

Reasonable Adjustments & Special Consideration Policy and Application

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Purpose

The Energy & Utilities Independent Assessment Service (EUIAS) recognises that in agreed and specified instances certain apprentices may require alternative arrangements for aspects of their knowledge tests and practical assessments, known as reasonable adjustments or special considerations.

There are two ways in which access to fair assessment can be maintained:

- Reasonable adjustments – agreed before the assessment takes place; or
- Special considerations – applied post assessment

A reasonable adjustment or special consideration is any action that helps to reduce the effect of a disability or difficulty that places the apprentice at a substantial disadvantage in the assessment situation.

Reasonable adjustments and/or special considerations should not give the apprentice an unfair advantage. The apprentice's result must reflect his or her achievement in the assessment and not necessarily his or her potential ability. Adjustments must not affect the integrity of what is being assessed.

The provision of reasonable adjustments and/or special condition arrangements are made to ensure that apprentices receive recognition of their achievement so long as the equity, validity and reliability of the assessments can be assured. Such arrangements are not concessions to make assessments easier for apprentices, nor are they to give apprentices a head start.

All apprentices, regardless of their reasonable adjustment or special consideration, must still meet the minimum requirements to achieve the apprenticeship.

EPAOs and employers/lead provides are only required to do what is 'reasonable' in terms of giving access. What is reasonable will depend on the individual circumstances, cost implications and the practicality and effectiveness of the adjustment. Other factors, such as the need to maintain competence standards and health and safety, will also be taken into consideration.

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

Scope

This policy covers the delivery of EUIAS End-Point Assessments (EPA) that are subject to internal and external quality assurance.

This policy also forms part of a range of EUIAS policies, all of which are designed to:

- Protect apprentices who are registered with us;
- Minimise the risk of an Adverse Effect occurring;
- Help support EUIAS and all parties involved in risk management and risk minimisation;

The Policy supports the compliance with the EUIAS Service Level Agreement. It does not replace any of the requirements contained with the Service Level Agreement. Non-adherence to EUIAS policies may constitute Malpractice and/or Maladministration.

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 at their Gateway to end-point assessment.

Examples of entitlement 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 might be possible?

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 on Page 9 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

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.

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 A**.

Applications must be supported with documentary evidence at least **three months** before end-point assessment activities commence. Applications must be submitted to enquiries@euias.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 Apprentice	Appropriate professional providing a written, dated and signed 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

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 and Special Consideration 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.

When is a Special Consideration Applied?

Special considerations can be applied **after** an assessment if there is a reason the apprentice may have been disadvantaged during the assessment. Reasons for special consideration could be temporary illness, injury or adverse circumstances during the assessment.

Special consideration may result in a post-assessment adjustment to the mark of the apprentice. The size of the adjustment will depend on the circumstances during the assessment and will reflect the difficulty faced by the learner or the reason for the special consideration request.

Where an assessment requires a competence, criterion or standard to be fully met, or in the case of standard(s) that confer a Licence to Practise, it may not be possible to apply special considerations. It may be more appropriate to offer the apprentice an opportunity to retake the assessment at a later date, or to extend the registration period so that the apprentice has more time to complete the assessment activity

To request a special consideration you should complete the application template at **Appendix B**. EUIAS can only accept requests for special consideration after the results of the assessment have been released.

Timescales for requesting a Special Consideration

- To request a special consideration you should complete the template at **Appendix B** within 10 working days of the assessment decision.
- Once a request for a special consideration is received, EUIAS will aim to review the request and evidence provided within 10 working days of it being received.
- Special consideration(s) will not be approved until sufficient evidence is provided.

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
- c) Screen reading software (supporting both users with visual impairment and dyslexic users)
- d) Input devices – eye / head operated pointing devices or on-screen keyboards

7 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.

8 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.

9 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.

10 Adjustments on grounds of 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.

11 Adjustments on grounds of 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.

12 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.

Application for Reasonable Adjustments

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 above named 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	

Application for Special Consideration

Name of the Employer:	
Name of the Training Provider:	
Title and Level of the Apprenticeship:	
Date of end-point assessment:	

Apprentice Name	End-Point Assessment Component	Special Consideration Requested	Details and/or evidence as appropriate

Declaration	
I confirm that the above apprentices requires a Special Consideration, that the apprentice has been fully involved in any decisions about Special Consideration	
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 Name	End-Point Assessment Component	Special Consideration Requested	Details and/or evidence as appropriate

Declaration	
This is to confirm that the above named apprentice has been granted by EUIAS a Special Consideration following 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	