

Disability policy (Exams)

Key staff involved in the policy

Role	Name(s)
SENCo	Miss E Belcher
SENCo line manager (Senior Leader)	Mr C Patrick
Head of centre	Mr S Shaw
Assessor(s) & EAA coordinator	Ms A Forbes
Access arrangement facilitator(s)	Exams Manager - Mr B Guy

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Purpose of the policy

This document is provided as an exams-specific supplement to the *centre-wide accessibility policy* which details how the centre 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...

for any legislation in a relevant jurisdiction other than England and Wales which has an equivalent purpose and effect”

[Quotation taken directly from section 5.4c of the JCQ publication [General regulations for approved centres 2022-23](#)]

This policy details how the centre facilitates access to exams and assessments for disabled candidates, as defined under the terms of the Equality Act 2010, by outlining staff roles and responsibilities in relation to

- identifying the need for appropriate arrangements, reasonable adjustments and/or adaptations (referred to in this policy as ‘access arrangements’)
- requesting access arrangements
- implementing access arrangements and the conduct of exams
- good practice in relation to the Equality Act 2010

The Equality Act 2010 definition of disability

Generally, impairments have to meet the statutory requirements set out in section 6 and Schedule 1 to the Equality Act 2010 and associated regulations.

The Equality Act 2010 definition of disability is usually considered cumulatively in terms of:

- identifying a physical or mental impairment;
- looking into adverse effects and assessing which are substantial;
- considering if substantial adverse effects are long term;
- judging the impact of long term adverse effects on normal day to day activities.

Statutory guidance on the Equality Act 2010 definition of disability has been produced by the Office for Disability Issues (within the Department for Work and Pensions) to help better understand and apply this definition - <http://odi.dwp.gov.uk/docs/wor/new/ea-guide.pdf>

The clear starting point in the statutory guidance is that disability means **‘limitations going beyond the normal differences in ability which may exist among people’**.

‘Substantial’ means ‘more than minor or trivial’. Substantial adverse effects can be determined by looking at the effects on a person with the impairment, comparing those to a person without the impairment, to judge if the difference between the two is more than minor or trivial.

‘Long term’ means the impairment has existed for at least 12 months, or is likely to do so.

‘Normal day to day activities’ could be determined by reference to the illustrative, non-exhaustive list of factors in pages 47 to 51 of the statutory guidance relating to the Equality Act 2010. **(Study and education related activities are included in the meaning of ‘day to day’ activities.)**

The guidance from the Office for Disability Issues referred to above illustrates the factors which might reasonably be regarded as having a substantial adverse effect on normal day to day activities. Factors that might reasonably be expected not to have a substantial adverse effect are also provided.

Factors that might reasonably be expected to have a substantial adverse effect include:

- persistent and significant difficulty in reading and understanding written material where this is in the person's native language, for example because of a mental impairment, a learning difficulty or a sensory or multi-sensory impairment;
- persistent distractibility or difficulty concentrating;
- difficulty understanding or following simple verbal instructions;
- physical impairment – for example, difficulty operating a computer because of physical restrictions in using a keyboard.

Factors that might reasonably be expected not to have a substantial adverse effect include:

- minor problems with writing or spelling;
- inability to read very small or indistinct print without the aid of a magnifying glass;
- inability to converse orally in a language which is not the speaker's native spoken language.

Identifying the need for access arrangements

Roles and responsibilities

Head of centre

- Is familiar with the entire contents, refers to and directs relevant centre staff to the annually updated JCQ publications including [GR](#) and [AA](#)
- Ensures an appropriately qualified assessor(s) is appointed, evidence of the assessor's qualification(s) is obtained before he/she assesses candidates and that evidence of the qualification(s) of the person(s) appointed is held on file

Senior leaders

- Are familiar with the entire contents of the annually updated JCQ publications including [GR](#) and [AA](#)
- Ensure a statement is provided which details the criteria the centre uses to award and allocate word processors for exams
- If the SENCo or **Examination Access Arrangements Coordinator** is unavailable, presents the files/e-folders of access arrangements candidates when requested by a JCQ Centre Inspector and addresses any queries/questions raised

Special Educational Needs Coordinator (SENCo) or Examination Access Arrangements Coordinator

- Has full knowledge and understanding of the contents, refers to and directs relevant centre staff to the annually updated JCQ publication [AA](#)
- Leads on the access arrangements process to facilitate access for candidates
- Presents when requested by a JCQ Centre Inspector, evidence of the assessor's qualification

Teaching staff

- Inform the SENCo of any support that might be needed by a candidate
- Provide information to evidence the normal way of working of a candidate

Support staff (for example, Learning Support Assistants, Teaching Assistants and Communication Support Workers)

- (where appropriate) Provide comments/observations to support the SENCo in *painting a holistic picture of need* confirming *normal way of working* for a candidate

Assessor of candidates with learning difficulties

(An assessor of candidates with learning difficulties will be an appropriately qualified access arrangements assessor/psychologist/specialist assessor)

- Has detailed understanding of the JCQ publication [AA](#)
- Ensures that all assessments carried out and arrangements put in place comply with JCQ and awarding body regulations and guidance.
- Ensures arrangements put in place for exams/assessments reflect a candidate's *normal way of working* within the centre
- Ensures the need for access arrangements for a candidate will be considered on a subject by subject basis
- Works with teaching staff, relevant support staff and the exams officer to ensure centre-delegated and awarding body approved access arrangements are put in place for candidates taking internal and external exams/assessments
- Conducts appropriate assessments to identify the need(s) of a candidate
- Provides appropriate evidence to confirm the need(s) of a candidate
- Completes appropriate documentation as required by the regulations of JCQ and the awarding body

Use of word processors

See appendix 1

Requesting access arrangements

Roles and responsibilities

Special educational needs coordinator (SENCo) or Examination Access Arrangements Coordinator

- Determines if the arrangements identified for a candidate require prior approval from the awarding body before the arrangements are put in place or if approval is centre-delegated
- Follows guidance in [AA](#) to process approval applications for access arrangements for those qualifications listed on page 2/92 of [AA](#)
- Applies for approval where this is required, through *Access arrangements online* (AAO), or through the awarding body where qualifications sit outside the scope of AAO
- Ensures appropriate and required evidence is held on file to confirm validation responses in AAO including the completion of JCQ Form 8 (*Application for access arrangements – Profile of learning difficulties*), where required, and a body of evidence to substantiate the candidate's normal way of working within the centre
- Ensures where form 8 is required to be completed, the original form is signed (an electronic signature is permissible) and dated as required **prior** to approval being sought and that the original form is provided for processing and inspection purposes (This may be a hard copy paper version or an electronic version).
- Ensures the names of all other assessors, who are assessing candidates studying qualifications as listed on page 2/92 of [AA](#), are entered into AAO to confirm their status including any professionals working outside the centre
- Confirms by ticking the '*Confirmation*' box prior to submitting the application for approval that the '*malpractice consequence statement*' has been read and accepted
- Makes an *awarding body referral* through AAO where the initial application for approval may not be approved by AAO, where it is deemed by the centre that the candidate does meet the criteria for the arrangement(s)
- Ensures that arrangements, and approval where required, are in place before a candidate takes his/her first exam or assessment (which is externally assessed or internally assessed/externally moderated)
- Ensures that where approval is required that this is applied for by the awarding body deadline
- Maintains a (hard copy or electronic) file/e-folder for each candidate that will include:

- completed JCQ/awarding body application forms and evidence forms
- appropriate evidence to support the need for the arrangement where required
- appropriate evidence to support normal way of working within the centre
- in addition, for those qualifications listed on page 2/92 of [AA](#) (where approval is required), a print out of the AAO approval and a signed data protection notice (which provides candidate consent to their personal details being shared)
- Presents the files/e-folders when requested by a JCQ Centre Inspector and addresses any queries/questions raised
- Liaises with teaching staff regarding any appropriate modified paper requirements for candidates

Exams Manager

- Is familiar with the entire contents of the annually updated JCQ publication [GR](#) and is aware of information contained in [AA](#) where this may be relevant to the EO role
- Liaises with the SENCo to ensure arrangements are in place to either order a non-interactive electronic (PDF) question paper or to open question paper packets in the secure room within 90 minutes of the published starting time for the exam where the centre is permitted to modify a timetabled written component exam paper (copy on coloured paper, enlarge to A3 or copy to single sided print)
- Following the appropriate process (AAO for those qualifications listed on page 74 of [AA](#); *Form VQ/EA*), orders published modified papers, by the awarding body's deadline for the exam series, where these may be required for a candidate

Implementing access arrangements and the conduct of exams

Roles and responsibilities

External assessments

These are assessments which are normally set and marked/examined by an awarding body which must be conducted according to awarding body instructions and/or the JCQ publication [Instructions for conducting examinations](#) (ICE).

Head of centre

- Supports the SENCo, the exams team and other relevant centre staff in ensuring appropriate arrangements, adjustments and adaptations are in place to facilitate access for disabled candidates to exams

Special educational needs coordinator (SENCo) or Examination Access Arrangements Coordinator

- Ensures appropriate arrangements, adjustments and adaptations are in place to facilitate access for candidates where they are disabled within the meaning of the Equality Act (unless a temporary emergency arrangement is required at the time of an exam)
- Ensures a candidate is involved in any decisions about arrangements, adjustments and/or adaptations that may be put in place for him/her and ensures the candidate understands what will happen at exam time
- Liaises with the exams team regarding facilitation and invigilation of access arrangement candidates in exams
- Appoints appropriate centre staff as facilitators to support candidates (practical assistant, prompter, Oral Language Modifier, reader, scribe or Communication Professional)
- Ensures facilitators supporting candidates are appropriately trained and understand the rules of the particular access arrangement(s)
- Ensures a record of the content of training given to those facilitating an access arrangement for a candidate under examination conditions is kept and retained on file until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later

- Ensures the facilitator is known by or introduced to the candidate prior to exams
- Ensures a facilitator acting as a prompter is aware of the appropriate way to prompt depending on the needs of the candidate

Exams Manager

- Understands and follows instructions for *Invigilation arrangements for candidates with access arrangements* and *Access arrangements* in [ICE 2022-23](#)
- Ensures a candidate is involved in any decisions about arrangements, adjustments and/or adaptations that may be put in place for him/her and ensures the candidate understands what will happen at exam time
- Ensures exam information (JCQ information for candidates documents, individual exam timetable etc.) is adapted where this may be required for a disabled candidate to access it
- Ensures that prior to any arrangements being put in place checks are made that arrangements do not impact on any assessment criteria/competence standards being tested
- Ensures that any arrangements put in place do not unfairly disadvantage or advantage disabled candidates
- Monitors, in internal tests/mock exams, the use of arrangements granted to a candidate and where a candidate has never made use of the arrangement, may consider withdrawing the arrangement, provided the candidate will not be placed at a substantial disadvantage
- Liaises with other relevant centre staff regarding the provision of appropriate rooming and equipment that may be required to facilitate access for disabled candidates to exams
- Ensures facilitators supporting candidates are appropriately trained and understand the rules of the particular access arrangement(s)
- Ensures a record of the content of training given to those facilitating an access arrangement for a candidate under examination conditions is kept and retained on file until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later
- Ensures the facilitator is known by or introduced to the candidate prior to exams
- Ensures a facilitator acting as a prompter is aware of the appropriate way to prompt depending on the needs of the candidate
- Ensures invigilators supervising access arrangement candidates are trained in their role and understand the invigilation arrangements required for access arrangement candidates and the role of any facilitator
- Ensures cover sheets, where these are required by the arrangement are completed as required by facilitators
- Ensures appropriate seating arrangements are in place where different arrangements may need to be made for a candidate to facilitate access to his/her exams
- Ensures candidates with access arrangements are identified on exam room seating plans
- Ensures invigilators are briefed prior to each exam session of the arrangements in place for a disabled candidate in their exam room
- Checks in advance of dated exams/assessments that modified paper orders have arrived (and if not will contact the awarding body to ensure that papers are available when required)
- Makes modifications that are permitted by the centre (a question paper copied onto coloured paper, an A4 to A3 enlarged paper or a paper printed on single sheets or where a question paper may need to be scanned into PDF format where a candidate is approved the use of a computer reader) that may be required and either accesses a non-interactive electronic (PDF) question paper or opens the exam question paper packet in the secure room no earlier than 90 minutes prior to the awarding body's published start time of the exam
- Understands that where permitted/approved, secure exam question paper packets may need to be opened early so the facilitator (Oral Language Modifier, Live Speaker, Communication Professional

only) may have access to the question paper 60 minutes prior to the awarding body's published starting time for the exam in order to prepare

- Provides cover sheets prior to the start of an exam where required for particular access arrangements and ensures that these have been fully completed before candidates' scripts are dispatched to examiners/markers
 - Prints pre-populated cover sheets from AAO where this is required for those qualifications listed on page 2/92 of [AA](#)
- Has a process in place to deal with emergency (temporary) access arrangements as they arise at the time of exams in terms of rooming and invigilation
- Liaises with the SENCo where a facilitator may be required to support a candidate requiring an emergency (temporary) access arrangement at the time of exams

Other relevant centre staff

- Support the SENCo and the exams team to ensure appropriate arrangements, adjustments and adaptations are in place to facilitate access for disabled candidates to exams
- Staff responsible for **IT or other specialist equipment** to ensure that appropriate resources are available
- Senior staff responsible for the centre's **emergency evacuation procedures** have made arrangements for a candidate with a disability who may need assistance when an exam room is evacuated

Internal assessments

These are non-examination assessments (NEA) which are normally set by a centre/awarding body, marked and internally moderated by the centre and externally moderated by the awarding body.

"Externally marked and/or externally set practical examinations taken at different times across centres are classified as 'NEA'."

[Quotation taken from the JCQ publication [Instructions for conducting non-examination assessments](#), Foreword]

Special Educational Needs Coordinator (SENCo) or Examination Access Arrangements Coordinator

- Liaises with teaching staff to implement appropriate access arrangements for candidates
- Ensures centre-delegated and awarding body approved arrangements are in place prior to a candidate taking his/her first formal supervised assessment
- Ensures candidates are aware of the access arrangements that are in place for their assessments
- Ensures facilitators supporting candidates are appropriately trained and understand the rules of the particular access arrangement(s)
- Ensures cover sheets are completed as required by facilitators
- Liaises with the teacher where a facilitator may be required to support a candidate requiring an emergency (temporary) access arrangement at the time of his/her formal supervised assessment

Teaching staff

- Support the SENCo in implementing appropriate access arrangements for candidates
- Ensures candidates are aware of the access arrangements that are in place for their assessments
- Provide the SENCo with assessment schedules to ensure arrangements are put in place when required
- Liaise with the SENCo regarding assessment materials that may need to be modified for a candidate

Internal exams

These are exams or tests which are set and marked within the centre; normally a pre-cursor to external assessments.

Special educational needs coordinator (SENCo) or Examination Access Arrangements Coordinator

- Liaises with teaching staff to implement appropriate access arrangements for candidates

Teaching staff

- Support the SENCo in implementing appropriate access arrangements for candidates
- Provide exam materials that may need to be modified for a candidate

Exams Manager

- Provide exam materials that may need to be modified for a candidate
- Provide the SENCo with internal exam timetable to ensure arrangements are put in place when required

Facilitating access - examples

The following information confirms the centre's good practice in relation to the Equality Act 2010 and the conduct of examinations. On a candidate by candidate basis, consideration is given to:

- adapting assessment arrangements
- adapting assessment materials
- the provision of specialist equipment or adaptation of standard equipment
- adaptation of the physical environment for access purposes

The table provides example arrangements, adjustments and adaptations that are considered to meet the need(s) of a candidate and the actions considered/taken by the centre for the purposes of facilitating access.

Example of candidate need(s)	Arrangements explored	Centre actions
A medical condition which prevents the candidate from sitting for a long period of time	Supervised rest breaks Seated in appropriate place to facilitate exit from exam room without disturbing others	SENCo or Examination Access Arrangements Coordinator gathers evidence to support the need for the candidate to take rest breaks Pastoral head provides written statement for file to confirm the need Approval confirmed by SENCo; AAO approval for this arrangement is not required Pastoral head discussion with candidate to confirm the arrangements should be put in place Invigilator monitors candidate's condition for each exam and records any issues on incident log Invigilator records rest breaks (time and duration) on incident log and confirms set time given for exam Invigilator briefs EO after each exam on how candidate's performance in exam may have been affected by his/her condition.
Persistent and significant difficulties in accessing written text	Reader/computer reader 25% Extra time Separate invigilation within the centre	Confirms candidate is disabled within the meaning of the Equality Act 2010 Papers checked for those testing reading Computer reader used for use in papers (or sections of papers) testing reading OR up to 50% extra time awarded Original Form 8 signed and dated, with Sections A, B and C completed; kept on file with body of supporting evidence, printed approval from AAO and signed data protection notice
Significant difficulty in concentrating	Prompter	Gathers evidence to support substantial and long-term adverse impairment Confirms with candidate how and when they will be prompted Briefs invigilator to monitor candidate and the method of prompting - tap on desk to bring his attention back to the paper

A wheelchair user	Desk Rooms Facilities Seating arrangements Practical assistant	Applies for practical assistant to help candidate set up wheelchair and other equipment in a practical assessment; approval automatically fails so awarding body referral lists the tasks that will be performed Allocates exam room on ground floor Spaces desks to allow wheelchair access Seats candidate near exam room door Confirms arrangements in place to assist the candidate in case of emergency evacuation of the exam room Practical assistant cover sheet printed from AAO; to be completed by facilitator and inserted inside the candidate's work where this may be applicable to the assessment
A candidate with severe cerebral palsy who cannot use a word processor and has illegible writing	Scribe Practical assistant	Confirms candidate is disabled within the meaning of the Equality Act 2010 Gathers evidence to support substantial and long term adverse impairment Confirms with candidate how and when and where they will have a scribe Original Form 8 signed and dated, with Sections A, B and C completed; kept on file with body of supporting evidence, printed approval from AAO and signed data protection notice.
Candidate has illegible writing despite handwriting intervention sessions	Word processor	SENCo or Examination Access Arrangements Coordinator gathers evidence to support the need for the candidate to use a word processor Approval confirmed by SENCo; AAO approval for this arrangement is not required Candidate seated so that other candidates cannot see what is being written on the word processor Candidate reminded to save regularly and given information about the printing process at the end of the exam At the end of the exam, the candidate and their memory stick are taken to a printer for the candidate to see and confirm the work is theirs Word processor cover sheet printed from AAO; to be completed by facilitator and inserted inside the candidate's work

Appendix 1

Thomas Keble School use of laptops policy

Thomas Keble School believes that handwriting is a skill for life and that it should be developed alongside the typing skills that our students develop as they continue through life. This means that our initial response to a student who has difficulty writing legibly is to give them additional support with their handwriting so that this skill is developed rather than lost by reverting purely to word processing.

Thomas Keble School is committed to supporting all of our students to achieve their full potential. However, we do not have the resources to fund examination enabled laptops to all students (personal laptops cannot be used in examinations) and therefore have to ensure that we do not advantage some students over others.

“A word processor cannot simply be granted to a candidate because he/she now wants to type rather than write in examinations or can work faster on a keyboard or because he/she uses a laptop at home.” **(Joint Council for Qualifications [JCQ] adjustments for candidates with disabilities and learning difficulties – access arrangements and reasonable adjustments 2016 section 5.8.4)**

Transition from primary or another school to TKS:

If a student's normal way of working at primary school (or another secondary school) is to use a laptop we would need evidence of this normal way of working as this must be on our file for inspectors to explain the need and normal way of working. For example: A letter from the SENCo and copies of word-processed examinations or work or exercise books with word processed work stuck in.

KS3:

We are very keen to support students in their acquisition of legible handwriting as this is a skill for life. We do run handwriting interventions to enable the development of legible handwriting. We assess students for whom we have a history of need for possible examination access arrangements for GCSE in the second half of Year 9.

GCSE: There should be enough evidence to demonstrate a requirement by the beginning of Year 10 or, at the very latest, after the Year 10 internal examinations.

Next steps if interventions fail:

If interventions have not enabled the student to write legibly we will then investigate to see if further interventions are required or if the student would be eligible for the examination access arrangement of a word processor. Parents are informed of the results of these assessments by letter.

Regulations which we are required to follow:

Examination access arrangements are to level the playing field and “allow candidates/learners with special educational needs, disabilities or temporary injuries to:

- Access the assessment;
- Show what they know and can do without changing the demands of the assessment.” (JCQ)

A laptop in examinations needs a specific and appropriate need to warrant its use so that the candidate is **not having an advantage over all other candidates**. If their writing is illegible because they are not taking care then that is not an appropriate need.

Some appropriate uses are:

- A learning difficulty which has a substantial and long-term adverse effect on their ability to write legibly
- A medical condition
- A physical disability
- A sensory impairment
- Handwriting which has been hard to decipher over a number of years without improvement **(even though there have been documented interventions)**
- A candidate who has substantial problems with organisation of ideas and this has been documented over a number of years

Student responsibility if laptop use is granted:

This need means that using a laptop will be their **normal way of working** as they cannot record their learning and demonstrate their knowledge without it. We will have evidence of their normal way of working (required for JCQ inspectors) because they will be word processing their work in most lessons and homeworks. It is the student's responsibility to print off their work and stick it into exercise books. Without this evidence that word processing is their normal way of working they will not be able to use it in examinations.

In order to retain this access arrangement, it is also important that students follow the school policy on acceptable computer use.