

EDUCATION FOR INDUSTRY AWARDS

Reasonable Adjustments and Special Considerations Policy

Version 2.1

Summary of updates

Date	Changes made
June 25	Related Ofqual conditions added RA matrix updated to include what the numbers relate to and definitions of some RAs (e.g. a scribe) Update of email to send requests (from policy@ to info@) Amended definitions of Reasonable Adjustments and Special Considerations to align to Ofqual's definitions Amendments to the language and sentence structure to improve clarity, but has not fundamentally changed the intended meaning or purpose Change of responsibility from Head of Assessment to Head of EFI Awards
June 26	Updated to reflect EFI Awards intentions to develop, deliver and award other types of vocational qualifications in addition to apprenticeship assessments.

Reasonable Adjustments and Special Considerations Policy

Purpose

This policy outlines the approach, processes and procedures through which we ensure that no apprentice or learner is materially disadvantaged when participating in learning and assessment. It outlines the commitment to, and mechanisms by which we intend to minimise unnecessary barriers to participation, or features of learning and assessment that may disadvantage specific groups. It clarifies our approach to identifying, determining and acting on cases where an individual's disabilities or learning support need or impairment require accommodation for fair assessment, or where special circumstances arise that may prevent fair assessment. The policy also aims to ensure that any agreed reasonable adjustment or special consideration does not unfairly advantage a learner or group of learners, over others.

The policy ensures EFI Awards is compliant with the below Ofqual regulatory conditions:

- D2 - Accessibility of qualifications
- E4.2 - Ensuring an assessment is fit for purpose and can be delivered
- G2.2 - Language of the assessment
- G6 - Arrangements for Reasonable Adjustments
- G7 - Arrangements for Special Consideration
- G8.1 - Completion of the assessment under the required conditions
- G9.2 - Delivering the assessment

Definitions

The following definitions are used to describe the terms 'reasonable adjustments' and 'special considerations' as referenced in this policy. We have used the definitions in Ofqual's handbook for clarity and consistency of approach

Reasonable Adjustments

An adjustment made to an assessment for a qualification to enable a disabled apprentice or learner to demonstrate his or her knowledge, skills and understanding to the levels of attainment required by the specification for that qualification.

Special Considerations



Consideration to be given to an apprentice or learner who has temporarily experienced an illness or injury, or some other event outside of his or her control, which has, or is reasonably likely to have, materially affected the Learner's ability to –

1. (a) take an assessment, or
2. (b) demonstrate his or her level of attainment in an assessment

Scope

This policy applies to:

- Apprentices receiving assessment services and learners registered on EFI Awards qualifications, or employers or centres (herein 'partners') acting on a learner's or apprentice's behalf. This will include, but not be limited to, those with disabilities as defined in the Equality Act 2010. For special consideration requests, learners (or employers/training providers acting on their behalf) who have a temporary illness, condition or injury, or who experience particularly disruptive circumstances at the time of the assessment.
- Assessors, facilitators or other direct contributors to the assessment process.
- Staff responsible for the delivery, administration, coordination or development of qualification and assessments or who contribute to the assessment process indirectly.

Management Approach

The following outlines the primary mechanisms through which this policy is disseminated and embedded into our core operational processes.

Prevention

We take all reasonable steps to minimise disproportionate learner advantage or disadvantage in the way we design our assessment process. Ongoing review of data on assessment outcomes will allow us to monitor, identify and act on adverse patterns.

Design of Qualifications and Assessment

Qualifications and assessment instruments and processes will be designed in a way that does not disadvantage learners due to their disability or learning support needs. It will be required, as part of the development process, to give due regard to any features of qualifications and assessment, or barriers, that could disadvantage learners. Any features identified of this type will be assessed in terms of whether they can be mitigated or otherwise state their nature and raise awareness.

The detail of how this is achieved is set out in our Qualifications and Assessment Design Principles and Process.

Ongoing Monitoring or Review

Outcomes data will be collected and reviewed routinely, including information on learner disabilities and learning support needs. In this way, potentially adverse trends will be identified and can be acted on.

Awareness Raising

Early identification of the need for reasonable adjustments or special considerations is an important feature of our approach. Awareness raising amongst all parties is necessary for this to be effective.

It will be the responsibility of all managers to disseminate and clarify the contents of this policy to staff and associates (assessors, qualification developers, etc.). In addition, it will be built into the following processes:



- Induction and on-boarding processes for all new staff.
- Staff training and development – with refreshers at appropriate junctures.

Communication with Learners and Partners

This policy and the procedures it outlines will be highlighted to partners and learners during the inception processes, as well as being detailed in our support materials. All requests for accommodation will be considered.

Advance Notice

It is essential to this process that requests for reasonable adjustments or special considerations are raised as early as possible, to ensure that accommodations can be made. Reasonable adjustment requests must be submitted as soon as employers, training providers or learners are aware of requirements and at the latest **21 days** before the element of assessment that requires accommodation is to take place. For special consideration requests, these must be submitted before the assessment wherever possible, or within **seven days** of the assessment event (starting from and including the date of the event). The timeliness of the request can be taken as grounds for rejecting the request.

Informed and Evidence-Based Decisions

The decisions relating to reasonable adjustments and special consideration requests will be made by the Head of EFI Awards and based on the requirements of equalities law, regulations, authoritative guidance and evidence provided.

Informed Decisions

Individual disabilities and adverse circumstances can be complex and interact with the assessment processes in several ways. Outside expertise may be called for in determining whether to accept a reasonable adjustment request and to inform the nature of the adjustment where grounds are accepted. Our duties under equalities law will be considered as primary for all reasonable adjustments. Due consideration of guidance provided by public authorities will be given where applicable, including but not limited to Ofqual regulations, Skills England guidance (see **Annex A**) and JCQ (Joint Council for Qualifications) guidelines.

Evidence-Based Decisions

Decisions to accommodate reasonable adjustments or special consideration requests will only be made on a sound evidential basis. It is the expectation that the learner (or their representatives) will provide this evidence with their request and provide further evidence where required. Failure to provide evidence to back up assertions in the request, may be considered grounds for rejecting a request. The eligible evidence for both requests is outlined below:

Reasonable Adjustment Evidence

Two acceptable types of evidence for a reasonable adjustment request are outlined below:

- **Medical evidence:** Evidence of the nature and severity of the disability and of the associated reasonable adjustment/s requested in the form of a written report. The medical report must detail the learner's name, as well as the name and signature of the medical practitioner who provided the certificate.
- **Specialist report:** A report written and signed by an independent specialist such as clinical or psychological professional following a diagnostic assessment. The report will provide evidence of the nature of the learner's disability and the extent to which the learner is affected. The report



should include recommendations about how to support the learner in the context of work and/or examinations. Reports will state the name, job title and professional credentials of the individual who conducted the diagnostic assessment and wrote the report, as well as the assessment date.

Special Consideration Evidence:

- A learner experiencing temporary illness or temporary injury should submit supporting medical evidence such as a medical certificate. In some circumstances the learner can self-certify on the request form.
- Special considerations relating to the disruption to an assessment would need to be supported by a written statement detailing the nature of the disruption to be considered alongside official accounts (e.g. invigilator logs or assessment recordings).
- Supporting evidence for other situations will be specified on a case-by-case basis by the Head of EFI Awards.

Integrity of Assessment

The integrity of assessment is, in all circumstances, our primary consideration. We seek to remove structural disadvantages in the assessment process where possible but cannot in doing so give unfair advantage to any learners, regardless of the circumstances.

Environments for Assessment

The environments in which assessments take place are important to the integrity of the assessment. For this reason, we will ensure that:

- Parties facilitating assessment venues have policies that conform to the intent of Education for Industry Awards' reasonable adjustments and special considerations policy and can make adjustments where required.
- The systems and assessment instruments through which we administer assessment can either be altered to accommodate adjustments, or alternative methods can be feasibly deployed in a way that will promote accessibility without compromising the integrity of assessment.

Feasibility

In some complex cases, for example where adjustments would not be feasible or where notice of a reasonable adjustment request was not obtained in a timely enough manner to faithfully implement adjustments, we reserve the right to reject the requests on these, or related, grounds.

Procedures

The procedure for raising awareness of and handling all requests will conform to the following:

- Learners and related stakeholders will be informed at the outset of the EPA process of our Reasonable Adjustments and Special Considerations Policy, including:
 - The facility to request reasonable adjustment arrangements and the associated requirements.
 - The facility to flag special considerations and the conditions under which these may be considered.
- The learner's employer (where applicable), with input from the learner and training provider/centre, must raise all reasonable adjustment and special considerations requests, using the forms found in **Annex B** and **Annex C** respectively. All requests will be acknowledged within **three working days**, or as soon as practicable.
- Due regard will be given to equalities law and Ofqual's regulatory conditions primarily and relevant guidance from other public authorities where relevant to the case (e.g. Skills England's

reasonable adjustments matrix - **Annex A**, or JCQ guidelines). It is our aim for decisions to be made within **21 days** of acknowledgement determining whether to:

- Reject the reasonable adjustment or special considerations request. In these circumstances, reasons will be given and their right to appeal the decision through the Complaints, Enquiries and Appeals policy will be clarified.
- Accept the request, in which case suitable accommodations and other conditions will be clarified and applied to the assessment process.

Outcome

- The Head of EFI Awards will not enter into discussions with the learner, employer or training provider about the nature and extent of the adjustment prior to sharing the outcome of the review process.
- **Reasonable adjustment requests.** If the request is accepted, the Head of EFI Awards will use the information on the request form, the nature of the disability and submitted evidence to determine the nature of the adjustments to be made with due regard given to equalities law and regulations/guidance from relevant public authorities.
- **Special consideration requests.** The outcome for special consideration requests will be based on various factors which will depend on the specific circumstances. These include:
 - the severity of the circumstances
 - the date of the assessment/s in relation to the circumstances, and
 - the assessment method.
- If the special consideration request is accepted (and it was submitted after an assessment has taken place) due to a learner's performance in an assessment being negatively impacted by circumstances beyond their control, for example a significant disturbance during the assessment or domestic crisis, there are two options available to the Head of EFI Awards, which will be applied with careful consideration.
 - The learner can be given the option to repeat the assessment at a date (within the shortest possible timeframe) that would enable them to perform at their best. In this instance, the assessment would be treated as an original assessment and not a resit or retake.
 - A small adjustment (up to 5%) to the assessment mark (only for assessments impacted by the special circumstances evidenced) will be made ahead of the initial results being shared with the learner. Where an assessment requires a competence, criterion or standard to be fully met, it may not be possible to apply special considerations and apprentices must complete and achieve a pass in all elements of their assessment. It may be more appropriate to offer the apprentice an opportunity to retake the assessment at a later date.
- If the special considerations request is accepted and it was submitted prior to the submission of project work or assessment, for example due to a temporary illness or injury, it may be possible to allow a short extension to the deadline.

Please note that approval of any special consideration that requires the postponement or cancellation of a live assessment activity will still be subject to cancellation fees.

Monitoring and Review

The implementation of this policy will be monitored and reviewed annually.

Annex A: Reasonable Adjustment Matrix

Where possible our approach to reasonable adjustments is aligned to national guidance published by the Skills England.

1. No known disability
2. Cognitive processing need such as dyslexia, dyspraxia; a need in executive function, visual processing speed, visual perception, literacy, numeracy, verbal reasoning, verbal memory, nonverbal memory
3. Social/ communication need such autistic spectrum condition
4. Long standing illness such as cancer, epilepsy, Crohn's, IBS, Chronic Fatigue
5. A mental health condition
6. A physical need such as crutches or wheelchair user, arthritis, paraplegia, quadriplegia, cerebral palsy
7. Hearing need
8. Visual need

Assessment Method Reasonable Adjustment	Observation	Practical Skills Test	Test	Project	Presentation	Professional Discussion
Extra time allowance (up to 50%)	2,3,4,5,6,7,8	2,3,4,5,6,7,8	2,3,4,5,6,7,8	2,3,4,5	2,3,4,5,7	2,3,5,6,7
Scribe			2,6,8			
Reader			2,8			
Personal support worker in attendance	2,5,6,8	2,5,6,8	2,5,8	2,5,8	2,5,6,8	2,5,8
Timed rest breaks	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8
Bathroom breaks	4,6	4,6	4,6	4,6	4,6	4,6
Voice explanation	2,8	2,8				
BSL interpreter + extra time	7	7	7	7	7	7
Assistive technology - voice recognition			2,4,6			
Assistive technology - screen reader			8			
Assistive technology - text to speech			2,4			
Flexibility with location				3,4,5,6	3,4,5,6	3,4,5,6
Flexibility of time of assessment	4	4	4	4	4	4
Flexibility with the method of assessment		6	3,4,5,6	3,4,5,6	3,4,5,6	3,4,5,6
Pre-recorded evidence/ delivered by video link				2,3,4,5	2,3,4,5	
Permission to write notes						2,4,5
Permission to bring notes				2,4,5		2,4,5

Info presented in required format - size, font style, colour			2,8			
Individual testing			3,4,5			
Paper-based option			2,4			
Supervised assessment taken at home			3,4,5,6			
Written questions to back up verbal					2,4,5,6	2,4,5,6
Rewording of questions/ clarification if needed					2,3,7	2,3,7
Time allowance for processing verbal questions					2,4,5,7	2,4,5,7
Information presented in small chunks					2,4,7	2,4,7

Definitions

Scribe: A scribe writes down or word processes a learner's dictated responses. The most common need for a scribe is where a learner has injured their writing arm and is unable to write.

Reader: A reader reads to the learner all or part of the assessment material and their written responses

Annex B: Reasonable Adjustment Request Form

The reasonable adjustment request must be completed by the apprentice's employer in consultation with the learner and sent to info@efiawards.co.uk.

Learner and requestor details	
Learner name	
Learner email address	
Apprenticeship programme (if applicable)	
Anticipated assessment date	
Employer name (if applicable)	
Employer email address (if applicable)	
Request date	

Evidence of disability or additional need that may affect learner's assessment performance	
Complete as appropriate (use additional sheets if necessary) including details of existing adjustments/support. Please detail all evidence submitted in support of this request.	
Learner is diagnosed with	
Diagnosis supplied by (enter details below)	
Name	
Organisation	
Occupation	
Date of diagnosis	



Through consultation with the learner and training provider, please detail what type of accommodation is, in their view, necessary for each assessment. This information will inform decisions about the nature of support where the grounds for reasonable adjustments are accepted.

Details of adjustment sought

Complete as appropriate (use additional sheets if necessary).

I acknowledge that the information contained is accurate to the best of my knowledge and have provided all relevant information.

Signed	
Date	



Annex C: Special Considerations Request Form

All special considerations requests should be provided either before the assessment event, wherever possible, or at latest **seven days** after the event (inclusive of the day of the event) and sent to:

info@efiawards.co.uk.

Learner details	
Learner name	
Learner email address	
Apprenticeship programme (if applicable)	
Employer organisation (if applicable)	
Date of assessment for which special consideration is being requested	

Describe the reason for requesting special considerations
Complete as appropriate (use additional sheets if necessary). Please list all evidence in support of your request, which should be attached to this form as appropriate.

I acknowledge that the information contained is accurate to the best of my knowledge and have provided all relevant information.

Signed	
Date	