

Reasonable Adjustments and Special Considerations Policy

End-point Assessment

Version 1.0

Contents

1.	Introduction	3
2.	Apprenticeship Provider responsibility	3
3.	Review arrangements.....	4
4.	Arrangements not covered by this policy.....	4
5.	Appeals	4
6.	Policy overview	4
7.	Reasonable Adjustments	5
7.1.	Definition of Reasonable Adjustments.....	5
7.2.	Submitting a Reasonable Adjustment Application	5
7.3.	Acceptable supporting evidence.....	6
8.	Special Consideration	7
8.1.	Definition of Special Consideration.....	7
8.2.	Submitting a Special Consideration Application	8
9.	How VTCT will deal with applications.....	8
10.	Invigilating learners with access arrangements.....	9
10.1.	Reader	9
10.2.	Scribe	9
10.3.	Sign language interpreter	9
11.	Prompter.....	10
11.1.	Upholding the EPA	10
	Appendix 1 – Reasonable adjustments permissions table.....	11
	Appendix 2 – Examples of Special Considerations post assessment.....	13

1. Introduction

The Equality Act 2010 requires awarding bodies to make reasonable adjustments where a disabled learner would be at a substantial disadvantage in undertaking an assessment in comparison to learners who are not disabled.

This policy sets out the process for requesting reasonable adjustments and special considerations and provides VTCT group Apprenticeship Providers with guidance for implementing these. The recommendations in this guide are not exhaustive and, in every case, it is for the VTCT Group and our approved Apprenticeship Providers to determine on a case-by-case basis whether reasonable adjustments are necessary and what reasonable adjustments will be effective.

This policy outlines:

- VTCT Skillsfirst arrangements for making Reasonable Adjustments and giving Special Considerations in relation to our EPAs
- How apprentices qualify for Reasonable Adjustments and Special Considerations
- The Reasonable Adjustments we permit and those where permission is required in advance before they are applied
- In what circumstance a Special Consideration be given to apprentices

2. Apprenticeship Provider responsibility

It is important that staff involved in the management, assessment, administration, and quality assurance of End-point Assessments are fully aware of the contents of this policy and are able to advise apprentices appropriately.

Apprenticeship Providers have a duty to ensure the rights of apprentices to access End-point Assessments in a way most appropriate for their individual needs are upheld.

Apprenticeship Providers are reminded, charging for providing or arranging reasonable adjustments is unlawful under Section 20 (7) of the Equality Act 2010, which states:

'A person (A) who is subject to a duty to make reasonable adjustments is not (subject to express provision to the contrary) entitled to require a disabled person, in relation to whom A is required to comply with the duty, to pay to any extent A's costs of complying with the duty.'

This means that where an adjustment or aid is necessary, and it is reasonable for the Apprenticeship Provider to make the adjustment or provide the aid, the Provider or EPAO must not charge the disabled person any additional fee in relation to that adjustment or aid.

Please note: VTCT Group is duty-bound by law to inform the relevant agencies should this practice be identified.

Apprenticeship Providers must ensure they have an inclusive assessment process in place that adheres to disability and equal opportunity legislation and other regulatory criteria whilst ensuring standards of assessment are maintained.

All records, including the appropriate evidence to support a Reasonable Adjustment or Special Consideration, must be retained by the Apprenticeship Provider for at least three years from the end of the year to which they relate.

Apprenticeship Providers must make the learner evidence available to VTCT Group upon request.

3. Review arrangements

VTCT Group will review this policy annually as part of its self-evaluation arrangements and revise it as and when necessary, in response to customer and apprentice feedback, changes in our practices, requirements from the EQA, or changes in legislation.

4. Arrangements not covered by this policy

Circumstances for End-point Assessment not covered in this policy should be discussed with the EPA Administration Team before the assessment takes place. Please contact us via the details provided at the end of this policy.

5. Appeals

If you wish to appeal against our decision to decline a request for a Reasonable Adjustment or a Special Consideration arrangement, please refer to VTCT EPA Complaints & Appeals Policy.

6. Policy overview

In order to comply with The Equality Act 2010 (Disability) Regulations 2010, EPAO must have in place clear arrangements to make Reasonable Adjustments in relation to its EPAs. A Reasonable Adjustment enables an apprentice with special educational needs or a disability to demonstrate their knowledge, skills, and understanding to the levels of attainment required by the EPA, without affecting the integrity of the assessment.

Often apprentices are required to compile a portfolio of evidence which can consist of a mixture of work products, observation reports, witness testimonies, underpinning knowledge tests etc. Making appropriate access arrangements in assessments of this type can be easier than in EPAs where the mode of assessment is more firmly fixed.

It is important to ascertain the most appropriate method of obtaining evidence when an apprentice is first enrolled in an apprenticeship. The apprentice may present their evidence of assessment in any format, as long as it enables them to demonstrate that they have met the specified assessment criteria. For example, an apprentice may present their evidence through the medium of braille, on audio recording equipment, or on video, rather than in written formats. Alternatively, oral questioning or witness testimonies may replace written responses.

The provision for Reasonable Adjustments and Special Consideration is made to ensure that apprentices receive recognition of their achievement so long as the comparability, 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. For guidance on Reasonable Adjustments permissions table, please see Appendix 1.

7. Reasonable Adjustments

7.1. Definition of Reasonable Adjustments

A Reasonable Adjustment is any action that helps to reduce the effect of special educational needs or a disability that places the apprentice at a substantial disadvantage during an assessment. A Reasonable Adjustment is made to an assessment to enable the apprentice to demonstrate their knowledge, skills, and understanding of the levels of attainment required.

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

- Changing usual assessment arrangements, for example allowing an apprentice extra time to complete the assessment activity
- Adapting assessment materials, such as providing materials in Braille
- Provide assistance during the assessment, such as a sign language interpreter or a reader
- Re-organising the assessment room, such as removing visual stimuli for an apprentice with autism
- Using assistive technology, such as screen reading or voice-activated software
- Provide the mechanism to have different colour backgrounds to screens for onscreen assessments
- Provide Apprenticeship Providers the mechanism to request permission for copying to different coloured paper for paper-based assessments
- Provide and allow 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 apprentice access to the assessment. The use of a Reasonable Adjustment will not be taken into consideration during or after the assessment of an apprentice's work. It is the Providers responsibility to ensure a Reasonable Adjustment is approved where necessary by VTCT Group and arrangements are put in place prior to the assessment taking place.

VTCT Group and Apprenticeship Providers are only required by law to do what is 'reasonable' in terms of giving access to assessment. 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.

7.2. Submitting a Reasonable Adjustment Application

If an Apprenticeship Provider is making a request to VTCT Group on behalf of its apprentice, it should complete an online Reasonable Adjustments Request Form or a Special Consideration Request Form through the epaPro (EPA Management System). You will be asked to supply relevant supporting information.

Requests for reasonable adjustments must be submitted no later than 30 working days before the assessment.

7.3. Acceptable supporting evidence

An application for a Reasonable Adjustment must be accompanied by supporting evidence.

See below a list of acceptable evidence, please note this is not an exhaustive list:

- Disability statement
- SEN report
- Doctors letter
- Psychological report
- Care plan
- Diagnostic report
- Education Health Care (EHC) plan
- Assessment report

There are instances where the implications of a difficulty are clear and the Apprenticeship Provider can provide supporting evidence of a disability or difficulty. For these reasonable adjustments, the Provider does not need to provide any further evidence. For example, an apprentice who is registered as blind or partially sighted.

In cases where the implications of the difficulty are not obvious, for example, identified learning difficulties or mental health difficulties, we require the Apprenticeship Provider to provide additional evidence that confirms the effect of the impairment in regard to the apprentice's performance within an assessment.

The evidence should consider:

- The Apprenticeship Provider's assessment of the apprentice's needs in relation to the assessment the reasonable adjustment relates to, including how the Provider plans to meet the apprentice's needs. It should also include how the Apprenticeship Provider has ensured the apprentice can cope with the level and content of the assessment. This evidence can include information from previous Providers the apprentice has attended
- The history of the support the apprentice has received from the Apprenticeship Provider during the learning programme including through formative assessment

If the evidence above is not available for the apprentice, we may accept a statement from the Assessor which explains in detail the need for a Reasonable Adjustment. Any statement submitted to VTCT Group must include the information set out above.

All supporting evidence that is submitted must be individual to each apprentice and their requirements. Should there be a concern that the evidence provided contains large similarities to that provided for another apprentice(s), the request will be rejected.

8. Special Consideration

8.1. Definition of Special Consideration

Special Consideration can be applied before or after an assessment depending on the circumstance for the individual apprentice and cannot be applied to a cohort of apprentices.

For example, Special Consideration could apply to an apprentice who has:

- A temporary illness or injury (must be approved prior to the assessment)
- A temporary disability or medical condition (must be approved prior to the assessment)
- Experienced some other event outside of their control such as a fire alarm (must be applied post-assessment) which has had, or is likely to have had, a material effect on that apprentice's ability to take an assessment, or demonstrate their level of attainment in an assessment

Special Consideration cannot be applied in a cumulative fashion, for example, on the basis of a domestic crisis at the time of the examination and the apprentice suffering from a viral illness.

If the application for Special Consideration post-assessment is successful, the apprentice's performance will be reviewed in light of available evidence.

A Special Consideration should not give the apprentice an unfair advantage; neither should its use cause the user of the certificate to be misled regarding an apprentice's achievements. The apprentice's result must reflect their achievement in the assessment and not their potential ability.

A Special Consideration, if successful, may result in a small post-assessment adjustment to the mark of the apprentice, but not necessarily so. The size of the adjustment (to a maximum of 5%) will depend on the circumstances and reflect the difficulty faced by the apprentice. See Appendix 2 for further information.

Providers should note that:

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

8.2. Submitting a Special Consideration Application

If the request is related to a temporary illness, injury, disability, or medical condition, it must be submitted to VTCT Group with at least one working days notice prior to the assessment. This will ensure that special consideration can be reviewed and applied before the assessment. It is important the assessment does not take place until our decision has been confirmed via epaPro.

Requests for special consideration should be submitted as soon as possible but no more than 5 working days after the assessment. This is with the exception of on-screen Situational Judgement Tests, which are required to be submitted within 24 hours of the assessment taking place.

Requests for special consideration may only be accepted after the results of the assessment have been released in the following circumstances:

- The application has been overlooked by the Employer and the oversight is confirmed by the standards assessor
- Medical evidence comes to light about an apprentice's condition, which demonstrates that the apprentice must have been affected by the condition at the time of the assessment, even though the problem revealed itself only after the assessment
- For onscreen assessments where results are immediately available

Requests for Special Consideration may only be accepted after the results of the assessment have been released in the following circumstances:

- The application has been overlooked by the Apprenticeship Provider and the oversight is confirmed by the Provider co-coordinator,
- Medical evidence comes to light about an apprentice's condition, which demonstrates that the apprentice 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-screen assessments where results are immediately available

9. How VTCT will deal with applications

All applications will be applied for via epaPro allowing the Provider to view the progress. The request will be evaluated by a member of the EPAO Administration Team or other appropriate person, with the aim of a decision being given within 5 working days. Some requests may take longer to evaluate, particularly if we need to call on specialist advice. If we are unable to respond in this timeframe, we will provide you with an estimated response date via email.

10. Invigilating learners with access arrangements

It is important the following invigilation rules are adhered to in relation to Reasonable Adjustments/Special Considerations.

In cases where additional support is required to facilitate access arrangements, the Head of Provider has the responsibility to ensure that invigilators and those facilitating access arrangements i.e. readers, scribes, and sign language interpreters understand their role and responsibilities. All involved must be trained appropriately in their role.

10.1. Reader

The invigilator is responsible for ensuring that the reader and learner are not distracted or can be overheard by other learners therefore must be in a separate room, an additional invigilator will be required.

10.2. Scribe

The invigilator is responsible for ensuring that the scribe and learner are not distracted, or be overheard by other learners, therefore must be in a separate room, an additional invigilator will be required.

10.3. Sign language interpreter

The invigilator is responsible for ensuring that the interpreter and learner are not distracted by other learners, therefore must be in a separate room, an additional invigilator will be required.

11. Prompter

A prompter may be requested if a learner loses concentration easily, has little or no sense of time, or is affected by an obsessive-compulsive disorder, leading them to repeatedly go over a question, rather than moving on to another question.

A prompter:

- Must not be the learners, relative, friend, or peer
- Must be a responsible adult
- Should keep the learner focused on the question in hand and then move them on to the next question
- Has a different role to a reader, scribe, and practical assistant, however, the same person can conduct more than one role to support the learner if permission has been granted by EPAO
- The invigilator may act as the prompter if no other learners are present

11.1. Upholding the EPA

Reasonable adjustments should support an apprentice in showing their occupational competence. As the EPAO we must balance this with upholding the validity and reliability of the: assessment methods, EPA plan, and occupational requirements.

Additionally, the outcomes of the EPA must:

- Meet the requirements of the occupational standard regardless of the process or methods used
- Be as rigorously assessed as outcomes generated by other apprentices
- Not provide an unfair advantage to the apprentice. This should be in comparison to other apprentices undertaking the same EPA without adjustments. There should be no unfair advantage in relation to the grading of the assessment
- Be able to be moderated and verified

The process of considering reasonable adjustments must be rigorous and fair.

Where any concerns are raised against these requirements, further discussion may be required. To find a solution, as the EPAO will discuss our concerns with the apprentice, training provider, and employer.

Applying reasonable adjustments is a legal duty. As the EPAO we will only decline a request for reasonable adjustment when it is determined that the adjustment would not be a 'reasonable' one.

Appendix 1 – Reasonable adjustments permissions table

The intention of the matrix is to support EPAOs in applying appropriate and consistent judgments. It uses the Higher Education Statistical Authority's (HESA) disability grouping framework to categorise disabilities. These are then overlaid with different assessment methods. This provides examples of reasonable adjustments that could be applied to EPA.

The examples in the matrix are recommendations only. The included examples are not a definitive list of what can, or cannot, be requested or approved. EPAOs must consider all requests for reasonable adjustments on an individual, case-by-case basis.

Key:-

1. No known disability
2. Cognitive processing need such as dyslexia, and dyspraxia; a need in executive function, visual processing speed, visual perception, literacy, numeracy, verbal reasoning, verbal memory, nonverbal memory
3. Social/communication needs such as autistic spectrum condition
4. Long-standing illnesses 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

Requested	Obs	Practical skills	Knowledge test	Project	Presentation	PD
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 interpreted and 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 is presented in small chunks	-	-	-	-	2,4,7	2,4,7

*** The learner must remain in view of the camera with no access to external materials**

Appendix 2 – Examples of Special Considerations post assessment

The examples listed below are provided for illustrative purposes only.

For the purpose of this list, EPAO defines immediate family as a parent, carer, partner, sibling, or child.

5% This is the maximum allowance and will be reserved for the most exceptional cases, such as:

- Terminal illness of the learner
- Terminal illness of a parent/carer
- Very recent death of a member of the immediate family
- Very serious and disruptive domestic crisis leading to acute anxiety about the family

4% Very serious problems such as:

- Life-threatening illness of learner or member of immediate family
- Major surgery at, or near the time of the examination
- Severe disease
- Severe injury arising from a car accident
- Very recent death of member of extended family
- Severe, or permanent bodily injury occurring at the time of the examinations
- Serious domestic crisis at time of examinations

3% A more common category, (more cases will fall into this category) including:

- Recent traumatic experience such as death of a close friend or distant relative
- Recent illness of a more serious nature
- Flare-up of severe congenital conditions such as epilepsy, diabetes, severe asthmatic attack
- Recently broken limbs
- Organ disease
- Physical assault trauma before an examination
- Recent domestic crisis
- Witnessing a distressing event on the day of the examination

2% The most common category of allowance – the majority of cases will fall within this category:

- Illness at the time of the assessment
- Broken limb on the mend
- Recent viral illness
- Concussion
- Effects of pregnancy (**not pregnancy** per se)
- Hay fever on the day of an examination
- Extreme distress on the day of an examination (**not simply exam related stress**)
- Where extra time has been used following reasonable adjustment approval, this should be included in the calculation
- Supervised rest breaks **must not** be included in the total duration of the papers when applying for special consideration

1% Reserved for more minor problems:

- Noise during examination which is more than momentary
- Illness of another learner which leads to disruption in the examination room
- Stress or anxiety for which medication has been prescribed
- Minor ailments
- Headache
- Minor upset arising from administrative problems, such as wrong time allocated

0% The application was reviewed but the addition of marks was deemed inappropriate. Where the request fails to meet the criteria, it will be rejected.



Document amendment history page

Version	Document Owner	Issue Date	Changes	Role
v1.0	Head of EPA Services	20/05/2024	First published	Head of EPA Services

Document Review

Role	Review Status

Document Owner

Document Owner	Document shared with
Head of EPA Services	Head of EPA Quality

Document Sign-off

Role	Sign-off Date
Head of EPA Services	02/05/2024