



Equality Policy (In Relation to Exams)

2022/23

THE KING DAVID HIGH SCHOOL

his policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Date of next review	Sept 2023

Key staff involved in the policy

Role	Name(s)
SENCo	Heidi Greenstein
SENCo line manager (Senior Leader)	
Head of centre	John Dalziel
Assessor(s)	Grant Peden
Access arrangement facilitator(s)	

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Purpose of the policy

This document is provided as an exams-specific supplement to the *centre-wide disability/accessibility policy/plan* which details how the centre will:

- *recognise its duties towards disabled candidates, including private candidates, as defined under the terms of the Equality Act 2010†. This must include a duty to explore and provide access to suitable courses, 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*

[Quote taken directly from section 5.4 of the JCO publication General Regulations for Approved Centres 2019-2020]

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

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

Special educational needs coordinator (SENCo)

- Has full knowledge and understanding of the contents, refers to and directs relevant centre staff to the annually updated JCQ publication Access Arrangements

Teaching staff

- Inform the SENCo of any support that might be needed by 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](#)

Use of word processors

Separate policy available to view

Requesting access arrangements

Roles and responsibilities

Special educational needs coordinator (SENCo)

- 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

Exams officer

- Is familiar with the entire contents of the annually updated JCQ publication and is aware of information contained in Access Arrangements where this may be relevant to the EO role
 - Follows guidance in [AA](#) Section 8 to process approval applications for access arrangements for those qualifications listed on page 2 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 (where required) the completion of JCQ Form 8 (*Application for access arrangements – Profile of learning difficulties*), and/or centre based evidence including concise file note(s) on centre headed paper, signed and dated, and a body of evidence to substantiate the candidate's normal way of working within the centre (Form 8 must only be used for candidates with learning difficulties who are not subject to a current EHCP or Statement of Special Educational Needs or those requiring a Language Modifier.)
[Form 8](#) must only be used for
 - candidates with learning difficulties who are **not** subject to a current EHCP or Statement of Special Educational Needs who require 25% extra time and/or a scribe (including candidates who require a computer reader/reader and 25% extra time and/or a scribe)
 - all candidates with learning difficulties who require up to 50% extra time
 - all candidates who require a Language Modifier)
 - Ensures where form 8 is required to be completed, the form is signed (a handwritten, electronic or typed signature is acceptable) and dated as required **prior** to approval being sought and that the 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 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 processed at the start of the course and at the latest by the awarding body deadline
- Maintains a file/e-folder for each candidate (the required documentation for a candidate will either be all in hard copy within the candidate's file **or** all in electronic format within the candidate's e-folder) 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 of [AA](#) (where approval is required), a print out/PDF of the AAO approval and a signed candidate personal data consent form (which provides candidate consent to their personal details being shared)
 - (where applicable) 'Data protection confirmation by the examinations officer or SENCo' acknowledged before an application is processed online

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- Presents the files/e-folders when requested by a JCQ Centre Inspector and addresses any queries/questions raised (In the event of an IT failure at the time of an inspection is able to access the required documentation in an alternative format, e.g. a memory stick or hard copy)
- If the SENCo is unavailable, presents the files/e-folders of access arrangements candidates 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
- Liaises with the SENCo to ensure arrangements are in place to either order a non-interactive electronic (PDF) question paper from OCR and WJEC (or to download a PDF copy of the standard question paper where provided by AQA and Pearson) or to open q or to open question paper packets in the secure room within 90 minutes of the awarding body's 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 (using AAO for those qualifications listed on page 74 of [AA](#); using *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
- Ensures that where approval is required the application is processed on time and no later than the awarding body's published deadline
- Ensures that the full supporting evidence is in place before an online application is processed
- Reviews the evidence before an online application is processed, ensuring that the candidate does meet the published criteria for the respective arrangement
- Holds all supporting evidence and presents such evidence to a JCQ Inspector upon request
- Ensures that the agreed adjustment has been put in place before the candidate's first examination, e.g. internal tests and mock examinations
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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 officer 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)

- 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)

Exams officer

- Understands and follows instructions for *Invigilation arrangements for candidates with access arrangements* and *Access arrangements* in [ICE 2022-2023](#)

Other relevant centre staff

- Support the SENCo and the exams officer to ensure appropriate arrangements, adjustments and adaptations are in place to facilitate access for disabled candidates to exams

When the information contained in this table is understood – highlight the table and select delete to remove the table and its contents from your policy

Determine the responsibilities of each of the roles above. The list of roles is not exhaustive; add additional roles as identified in your centre. Add responsibilities as bullet points under each role. An example has been provided under each role to demonstrate.

Responsibilities might include some of the examples listed below (this list is by no means exhaustive); the same responsibility could be assigned to more than one role.

- Is familiar with the instructions for *Invigilation arrangements for candidates with access arrangements* and *Access arrangements* in [ICE 2022-2023](#)
- 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 the exams officer (EO) regarding facilitation and invigilation of access arrangement candidates in exams
- 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
- Appoints appropriate centre staff as facilitators to support candidates (practical assistant, prompter, 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 where a person is appointed to facilitate an access arrangement, the person appointed is not normally the candidate's own subject teacher but where the candidate's own subject teacher has to be used, ensures a separate invigilator is always present
- Ensures where a person is appointed to facilitate an access arrangement, the person appointed is not a relative, friend, peer or private tutor of the candidate
- Ensures a facilitator acting as a prompter is aware of the appropriate way to prompt depending on the needs of the candidate
- Liaises with the EO to ensure that invigilators are made aware of the Equality Act 2010 and are trained in disability issues
- 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
- Liaises with the EO where a facilitator may be required to support a candidate requiring an emergency (temporary) access arrangement at the time of exams
- Liaises with the SENCo and other relevant centre staff to ensure appropriate arrangements, adjustments and adaptations are in place to facilitate access for disabled candidates to exams
- Liaises with the SENCo to ensure 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
- Liaises with the SENCo regarding the facilitation and invigilation of access arrangement candidates
- Liaises with the SENCo regarding rooming of access arrangement candidates
- Liaises with the SENCo to ensure that invigilators are made aware of the Equality Act 2010 and are trained in disability issues
- 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, a secure question paper packet may need to be opened early in the secure room to facilitate the following:
 - a Language Modifier may have access to the question paper 60 minutes prior to the awarding body's published start time for the exam in order to prepare
 - the Communication Professional may have access to the question paper 60 minutes prior to the awarding body's published start time for the exam in order to prepare
 - the Live Speaker may have access to the transcript of the Listening examination 60 minutes prior to the awarding body's published start 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 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
- Where required for emergency (temporary) access arrangements, applies for approval through AAO or through the awarding body where qualifications sit outside the scope of AAO

Other relevant centre staff could include:

- Staff responsible for **IT or other specialist equipment** that may need to be provided or adapted for a candidate
- Estates/site staff responsible for **rooms and non-specialist equipment** (chairs, tables, clocks etc.) used for exams that may need to be adapted for a candidate
- Senior staff responsible for the centre's **emergency evacuation procedures** and the arrangements that may need to be in place 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/standardised 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'. [JCO publication [Instructions for conducting non-examination assessments](#), Foreword]

Special educational needs coordinator (SENCo)

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

Teaching staff

- Support the SENCo in implementing appropriate access arrangements for candidates

Determine the responsibilities of each of the roles above. The list of roles is not exhaustive; add additional roles as identified in your centre. Add responsibilities as bullet points under each role. An example has been provided under each role to demonstrate.

Responsibilities might include some of the examples listed below (this list is by no means exhaustive); the same responsibility could be assigned to more than one role.

- 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
- 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)

- 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

- 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 taking exams in the centre	Alternative site for the conduct of examinations Supervised rest breaks	<p><i>SENCo gathers evidence to support the need for the candidate to take exams at home</i></p> <p><i>Pastoral head provides written statement for file to confirm the need</i></p> <p><i>Approval confirmed by SENCo; AAO approval for both arrangements not required</i></p> <p><i>Pastoral head discussion with candidate to confirm the arrangements should be put in place</i></p> <p><i>EO submits 'Alternative site form' for timetabled written exams to awarding body/bodies online through CAP</i></p> <p><i>An on-line submission must only be made for timetabled written examinations in the following qualifications...</i></p> <p><i>EO provides candidate with exam timetable and JCQ information for candidates</i></p> <p><i>Pastoral head confirms with candidate the information is understood</i></p> <p><i>Pastoral head agrees with candidate that prior to each exam will call to confirm fitness to take exam</i></p> <p><i>EO allocates invigilator(s) to candidate's timetable; confirms time of collection of exam papers and materials</i></p> <p><i>Invigilator monitors candidate's condition for each exam and records any issues on incident log</i></p> <p><i>Invigilator records rest breaks (time and duration) on incident log and confirms set time given for exam</i></p> <p><i>Invigilator briefs EO after each exam on how candidate's performance in exam may have been affected by his/her condition</i></p> <p><i>EO discusses with pastoral head if candidate is eligible for special consideration (candidate present but disadvantaged)</i></p> <p><i>EO processes request(s) for special consideration where applicable; incident log(s) provides supporting evidence</i></p> <p><i>Pastoral head informs candidate that special consideration has been requested</i></p>

<p>Persistent and significant difficulties in accessing written text</p>	<p>Reader/computer reader 25% Extra time Separate invigilation within the centre</p>	<p><i>Confirms candidate is disabled within the meaning of the Equality Act 2010</i></p> <p><i>Papers checked for those testing reading</i></p> <p><i>Computer reader/examination reading pen sourced for use in papers (or sections of papers) testing reading OR up to 50% extra time awarded</i></p> <p><i>A short concise file note produced on centre headed paper, signed and dated kept on file, confirming the nature of the candidate's impairment and that the use of a computer reader and/or a reader reflects his/her normal and current way of working within the centre</i></p> <p><i>(25% Extra time - Form 8 completed as appropriate)</i></p> <p><i>Supporting evidence, AAO approval and signed candidate personal data consent form kept on file</i></p>
<p>Significant difficulty in concentrating</p>	<p>Prompter Separate invigilation within the centre</p>	<p><i>Gathers evidence to support substantial and long term adverse impairment</i></p> <p><i>Confirms with candidate how and when they will be prompted</i></p> <p><i>Briefs invigilator to monitor candidate and the method of prompting (call out his name to bring his attention back to the paper - confirms requirement for separate room)</i></p>
<p>A wheelchair user</p>	<p>Desk Rooms Facilities Seating arrangements Practical assistant</p>	<p><i>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</i></p> <p><i>Provides height adjustable desk in exam room</i></p> <p><i>Allocates exam room on ground floor near adapted bathroom facilities</i></p> <p><i>Spaces desks to allow wheelchair access</i></p> <p><i>Seats candidate near exam room door</i></p> <p><i>Confirms arrangements in place to assist the candidate in case of emergency evacuation of the exam room</i></p> <p><i>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</i></p>