

Reasonable Adjustments Policy and Procedures

1. Regulatory requirements and review

This policy addresses the regulators' conditions of recognition – namely:

- C2 Arrangements with centres
- D2 Accessibility of qualifications
- E4 Ensuring an assessment is fit for purpose and can be delivered
- G2 Language of assessment
- G6 Arrangements for reasonable adjustments
- G7 Arrangements for special consideration
- G8 Completion of the assessment under the required conditions
- H7 Results for a qualification must be based on sufficient evidence
- I1 Appeals process

This policy is reviewed annually as part of the JPIE's self-assessment activity, which considers user and regulatory feedback and good practice guidance.

Should the regulators notify the JPIE of the failure of any similar policy, procedure or process of another awarding organisation, the JPIE will review the content of this document to ensure it remains fit for purpose.

2. Introduction

2.1 Purpose

As an awarding organisation, the JPIE has a duty not to discriminate against individuals in relation to conferring qualifications in respect of the protected characteristics set out in the Equality Act 2010 (see the JPIE Equality, Diversity and Inclusion Policy and Procedures). The JPIE will take steps when developing specifications, identifying the assessment criteria and drafting assessment content to ensure that the impact on individuals with different protected characteristics is minimised.

The duty of the JPIE to make a reasonable adjustment will apply where assessment arrangements would put a learner with a disability or learning need at a substantial disadvantage compared with a learner who does not have a disability or learning need. In such circumstances, the JPIE must take steps to mitigate that disadvantage.

2.2 Scope

This policy applies to all centre staff who deliver and assess JPIE qualifications and all registered learners.

2.3 Definition

A reasonable adjustment is any action that helps to reduce the effect of a disability or learning need that places a learner at a substantial disadvantage in the assessment situation.

Reasonable adjustments may include, but are not limited to:

- a. changing usual assessment arrangements, for example, allowing a learner extra time to complete the assessment activity and allowing rest breaks
- b. making changes to the assessment venue
- c. adapting assessment materials, such as providing materials in alternative formats
- d. making use of ICT
- e. assisting with the assessment, such as a reader, writer, prompter, communication professional
- f. using bilingual dictionaries.

The JPIE and centres are only required by law to do what is 'reasonable' in giving access to the qualification.

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

What is reasonable will depend on the individual circumstances, the impact of the disability on the individual, cost implications and the practicality and effectiveness of the adjustment. Other factors will be considered, such as the need to maintain competence standards and health and safety.

Reasonable adjustments must not affect the reliability and validity of the assessment outcomes.

Where reasonable adjustments have been applied, the work produced by the learner will be marked to the same standard as the work of other assessed learners.

2.4 Types of assessment and reasonable adjustment

Different types of assessment make different demands on the learner. They will influence whether reasonable adjustments will be needed and the type of reasonable adjustment that may be put in place. The adjustments that are appropriate for a particular assessment will depend upon the following:

- a. specific assessment requirements of the qualification
- b. type of assessment
- c. specific needs of the learner.

2.5 Confidentiality and data protection

Following the reasonable adjustment procedure, a learner might provide or be asked to give the JPIE with special category personal data. Learners can be assured that the JPIE will comply fully with data protection regulations to ensure that confidential information is kept securely and used only for its intended purposes (see the JPIE privacy notice published on the JPIE website JPIE.org.uk).

3. Centre responsibilities

To meet their responsibilities to individual learners, centres must take all possible practical steps to apply reasonable adjustments in terms of current equality legislation and regulatory requirements. For example, a centre should:

- a. have an assessment policy and communicate this to all staff and learners
- b. ensure that all staff who recruit, advise, or guide potential learners have had the training to make them aware of access-related issues and create an environment in which learners are encouraged to disclose access-related needs
- c. consider what adjustments future learners may need and make appropriate provisions in advance
- d. identify as early as possible, preferably before registering a learner for a qualification, any difficulties they may have in accessing the assessment
- e. select an appropriate qualification for the learner, based upon their particular circumstances
- f. explain to the learner the requirements of the evaluation of the qualification and the planned programme of study – making it clear, at the outset, if the learner will not be able to meet all the assessment criteria and the impact of this with regard to achievement and progression
- g. in consultation with the learner, select an appropriate adjustment to make the assessment accessible
- h. ensure that the chosen adjustment to assessment can be resourced
- i. follow the procedures outlined in this document for requesting adjustments to the assessment
- j. follow the JPIE's procedures for implementing adjustments to the assessment
- k. document any reasonable adjustments made
- l. ensure that it has effective internal appeals procedures so that the learner can query any decision taken by the centre not to allow an adjustment to the assessment
- m. ensure that assessment venues are accessible to all learners insofar as is practicable.

4. Identifying learners' needs

Learners are only eligible for reasonable adjustments if their disability or learning need puts them at a disadvantage in an assessment compared to a learner who does not have a disability or learning need.

Some examples of disability and learning needs are outlined below (please note: this list is not exhaustive, and some needs may fall within more than one of the categories).

4.1 Communication and interaction needs

A learner with communication and interaction needs may have problems with reading or writing, which could be reduced through the use of ICT, a reader, a writer or a communication professional. Learners with communication and interaction needs may also benefit from extra time during time-constrained assessments to allow them to demonstrate their skills and knowledge.

4.2 Cognition and learning needs

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

4.3 Sensory and physical needs

A learner with sensory and physical needs may need to have assessment material modified and/or to use ICT, a reader, writer or communication professional. In addition, they may benefit from extra time to complete assessments.

4.4 Behavioural, emotional and social needs

A learner with behavioural, emotional and social needs 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 a prompter.

4.5 Learners for whom English is an additional language

A learner for whom English is an additional language may benefit from extra time during time-constrained assessments and/or the use of a bilingual dictionary.

5. Evidencing disability and learning needs

Any application for an assessment adjustment must be supported by valid, sufficient and reliable evidence.

To ensure that any assessment adjustment will only provide the learner with the necessary assistance without giving them an unfair advantage over others, the centre must be clear about the extent to which the learner is affected by the disability or difficulty.

Where the centre can verify the evidence of the disability or difficulty and where the implications are clear, such as for a learner with physical difficulties, profound hearing impairment or who is registered as blind or partially sighted, the centre does not need to provide further evidence.

Where the implications of the difficulty are not obvious, such as for learning or mental health difficulties, the centre will have to provide additional evidence of the effect of the impairment on the learner's performance in the assessment. Any of the following types of evidence would be acceptable:

5.1 Centre-arranged assessment

Evidence of assessment of the learner's needs about the particular assessment, made within the centre by the relevant staff member with competence and responsibility in this area (for example, learning support staff, teaching staff, trainers, assessors and other specialist staff). If necessary, external experts may be called upon to assess the learner. This evidence should include an indication of how the centre plans to meet the learner's needs and should show that the learner can cope with the level and content of the

assessment. The evidence should be documented for audit purposes. Information from previous centres attended by the learner may also be included.

5.2 History of provision within the centre

This should include information about the support received by the learner during the training programme and formative assessments. Evidence of how the learner's needs are being met during the training programme should be documented for audit purposes.

5.3 Written evidence produced by independent, authoritative specialists

This could be medical, psychological or professional reports or assessments. These reports should state the name, title and professional credentials of the person who conducted the assessments and wrote the report. The report should set out the nature of the difficulty and the extent to which the learner is affected by the difficulty, including the effects of any medication the learner may be taking. In cases where it might be expected that there could be changes in the way the learner is affected by the difficulty, there will have to be recent and relevant evidence of assessments and consultations carried out by an independent expert.

A learner with a Statement of Special Educational Needs does not automatically qualify for reasonable adjustments. The demands of the qualification should be taken into account. The reasons for the statement may have only a limited effect on achievement in the assessment.

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 monitor the effectiveness of the reasonable adjustments made.

6. Making reasonable adjustments

6.1 Principles for making reasonable adjustments

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

- not invalidate the assessment requirements of the qualification
- not give the learner an unfair advantage
- reflect the learner's usual way of working
- be based on the individual needs of the learner.

The JPIE and centre both have a responsibility to ensure that the assessment process is robust and fair and allows the learner to show what they know and can do without circumventing the assessment criteria.

When considering whether an assessment adjustment is appropriate, the JPIE and centre need to bear in mind the following:

- Adjustments to assessment should not compensate the learner for a lack of knowledge and skills. The learner must be able to cope with the assessment content and work at the required level.
- Any assessment adjustment must not invalidate the assessment requirements of the qualification or the requirements of the assessment strategy. Competence standards should not be altered. All learners' performance will be assessed against set standards. These standards cannot be modified, 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 and can do.
- Any assessment adjustment must not give the learner an unfair advantage or disadvantage. The qualification of a learner who had an assessment adjustment must have the same credibility as any other learner. As vocational qualifications may lead to employment, achieving such qualifications must give a realistic indication to the potential employer of what the certificate holder can do.
- Any assessment adjustment must be based on the learner's needs. Decisions about adjustments to assessment should be taken after careful consideration of each learner's assessment needs, the qualification's assessment requirements and the nature and extent of the support given as part of everyday 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 other demands on the learner. The learner should be consulted throughout the process.
- Any assessment adjustment should reflect the learner's usual way of working, providing this does not affect what is being assessed. The learner should have experience and practice in the use of the adjustment.
- Any adjustment to the assessment must be supported by sufficient, valid and reliable evidence.
- All adjustments to assessment must be authorised by the Main Centre Contact or a staff member with delegated authority.
- All assessment adjustments must be implemented per the guidance given by the JPIE.

6.2 The process for making the adjustment

There are two routes through which a learner may be granted adjustments to assessment – these are to:

- use reasonable adjustments permitted at the discretion of the centre
- apply to the awarding body for permission.

a. Adjustments permitted by the centre.

In some cases, the centre is permitted to implement reasonable adjustments without prior permission from the JPIE. In these instances, centres must notify the JPIE that reasonable adjustments have been made (using the Reasonable Adjustments Notification form, see Appendix 1, which can be downloaded from the QuartzWeb portal).

The declaration should be signed and dated by the Main Centre Contact (or another staff member with sufficient authority).

The centre should retain a copy of the completed form and any supporting evidence for three years.

Please note: centres must notify the JPIE that reasonable adjustments are to be made at the point of learner registration.

b. Adjustments permitted by the JPIE.

The centre has to apply for adjustments to assessments on behalf of the learner (using the Reasonable Adjustments Application form, see Appendix 2, which can be downloaded from the QuartzWeb portal). A separate form should be completed for each learner and submitted to the JPIE a minimum of six weeks before the examination). It should be noted that applications received after the deadline may not be processed in time for the learner to take the assessment. The application should be signed and dated by the Main Centre Contact (or another staff member with sufficient authority).

The centre should retain a copy of the application form, the supporting evidence sent to the JPIE, and any relevant documentation received from the JPIE.

6.3 Range of reasonable adjustments

The permissions table (below) lists the most requested adjustments to standard assessment arrangements.

Reasonable adjustments – permissions		
Reasonable adjustment	Assessments NOT taken under controlled conditions	Assessments taken under controlled conditions
Extra time up to 25%	Centre	Centre
Extra time in excess of 25%	JPIE	JPIE
Supervised rest breaks	Centre	JPIE
Environment of the assessment room	Centre	Centre
Separate accommodation within the centre	Centre	JPIE
Use of an alternative venue	JPIE	JPIE
Use of ICT (including assistive technology)	Centre	JPIE
Assessment material in an alternative format	JPIE	JPIE
Responses in an alternative format	Centre	JPIE

Use of a reader and/or writer	Centre	JPIE
Use of prompter	Centre	JPIE
Use of a communication professional	Centre	JPIE
Use of a bilingual translation dictionary	Centre	JPIE
Other	JPIE	JPIE

It is not intended to be a comprehensive list, and centres are advised to contact the JPIE for advice on alternative ways of accessing assessment for situations. Centres must seek advice from the JPIE in any case where they do not consider that they have the necessary expertise to judge whether a reasonable adjustment is needed and/or how it should be applied.

6.4 Implementing reasonable adjustments

This section guides centres on how various reasonable adjustments should be implemented. Centres should note that:

- not all the adjustments to assessments described below will be reasonable, permissible, or practical in particular situations (if in doubt, the centre is advised to contact the JPIE for advice)
- the learner may not need, nor be allowed, the same adjustment for all qualifications
- some learners may need a single adjustment, and others may require a combination of several adjustments
- adjustments to assessments will mainly be required for assessments taken under controlled/examination conditions.

a. Extra time

Learners who have a condition that affects the speed of processing may be allowed extra time to complete assessments that are time constrained. The allowance (up to 25%) should be specified based on an understanding of the learner's needs derived, for example, from how the learners' condition has impacted the completion of formative assessments. Centres wishing to make a reasonable adjustment for a learner over 25% must apply to the JPIE for permission.

b. Supervised rest breaks

If there is a demonstrated need, learners may be allowed supervised rest breaks during a time-constrained assessment.

Rest breaks may be taken in the assessment room or another space, but as the learner will complete the assessment under controlled conditions, they must be supervised at all times.

c. The environment of the assessment room

Centres should consider learners' needs when planning assessments. For example, learners may benefit from sitting near a window, being at the front or back of the room, using specific furniture, or reducing visual or noise distractions.

d. Separate accommodation

When implementing reasonable adjustments that may disturb other learners (for example, using readers, scribes, interpreters or ICT), the centre may need to provide another space (within the venue) for the assessment to be completed under controlled conditions.

e. Use of an alternative venue

In exceptional circumstances, the learner may be permitted to complete the assessment at an alternative venue. If this reasonable adjustment is required due to a medical condition, the centre needs to ensure that the learner is fit to take the assessment.

f. Use of ICT (including assistive technology)

Unless specified in the test specification, only learners who require a reasonable adjustment (based on evidence of need) are entitled to use ICT. For clarity, this does not include other learners – even those who use ICT in everyday learning.

The centre must ensure that the following:

- The learner has had sufficient practice in the use of any technological aid
- equipment is in good working order
- use of the technology will not invalidate the assessment requirements or give the learner an unfair advantage.

g. Assessment material in an alternative format

If a learner requires assessment material in any other format (for example, in Braille or British Sign Language or audio format, enlarged or on coloured paper), the centre must advise the JPIE at the point of registration so that the materials can be prepared in time for the assessment. It remains the centre's responsibility to provide centre-devised training resources in a suitable format for the learner.

h. Responses in an alternative format

If there is evidence of need, learners may present their responses to assessments in a suitable format (for example, electronic recording and/or in Braille or British Sign Language).

In such circumstances, the centre must ensure that:

- recording equipment is in good working order
- an authenticated transcript of the learner's responses is provided (and this is an accurate representation) to the Awarding Organisation
- it keeps a copy of the recording and authenticated transcript.

i. Use of a reader and/or writer

A reader/writer is a person who, on request, will read/write for the learner:

- all or any part of the examination paper
- all or any part of the learner's answers.

A reader may also act as a writer and vice-versa.

Using a reader/writer should neither advantage the learner unfairly nor disadvantage the learner.

The reader/writer should not normally be the learner's tutor or a subject specialist, but there may be circumstances where this is unavoidable. In such cases, it should be noted in the reasonable adjustment record. On no account should the reader/writer be a relative, colleague or friend of the learner or a learner who has previously taken the examination (in the same or another cohort).

The reader must be able to read accurately and at a sufficient speed. The writer must be able to scribe accurately (the answers exactly as the learner dictates them), legibly and at an adequate speed.

It is recommended that before undertaking the examination, the learner, wherever possible, should have practice with a reader/writer.

Learners using the services of a reader/writer must be accommodated separately during the assessment to avoid disturbing other learners. However, learners attempting the same paper may be accommodated at the same venue.

A reader should read as guided by the learner, but only the words exactly as they are written on the paper. Readers must not, in any way, attempt to modify either the content of the assessment or any of the specific assessment requirements. A reader may read the same question(s) as often as requested, providing it is within the time allowed.

Writers must not, in any way, attempt to modify either the content of the answers given by learners.

During the assessment, the reader/writer must not give factual help to the learner nor offer suggestions concerning which questions to attempt, when to move on to the next question or in which order the questions should be answered.

Readers and writers are responsible to the invigilator.

Invigilators may not act as either readers or writers during an examination.

Failure to comply with these guidelines could result in the learner being disqualified.

j. Use of a prompter

A prompter may be permitted where a learner has a substantial and long-term adverse impairment resulting in persistent distractibility or significant difficulty concentrating.

For example, the learner:

- has little or no sense of time (e.g. learners with ADHD or ASD)
- persistently loses concentration
- Is affected by Obsessive-Compulsive Disorder, which leads them to keep revising a question rather than moving on to other questions.

In such instances, a learner may be assisted by a prompter who can keep the learner focused on the need to answer a question and then move on to answering the next question.

k. Use of a communication professional (sign language)

A communication professional is permitted to present the questions in a different language without:

- changing the meaning
- providing any additional information
- explaining what the question requires of the learner.

Great care must be taken not to disadvantage or advantage the learner. Centres should video the signing of the Communication Professional to demonstrate accuracy.

The Communication Professional must be:

- proficient in the use of the learner's sign language, ideally being qualified to a minimum of BSL/ISL at Level 3 (and aspiring towards Level 6)
- at an appropriate level for the examination. The Communication Professional should also be a qualified Language Modifier
- familiar to the learner and must constantly work at the learner's pace.

The Communication Professional must be familiar with the examined subject and the learner's usual way of working. Technical and subject-specific terms must be finger-spelt (not signed) to ensure the question's meaning is not altered, and the terms are recognised. If such terms are signed instead of finger spelt, then the demands of the question will have been compromised. This will constitute malpractice.

A Communication Professional is not a reader. However, the same person may act as a Communication Professional and a reader. Permission must have been given for the use of a Communication Professional and a reader.

The Communication Professional may repeat content if requested to do so by the learner. An alternative signing of the carrier language may be provided. However, under no circumstances may an explanation of the question or clarification of the carrier language be given. These actions would give the learner an unfair advantage and may constitute malpractice.

Learners may only sign their answers in question papers or non-examination assessments where it is possible to fingerspell the answers or where the answers involve single words.

I. Use of a bilingual translation dictionary

A bilingual translation dictionary is only available to learners who entered Level 1 and Level 2 qualifications.

Not all learners for whom English is an additional language need to use a bilingual translation dictionary. Extra time will only be awarded where all of the following exist:

- the learner's first language is not English, Irish or Welsh
- the learner entered the United Kingdom within three years of the examination(s) with no prior knowledge of the English Language
- English is not one of the languages spoken in the family home
- before they arrived in the United Kingdom, the learner was not educated in an International school where some or the entire curriculum was delivered in English
- before they arrived in the United Kingdom, the learner was not prepared for or entered for IGCSE qualifications where the question papers were set in English
- before they arrived in the United Kingdom, the learner was not prepared in English for other qualifications, e.g. IELTS qualifications, Preliminary English Tests
- the learner has to refer to the bilingual translation dictionary so often that examination time is used for this purpose, delaying the answering of questions
- the provision of extra time reflects the learner's usual way of working with the dictionary.

The centre should check the dictionaries used by the learner to make sure they do not contain notes which would give the learner an unfair advantage. Where permission is granted to use electronic dictionaries, the centre must check that the equipment does not have additional functionality that will give the learner an unfair advantage. If such functionality is present, it must be disabled, or the equipment disallowed.

7. Appeals

Learners have a right to appeal against a decision not to grant a reasonable adjustment request. Initially, the centre's appeals procedure should be implemented. If necessary, the centre should contact the JPIE on the learner's behalf, which will trigger the JPIE Enquiries and Appeals Policy and Procedure.

The centre should retain copies of documents about learner appeals for three years.

8. Malpractice

A centre should note that failure to comply with the guidance regarding adjustments to assessments set out by the JPIE can constitute malpractice.

Failure to comply is defined as any or all of the following:

- failing to report delegated adjustments to the JPIE, where this is required
- agreeing delegated adjustments that are not supported by evidence
- putting in place arrangements without seeking prior approval from the JPIE, where this is required
- exceeding the allowances agreed with the JPIE
- failing to maintain records of reasonable adjustments for audit.

Any such incidents will result in an investigation (see the JPIE Malpractice and Maladministration Policy and Procedures).

Appendix 1
Reasonable Adjustment Notification form

To be completed by the centre when it has permitted reasonable adjustments (in accordance with JPIEs Reasonable Adjustment Policy and Procedures).

Please list the learners granted reasonable adjustments by the centre. Please do not list learners for whom an application has been made to the JPIE.

Centre name:	
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This form should be completed at the point of learner registration. A copy of this form should be available to JPIE or the regulatory authorities as required.

<u>Learner ID</u>	<u>Learner name</u>	<u>Qualificati on ID</u>	<u>Qualification name</u>	<u>Reason for application</u>	<u>Reasonable adjustment made</u>	<u>Supporting evidence</u>

Declaration:

I confirm that:

- This form contains the details of all the reasonable adjustments permitted by the centre
- The adjustments to assessments have been made in accordance with JPIE Reasonable Adjustments Policy and Procedures

Name		Signature		Centre Role		Date	
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JPIE is a Data Controller as defined by GDPR. The information we are requesting is for the purposes of processing learner registrations and results. As a regulated awarding organisation, we are required to comply with general conditions of recognition, which is the lawful basis by which we collect this information.

Appendix 2

Reasonable Adjustment Application Form

To be completed by the centre for reasonable adjustments that must be permitted by JPIE.

Please complete a separate form for each learner and send a completed copy to JPIE at least four weeks prior to the assessment.

Centre name		Centre ID	
Learner name		Learner ID	
Qualification name		Assessment date	

Reason for application	
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Reasonable adjustment required (please be specific)	
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Evidence in support of the application

This may include:

- The centre's assessments of the learner's needs
- History of provision which the centre
- Medical certificate
- Psychological or another professional assessment report

Provide details of supporting evidence	
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If using an access facilitator (writer/reader/prompter, communication professional), please provide their name	
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Declaration

I confirm that the following:

- information provided is accurate
- centre will be able to provide the arrangements requested
- reasonable adjustments will be implemented in accordance with the guidance given by JPIE

Name		Signature		Centre Role		Date	
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