

POL06 – Reasonable Adjustments, and Special Considerations Policy

1. Purpose

RPD is committed to offering fair and equal opportunities to access our end-point assessment service, ensuring that all learners / apprentices are granted equal opportunity to assessment, in line with the Equality Act 2010, whilst maintaining the equity, validity and reliability of assessments.

This policy defines what is meant by reasonable adjustments and special considerations and details the approach to apply.

2. Regulation

RPD is required to comply with Ofqual's General Conditions in relation to reasonable adjustments and special considerations, namely condition G6 and G7.

This policy also uses, as its reference, the Institute for Apprenticeships and Technical Education guidance on reasonable adjustments.

3. Reasonable Adjustments

Reasonable adjustment is defined by Ofqual as: “an adjustment made to an assessment for a qualification so as to enable a disabled Learner / Apprentice to demonstrate his or her knowledge, skills and understanding to the levels of attainment required by the specification for that qualification.” Contextualised to end-point assessment, this means:

adjustments made to an end-point assessment so as to enable a learner / apprentice to demonstrate their knowledge, skills, and behaviours to the levels of attainment required by the apprenticeship end-point assessment plan.

The Equality Act 2010 defines disability as a physical or mental impairment which has substantial and long-term adverse effect on a person's ability to perform normal day to day activities.

3.1 The Application of Reasonable Adjustments

A 'reasonable adjustment' helps to reduce the effect of a disability or difficulty that places the learner / apprentice at a substantial disadvantage in the assessment situation. Reasonable adjustments must not give the apprentice an unfair advantage and must not affect the integrity of what is being assessed. When a reasonable adjustment has been agreed and applied, the work produced by the learner / apprentice will be marked to the same standards and assessment requirements as the work assessed of the other learners / apprentices

A reasonable adjustment is unique to an individual Learner / Apprentice and will be considered on the information received. In order to ensure consistency of approach we use the Institute for Apprenticeships and Technical Education guide to reasonable adjustments as provided within the appendix to this policy.

Reasonable adjustments in assessment should mirror the types of reasonable adjustments and additional support that the learner / apprentice has received from their employer and/or training provider during their apprenticeship programme.

Reasonable adjustments are approved or set in place before the assessment activity takes place.

3.2 How to apply for reasonable adjustments

Reasonable adjustments can be applied for by a learner / apprentice, their employer, or their training provider. They must be notified in advance of End-Point Assessment, no later than at the gateway to end-point assessment, using the application form contained in Appendix 2 of this Policy.

Adjustments requested should mirror the types of reasonable adjustments and additional support that the learner / apprentice has received from their employer and/or training provider during their apprenticeship programme, and the learner / apprentice should be fully involved in any decisions about adjustments.

Applications must be supported with documentary evidence and submitted to the office manager in writing / email.

The application, and associated learner / apprentice information, will only be made available to those on a 'need to know' basis based on the Equality Act 2010 and UK Data protection regulations. This will include administrative staff, the assessor, and any people who may be required to assist the learner / apprentice during the assessment.

Documentary evidence should outline the nature and severity of a learner / apprentice's disability, and could include:

Evidence of assessment of the apprentice's needs by a member of staff with competence and responsibility in the areas, such as learning support staff, trainers, and other specialist staff.

History of the provision provided by the employer and provider during the apprentice training

Written evidence produced by independent, authoritative, specialists. This could take the form of medical, psychological, or professional reports or assessments. These reports should state the name, title and professional credentials of the person who wrote the report, and the report should detail the nature of the difficulty and extent to which the apprentice is affected by the difficulty, including the effects of any medication that the apprentice may be taking.

An apprentice with an Education and health Care Plan (EHCP) does not automatically qualify for reasonable adjustments, but it will be considered with any request.

3.3 Approval of Reasonable adjustments

All requests will be considered on the information received. The request will be reviewed by the Administrative Support Assistant and agreed by the Office Manager. If there is a conflict of interest the decision will be made by the Managing director. RPD may contact the learner / apprentice's training provider to discuss what adjustments have already been given during the on-programme / learning phase of the apprenticeship.

The review of the request and agreed reasonable adjustment will be made within 7 working days from receipt of the request.

Whether an adjustment will be considered reasonable will depend on several factors which will include, but are not limited to:

- the needs of the disabled apprentice.

- the types of adjustment requested as compared to the adjustments provided on-programme.
- the effectiveness of the adjustment.
- the cost of the adjustment; and
- the likely impact of the adjustment upon the Apprentice and other Apprentices.

Some adjustments may not be considered reasonable if they:

- Do not mirror the adjustments of support provided on-programme.
- Affect the security and integrity of the apprenticeship itself.
- Put in jeopardy the health and well-being of the apprentice.

Where a request is rejected, or partially accepted, we will provide a written justification behind the decision.

3.4 Reasonable adjustments during assessment

The decision will include detail of the requirements around the provision of the adjustment, for example:

- If rest breaks are permitted, the learner / apprentice may not be permitted to talk with third parties during rest breaks
- The support of a reader will be solely to read text and not to advise the learner / apprentice or answer questions.
- Modified equipment must be approved by our EPA team in advance of the assessment.

Should third parties be required for an adjustment, such as a reader, full checks will be made for possible conflicts of interest prior to their appointment.

RPD will ensure that all reasonable adjustments are in place for the assessment and will provide the necessary briefing, and/or training to the assessors.

4. Special Considerations

4.1 Definition of special consideration

A special consideration is defined by Ofqual as a consideration to be given to a Learner / Apprentice who has temporarily experienced an illness or injury, or some other event outside of the Learner / Apprentice's control, which has had, or is reasonably likely to have materially affected the Learner / Apprentice's ability to:

- take an assessment
- demonstrate his or her level of attainment in an assessment.

4.2 Application of special considerations

A special consideration is an adjustment which may be applied after an assessment where the apprentice has encountered exceptional circumstances, beyond their control, that may have disadvantaged them during their assessment. For example:

- their performance in an assessment is affected by personal circumstances beyond the control of the learner / apprentice, e.g., recent personal illness, accident, bereavement

- their performance in an assessment is affected by assessment circumstances beyond the control of the learner / apprentice, e.g., serious disturbance during the assessment such as an issue with their technology or a fire alarm

Requests for special consideration will not be permissible under the following circumstances:

- if the assessment is missed due to pre-planned arrangements such as holiday, and hospital appointments.
- if the request is based on a minor illness or a minor disturbance during the assessment, such as a mobile phone ringing.
- if the request is solely on the grounds of disability or learning difficulty. In these circumstances, the request must have been made and agreed in advance of the assessment

If the circumstances beyond the learner / apprentice's control are the result of the RPD staffing or equipment failure, a request for special consideration is not required, and the assessment will be re-arranged. In such circumstances the learner / apprentice has the right to complain in line with RPD POL08 Complaints/Appeals Policy. RPD will also consider any potential or actual adverse effects and investigate and report to the regulator accordingly.

4.3 How to apply for special considerations

Learner / Apprentice's must apply for Special Consideration in writing within four working days prior to the event (Assessment / Training) and include the relevant evidence to support their application. The learners / apprentice's employer must sign to support the application for special considerations.

Applications for special considerations must be submitted by email to Administrative Support Assistant on ID@RPD.co.uk.

4.4 Decisions on special considerations

The request will be considered by RPD Office Manager, with a written decision about whether to accept or reject the application within two working days.

Should there be any conflicts of interest with the Office Manager considering the application, it will be considered by the Managing Director

If the application is accepted, a range of options may be available, which will depend on the circumstances, for example:

- Re-scheduling of the assessment
- the rescheduling of the assessment in such circumstances is not considered a re-sit or re-take.
- re-assessment will be carried out no later than four weeks after the application for special consideration, depending on the learner / apprentice's circumstances.
- Re-marking of the assessment to take account of the reduced time a learner / apprentice had to complete the assessment.

It should be noted that a successful application of Special Consideration will not necessarily change a learner / apprentice's results.

5 Appeals

If a learner / apprentice wishes to appeal against a decision on a reasonable adjustments or special consideration arrangement that was applied, please refer to the RPD POL08 Complaints/Appeals Policy.

6 Disclosure, Confidentiality and Monitoring

Information about a learner / apprentice's disability is deemed 'sensitive personal data, and therefore our EPA team, the employer and/or the training provider, if appropriate, are required by law (under General Data Protection Regulation) to process the information 'fairly and lawfully'.

We will keep in confidence all correspondence and documentation received in accordance with General Data Protection Regulation, using RPD SharePoint and the Assure system.

A learner / apprentice's information will only be made available to those on a need-to-know basis based on the Equality Act 2010. This will include the assessor/invigator and those who may be required to assist the learner / apprentice during the assessment, such as a scribe or sign language interpreter.

We may be required to provide regular reports to the regulators regarding the total number of requests for extra time due to disability and the breakdown of requests. This report will not contain a learner / apprentice's name or any detailed information about the learner / apprentice. We will not pass on any sensitive information without the learner / apprentice's written consent.

We will record and evaluate all requests, outcomes, and feedback. This information will ensure consistency over time and will be available to the regulatory authorities on request.

7 Document Retention

We will keep on record all reasonable adjustment and special consideration applications and evidence for a period of 6 years after the assessment in line with the document retention period specified within the conditions for acceptance for end-point assessment organisations.

APPENDIX 1- Types of reasonable adjustment

<https://www.instituteforapprenticeships.org/quality/end-point-assessment-reasonable-adjustments-guidance/>

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

Assessment method Reasonable adjustment	Observation	Practical Skills Test	Test	Project	Presentation	Professional Discussion
Extra time allowance	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 within the		6	3, 4, 5, 6	3, 4, 5, 6	3, 4, 5, 6	3, 4, 5, 6

Assessment method Reasonable adjustment	Observation	Practical Skills Test	Test	Project	Presentation	Professional Discussion
method of assessment						
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

APPENDIX 2 - reasonable adjustment application

Name of the apprentice:			Apprentice ULN	
Name of the Employer:				
Name of the Training Provider:				
Contact Details				
Title and Level of the Apprenticeship:				
Date of end-point assessment:				
Disability or Learning Difficulty Code	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			
Details of the reasonable adjustments and additional support that the apprentice has received during their apprenticeship programme				
End-point Assessment Component (e.g., practical observation)	Disability or Learning Difficulty Code	Reasonable Adjustment(s) Requested *	Supporting Evidence**	
* For example: wheelchair access/adapted equipment, printed materials in accessible format, specialist software, reader, scribe, coloured overlays, extra time, rest breaks (please use the chart in the appendix of the policy to determine appropriate adjustment request). The request should mirror the types of reasonable adjustments and additional support that the apprentice has received from their employer and/or training provider during their apprenticeship programme ** copy of diagnosis, expert supplying the diagnosis and date				
Declaration				
I confirm that the above apprentice(s) have been assessed as requiring reasonable adjustments, that the apprentice(s) have been fully involved in any discussion about requests for adjustments / adaptations.				
Role and Signature of employer representative				
Signature of training provider representative				
Date				

APPENDIX 3 EPAO Decision

End-point Assessment Component (e.g., practical observation)	Disability or Learning Difficulty Code	Reasonable Adjustment(s) Decision (approved / rejected)	Detail of provision approved OR Reason for rejection
Declaration This is to confirm that the decision regarding reasonable adjustments has been made without any conflict of interest, and that where: - the application has been rejected; a full explanation has been provided alongside the rights to appeal - the application has been approved; the reasonable adjustments approved have been detailed and are in line with those expected of industry standards and health and safety requirements, and that the adjustment will not impact upon the integrity of the assessment.			
Name of EPAO Signatory			
Signature			
Date			

APPENDIX 4 – Special Considerations Application

Name of the apprentice:			
Unique Learner / Apprentice Number (ULN) of apprentice:			
Name of the Employer:			
Name of the Training Provider:			
Contact Details			
Title and Level of the Apprenticeship:			
End-point Assessment Component (e.g., observation)	Date of Assessment	Reason for special consideration request	Supporting evidence
Was the end-point assessor / invigilator notified at the time of the assessment?	Yes (please detail who was notified)		No (please detail why they were not notified)
Declaration			
Signature of apprentice			
Name, Job Role, and Signature of employer representative			
Name and Signature of training provider representative			
Date			

EPAO Decision	
End-point Assessment Component (e.g., observation)	
Name of EPAO Investigator	
Name of person that checked and confirmed that the investigator has no conflict of interest	
Details of Investigation (actions, those involved)	
Investigation outcome reported to	
EPAO Decision	
Date reported to applicant	

