

Reasonable Adjustments Policy and Application

Version 4.0 (October 2018)

Policy

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Document History

Version Number	Date	Reason for Revision
1.0	Autumn 2015	First draft (JH)
2.0	August 2016	Updated following feedback from initial delivery of EPA
3.0	July 2017	<p>Updated following annual review process via the sector assessment and assurance panels</p> <ul style="list-style-type: none"> • Some information moved to appendices • Application form added to the document as an appendix • Applied for by the employer or training provider supported by the apprentice and their employer (used to say by the apprentice) • Examples of reasonable adjustments added • Reference made to malpractice • Reference made to HSE safety requirements for non-English reading persons • Updated application form • Additional information on pregnancy
4.0	October 2018	Front page, contents page and version control added. Document History relocated.

Introduction

The Energy & Utilities Independent Assessment Service (EUIAS) recognises that in agreed and specified instances certain apprentices may require alternative arrangements for aspects of their theoretical and practical assessments. At all times these reasonable adjustments are set in the context of regulations relating to the health and safety requirements set out by the Health & Safety Executive and the standards of performance for the specific occupation specified by the Engineering Council (EngC). It is anticipated that all apprentices undertaking EUIAS assessments or assessments will be in employment in the energy and utilities industry and / or seeking entry into or progression within it. The EUIAS takes no responsibility for apprentices' current or future employment status arising from their performance in the assessments or assessments where reasonable adjustments have been sought or secured.

The gas, power, waste & recycling and water sectors that comprise the energy and utilities industry are rigorously regulated and very safety conscious as a consequence employers and providers must take a balanced view in terms of the impact that certain disabilities may have on each individual's ability to have the appropriate competence and safety levels for each occupation or role. As the independent awarding and assurance body the EUIAS has no role whatsoever in that decision making process. To that end the information on 'disabilities' that follows in this documents is as all-embracing as possible to ensure that employers, providers and apprentices have as wide and access to authentic, fair and valid assessment as possible.

Any request for reasonable adjustment must be the result of a disability, 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 the EUIAS 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 which many disabled people face and it is now unlawful for assessment institutes, among others, to discriminate against disabled people.

The EUIAS 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 EUIAS hopes that this document will increase knowledge and understanding about the Equality Act (or local equivalent), associated legislation such as the Data Protection Act (or local equivalent) and the opportunities that are available to accommodate apprentices who may require reasonable adjustments when taking assessments leading to achievement and certification.

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 the EUIAS for guidance via enquiries@euias.co.uk

Communication

This policy is sent to employers and training providers upon selection and appointment of EUIAS as the end-point assessment service provider. It is also available on the EUIAS website www.euias.co.uk

This policy must be made available by employers to their apprentices upon registration, and at their gateway to end-point assessment.

Who is entitled to reasonable adjustments?

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

- a) Permanent physical impairment, e.g. cerebral palsy and multiple sclerosis.
- b) Behavioural, emotional, social needs, e.g. chronic depression and autism.
- c) A sensory impairment, e.g. hearing impairment and visual impairment.
- d) Specific cognitive difficulties, e.g. dyslexia and memory loss.
- e) Motor difficulties, e.g. hand / eye co-ordination 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?

The EUIAS 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 apprenticeship.

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 are provided in **Appendix A** and may include:

- a) Allocation of extra time.
- b) Support of a personal assistant
- c) Rest / time breaks
- d) Support of a sign language interpreter
- e) Support of a scribe / amanuensis
- f) Use of assistive technology
- g) Support of a reader
- h) Braille paper
- i) Use of alternative assessment locations
- j) Alternative fonts, coloured paper / contrasting background colours
- k) Re-assessments, in the case of temporary illness / injury
- l) Pregnancy
- m) Adjustments for those undergoing end-point assessment that is not in their native language
- n) Stammer / stutter (oral assessments / interviews only)
- o) Religious obligations

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

The EUIAS 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 the EUIAS;
- Involve unreasonable timeframes; for example, Braille papers cannot be produced at short notice; or
- Affect the security and integrity of the apprenticeship itself

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

Examples of Reasonable Adjustments

1. An apprentice with Dyslexia needs to use a coloured overlay, 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.
2. 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 re-start his work, would be reasonable adjustments.
3. 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 written knowledge assessment within the time allowed. Without the application of 25% extra time in those subjects the candidate would be at a substantial disadvantage. However, if the knowledge assessment is multiple choice, it is unlikely that extra time would be awarded as the impairment is not about processing information it is about their quality of writing.

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 **one month** before end-point assessment activities commence. Applications must be submitted to kelly-ann.stubbs@euskills.co.uk

What documentary evidence is required?

An employer or provider should provide EUIAS with documentary evidence which outlines the nature and severity of an apprentice's disability. It should be from an appropriate independent professional.

Disability	Documentary Evidence
Visually Impaired Apprentice	Appropriate professional providing a written, dated and signed statement OR a certificate of registration as blind or partially sighted
Hearing Impaired	Appropriate professional providing a written, dated and signed

Apprentice	statement
Dyslexic Apprentice	Appropriate professional providing a written, dated and signed statement OR report form a learning support professional or educational psychologist
Other Medical Conditions	Appropriate professional providing a written, dated and signed statement

Please send EUIAS a copy of the evidence rather than the original. EUIAS will keep on record all Reasonable Access Requests forms and evidence for a period of 5 years after the assessment so that if an apprentice takes another assessment at a later date they will not need to resubmit the evidence. If an apprentice takes another assessment with the EUIAS all they need to do is quote their reasonable adjustments number and the EUIAS will be able to authorise the extra time based on the previous application. An apprentice can request that the EUIAS destroys all information once an assessment or assessment has been passed if they prefer.

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

Authorising Reasonable Adjustments

The EUIAS will consider each request in line with our Reasonable Adjustments Policy and the employer, training provider and apprentice will be informed in writing of our decision. If we require further information or clarification we may do this by telephone or email.

Responsibilities for the Provision of Reasonable Adjustments

Arrangements for reasonable adjustments are the responsibility of the employer. However, where equipment or external human resources such as a scribe, are required, the training provider and apprentice may have access to and be able to provide the equipment / resource.

The EUIAS will take reasonable steps to source equipment and resources if other parties are not able to do so, but such provision are chargeable.

Reasonable Adjustments during Assessment

Strict guidelines during the assessment and / or 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 the EUIAS in advance of the assessment.
 - c) Apprentices cannot talk to third parties during rest / time breaks apart from the assessor or invigilator.
 - d) The EUIAS will ensure that all independent assessment and public 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 assessments 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 EUIAS will ensure that the invigilator or other authorised third party has prior information of your requirements.

Disclosure and Confidentiality

Information about an apprentice's disability is deemed 'sensitive personal data' and therefore the EUIAS, the employer and / or the training provider, if appropriate, are required by law (under the Data Protection Act) to process the information 'fairly and lawfully'. The EUIAS will keep in confidence all correspondence and documentation received in accordance with the Data Protection Act.

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 EUIAS administrative staff, the assessor and / or the invigilator, as well as people who may be required to assist the apprentice during the assessment or the assessment such as a scribe or sign language interpreter.

The EUIAS may be required to provide regular reports to the Institute for Apprenticeships 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.

The EUIAS will not pass on in written form any sensitive information without the apprentice's written consent.

EUIAS Record Keeping and Reporting

The EUIAS 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

This appendix provides further details on types of reasonable adjustment.

1. 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 (please refer to section 11 for further information about native language).

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 the EUIAS 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

2. 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.

3. 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.

4. 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 re-phrasing using sign language or by writing it down. They must not give factual or practical help, offer any suggestions or advice which could be seen as giving the apprentice an unfair advantage. The EUIAS will normally expect the apprentice or their employer to source the interpreter although if this is not possible, the EUIAS will make reasonable efforts to locate a suitable person.

5. 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.

6. Use of Laptop and Adaptive Technology (Assistive / Access Technology)

An apprentice can request to use adaptive, assistive or access technology which enables them to access computer systems if they have particular needs. Where possible, the EUIAS 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 the EUIAS will make reasonable efforts to source the same or similar equipment.

If the EUIAS is 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:

- a) Alternative keyboards and mice including:
 - a. Braille labelled keyboards or home-row key indicators
 - b. Joysticks / trackerballs / mouse keys on the keyboard mouth stick

- b) Braille display
- c) Switches (alternative input to keyboard and mouse, used by apprentices with physical disabilities)
- d) Large monitors
- e) Headphones and volume adjustment for use with voice output / input software packages

Software:

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

6. Support of a Reader

An apprentice can request a reader if they have a visual impairment or specific learning difficulties which would benefit from the support of a reader. They 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.

7. 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.

8. Alternative Format of Assessment Papers

An apprentice can request changes to the knowledge tests to enhance accessibility including font and / or font colour to any size and colour within reason for paper based assessments. The EUIAS can 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.

9. Temporary Illness / Injury

Although a temporary illness or injury or indisposition would not be covered by the Equality Act (or local equivalent), the EUIAS 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 the EUIAS will try to accommodate your request.

10. 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 become 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. If their pregnancy places them at risk during their on-programme journey, then they are able to take a break in learning in accordance with the Education and Skills Funding Agency rules.

11. Apprentices taking an assessment not in your official or native language

In the energy and utilities sector, apprentices will have to make reference to safety documentation and some roles are safety critical. Some authorisations (approved by HSE) may not be issued to non-English reading persons due to the safety risk. Employers must include arrangements for dealing with this issue within their own Health and Safety Policy and ensure that their approach is not in breach of the Race Relations Act.

Where, safety is not at risk, the apprentice will be entitled to use their own **paper** dictionary (whose purpose is translation between the assessment or assessment language and another national language) during the assessment. Electronic dictionaries will **not** be allowed into the assessment.

The apprentice must advise their employer and or provider as early as possible in

advance of any assessment if they are likely to require extra time, but no less than one month before the assessment(s).

12. 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). The EUIAS will also try to allocate an apprentice with the final interview slot of the day so that there are fewer time pressures and restrictions on them and the interviewers. Please let the EUIAS know as early as possible so that the schedule can be devised appropriately. In exceptional circumstances, the EUIAS may consider written responses to the interview questions.

13. Religious Obligations

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

14. 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

The EUIAS is committed to ensuring that all assessments are a fair test of an individual's knowledge, skills and behaviours, and what they are able to do. It also recognises that in certain instances the usual format of specific assessments may not be suitable for an apprentice with a disability or learning difficulty. In such circumstances adjustments may need to be made for them.

Once an employer / training provider has decided that reasonable adjustments are necessary, they must apply to the EUIAS **in advance of the end-point assessment** using this form to detail the reasonable adjustments requested.

The EUIAS will review all requests for reasonable adjustments in line with the policy and agree with the employer and training provider what reasonable adjustment will be allowed. If equipment is required, it is the responsibility of the employer and their training provider to provide the equipment.

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 (eg, trade test)	Disability or Learning Difficulty	Reasonable Adjustment(s) Requested	Supporting Evidence Provided

Declaration

I confirm that the above apprentices have been assessed as requiring reasonable adjustments, that the apprentice has been fully involved in any decisions about adjustments / adaptations.

Role and Signature of employer representative

Signature of training provider representative

Date

EUIAS 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 (eg, trade test)	Disability or Learning Difficulty	Reasonable Adjustment(s) Approved	Provider of Reasonable Adjustment
<i>Example, John Smith</i>	<i>Example, Knowledge Assessment</i>	<i>Example, dyslexia</i>	<i>Example, 25% extra time</i>	<i>employer ensure the invigilator and the room used for the knowledge assessment is available for the extra time allocated</i>

Declaration

This is to confirm that the following apprentices have been approved by the EUIAS to have reasonable adjustments applied to the end-point assessment and that the approaches deployed are in line with those expected of industry standards and health and safety requirements and that outcomes secured demonstrated the appropriate levels of occupational competence.

Name of EUIAS representative	
Signature of EUIAS representative	
Date	