

REASONABLE ADJUSTMENTS POLICY



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Introduction

The partnership between the Institute of School Business Leadership (ISBL) and Serco Education is committed to the equal and fair assessment of all apprentices. As part of this, we are prepared to give special considerations to those in need of enhanced access during assessments and make any reasonable adjustment we can, within the constraints of budgets and practical feasibility.

This policy sets out the procedures that apprentices and the EPA team should follow when implementing reasonable adjustments and special considerations.

Any request for reasonable adjustment must be the result of a disability or medical condition or for religious reasons. The majority of the document focuses on reasonable adjustments for apprentices who have disabilities, but it also covers apprentices who may require adjustments based on religious grounds or apprentices whose first language is not English. The disabilities, medical conditions or religious reasons set out in this guidance are not definitive, and others may be addressed on request as described later. Equally, those that are captured are provided as examples only; their appearance in this guidance document should not be seen as our partnership determining that apprentices with these disabilities or conditions are safe to work in the sectors; these decisions are the responsibility of the employer who is best placed to implement the requirements of employment law (the Equality Act).

The Equality Act 2010 (previously the Disability Discrimination Act 1995) aims to end discrimination that many disabled people face, and it is now unlawful for assessment institutes, among others, to discriminate against disabled people.

Our partnership is committed to ensuring that all assessments are a fair test of an individual's knowledge and what they are able to do. If someone has a disability or learning difficulty, the usual format of specific assessments may not be suitable, and in certain circumstances adjustments may need to be made for them. They allow an individual to show their ability and knowledge without being disadvantaged by the assessment format itself.

The information in this document can be used by employers, training providers and apprentices for guidance, and we have tried to ensure that the information is accurate and current. Where conditions and situations arise that are not addressed in this document, please contact our EPA admin team for guidance via epa@serco.com

Who is entitled to reasonable adjustments?

The Equality Act 2010 defines disability as a physical or mental impairment that has substantial and long-term adverse effects on a person's ability to perform normal day-to-day activities. The following categories will be considered for reasonable adjustments:

1. Permanent physical impairment, e.g. cerebral palsy and multiple sclerosis
2. Behavioural, emotional, social needs, e.g. chronic depression and autism
3. A sensory impairment, e.g. hearing impairment and visual impairment
4. Specific cognitive difficulties, e.g. dyslexia and memory loss
5. Motor difficulties, e.g. hand-eye coordination and difficulty moving hands/arms

This list set out above is not exhaustive, and it is recognised that certain apprentices may fall within more than one of the categories set out above.

What reasonable adjustments are considered acceptable?

Our partnership seeks to provide equal access to assessment for all apprentices, ensuring that there are no unnecessary barriers and that any reasonable adjustments for apprentices preserve the validity, reliability and integrity of the end-point assessment.

Applications for reasonable adjustments will be individually considered, and decisions may vary according to the exact nature of an apprentice's everyday needs and usual method of working.

Further detail on reasonable adjustments is provided in **Appendix A** and may include:

1. Allocation of extra time
2. Support of a personal assistant
3. Rest/time breaks
4. Support of a sign language interpreter
5. Support of a scribe/amanuensis
6. Use of assistive technology
7. Support of a reader
8. Braille paper
9. Use of alternative assessment locations
10. Alternative fonts, coloured paper/contrasting background colours
11. Reassessments, in the case of temporary illness/injury
12. Pregnancy
13. Adjustments for those undergoing end-point assessment that is not in their native language

14. Stammer/stutter (oral assessments/interviews only)
15. Religious obligations

This is not an exhaustive list, and other adjustments will be considered on a case-by-case basis. ISBL will consider all requests in line with our Reasonable Adjustments Policy.

We will endeavour to accommodate the needs of apprentices with a particular assessment requirement, according to individual circumstances, ensuring such apprentices are not disadvantaged in relation to other apprentices and that certificates accurately reflect apprentice attainment.

All requests will be considered on the information received. Some adjustments may not be considered reasonable if they:

- do not meet the published criteria;
- involve unreasonable costs to our partnership;
- involve unreasonable timeframes; for example, Braille papers cannot be produced at short notice; or
- affect the security and integrity of the end point assessment process itself.

Adjustments **must not** put in jeopardy the health and wellbeing of the apprentice or any other person.

Examples of reasonable adjustments

- An apprentice with dyslexia needs to use a coloured overlay in his presentation notes and requires 25% extra time. The use of a yellow coloured overlay is a reasonable adjustment for the candidate since it helps him to improve his reading accuracy.
- An apprentice with ADD (attention deficit disorder) has persistent difficulty concentrating and poor working memory. Supervised rest breaks and the use of a prompter, who may need to physically show him where on a page he had been working in order to restart his task or presentation, would be reasonable adjustments.
- A candidate has Asperger's syndrome, which is formally confirmed by a letter from a consultant paediatrician. He has persistent and significant difficulties with his handwriting, which is poor but not illegible. He is unable to complete his simulated assessment task within the time allowed. Without the application of 25% extra time, the apprentice would be at a substantial disadvantage.

How to apply for reasonable adjustments

Reasonable adjustments must be applied for by an apprentice's employer or training provider. If applied for by the training provider, the employer must sign to support the application for

reasonable adjustment.

Apprentices should be fully involved in any decisions about adjustments/adaptations. This will ensure that individual needs can be met, whilst still bearing in mind the specified assessment criteria for a particular apprenticeship end-point assessment.

An application template is contained within **Appendix B**.

Applications must be supported with documentary evidence at least 1 month before end-point assessment activities commence. Applications must be submitted to EPAO@serco.com

Documentary evidence should outline the nature and severity of an apprentice’s disability and should be from an appropriate independent professional. See examples below:

Disability	Documentary evidence
Visual impairment	Appropriate professional providing a written, dated and signed statement OR a certificate of registration as blind or partially sighted
Hearing impairment	Appropriate professional providing a written, dated and signed statement
Dyslexia	Appropriate professional providing a written, dated and signed statement OR report from a learning support professional or educational psychologist
Other medical conditions	Appropriate professional providing a written, dated and signed statement

The provision of reasonable adjustments at assessment without approval or supporting evidence will be treated as malpractice.

Reasonable adjustments during assessment

Strict guidelines during the assessment must be maintained, for example:

- a) The support of a reader should be solely to read text and not to advise the apprentice. They cannot offer suggestions or any other support, which could be seen as giving the apprentice an unfair advantage. We would expect the reader to not have a conflict of interest in undertaking this task; however, we acknowledge that it is appropriate to have had previous working experience with the apprentice.
- b) Modification to equipment/disability aids and input display devices including adapted keyboard, large monitor, synthesisers must be approved by our EPA team in advance of

the assessment.

- c) Apprentices cannot talk to third parties during rest/time breaks apart from the assessor or invigilator.
- d) We will ensure that all assessment facilities comply with the relevant legislation for apprentices with reasonable adjustments. It is the responsibility of the employer and/or provider to ensure that end-point assessment activities held on their premises meet the regulatory requirements. Should the location need to accommodate a third-party support, a separate room must be provided.
- e) The EPA admin team will ensure that the invigilator and assessor have prior information of your requirements.

Disclosure and confidentiality

Information about an 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.

An 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 our EPA admin team, the assessor and/or the invigilator, as well as people who may be required to assist the apprentice during the assessment, such as a scribe or sign language interpreter.

We may be required to provide regular reports to the IfA&TE regarding the total number of requests for extra time due to disability and the breakdown of requests. This report will not contain an apprentice's name or any detailed information about the apprentice.

We will not pass on in written form any sensitive information without the 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.

The Equality Act requires that the information held be accurate, relevant and up to date and should not be deemed 'excessive'. Information will be kept secure (either in a locked filing cabinet or for electronic information in a restricted folder). We will destroy an apprentice's information five years after the last assessment or assessment date.

Appendix A – Types of reasonable adjustment

Allocation of additional time

Extra time will be permitted, as appropriate to each apprentice, in line with this document, ensuring that they are not disadvantaged in relation to other apprentices.

The standard time extension for assessments is 25% if an apprentice has a disability or is not able to take the assessment in their official or native language. An apprentice cannot request any more than 25% extra time due to language limitations. Up to 100% extra time can be provided due to a disability dependent on each apprentice's particular needs if this is requested by an appropriate professional.

All requests for extra time will be considered based on the information supplied; however; in consideration of the amount of extra time requested, our EPA admin team must ensure that:

1. the credibility of the qualification is maintained
2. the validity, reliability and integrity of the assessment process is preserved
3. an apprentice is not given, or does not appear to have been given an unfair advantage.

Support of a personal assistant

An apprentice can request the support of a personal assistant if they need someone to help with personal care/assistance during the assessment. Such help is designed to maintain the effectiveness of the assessment. Personal assistants cannot give factual or practical assistance or offer any suggestions or advice, which could be seen as giving an apprentice an unfair advantage.

Rest breaks

An apprentice can request a rest break if they suffer from fatigue, physical or mental disabilities or for religious obligations. The rest break will be seen as part of their extra time request and can be taken at any time during the assessment. Women who are pregnant are also allowed to use the toilet although no extra time is awarded for pregnant women.

It is important that the apprentice does not discuss the assessment with any third party during any break period.

Support of a sign language interpreter

An apprentice can request a sign language interpreter if they are hard of hearing to undertake

the role of conversing with others on the apprentice's behalf. The interpreter can say a phrase or particular word as well as rephrasing using sign language or by writing it down. They must not give factual or practical help or offer any suggestions or advice, which could be seen as giving the apprentice an unfair advantage. We will normally expect the apprentice or their employer to source the interpreter, although if this is not possible, we will make reasonable efforts to locate a suitable person.

Support of a scribe/amanuensis

An apprentice can request a scribe if they have limitations with writing down the answers, such as a physical or visual impairment or a specific learning difficulty. The scribe's role will be someone who will write down their dictated answers to the questions. They must write down the answers exactly as they are dictated. They must not give factual help nor offer any suggestions or advice, which could be seen as giving the apprentice an unfair advantage. This form of support is only available for knowledge assessments.

Use of laptop and adaptive technology (assistive/access technology)

An apprentice can request to use adaptive, assistive or access technology that enables them to access computer systems if they have particular needs. Where possible, we would expect the apprentice to use an employer's or their own laptop and software. An apprentice will only be able to have access to the relevant programme or programmes, and all equipment will be checked by the assessor or invigilator prior to the start of the assessment. If an apprentice has no access to equipment, we will make reasonable efforts to source the same or similar equipment.

If we are unable to source suitable equipment, then we will advise the apprentice accordingly, and they will be responsible for either sourcing suitable equipment or using what can be made available to them by their employer or training provider. The list below is indicative of the most common assistive technologies available but should be used as a guideline only.

Hardware

- Alternative keyboards and mice including: Braille labelled keyboards or home-row key indicators; joysticks/tracker balls/mouse keys on the keyboard head/mouth stick
- Braille display
- Switches (alternative input to keyboard and mouse, used by apprentices with physical disabilities)
- Large monitors
- Headphones and volume adjustment for use with voice output/input software packages

Software

- Operating system accessibility features such as sticky keys, filter keys, mouse speed adjustments
- Screen magnification software, e.g. Dragon Software
- Screen reading software (supporting both users with visual impairment and dyslexic users), e.g. browsealoud.com, JAWS software or NVDA
- Input devices – eye-/head-operated pointing devices or on-screen keyboards

Support of a reader

An apprentice can request a reader if they have a visual impairment or specific learning difficulties that would benefit from the support of a reader. The reader will be able to read all or any part of the assessment instructions, questions or answers to the apprentice. They can only read the exact wording and must not give meanings of words, rephrase or interpret anything. They should only repeat instructions and questions on the paper when specifically requested to do so by the apprentice. They cannot advise the apprentice on which questions to do, when to move on to the next question, or the order in which the questions should be answered. The reader cannot provide any practical support during the assessment process.

Use of alternative assessment and assessment locations

An apprentice can request the use of alternative premises to take an assessment if this benefits them due to a physical disability and where the alternative location does not materially impact on the integrity of the assessment process or compromise the competence being assessed. Locations must comply with the requirements of the Equality Act, Health and Safety Regulations (or local equivalent) as well as disability access regulations, and approved providers are also required to meet these standards when hosting an assessment.

Alternative format of assessment papers

An apprentice can request changes to the simulated task to enhance accessibility including font and/or font colour to any size and colour within reason for paper-based assessments. We will offer different coloured paper for dyslexic apprentices. Where the competence being assessed is not compromised, braille papers can also be made available on request but this will require extra time as the paper will need to be sent externally to have the paper printed and verified. Please note that these options are not available for apprentices taking computer-based assessments.

Temporary illness/injury

Although a temporary illness or injury or indisposition would not be covered by the Equality Act (or local equivalent), we may still be able to accommodate apprentices affected in such a way. An employer and/or provider must complete the Reasonable Adjustments Form as soon as the decision is taken to seek adjustments and provide supporting evidence of the circumstances, and we will try to accommodate your request.

Pregnancy

An apprentice is entitled to go to the toilet if they are pregnant, but they are not entitled to extra time unless there are other medical conditions that would allow them to request extra time. Reasonable adjustments are not available on practical assessments where they will

compromise the assessment process. If an apprentice becomes pregnant during their on-programme journey and will reach a stage of pregnancy during end-point assessment that is unsafe or places them at risk during on-site work, then their entry to end-point assessment will need to be deferred.

Stammer/stutter (oral assessments only)

An apprentice can request extra time for an oral assessment if they have a stammer or stutter (not for a written assessment). We will also try to allocate an apprentice with the final assessment slot of the day so that there are fewer time pressures and restrictions on them and the assessor. Please let our EPA admin team know as early as possible so that the schedule can be devised appropriately. In exceptional circumstances, we may consider written responses to the interview questions.

Religious obligations

An apprentice can request a break or different time to start the assessment if this is for religious reasons. We will require a written request for this and the contact details for the appropriate religious authority (e.g. imam, minister, rabbi or priest).

Other reasonable adjustments

The reasonable adjustment arrangements listed here are not intended to be comprehensive. Other reasonable adjustments will be considered in line with our Reasonable Adjustments Policy.

Appendix B – Application and approval of reasonable adjustments

Application

Name of the employer	
Name of the training provider	
Title and level of the apprenticeship	
Date of End-Point Assessment	

Apprentice's name	End-Point Assessment component (e.g. simulated tasks)	Disability or learning difficulty	Reasonable adjustment(s) requested	Supporting evidence provided

Declaration	
<i>I confirm that the above apprentices have been assessed as requiring reasonable adjustments, and that the apprentice has been fully involved in any decisions about adjustments/adaptations</i>	
Role and signature of employer representative	
Signature of training provider representative	
Date	

EPA team approval

Name of the employer	
Name of the training provider	
Title and level of the apprenticeship	
Date of End-Point Assessment	

Apprentice's name	End-Point Assessment component (e.g. simulated tasks)	Disability or learning difficulty	Reasonable adjustment(s) requested	Supporting evidence provided

Declaration	
<p><i>This is to confirm that the above apprentices have been approved by our EPA admin team to have reasonable adjustments applied to end-point assessment and that the approaches deployed are in line with those expected in industry standards and health and safety requirements and that outcomes secured demonstrate the appropriate levels of occupational competence.</i></p>	
Role and signature of employer representative	
Signature of training provider representative	
Date	