

# ACCESS ARRANGEMENTS POLICY

## 2022/23

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Claire Jones	
Date of next review	January 2024

## Key staff involved in the policy

Role	Name(s)
ALS lead/SENCo	<b>Karen Colton</b>
ALS lead/SENCo line manager (Senior leader)	<b>Amanda Welsh</b>
Head of centre	<b>Angus Neal</b>
Assessor(s)	<b>Jess Bussey</b>
Access arrangement facilitator(s)	<b>Karen Colton</b>

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## What are access arrangements and reasonable adjustments?

### Access arrangements

Access arrangements are agreed **before** an assessment. They allow candidates with **specific needs**, such as special educational needs, disabilities or temporary injuries to access the assessment and show what they know and can do without changing the demands of the assessment. The intention behind an access arrangement is to meet the needs of an individual candidate without affecting the integrity of the assessment. Access arrangements are the principal way in which awarding bodies comply with the duty under the Equality Act 2010\* to make 'reasonable adjustments'. (<sup>1</sup>AA, Definitions)

### Reasonable adjustments

The Equality Act 2010\* requires an awarding body to make reasonable adjustments where a candidate, who is disabled within the meaning of the Equality Act 2010, would be at a **substantial disadvantage** in comparison to someone who is not disabled. The awarding body is required to take reasonable steps to overcome that disadvantage. An example would be a Braille paper which would be a reasonable adjustment for a vision impaired candidate who could read Braille. A reasonable adjustment may be unique to that individual and may not be included in the list of available access arrangements. 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 candidate;
- the effectiveness of the adjustment;
- the cost of the adjustment; **and**
- the likely impact of the adjustment upon the candidate and other candidates.

An adjustment will not be approved if it:

- involves unreasonable costs to the awarding body;
- involves unreasonable timeframes; **or**
- affects the security and integrity of the assessment.

This is because the adjustment is not 'reasonable'. (<sup>1</sup>AA, Definitions)

\*References to legislation are to the Equality Act 2010. Separate legislation is in place for Northern Ireland (see AA 1.8). The definitions and procedures in AA relating to access arrangements and reasonable adjustments will also apply in Northern Ireland

### Purpose of the policy

The purpose of this policy is to confirm that Holy Trinity Academy has a written record which clearly shows the centre is leading on the access arrangements process and is complying with its ...obligation to identify the need for, request and implement access arrangements.

(JCQ's **General Regulations for Approved Centres**, section 5.4)

This publication is further referred to in this policy as **GR**

This policy is maintained and held by the ALS lead/SENCo alongside the individual files/e-folders of each access arrangements candidate. Each file/e-folder contains detailed records of all the essential information that is required to be held according to the regulations.

Where the ALS lead/SENCo is storing documentation electronically he/she **must** create an e-folder for each individual candidate. The candidate's e-folder must hold each of the required documents for inspection. (<sup>1</sup>AA, section 4.2)

The policy is annually reviewed to ensure that processes are carried out in accordance with the current edition of the JCQ publication 'Adjustments for candidates with disabilities and learning difficulties - **Access Arrangements and Reasonable Adjustments**'.

<sup>1</sup>This publication is further referred to in this policy as **AA**

### General principles

The principles for the centre to consider are detailed in AA (section 4.2). These include:

The purpose of an access arrangement/reasonable adjustment is to ensure, where possible, that barriers to assessment are removed for a disabled candidate preventing him/her from being placed at a substantial disadvantage due to persistent and significant difficulties. The integrity of the assessment is maintained, whilst at the same time providing access to assessments for disabled candidate.

The SENCo, or an equivalent member of staff within a FE college, **must** ensure that the proposed access arrangement/reasonable adjustment does not unfairly disadvantage or advantage the candidate.

Access arrangements/reasonable adjustments should be processed at the **start** of the course.

Arrangements **must** always be approved **before** an examination or assessment.

The arrangement(s) put in place **must** reflect the support given to the candidate in the centre.

The candidate **must** have had appropriate opportunities to practise using the access arrangement(s)/reasonable adjustment(s) before his/her first examination.

## Equalities Policy (Exams)

A large part of the access arrangements/reasonable adjustments process is covered in the Equalities Policy (Exams) which covers staff roles and responsibilities in identifying the need for, requesting and implementing access arrangements and the conduct of exams.

See separate policy

**The head of centre/senior leadership team will...** recognise its duties towards disabled candidates, including private candidates, ensuring compliance with all aspects of the Equality Act 2010†, particularly Section 20 (7). This **must** include a duty to explore and provide access to suitable courses, through the access arrangements process submit applications for reasonable adjustments and make reasonable adjustments to the service the centre provides to disabled candidates. Where the centre is under a duty to make a reasonable adjustment, the centre **must not** charge a disabled candidate any additional fee in relation to the adjustment or aid...

†or any legislation in a relevant jurisdiction other than England and Wales which has an equivalent purpose and effect ([GR](#), section 5.4)

The Access Arrangements Policy further covers the assessment process and related issues in more detail.

## The assessment process

Assessments are carried out by an assessor(s) appointed by the head of centre. The assessor(s) is (are) appropriately qualified as required by JCQ regulations in [AA](#), section 7.3.

## The qualification(s) of the current assessor(s)

**Jess Bussey LSAT (learning support advisory teacher) representing Telford and Wrekin Council**

## Appointment of assessors of candidates with learning difficulties

At the point an assessor is engaged/employed at Holy Trinity Academy: Evidence of the assessor's qualification is obtained and checked against the current requirements (AA 7.3.4) This process is carried out prior to the assessor undertaking any assessment of a candidate (AA 7.3.4)

## Checking the qualification(s) of the assessor(s)

**The head of centre/senior leadership team will...** have a **written** process in place to not only check the qualification(s) of their assessor(s) but that the correct procedures are followed as in Chapter 7 of the JCQ publication Access Arrangements and Reasonable Adjustments... ([GR](#), section 5.4)

The head of centre **must** ensure that evidence of the assessor's qualification(s) is obtained at the point of engagement/employment and prior to the assessor undertaking any assessment of a candidate.

Evidence of the assessor's qualification(s) **must** be held on file for inspection purposes and be presented to the JCQ Centre Inspector by the SENCo. (AA, section 7.3)

Jess Bussey is a specialist teacher assessor with a current SpLD Assessment Practising Certificate, as awarded by BDA, the Dyslexia Guild or Patoss and listed on the SASC website, who may conduct assessments to be recorded within Part 2 of Form 8 and where necessary undertake full diagnostic assessments. (AA7.3.3)

A photocopy of the assessor's certificate(s) (or a printout of screenshot of HCPC or SASC registration) is kept on file (AA 7.3.1) Additional information: A copy of Jess Bussey's qualification (certificate) is kept at the front of the Access Arrangements file in the SENCO's office.

### **Reporting the appointment of the assessor(s)**

A copy of Jess Bussey's qualification certificate is kept at the front of the AA file in the Senco's office. This is a copy of current Assessment Practising Certificate (APC) issued by Patoss, Dyslexia Guild or British Dyslexia Association (AA 7.4.1)

### **Process for the assessment of a candidate's learning difficulties by an assessor**

The SENCo arranges for the candidates to be assessed by the centre's appointed assessor. (AA 7.5.1)

Before the candidate's assessment, the SENCo provides the assessor with background information, painting a picture of need as required in Part 1 of Form 8. The SENCo and the assessor work together to ensure a joined-up and consistent process. (AA 7.5.2)

Evidence of the candidate's normal way of working and relevant background information is provided to the assessor prior to assessment. The independent assessor is approved by the head of centre to assess the candidates. All candidates are assessed in the light of the picture of need and the background information as detailed within Part 1 of Form 8. The assessor discusses access arrangements/reasonable adjustments with the SENCo. The responsibility to determine and request appropriate and practicable access arrangements/reasonable adjustments specifically lies with the SENCo. (AA 7.5.3)

The assessor establishes if the results of tests in literacy and/or cognitive abilities present evidence that the candidate has an impairment which substantially affects their performance. (AA 7.5.4)

The assessor personally conducts the assessments. They do not sign off assessments carried out by another professional. (AA 7.5.5)

The assessor only carries out tests which are relevant to support the application. (AA 7.5.6)

The assessor uses current editions of nationally standardised tests which produce standardised scores where published. (AA 7.5.7)

The candidate's chronological age is always less than the 'ceiling' of the test, unless there is no published test for the candidate's age. (AA 7.5.8)

Results are given as standardised scores which use a mean of 100 and a standard deviation of 15. (These are standard scores.) Standardised scores of 84 or less are described as 'below average'. Standardised scores of 85-89 are described as 'low average'. (AA 7.5.9)

Where reading speed is being assessed: a candidate with a history of reading difficulties, whose reading accuracy (at single word level), or reading comprehension, is within normal limits for his/her age, may read slowly because he/she:

- takes longer than expected to decode the words, leading to slow reading (slow reading speed);
- needs to re-read text many times to absorb its meaning (slow reading comprehension speed). 85 There are various ways of assessing text level reading speed:
  - a test which assesses speed at text level (known as reading rate or reading speed);
  - a test which combines text level speed and accuracy (sometimes known as reading fluency);
  - a test that assesses the time taken to both read the text and to answer questions on what has been read.

These test provide a score for reading comprehension speed, not just for reading comprehension.

Where a candidate reads for him/herself, a measure of text reading speed may be used as one of the two required scores for 25% extra time. The results are recorded within Part 2 of Form 8 under 'Reading Speed'. Where the candidate uses a computer reader/reader or an examination reading pen, a measure of reading speed will not be used as evidence for 25% extra time.

Tests which measure single word reading speed and efficiency are not used in this context. However, they may contribute to cognitive processing measures for extra time, as recorded within Part 2 of Form 8 under cognitive processing or in 'Other relevant information'. (AA 7.5.10)

When assessing writing skills for use of a scribe, a word processor with the spell check enabled, or speech recognition technology, there will be evidence that the candidate's impairment has substantial and long-term adverse effect. This will be shown by the candidate having:

- a below average standardised spelling accuracy score (a standardised score of 84 or less) with unrecognisable spelling attempts; or
- a below average standardised score for writing speed (a standardised score of 84 or less). In some cases, the candidate's writing is illegible or grammatically incomprehensible but improves significantly when a scribe is used. Where the candidate writes by hand, an assessment of writing speed may be used as one of the two required measures for 25% extra time. The result will be recorded within Part 2 of Form 8 under 'Writing Speed'. Where the candidate uses a scribe, speech recognition technology or a word processor, a measure of writing speed will not be used as evidence for 25% extra time. (AA 7.5.11)

When assessing cognitive processing, the following assessments might be used by the assessor short-term/working verbal memory

- short-term/working visual memory (short-term/working verbal and visual memory may be combined within a composite score)
  - phonological awareness
  - phonological memory
  - phonological processing speed/rapid naming

- visual processing speed
- visual/motor processing
  - other measures as determined appropriate for the candidate by an assessor, for example, word reading fluency/sight word efficiency, decoding fluency/nonword reading efficiency, associational /oral fluency
- mathematical processing†.

An assessment of mathematical processing will only be used as one of the two required measures for 25% extra time in Mathematics examinations. An assessment of mathematical processing with a below average score will only contribute to the evidence for 25% extra time in examinations other than Mathematics.

Where a candidate has cognitive processing difficulties which have a substantial and long-term adverse impact on their speed of working an application for 25% extra time will be made. These difficulties will be demonstrated by tests which result in at least:

- two below average standardised scores of 84 or less; or
- one below average standardised score of 84 or less and one low average standardised score (85-89); which relate to two different areas of speed of working. This could include two different areas of cognitive processing.

The SENCO will always carefully consider any privately commissioned assessment to see whether the process of gathering a picture of need, demonstrating normal way of working within the centre and ultimately assessment will be instigated (AA, 7.3.6)

Where a candidate has complex needs, i.e.

- communication and interaction needs; or
- a learning difficulty with a current EHCP or
- sensory and/or physical needs; or
- social, emotional and mental health needs; which have a substantial and long-term adverse effect on his/her speed of working, appropriate evidence of need (as below) will be available at the centre for inspection.

So as not to give an unfair advantage, the SENCo will address both bullet points below, on centre headed paper/template, signed, and dated):

- confirm that 25% extra time is the candidate's normal way of working within the centre;
- provide evidence from teaching staff that the candidate has persistent and significant difficulties, and how these substantially impact on teaching and learning.

The SENCo's detailed information, as above, will be supported by specialist evidence confirming the candidate's disability:

- a letter/report from CAMHS, a HCPC registered psychologist, a medical consultant, a psychiatrist, a Speech and Language Therapist (SaLT); or
- a letter/report from the Local Authority Specialist Service, Local Authority Sensory Impairment Service or Occupational Health Service†; or
- a current EHCP, which confirms the candidate's learning difficulty, medical condition, physical disability, sensory or multi- sensory impairment. †For example, an Occupational Therapist specialising in Children and Young People Services, learning disability, mental health. The specialist evidence is not required to recommend 25% extra time but to simply confirm the candidate's disability. The specialist evidence may relate to any age provided it remains current. (AA 5.2.3)



## Picture of need/normal way of working

A Form 8, with Part 2 completed no earlier than the start of Year 9 for GCSE qualifications, may roll forward to GCE AS and/or A-level qualifications where a candidate requires:

- 25% extra time; and/or
- a scribe

As a minimum, a 'skeleton' Part 1 of Form 8 will be completed prior to the assessment by the SENCo or the assessor working within the centre detailing the candidate's background and history of support. The three questions within Part 1 of Form 8 will be addressed. Part 1 of Form 8 is a pen portrait of the candidate's needs. It allows the SENCo to 'paint a holistic picture of need', confirming normal way of working bringing together:

- if known, arrangements made for Key Stage 2 tests;
- comments and observations from teaching staff and support staff (i.e. Learning Support Assistants, Teaching Assistants and Communication Support Workers);
- intervention strategies (e.g. individual education/learning plans) in place for the candidate;
- pupil premium indicators; • screening test results;
- use of pupil baseline and tracking data;
- information about any differentiation in the classroom;
- normal way of working in the classroom (where appropriate); • arrangements made for end of year internal school examinations/mock examinations.

If very little information is available, a selection from the following will be used by the SENCo to paint a picture of need within Part 1 of Form 8, for example:

- screening test results; • the candidate's self reported difficulties;
- comments and observations from teaching staff and support staff (i.e. Learning Support Assistants, Teaching Assistants and Communication Support Workers) who have noted the candidate's difficulties;
- comments in school reports and/or pupil tracking data;
- information relayed by telephone, with notes taken, or a photocopy of Form 8, where a candidate has moved, for example, from an 11 to 16 school to a FE College.

Part 3 of Form 8 will be completed by the SENCo once the assessor has completed their testing and confirmed that the candidate has an impairment which substantially affects their performance. Part 3 of Form 8 will make recommendations for access arrangements/adjustments taking into account:

- the information from the assessment (Part 2 of Form 8);
- the requirements of the specifications; and • the candidate's normal way of working in the centre (Part 1 of Form 8). (AA 7.6.1)

The completion of Form 8, Parts 1, 2 and 3 will enable the JCQ Centre Inspector to see clearly and concisely the candidate's normal way of working within the centre and the results of an assessment. (AA 7.6.2)

All assessors, as appointed by the head of centre and thus having an established relationship with the centre, will use Form 8, Part 2, to record the results of their assessment. At the same time, the assessor will sign and date Part 2. (AA 7.6.3)

Once Form 8 has been completed, assessors employed within the centre will process the application using Access arrangements online (see the qualifications listed within the Deadlines section). For inspection purposes a fully completed Form 8 (Parts 1, 2 and 3), signed and dated will be kept in an access arrangements folder locked in the SENCo's office. (AA 7.6.4)

Assessors employed outside the centre will receive at least a 'skeleton' Part 1 of Form 8 from the SENCo before assessing the candidate and then completing Part 2 of Form 8. (AA 7.6.5)

The assessor will:

- sign and date Form 8, Part 2;
- have administered each assessment him/herself.

All form 8's held on file are originals, not copies.

## Processing access arrangements and adjustments

### Arrangements/adjustments requiring awarding body approval

Access arrangements online (AAO) is a tool provided by JCQ member awarding bodies for centres to apply for required access arrangement approval for the qualifications covered by the tool. This tool also provides the facility to order modified papers for those qualifications included. (Refer to [AA](#), chapter 8 (Processing applications for access arrangements and adjustments) and chapter 6 (Modified papers)).

AAO is accessed within the JCQ Centre Admin Portal (CAP) by logging in to one of the awarding body secure extranet sites. A single application for approval is required for each candidate regardless of the awarding body used.

Where possible HTA will make a single online application for each candidate requiring access arrangements/ reasonable adjustments using any of the awarding bodies' secure extranet sites. The SENCo and Exams officer are jointly responsible for online applications. NWO, file notes and Personal data consent forms signed by the learner. Completion of the data consent forms must be prior to application and [confirmation by the examinations officer and/or SENCo](#), they will be retained for 26 months from the date of the online application being approved. All of the evidence mentioned, as well as the AAO approval will be printed and kept on file in the SENCO's office. (AA 8.1)

Where an individual's needs will not be accommodated by AAO, For example:

- a candidate with a recent brain injury who may need access to eye gaze technology;
- a candidate who needs access to a device which monitors their heart rate or blood sugar levels; or
- a candidate who needs access to an individual timer on account of a learning difficulty.

If a candidate has very substantial needs which are not accommodated by the online system contact with the awarding bodies will be made with by the exams officer to discuss the individual cases. The SENCo will keep a written record of such discussions. (AA

If an application is not approved, the SENCo or the assessor working within the centre must consider whether this is because the candidate does not meet the published criteria for one of the arrangements requested and does not have a substantial and long-term impairment for the required arrangement.

The SENCo **must** keep detailed records, whether electronically or in hard copy paper format, of all the essential information on file. This includes a copy of the candidate's approved application, appropriate evidence of need (where required) **and** a signed candidate personal data consent form for inspection by the JCQ Centre Inspection Service. (AA, section 8.4)

The following applications will be processed on AAO

- Bilingual dictionary with 10% extra time (solely for those qualifications listed within Chapter 5, paragraph 5.18.2)

- Computer reader/reader
- 25% extra time
- Extra time over 25%†
- Practical Assistant†
- Scribe/speech recognition technology. †

The following will not be processed using AAO

- Amplification equipment
- Bilingual dictionary
- Braille transcript
- Braille
- Closed Circuit Television (CCTV)
- Colour naming by the invigilator for candidates who are colour blind
- Coloured overlays
- Communication Professional (for candidates using Sign Language)
- Examination on coloured/enlarged paper
- Fidget toys and stress balls
- Live speaker for pre-recorded examination components
- Low vision aid/magnifier
- Non-electronic ear defenders/ear plugs
- Optical Character Reader (OCR) scanners
- Prompter
- Read aloud (which can include an examination reading pen)
- Separate invigilation within the centre (sitting the examination outside of the main examination hall/room, e.g. a room for a smaller group of candidates) • Squared paper for visual spatial difficulties
- Supervised rest breaks
- Word processor. (AA 8.5)

HTA will order modified papers in advance of a specific examination series, no later than the published deadline for the series concerned. HTA will only order modified papers for candidates that we intend to enter for the relevant examination series. (AA 6.1) **Modified papers to be ordered by Claire Jones (exams officer)**

### Centre-delegated arrangements/adjustments

Decisions relating to the approval of centre delegated arrangement/adjustments are made by Karen Colton SENco and Claire Jones-exams officer.

Appropriate evidence where required by the arrangement is held on file by Karen Colton-SENco.

### Centre-specific criteria for particular arrangements/adjustments

#### Word Processor Policy (Exams)

An exam candidate may be approved the use of a word processor where this is appropriate to the candidate's needs and not simply because the candidate now wants to type rather than write in exams

or can work faster on a keyboard, or because they use a laptop at home. The use of a word processor must reflect the candidate's normal way of working within the centre.

Separate policy available

### Separate Invigilation Policy

A decision where an exam candidate may be approved separate invigilation within the centre will be made by the ALS lead/SENCo.

The decision will be based on:

- whether the candidate has a substantial and long term impairment which has an adverse effect **and**
- the candidate's normal way of working within the centre ([AA](#), section 5.16)

The separate Invigilation policy details the criteria HTA uses to award separate invigilation within the centre.

In the case of separate invigilation, the candidate's disability is **established within the centre** (see Chapter 4, paragraph 4.1.4). It is known to a Form Tutor, a Head of Year, the SENCo or a senior member of staff with pastoral responsibilities. **For** example, a long-term medical condition which has a substantial and adverse effect.

Separate invigilation must reflect the candidate's normal and current way of working in internal school tests and mock examinations.

Nervousness, low level anxiety or being worried about examinations is not sufficient grounds for separate invigilation within the centre. ([AA](#), section 5.16)

