustments' seems to contradict what is said in the student guidance. | paragraph amended to better express what is meant now to read 'It is good practice to work with students to determine what reasonable adjustments can be made but you should not expect disabled students to be aware of all the adjustments that might be available. Where a disabled student does make specific suggestions, you should consider whether or not the adjustments would help to overcome the disadvantage and whether or not the adjustments would help to overcome the disadvantage and whether or not they are reasonable. | Clarity | page 11 | 38 |
| J21 - Oct | Reasonable adjustments and reasonable steps are the same thing. | deleted to eliminate tautology | clarity | page 11 | 44 |

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| J22 - Oct | I'm not sure that subtle messages about diversity would be understood as discriminatory messages as the sentence implies reads '... for example by tackling issues such as stereotyping and prejudice and the subtle messages about diversity that staff can sometimes convey despite an organisational commitment to equality.' | latter part of sentence deleted | clarity | page 12 | 48 |
| J23 - Oct | Shouldn't refer to disabled people 'generally' | Drafting amended by removing word 'generally'. | clarity | page 13 | 52 |
| J24 - Oct | Not sure what is meant by 'regulations' in the sentence 'reviewing and adjusting learning and assessment policies and practices to ensure that regulations do not inherently discriminate against disabled students' | regulations deleted to avoid confusion | regulations was meant to mean assessment regulations in this context by deleted to avoid confusion. | page 13 | 56 |
| J25 - Oct | Does 'specialist services and resources available' relate to the OEI or the student | amended to indicate that this refers to 'staff know how to access' | clarity | page 14 | 56 |

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| J26 - Oct | <p>Example - This is a good example but illustrates the anticipatory duty rather than the duty to respond to the needs of the individual. It's confusing here as the text immediately before it is about responding to individual requests. It would make more sense if it came immediately after the bullet points which also illustrate the anticipatory duty.</p> | <p>Example moved as suggested.</p> | <p>clarity</p> | <p>page 14</p> | <p>56</p> |
| J27 - Oct | <p>One of the elements of the new legislation' suggests that it's a new element but the duty is effectively the same as what was under the DDA, Confusingly the way the duty is described reflects the DDA wording (eg 'refusing or deliberately omitting) rather than the words of the Equality Act.</p> | <p>drafting amended to avoid implication of new element.</p> | <p>clarity</p> | <p>page 14</p> | <p>59</p> |
| J28 - Oct | <p>No comment cited.</p> | | | | |

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| J29 - Oct | Sentence is almost 60 words long and not sure I understand the point about "and lead to independent practice." Sentence reads ' | Drafting amended to read as follows: In preparing this guidance, OEIs emphasised the importance of ensuring that prospective applicants are able to make an informed decision about a career in osteopathy. It is vital that applicants are made aware of the intellectual, physical, emotional and professional demands of training. This can be done by contrasting osteopathy with degrees that do not involve practical training, culminate in professional registration, or lead to independent healthcare practice. Publicity material should include a named contact able to advise prospective applicants about the nature and demands of osteopathy as a profession and a career, the challenges of the course and the support that can be made available to disabled students. | Drafting amended to clarify and reduce length of sentence (OEIs stressed the need to ensure that applicants properly understood the demands of training. They say for example, 'it's not the same as history'. (Also FB comment note that there is no supported postgraduate training unlike other healthcare professions). | page 15 | 62 |
| J30 - Oct | Sentence of over 60 words. | paragraph amended to reduce sentence length. | clarity | page 15 | 65 |
| J31 - Oct | replace 'can' with 'will' | 'will' substituted for 'can' | clarity | page 16 | 69 |

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| J32 - Oct | <p>What happens to students that don't apply through the UCAS process.</p> | No action taken. | <p>We can't say with confidence what non UCAS applicants are required to do, which may differ between institutions. Hopefully this guidance will help to ensure that all OEIs adopt a similar and comprehensive approach to early disclosure for every applicant regardless of the application route. (FB comment The GOsC does not have statutory remit over admissions).</p> | page 16 | 70 |
| J33 - Oct | <p>I'm not sure what our expectations and requirements are but isn't the important thing breach of its legal obligations. Sentence reads 'You are not in breach of your legal obligations or our expectations and requirements if you reach this conclusion [ie no reasonable adjustments suitable] having given due consideration to all reasonable adjustments'.</p> | No action taken. | <p>The intention was to emphasise the GOsCs role as well as the law. The phrase 'our expectations and requirements' could be deleted but doing so further reduces the guidance to a statement of legal duties, as opposed to being a statement of both legal and regulatory body requirements. As a consequence the phrase has been left as it is.</p> | page 17 | 73 |

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| J34 - Oct | All possible reasonable adjustments - is considered what might be reasonable for the OEI to do? | Amended so now reads 'all <i>possible</i> reasonable adjustments' | clarity | page 17 | 73 |
| J35 - Oct | Extensive range of what - there appears to be something missing. Or is it an 'extensive and appropriate range of therapeutic intervention' | Amended to read 'treat patients safely and effectively drawing upon an extensive range of osteopathic manual and other techniques....' | transcription error now rectified | page 17 | 74 |
| J36 - Oct | Does 'vision' mean sight or imagination? | amended to read '...leading to consideration of an applican's ability to assess risk derived from observations that require sensory acuity.' | clarity | page 18 | 74 |

J37 - Oct

There is no reference to the appeals process in the student guidance. Who is the appeal to and where is the process set out.

Reference to appeals removed.

We have removed the reference to page19 appeals (See J20 Student Guidance below) but we do consider it appropriate to retain the reference to a process for dealing with complaints (for example about the conduct of the interview of a disabled applicant). However we do not think it is appropriate to provide further detail because the GOsC has no direct role in selection and would not, we assume, wish to get embroiled in the recruitment process by specifying how or to whom complaints should be made.

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| J39 - Oct | <p>The sentence 'However, it is important to acknowledge that your duty of care extends not only to students with disabilities but also to the larger student body. Reasonable adjustments should not have an adverse impact on the learning experiences of other students.' suggests that reasonable adjustments are simply balancing exercises between the interests of the disabled and other students. That's not the case see para 7.88 of the draft code.</p> | <p>drafting adjusted to better reflect the position expressed in the draft EHRC code. Now reads 'It is important to acknowledge that your duty of care extends not only to students with disabilities, but also to the larger student body. It might be considered reasonable to expect other students to tolerate a level of inconvenience to accommodate adjustments for a disabled student, but it may not be reasonable to expect anm OEI to make an adjustment that puts other students at a significant and persistent disadvantage. ...'</p> | clarity | page 21 | 92 |
| J40 - Oct | <p>Reasonable adjustments are not required to competence standards. Sentence reads '... but should never involve lowering the expectation threshold for autonomous practice'.</p> | <p>Additional sentence inserted as follows: '<i>..Indeed reasonable adjustments are not required to the competence standard itself - something contributors to the guidance</i> considered especially important in a practice based profession where patients put their trust in the ethical behaviour, technical competence and clinical expertise of the practitioner.'</p> | <p>We think the point (concerning the immutability of the competence stabdard) is described in a manner that reflects the concerns that OEIs expressed to us and in a form that they will readily apprehend and appreciate. The paragraph has been retained by amended to refer again explicitly to the competence standard.</p> | page 22 | 94 |

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| J41 - Oct | No comment cited. | some additional commas inserted to break up the sentence | accessibility | page 24 | 104 |
| J42 - Oct | An uneasy leap from the previous sentence and contradicts what is said in the second para on 025 | No action taken on substance of point but clarity in language. | We don't think this is an uneasy leap but an accurate reflection of a question raised by the OEIs that follows on from their concerns which are set out in the previous sentence. In short, this is their experience and the question they ask themselves. Furthermore, we do not think it contradicts the next page but rather sets the scene for the answer 'However you ...' We have however tried to improve the wording. | page 24 | 104 |
| J43 - Oct | Registrants do not make 'reasonable adjustments' for themselves - this is about self-management. If the registrant is working for an employer, the employer has the duty to make the reasonable adjustments. | paragraph amended accordingly | clarity of language | page 25 | 108 |
| J44 - Oct | This sentence is extremely long at 80 words. | paragraph amended to reduce sentence length. | clarity | page 25 | 108 |
| J45 - Oct | Shouldn't widening participation be at the front of the guidance rather than at the end - seems almost an afterthought. | Moved to first page | improved structure | page 25 | 1 |

J1 - Nov

I understand the consultants point in their response to J2 - Oct. But 'those' reads as if its referring to equality duties imposed by the university. 'Equality duties' is itself confusing as it's often used as a shorthand for the PSED. The consultants have changed it elsewhere. I think this would be clearer if it read 'the duties you may have [under the Act] as an employer or the [standards or] requirements imposed by....

Amended as follows: 3 This guidance covers our expectations and the duties that arise from the Equality Act 2010 – in particular the legal obligations you owe to disabled applicants and students. The guidance does not address other equality issues such as gender or religious belief (which now come under the same legal umbrella as disability), nor does it cover the *equality* duties you may have (under the Act) as an employer or the standards or requirements imposed by a validating university.

Drafting amended to avoid any potential for confusion with the Public Sector Equality Duty

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J2 - Nov

I don't understand the agency point (consultants response to prev J7 - Oct). I'm not sure that 'non-university based OEIs offering university degrees will realise from this paragraph that they are not exempt from the education provisions as the consultants say. They have deleted the first reference to agents but left this one. Will OEIs realise what its referring to?

Paras 19 and 20 have been amended as per the suggested redrafting (following legal advice on paras 19 and 20) as follows '19 Osteopathic Education Institutions which are universities will be subject to the Equality Act provisions that apply to further and higher education institutions. OEIs that are not universities or further or higher education institutions will be subject to the provisions of the Act governing the activities of service providers. In addition, OEIs that are not universities but who provide university validated degree courses, may be regarded as the agent of the university under the Act and as such be indirectly subject to the provisions governing further and higher education institutions. Despite these differences of status the duties of all OEIs under the Equality Act will be very similar, and for the most part no distinction is made in this guidance as to the duties owed by different types of OEI. There is, however, one important distinction – the public

J2 Nov comment: we hope the amendments (following legal advice) to para 20 deal with the point about 'agency' and our view is that OEIs will not have any difficulty in understanding this. It is worth noting that the lawyer has in fact used the term 'agent' in the redrafting of the preceding paragraphs. paras 19 and 20 have been amended as per the suggested redrafting – with the exception of a minor reordering at the end of para 19. We think the reference to the PSED needs to come here because it is an exception to the point that's made immediately before it. In other words, it seems odd to say in para 19 that all OEIs will be treated the same, and then fail to mention the exception until the next para, so we have inserted a signpost to the PSED in para 19, inviting the reader to move on to an elaboration in para 20.

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| J3 - Nov | In their response to previous [J14], the consultants say some OEs may wish to consult the Act. I don't think they'd get much out of looking at Sch 1 but they would find the Govt's statutory guidance helpful as it explains the provisions and gives lots of examples. I think it should be referenced either here or in section 4 (see para 30 students' guide). | Amended to incorporate reference to statutory guidance in the footnote but have left in references to the legislation. | We have inserted a reference (and hyperlink) to guidance but consider it important to retain the reference to Schedule 1 of the Act as the primary source for such determinations. If GOsC disagrees, the first part of the footnote can be deleted. | 26 | 26 |
| J4 - Nov | Should reflect additional sentence in students' guide para 31 on past disability | an addition as been inserted at the end of para 27 (and is now consistent with the student guidance). Additional sentence now reads 'In determining whether someone is disabled the effects of treatment or medication are to be ignored save in relation to impairments of sight that are correctable by spectacles or contact lenses. The Act also protects people who have had a disability in the past.' | Consistency with student guidance. | 27 | 27 |

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| J5 - Nov | <p>This doesn't reflect what the Act says. Need to delete 'disabled' and 'the' before 'disability'. This is because you can now be discriminated against if you're not disabled but you're treated less well because of the disability of someone you're associated with (eg a relative or friend) or because you're mistakenly thought to be disabled (see previous comment [J 38] on students' guide.</p> | <p>amended by removing 'disabled' to ensure wording is consistent with the concept that you can be discriminated against because of the disability of someone you are associated with. Now reads - '28 Direct discrimination occurs if you treat a disabled student less favourably than you treat, or would treat, another student because of the disability. For a student to show that they had been directly discriminated against they would have to compare what happened to them with what happened, or would happen, to a student without their disability. '</p> | To ensure clarity | 28 | 28 |
| J6 - Nov | <p>See comment on para 57 students' guide ie This should make clear that it also includes an auxiliary service ie any kind of help (see my comments on the previous glossary. The consultants haven't responded to all of these.). Should be reflected in OEIs guide too.</p> | <p>we have elaborated the reference to auxiliary aids to refer also to services/assistance</p> | <p>Elaborated slightly, however, we do not think it appropriate or helpful to provide a longer list in the text which might then be construed (erroneously) as exhaustive rather than illustrative.</p> | 35 | 35 |

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| J7 - Nov | and proportionate' was removed from the sentence 'There is no justification for failing to make a reasonable adjustment where the duty applies, but it extends only to what it is reasonable and proportionate. ' as proportionality is included in reasonableness | And proportionate' removed as suggested | 'proportionate' deleted as tautological (despite our view that some tautologies are acceptable as a means of emphasising a point and helping readers to better appreciate what is required). | 37 | 37 |
| J8 - Nov | This doesn't convey what's covered by criteria such as rules or conditions (see draft code para 5.5). | A footnote has been added quoting para 5.5 of the draft Code as follows - 'What is meant by provision, criterion and practice?' as follows: 'This should be construed broadly to include "...any formal or informal policies, rules, practices, arrangements, criteria, conditions, prerequisites, qualifications or provisions." (Para 5.5, Draft Code of Practice: Further and Higher Education, October 2010, Equality and Human Rights Commission.' | | 40 | 40 |

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| J9 - Nov | Should reflect amendment made to students' guide para 58 (see previous comment on students' guide [J13] (The term 'service provider' has not been used elsewhere. It would be helpful to explain what this is or express this in a different way.) | para 52 amended to reflect change made to student guidance as follows 'This means that you must plan ahead and anticipate the requirements of prepare for the inclusion of disabled people people with different kinds of disability (for example people whose vision or mobility is impaired) by improving your facilities, services...' | | 52 | 52 |
| J10 - Nov | I understand the consultants' point (response to previous [J29]). I queried the wording only because the combination of 'do not culminate' and 'and lead' wasn't clear (did it mean 'lead' or 'don't lead'?). Suggest substitute 'or' for comma before 'culminate' and delete comma before 'or lead'. | para 62 further refined to avoid any misunderstanding as to its meaning ;This can be done by contrasting osteopathy with degrees that do not involve practical training, culminate in professional registration, or lead to <i>and</i> independent healthcare practice. | clarity | 62 | 62 |
| J11 - Nov | may' would be better (or 'will' if you mean all) | wording amended to better convey the intended meaning to read 'Prospective students with a long-standing disability can <i>will</i> have a keen sense of their capabilities and many will have developed a variety of strategies for managing and compensating for functional limitations. ' | Clarity | 83 | 83 |

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| J12 - Nov | Is this meant to have a comma ie 'As such,...' Or does it mean 'Because such students'? – in which case, the sentence needs to continue in some way. | missing comma inserted to clarify meaning. | clarity | 83 | 83 |
| J13 - Nov | It is not always the case that adjustments can be agreed and made at the outset which last for the duration of the course. It can be especially challenging to help those students whose disability emerges mid-course, ...' This wouldn't be good practice anyway – they should be kept under continual review – see draft code para 7.27 and Could this be rephrased – eg particular care should be taken... | Amended in part to reflect concerns - now reads 'Contributors to the preparation of this guidance observed that it is easier to make adjustments for students whose disability is discernible, enduring and relatively stable – such as a hearing impairment or restricted mobility – than it is to meet the needs of students with concealed or fluctuating conditions as occurs, for example, with some students who have mental health conditions or certain physical conditions. Special care is needed to recognise and respond appropriately to help and support those students whose disability emerges mid-course, or whose health condition runs an unpredictable path or is episodic in nature, or who are more susceptible to the inevitable stress points inherent in any course...' | this is a good example of a number of instances where we have tried to reflect the concerns and experiences expressed to us, not least as a means of demonstrating relevance and to secure acceptability of the guidance among the principal audience, but which we accept would not necessarily be used if the guidance was written only as an interpretation of the law. We have tried to amend the drafting of para 97 to accommodate J's concerns, but also to retain something of the thrust of what OEl's told us so that they recognise the point. | 97 | 97 |
| J14 - Nov | See J13 | | | | |

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| J15 - Nov | change in disease management or treatment regime' - Is disease the right word as opposed to a change in the management of their condition (or impairment)? | wording in box amended. | clarity | 97 - box underneath | 97 - box underneath |
| J16 - Nov | Apologies – I didn't put comment in previous [J41]. It's a point made elsewhere – it's confusing to refer to reasonable adjustments here because they're things that are made for disabled students by someone else such as an education provider or employer. This is about students managing their own condition and making any necessary changes to the way they work. | Amended to read '104 Contributors to the preparation of this guidance expressed concern that some disabled students who have demonstrated achievement of the required standard with the benefit of reasonable adjustments may not make the necessary changes to the way they work once registered, or may be less assiduous in taking medication for a long-term condition in the manner prescribed. ' | Again, this para reflects a concern that was raised by OElS and is expressed in the manner they described it, essentially as a means of getting to the point about speculating as to future behaviour. However we take the point that the concept of 'reasonable adjustment' is what employers and educators do, so the wording has been amended. | 104 | 104 |

Section 5: following our tele conference we have added a sentence to the EHRC section alerting people to the wide range of publications they produce. This now reads: The EHRC produces a range of publications to help with the interpretation of the Act and these can be downloaded from its website. It can be accessed at: <http://www.equalityhumanrights.com/>

To ensure that the guidance is not dated but signposts useful resources in this area for the OEIS.

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