

# ACCESS ARRANGEMENTS POLICY 2025/26

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by		
Date of next review		

# Key staff involved in the policy

Role	Name(s)
SENCo (or equivalent role)	Andrea Whittle
Senior leader(s)	Matt Ingle, Kat Hawkyard
Head of centre	Stephen Mulligan
Exams officer	Helen Allen
Assessor(s)	Emma Sey
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This policy is reviewed and updated annually to ensure that access arrangements process at Immanuel College is managed in accordance with current requirements and regulations.

References in this policy to **GR, ICE** and **AA** refer to the **JCQ publications General Regulations** for **Approved Centres, Instructions for conducting examinations** and **Access Arrangements** and **Reasonable Adjustments**.

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

# 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'. (AARA¹, Definitions)

A centre must make decisions on appropriate access arrangements for their candidates. Although professionals from other organisations may give advice, they cannot make the decision for the centre. They will not have a working knowledge of an individual candidate's needs and how their difficulties impact in the classroom and/or in timed assessments. It is the responsibility of the SENCo/Access Arrangements Coordinator (AAC) to make appropriate and informed decisions based on the JCQ regulations.

Where exam arrangements are requested for conditions other than a learning difficulty, medical letters can help to provide evidence of need for a student, but a note from a medical professional does not mean an automatic entitlement to exam access arrangements.

#### 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'.

The centre **must** ensure that approved adjustments can be delivered to candidates. (AARA<sup>1</sup>, Definitions)

\*References to legislation are to the Equality Act 2010. Separate legislation is in place for Northern Ireland (see AARA 1.8). The definitions and procedures in AARA 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 Immanuel College 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**, 5.4) This publication is further referred to in this policy as GR

This policy is maintained and held by SENCo/Arrangements Coordinator (AAC) 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 SENCo/Arrangements Coordinator (AAC) is storing documentation electronically they **mus**t create an e-folder for each individual candidate. The candidate's e-folder **must** hold each of the required documents for inspection. (¹AARA 4.2)

The policy is annually reviewed to ensure that processes are carried out in accordance with the current JCQ document 'Adjustments t 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 AARA

# **General principles**

The head of centre/senior leadership team will appoint a SENCo, or an equivalent member of staff (Access Arrangements Coordinator), who will coordinate the access arrangements process within the centre and determine appropriate arrangements for candidates with learning difficulties and disabilities, candidates for whom English is an additional language, as well as those with a temporary illness or temporary injury. (GR 5.4)

The principles for the centre to consider are detailed in **AARA (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 them 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 a disabled candidate.

The SENCo, or Access Arrangements Coordinator (AAC), **must** ensure that the proposed access arrangement/reasonable adjustment does not unfairly disadvantage or advantage the candidate.

A centre **must** make decisions on appropriate access arrangements for their candidates. Although professionals from other organisations may give advice, they **cannot** make the decision for the centre. They will not have a working knowledge of an individual candidate's needs and how their difficulties impact in the classroom and/or in timed assessments. It is the responsibility of the SENCo/Access Arrangements Coordinator (AAC) to make appropriate and informed decisions based on the JCQ regulations.

Access arrangements/reasonable adjustments should be processed at the **start** of the course, for example, at the start of or during the first year of a two-year GCSE 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 their 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.

This policy further covers the assessment process and related issues in more detail and copies of this policy can be provided upon request

# 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 AARA 7.3.

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

The head of centre/senior leadership team – when appointing a new assessor, evidence must be provided to show the candidate has completed Level 7 or equivalent to this plus completion of 100 hours relating to individual assessment (for the Access Arrangements Assessor). The AMBDA or APC level meet this requirement. The SpLD is a specialist teacher assessor and may complete part 2 of the Form 8 document together with a full diagnostic assessment. A qualified psychologist registered with the Health Care profession may also complete section 2 of the Form 8.

#### **Appointment of assessors**

At the point an assessor is engaged/employed in the centre, evidence of the assessor's qualification is obtained and checked against the current requirements in AARA. This process is carried out prior to the assessor undertaking any assessment of a candidate.

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

At the point an assessor is engaged/employed at Immanuel College:

- Evidence of the assessor's qualification is obtained and checked against the current requirements (AARA 7.3)
- This process is carried out prior to the assessor undertaking any assessment of a candidate (AARA 7.3)
- A photocopy of the assessor's certificate(s) (or a printout of screenshot of HCPC or SASC registration, or screenshot of other relevant qualification listing) is kept on file (AARA 7.3, 7.4)

**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 document *Access Arrangements and Reasonable Adjustments*... (GR 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. (AARA 7.3)

#### **Reporting the appointment of assessors**

 Evidence that the assessor(s) is/are suitably qualified is held on file for inspection purposes (AARA 7.4)

When requested, the evidence will be presented to the JCQ Centre Inspector by

The evidence that the assessor(s) is suitably qualified is held on file by the ALS lead/SENCo. Evidence accepted is as follows as per the list in <u>AARA</u>, section 7.4 (Reporting the appointment of assessors) and record your process that reflects the requirements.

- copy of current Assessment Practising Certificate (APC) issued by Patoss, Dyslexia
   Guild or British Dyslexia Association
- copy of Level 7 assessment qualification certificate
- screenshot of HCPC registration showing the Unique Registration Number
- screenshot of SASC listing showing the APC code number and expiry date
- screenshot of listing for PAPAA Graduates showing the certificate number
- screenshot of listing for CPT3A Certificate Holders showing the certificate number
- screenshot of listing for ETAAC Certificate Holders showing the certificate number
- screenshot of listing for Patoss AAA Certificate Holders showing the certificate number
- In the case of appropriately qualified psychologists (registered with the Health & Care Professions Council), or specialist assessors holding a current SpLD Assessment Practising Certificate, who are directly employed within the centre, there is no need to record the names of these individuals within Access arrangements online. (AARA 7.4)
- The names of all other assessors, who are assessing candidates studying qualifications
  as covered by AA must be entered into Access arrangements online to confirm their
  status (AARA 7.4)

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

#### Immanuel College Bradford confirms:

- Guidelines for the assessment of the candidate's learning difficulties by an assessor will be followed and Form 8 (JCQ/AA/LD - Profile of Learning Difficulties) will be completed (AARA 7.5, 7.6)
- Arrangements must be made for the candidate to be assessed by the centre's appointed assessor (AARA 7.5)
- Assessors must personally conduct the assessments. They must not sign off assessments carried out by another professional (AARA 7.5)
- The assessor must carry out tests which are relevant to support the application (AA
   7.5)
- A privately commissioned assessment carried out without prior consultation with the centre cannot be used to award access arrangements (AARA 7.3)
- Relevant staff working within the centre should 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 assessing the
  candidate themselves should be instigated (AARA 7.3)

#### **YEARS 7-9**

On entry to school in Year 7 all pupils have their ability in reading assessed. These initial results are used to identify pupils who may need additional support. If required, support or intervention will then be put in place and monitored.

Throughout Years 7 - 9, staff who have any concerns about a pupil who may need Access.

Arrangements should liaise with the Specialist Assessor or the SENCo/ Arrangements Coordinator. Wherever possible they should provide evidence of need.

When pupils reach the summer term of Y9, those who have had Access Arrangements applied in internal assessments will be reviewed and a decision made about the continuation of these arrangements in key stage 4 based on continued evidence of need. Any newly identified pupils will be considered based on their normal way of working.

During the summer term of year 10, he Specialist Assessor will ascertain whether any formal testing needs to be administered to determine any specific or additional needs for students for whom a normal way of working has been established. Permission will only be granted where arrangements:

- are the candidates normal way of working with history of evidence of need
- meet the conditions set out by the examination boards and the JCO.
- are backed by information and evidence clearly demonstrating the extent of the disability/SEND and the need for additional support. This information and evidence must be recorded and noted as the pupil's normal way of working RA on Sections A and B of the JCO Form 8, Application for Access Arrangements

It is important that any pupil with a possible disadvantage is identified during KS3 and referred to the Specialist Assessor/SENCo/Access Arrangements Coordinator (AAC) before the end of Y9. Arrangements cannot be submitted for consideration by the JCQ without evidence of a history of need.

#### **YEARS 10 and 11**

By this stage a history of need will have been established. If new concerns are raised the same process will be followed as for KS3. The Specialist Assessor will then decide if formal testing for Access Arrangements is required. Any new pupil transferring to Immanuel College from another school, who has previously been given Access Arrangements must present the following evidence:

- test data.
- supporting evidence of need and provision from their previous school
- a fully completed and signed copy of all sections of Form 8

It is the responsibility of the parent/carer to obtain these documents on transfer and to present them to the Specialist Assessor on entry to the school.

#### Picture of need/normal way of working

# **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 AARA 8 (Processing applications for access arrangements and adjustments) and 6 (Modified papers).

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

Online applications **must** only be processed where they are supported by the centre and the candidate meets the published criteria for the arrangement(s) with the full supporting evidence in place. (AARA 8 Summary)

Before applying for AAO the SENCo/assessor/ Access Arrangements Coordinator (AAC) have the following information first.

- The candidate's consent (completed candidate personal data consent form) The form is retained for 26 months from the date of the online application being approved.
- All paperwork determining the candidate's needs, including Form 8s.

Hard copies of all paperwork will be held on student files locked away in the Access Arrangement Coordinator office.

The ordering of modified papers where applicable will be done by the Exams Officer.

The SENCo/assessor/Access Arrangements Coordinator (AAC) **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. (AARA, section 8.6)

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

#### **Word Processor Policy (Exams)**

Refer to the Exams Word Processor Policy. This policy must be available for inspection. (AARA, section 5.8) details the criteria Immanuel College specifically uses to award and allocate word processors for examinations and assessments.

The JCQ provides guidelines when it is acceptable for individuals to be given access to word processing during examinations. 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.

A word process may be considered due to:

- A learning difficulty which has a substantial and long-term effect on their ability to write legibly
- A medical condition
- A physical disability
- A sensory impairment
- Planning and organisational problems when writing by hand (to be assessed)
- Very poor handwriting/illegible handwriting
- 1. The centre will review requests for the use of a word processor in exams if one of the following conditions is met:
- 2. A medical, physical or sensory disability that confirms use of a word processor as necessary. (We require confirmation in writing by an accredited medical specialist or consultant).
- 3. Slow handwriting speed (confirmed by the internal assessor)
- 4. Planning and organisational problems when writing by hand (supported by teacher evidence)
- 5. Extremely poor handwriting (Examiners are adept at deciphering poor handwriting, so it must be extremely difficult to read, not just messy.) Proof is required from subject teachers.
- 6. If a student has a history of need using a word processor in exams at their previous school and it is therefore their 'normal way of working,' and there is evidence that the provision of a word processor is still appropriate.

In all cases, the use of a word processor must reflect the candidate's normal way of working within the centre and be appropriate to the candidate's needs.

The candidates will have the spell/grammar check disabled.

# **Alternative Rooming Arrangements Policy**

Please note: 'Alternative Rooming Arrangements' is sitting the examination outside of the main examination hall/room- a room for a smaller group of candidates which could contain up to 30 students.

The JCQ regulations state that nervousness, low level anxiety or being worried about exams is **NOT** sufficient grounds for alternative rooming arrangements/smaller room within the centre (AA, section 5.16).

A decision where an exam candidate may be approved alternative rooming arrangements, e.g. a room for a smaller group of candidates with similar needs will be made by the SENCo/ Access Arrangements Coordinator (AAC).

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 (AARA 5.16)

A candidate may be eligible for alternative rooming arrangements under the following categories:

- 'Long term' mental health issues\*
- 'Long term' social or emotional needs\*
- A medical/physical condition/impairment requiring alternative rooming arrangements\*.
- Eligibility for access arrangements necessitating alternative rooming arrangements

The exams team and access arrangement co-ordinator will consider arrangements for a candidate to sit their exam in an alternative room if:

- The candidate provides written evidence from an accredited medical professional outlining their condition and explanation of need
- A candidate with mental health and/or social and emotional needs is accessing support within the centre or from an accredited external agency
- The centre is aware of history of the long-term need through the pastoral team and the candidate is know to the SEND team.

#### **Individual Invigilation**

Individual invigilation (where the candidate sits the exam in an individual room) can only be accommodate in highly exceptional circumstances. Individual invigilation would only be granted where, in addition to the evidence require for a smaller room, the candidate can provide evidence of need from a consultant or specialist which details the students condition and states exactly why individual invigilation is necessary.

Following the submission of this evidence the SENDCO/Access Arrangements Coordinator (AAC) will make a final decision and communicate this back to the applicant and parents or carers.

#### **Supervised Rest Breaks**

The centre will consider rest breaks in line with the JCQ regulations which state:

"The SENDCO must be satisfied that the candidate has an impairment which has a substantial and long-term adverse effect, giving rise to persistent and significant difficulties; and the candidate is disabled within the meaning of the Equality Act 2010" (Access arrangements and reasonable adjustments- JCQ 2024-2025)

<sup>\*</sup>N.B- Evidence from an accredited professional will be required

The SENDCo/Access Arrangement Coordinator will consider if supervised rest breaks would be more appropriate before making an application for 25% extra time. We cannot make any arrangements for internal or external exams without the required evidence.

Supervised rest breaks could be awarded on account of:

- 1. Medical conditions rest breaks can be agreed if you have a serious medical condition, e.g. type 1 diabetes. Medical evidence is required.
- 2. Diagnoses of ASC or AD(H)D if you have a diagnosis, we will look at the recommendations and consider whether rest breaks will be helpful in exams. Evidence of your diagnosis is required.
- 3. Social, emotional & mental health needs where current written evidence of need is provided from an accredited professional medical source outlining the condition and explanation of current need.
- 4. Sensory or physical needs where sitting or writing/reading for an extended period of time causes significant discomfort/difficulty. Medical evidence from an accredited professional is required.

Rest breaks are used in different ways, and always with full supervision:

- A student may take a short break to rest an injury or physical disability and sit quietly in the exam room.
- A student can leave the exam room supervised to take a short walk.
- A student may go to the toilet or have a snack.
- A student may need to check blood sugar levels and administer insulin if required.

**NB:** A Rest break is for taking a rest from the exam, not for thinking time or processing information, therefore the exam paper will not be on show and the student must not engage with the exam during this time

#### **Modified papers**

Modified papers are ordered using AAO.

- Modified papers must be ordered in advance of a specific examination series, no later than the published deadline for the series concerned (AARA 6.1)
- Modified papers are individually prepared for candidates for whom other adjustments are
  unsuitable. The modification of papers involves additional resources. Therefore, centres are
  required to provide the awarding bodies with early notification that a candidate will require a
  modified paper. (AARA 6.1)
- Modified papers must not be ordered for candidates unless the centre intends to enter them for the relevant examination series (AARA 6.1)
- For the adjustment to be effective, the candidate must have had appropriate opportunities to
  practise using an awarding bodies past modified papers before his/her first examination (AARA
  6.1)

#### **Roles and responsibilities**

When an access arrangement/reasonable adjustment has been processed on-line and approved, the evidence of need (where required) must be made available to a JCQ Centre Inspector upon request. An awarding body may also request evidence of need when considered necessary. This can either be in hard copy paper format or electronically. (AARA 4.2)

Where documentation is stored electronically an e-folder for each individual candidate must be created. The candidate's e-folder must hold each of the required documents for inspection. (AARA 4.2)

# It is the responsibility of

The Access Arrangements Coordinator (AAC) or Exams Manager:

- > to collect the signed personal data consent forms from candidates.
- > to collect a candidate's consent (a completed candidate Personal data consent form) to record their personal data on-line through AAO.
- > to complete the Data protection confirmation by the examinations officer or SENCo, prior to the processing of the online application
- > The Access Arrangement Coordinator is responsible for submitting applications for approval using AAO.
- ➤ The assessor will keep detailed records for inspection purposes, whether electronically or in hard copy paper format, of all the essential information on file. This includes a signed candidate personal data consent form; a completed Data protection confirmation by the examinations officer or SENCo/Access Arrangements Coordinator (AAC) form; a copy of the candidate's approved application; appropriate evidence of need (where required); evidence of the assessor's qualification (where required) (AARA 8.6)
- > The assessor will submit applications for approval directly to an awarding body for any qualification that does not fall within the scope of AAO.
- > The Access Arrangement Coordinator is responsible for submitting applications unless it is an emergency AA which has occurred on the day of the exam.
- > The exams manager is responsible for ordering modified papers from the awarding bodies.