



ETC Awards Limited

Reasonable Adjustments Policy

Regulatory references

Ofqual General Conditions of Recognition
<i>G6 Arrangements for Reasonable Adjustments</i> <i>G7 Arrangements for Special Considerations</i>

Introduction

This policy is primarily aimed at our centres and learners who are delivering/registered on or have taken an ETA approved qualification/unit. It is also for use by our staff to ensure they deal with all reasonable adjustment and special consideration requests in a consistent manner.

This policy outlines:

- our arrangements for making reasonable adjustments and special considerations in relation to our qualifications.
- how learners qualify for reasonable adjustments and special considerations
- the reasonable adjustments we will permit and those where permission is required in advance before they are applied
- what special considerations will be given to learners

Centre's responsibility

It is important that centre staff involved in the management, assessment and quality assurance of our qualifications and your learner/s are fully aware of the contents of the policy.

On their centre visits, our external quality assurers may check that your relevant colleagues and learner/s are aware of its contents and purpose.

Review arrangements

We will review the policy annually as part of our self-evaluation arrangements and revise it as and when necessary in response to customer and learner feedback, changes in our practices, actions from the regulatory authorities or external agencies or changes in legislation.

If you would like to feedback any views please contact us via the details provided on page 4.

Arrangements not covered by this policy

Circumstances for both internal and external assessment not covered in this policy should be discussed with ETA before assessment takes place. Please contact us via the details provided at the end of this policy.

Appeals

If you wish to appeal against our decision to decline requests for reasonable adjustments or special consideration arrangements, please refer to the ETA Appeals Policy.

Policy overview

ETA is committed to complying with all current and relevant legislation in relation to the development and delivery of our qualifications and, which at the time of writing includes, but is not limited to the Equality Act 2010. We seek to uphold human rights relating to race relations, disability discrimination and special educational needs of our learners and to provide equal reasonable adjustments and special considerations for all learners registered on our qualifications.

As an approved centre, we expect you to have a fair access to assessment policy in operation, which reflects the following principles and guidelines.

Assessment should be a fair test of learners' knowledge and what they are able to do, however, for some learners the usual format of assessment may not be suitable. We ensure that our assessments do not bar learners from taking our qualifications.

We recognise that reasonable adjustments or special considerations may be required at the time of assessment where:

- learners have a permanent disability or specific learning needs
- learners have a temporary disability, medical condition or learning needs
- learners are indisposed at the time of the assessment

The provision for reasonable adjustments and special consideration arrangements is made to ensure that learners receive recognition of their achievement so long as the equity, validity and reliability of the assessments can be assured. Such arrangements are not concessions to make assessment easier for learners, nor advantages to give learners a head start.

There are 2 ways in which access to fair assessment can be maintained:

- through reasonable adjustments, and
- through special considerations

Process for requesting reasonable adjustments and/or special considerations

If a centre is making a request on behalf of its learners it should submit a Reasonable Adjustments and Special Consideration Request and in doing so supply relevant supporting information. For example:

- learner's name and ETA learner registration number
- nature of, and rationale for, the request
- supporting information/evidence (e.g. medical evidence or a statement from the invigilator or any other appropriate information)

Learners can, in exceptional circumstances, make requests direct to ETA by contacting the Solutions and Compliance Manager (See the 'Contact us' section on page 4 for details).

Requests for reasonable adjustments should be submitted at least 30 days before the assessment.

Requests for special consideration should be submitted as soon as possible after

the assessment and not later than 5 working days after the assessment. Requests for special consideration may only be accepted after the results of assessment have been released in the following circumstances:

- application has been overlooked at the centre and the oversight is confirmed by the centre co-coordinator
- medical evidence comes to light about a learner's condition, which demonstrates that the learner must have been affected by the condition at the time of the assessment, even though the problem revealed itself only after the assessment
- for on line assessments where results are immediately available.

If the application for special consideration is successful, the learner's performance will be reviewed in the light of available evidence. It should be noted that a successful application of special consideration will not necessarily change a learner's result.

How ETA will deal with requests

We will aim to respond to all requests within 10 working days of receipt. If we are unable to respond within this time we will provide you with an estimated response date.

Definition of reasonable adjustments

A reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. They are made to an assessment for a qualification or accreditation to enable a disabled learner to demonstrate his or her knowledge, skills and understanding of the levels of attainment required by the specification for that qualification.

Reasonable adjustments must not affect the integrity of what needs to be assessed, but may involve:

- changing usual assessment arrangements, for example allowing a learner extra time to complete the assessment activity
- adapting assessment materials, such as providing materials in Braille
- providing assistance during assessment, such as a sign language interpreter or a reader
- re-organising the assessment room, such as removing visual stimuli for an autistic learner
- changing the assessment method, for example from a written assessment to a spoken assessment
- using assistive technology, such as screen reading or voice activated software
- providing the mechanism to have different colour backgrounds to screens for on line assessments or asking for permission for copying to different coloured paper for paper- based assessments
- providing and allowing different coloured transparencies with which to view assessment papers

Reasonable adjustments are approved or set in place before the assessment activity takes place; they constitute an arrangement to give the learner access to the programme. The use

of a reasonable adjustment will not be taken into consideration during the

assessment of a learner's work.

ETA and centres are only required by law to do what is 'reasonable' in terms of giving access. What is reasonable will depend on the individual circumstances, cost implications and the practicality and effectiveness of the adjustment. Other factors, such as the need to maintain competence standards and health and safety, will also be taken into consideration.

Definition of special considerations

Special consideration can be applied after an assessment if there was a reason the learner may have been disadvantaged during the assessment.

For example, special consideration could apply to a learner who had temporarily experienced:

- an illness or injury
- some other event outside of their control

and which has had, or is likely to have had, a material effect on that learner's ability to take an assessment or demonstrate his or her level of attainment in an assessment.

Special consideration should not give the learner an unfair advantage, neither should its use cause the user of the certificate to be misled regarding a learner's achievements. The learner's result must reflect his / her achievement in the assessment and not necessarily his / her potential ability.

Special consideration, if successful, may result in a small post-assessment adjustment to the mark of the learner. The size of the adjustment will depend on the circumstances and reflect the difficulty faced by the learner.

Centres should note that:

- where an assessment requires the learner to demonstrate practical competence or where criteria have to be met fully, or in the case of qualifications that confer a License to Practice, it may not be possible to apply special consideration
- in some circumstances, for example for on-demand assessments, it may be more appropriate to offer the learner an opportunity to take the assessment at a later date

Contact us

If you've any queries about the contents of the policy, please contact the Solutions and Compliance Manager at:

Tel: 07778198876

Email: peta@eta-gms.com

Section 1 - Making reasonable adjustments

Principles of making reasonable adjustments

These principles should be followed when making decisions about a learner's need for adjustments to assessment:

- should not invalidate the assessment requirements of the qualification
- should not give the learners an unfair advantage
- should reflect the learner's normal way of working
- should be based on the individual need of the learner

We and our centres have a responsibility to ensure that the process of assessment is robust and fair and allows the learner to show what they know and can do without compromising the assessment criteria.

When considering whether an adjustment to assessment is appropriate, ETA and our centres need to bear in mind the following (where appropriate for the related qualification or accreditation):

- adjustments to assessment should not compensate the learner for lack of knowledge and skills. The learner must be able to cope with the content of the assessment and be able to work at the level required for the assessment.
- any adjustment to assessment must not invalidate the assessment requirements of the qualification or the requirements of the associated assessment strategy.

Competence standards should not be altered. Whilst we will take all reasonable steps to ensure that a learner with a disability or difficulty is not placed at a substantial disadvantage, in comparison with persons who are not disabled, in terms of access to assessment, there is no duty to make any adjustment to a provision, criterion or practice which is defined as a competence standard.

All learners' performance must be assessed against set standards. These standards cannot be altered, but it may be possible to change the delivery or process of assessment so that each learner has an equal opportunity to demonstrate what they know, understand and can do.

- any adjustment to assessment must not give the learner an unfair advantage or disadvantage over other learners. The qualification or accreditation of a learner who had an adjustment to assessment must have the same credibility as that of any other learner. As vocational qualifications may lead to employment, achievement of such qualifications or accreditations must give a realistic indication to the potential employer of what the holder of the certificate can do.
- any adjustment to assessments must be based on the individual need of the learner. Decisions about adjustments to assessment should be taken after careful consideration of the assessment needs of each individual learner, the assessment requirements of the qualification and the nature and extent of the support given as part of normal teaching practice. A centre should not assume that the same adjustment will be required for all assessments. Different qualifications and different methods of assessments can make different demands on the learner. The learner should be consulted throughout the process.

- any adjustments to assessment should reflect the learner's normal way of working providing this does not affect what is being assessed in any way. The learner should have experience of and practice in the use of the adjustment.
- any adjustment to assessment must be supported by evidence which is sufficient, valid and reliable.
- all adjustments to assessment must be authorised by the Centre Co-ordinator or a member of staff with delegated authority.

The process for making the adjustment

There are three routes through which a learner may be granted adjustments to assessment. These routes are to:

- use reasonable adjustments permitted at the discretion of the centre
In some cases, ETA may permit the centre to implement reasonable adjustments without seeking prior permission. In these cases ETA requires centres to keep records for inspection (including any declaration that are signed and dated by a member of the centre staff who has formally been given delegated authority for this by the Centre Co-ordinator).

- apply to ETA for permission
- agree the adjustment with ETA external verifier assigned to the centre

Centres should keep records of adjustments they have permitted and those they have requested from ETA. These records should normally be kept for 3 years following the assessment to which they apply.

It is recommended that centres nominate members of staff to take responsibility for demonstrating the implementation and recording of adjustments to assessments for monitoring by ETA or the regulatory authorities.

Qualification specific information

Health and safety considerations for practical assessments

There are no circumstances when the health and safety of a learner should be compromised in the name of assessment. In a practical activity, if there is a concern that the effects of a person's disability or difficulty may have health and safety implications for him/herself and for others, a suitably qualified person in the centre should carry out a risk assessment related to the learner's particular circumstances.

The risk assessment should identify the risks associated with the particular activity, but should also take account of any reasonable adjustments put in place for the learner which may remove or reduce the risk. The risk assessment may reveal that it is not possible for the learner to fulfill all the requirements of the assessment. In this case it may be appropriate to substitute another task. The centre should contact ETA to discuss individual cases where further clarification is necessary.

Assumptions should not be made about a disability posing a health and safety risk, but the health and safety of all learners and others must always be paramount.

Assessments which are not taken under examination conditions

With these types of assessments, the centre has greater flexibility to be responsive to an individual learner's needs and to choose an assessment activity and method that will allow the learner to demonstrate attainment.

These types of assessments may include, for example, coursework, set assignments which are researched in the learner's own time, assessment activities devised by the centre or by ETA, assessments where the learner has to collect, present or describe evidence, information or opinion in order to demonstrate competence.

The assessment requirements for many vocational qualifications fall into the above.

In these types of assessments the learner may meet the specified assessment criteria in any way that is valid. To facilitate access where there is evidence of need, the centre may:

- allow the learner to use any mechanical, electronic or other aids in order to demonstrate achievement as long as the aids:
 - are generally commercially available
 - reflect the learner's normal way of working
 - enable the learner to meet the specified criteria
 - do not give the learner an unfair advantage
- present assessment materials or documents in a way that reflects the learner's normal way of working and enables him or her to meet the specified assessment criteria, for example, materials do not have to be in written or spoken format, unless specified by the assessment requirements.
- allow the learner to present their answers or evidence in any format as long as it enables them to demonstrate that they have met the assessment criteria, for example, answers or evidence do not have to be in written or spoken format unless specified by the assessment criteria.

The centre is advised to adopt a flexible approach in identifying alternative ways of achieving the assessment requirements. The centre is advised to contact ETA to discuss alternative arrangements that may be appropriate for specific situations.

The outcome produced by the learner must at all times:

- meet the requirements of the specifications regardless of the process or method used
- be assessable
- be able to be moderated or verified.

In the case of long-term illness of an individual learner, or when a permanent health condition/disability means a learner's completion of assessment takes additional time, it may be possible to permit an extension to the deadline for the submission of work for certification. A centre should note that it will not be possible to allow time extensions for all qualifications.

Where reasonable adjustments are put in place for these types of assessments, the centre should check whether permission needs to be obtained from ETA. The centre should ensure that they adhere to ETA requirements for record keeping and supporting evidence.

Assessments for externally verified qualifications

Some qualifications require learners to compile a portfolio of evidence which can consist of a mixture of work products, observation reports, witness statements, knowledge tests, etc. Making appropriate access arrangements in qualifications or accreditations of this type can be more straightforward than in qualifications or accreditations where the mode of assessment is more firmly fixed.

The benefits of being able to vary the assessment evidence and choose the most appropriate method of obtaining evidence should be considered when the learner is first accepted onto a programme.

Where there is an identified need, the learner may present their evidence in any format as long as it enables them to demonstrate that they have met the specified assessment criteria. For example, a learner may present their evidence through the medium of Braille, or using audio or video formats. Alternatively, oral questioning or witness statements may replace written responses or signed delivery.

Where evidence is produced in Braille or signed onto video, it is the centre's responsibility to ensure that a person who is suitably qualified in Braille or sign language is available to translate the material for the internal and external verifier/assessor if this is required.

Where the learner uses alternative means of providing evidence, the method must have equal rigour to those used for other learners.

The learner must fulfill the demands of the criteria consistently over a period of time, regardless of the method used to obtain the evidence. The assessment criteria may not be amended, re-worded or omitted.

The learner may use any mechanical or electronic aids which are available in the workplace or which are commercially available in order to demonstrate competence. For example, these may include specially adapted equipment or assistive technology. The centre is required to ensure that it has the necessary and appropriate resources to enable a learner with access-related needs to produce evidence of developing the portfolio.

All adjustments should be consistent with the learner's normal way of working and must not give the learner an unfair advantage over others.

While assessors, internal and external quality assurers normally prefer to see a portfolio made up of evidence which is varied, the centre should be prepared to accept a more restrictive variety of evidence as a means of enabling access. It is sensible, however, to discuss this matter with the internal and/or external verifier at an early stage.

Where reasonable adjustments are put in place for verified types of assessments, the centre should check whether permission needs to be obtained from ETA or the external verifier. The centre should ensure that they adhere to ETA requirements for record keeping and supporting evidence.

Identifying learners who are eligible for reasonable adjustments

Learners will only be eligible for reasonable adjustments if their disability or difficulty places them at a substantial disadvantage in the assessment situation in comparison with a person who is not disabled or affected.

Any adjustment to assessment will be based on what the learner needs to access the assessment. Below are some examples of learner needs that may be eligible for adjustments to assessments. This list is not exhaustive and it should be noted that some learner needs will fall within more than one of the categories set out below.

- **communication and interaction needs**

A learner with communication and interaction difficulties may have problems with reading or writing, the effects of which could be reduced through the use of a reader, word processor, scribe, British Sign Language (BSL)/English interpreter, screen reading software or voice activated software. They may also benefit from extra time during assessments that are time-constrained to allow them to demonstrate their skills and knowledge.

- **cognition and learning needs**

A learner with learning difficulties and difficulties with comprehension may benefit from extra time in time-constrained examinations. They may also need assistance with reading and writing.

- **sensory and physical needs**

A learner may need to have assessment material modified for hearing impairment and visual impairment. They may also need to use a BSL/English interpreter, practical assistant, reader and scribe. In addition they may benefit from the use of assistive technology and extra time to complete assessments.

- **behavioral, Emotional and Social needs**

The learner may benefit from supervised rest breaks and separate accommodation, either within the centre or at an alternative venue. A learner with attention difficulties may need the use of a prompter.

- **learners for whom English is an additional language**

A learner may benefit from extra time during assessments that are time constrained or who are using a bilingual dictionary.

The learner's need of the dictionary does not in itself justify allowing the learner extra time, unless the learner has to refer to the dictionary so often that examination time is used for this purpose instead of answering the questions

It is the centre's responsibility to ensure that all applications for reasonable adjustments are based on the individual need of the learner and that the evidence in support of the application is sufficient, reliable and valid. A centre should maintain records of all cases for audit purposes and to monitor the effectiveness of the reasonable adjustments that have been made.

Section 2 - Making special considerations

We will review the circumstances and evidence surrounding each request for special consideration to ensure that the decision made maintains the equity, validity and reliability of the assessment for the learner and does not give the learner an unfair advantage.

A learner who is fully prepared and present for a scheduled assessment may be eligible for special consideration if:

- performance in an assessment is affected by circumstances beyond the control of the learner e.g. recent personal illness, accident, bereavement, serious disturbance during the assessment
- alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate
- part of an assessment has been missed due to circumstances beyond the control of the learner
- there is a sufficient difference between the part of the assessment to which special consideration is applied and other parts of the qualification that have been achieved to infer that the learner could have performed more successfully in the assessment

A learner will not be eligible for special consideration if:

- no evidence is supplied by the centre that the learner has been affected at the time of the assessment by a particular condition
- any part of the assessment is missed due to personal arrangements including holidays or unauthorised absence
- preparation for a component is affected by difficulties during the course, e.g. disturbances through building work, lack of proper facilities, changes in or shortages of staff, or industrial disputes