

Reasonable Adjustments and Special Considerations Policy

There is a Glossary of terms (Appendix 2, Page 25) at the end of this policy

Introduction

This policy is for Crossfields Institute approved centres and learners who are delivering/registered on or have taken a Crossfields Institute approved qualification or module. It is also for use by staff, including Assessors, Internal Quality Assurers (IQAs) and External Quality Assurers (EQAs), to ensure they deal with all reasonable adjustment and special consideration requests in a consistent manner.

This policy outlines:

- our arrangements for making reasonable adjustments and special considerations in relation to our qualifications
- how learners qualify for reasonable adjustments and special considerations
- the reasonable adjustments we will permit and those where permission is required in advance before they are applied
- what special considerations will be given to learners

Centre's responsibility

It is important that all staff involved in the management, assessment and quality assurance of our qualifications and all learners are fully aware of the contents of the policy.

During centre visits, our EQAs or Quality Team staff will check that relevant staff and learners are aware of its contents and purpose.

Review arrangements

We will review the policy and associated procedures annually as part of our self-evaluation arrangements and revise it as and when necessary in response to centre and learner feedback, changes in our practices, actions from the regulatory authorities or external agencies or changes in legislation.

If you would like to give us feedback on this policy please contact us via the details provided at the end of this policy.

Policy last reviewed September 2019

Next revision date September 2020

Reviewed by: Head of Quality, Alison Richards

Arrangements not covered by this policy

Circumstances for assessment not covered in this policy should be discussed with the Quality Team at Crossfields Institute before assessment takes place. Please contact us via the details provided at the end of this policy.

Appeals

If learners wish to appeal against our decision to decline requests for reasonable adjustments or special consideration arrangements, please refer to our Appeals Policy, available to download from our website at <https://www.crossfieldsinstitute.com/resources/>

Policy overview

Crossfields Institute is committed to complying with all current and relevant legislation in relation to the development and delivery of our qualifications, which at the time of writing includes, but is not limited to, the Equality Act 2010. We seek to uphold human rights relating to race relations, disability discrimination and the special educational needs of our learners and to provide equal reasonable adjustments and special considerations for all learners registered on our qualifications.

We expect Crossfields Institute approved centres to have an Assessment Policy in operation, which reflects the following principles and guidelines:

Assessment should be a fair test of learners' knowledge and what they are able to do. However, for some learners, the usual format of assessment may not be suitable. We ensure that our qualifications and assessments do not exclude learners from taking our qualifications.

We recognise that reasonable adjustments or special considerations may be required at the time of assessment where:

- learners have a permanent disability or specific learning needs
- learners have a temporary disability, medical condition or learning needs
- learners are indisposed at the time of the assessment.

The provision for reasonable adjustments and special consideration arrangements is made to ensure that learners receive recognition of their achievement so long as equity, validity and reliability of assessment can be assured. Such arrangements are not concessions to make assessment easier for learners, nor advantages to give learners a head start.

There are 2 ways in which access to fair assessment can be maintained:

- through reasonable adjustments (Pages 3-18)
- through special considerations (Pages 18-21)

REASONABLE ADJUSTMENTS

Process for requesting reasonable adjustments

There are two routes through which a learner may be granted reasonable adjustment, these are:

1. Reasonable adjustments permitted at the discretion of the Centre
2. Reasonable adjustments permitted by Crossfields Institute (see Appendix 1 for more information)

If the centre has any queries regarding the appropriateness of the reasonable adjustment they should contact the Crossfields Institute Quality Team. If a Centre is asked to make a reasonable adjustment by a learner, a Reasonable Adjustment request form

<https://www.crossfieldsinstitute.com/resources/>

should be completed, and this should be stored securely, and made available on request by Crossfields Institute Quality Team staff, or an EQA. Supporting evidence that contains special category (sensitive) data should not be retained for any longer than is needed to process the request or for the purposes of responding to an appeal. Requests for reasonable adjustments should be submitted no later than 10 working days before the assessment.

How Crossfields Institute will deal with requests for reasonable adjustments

If a request for reasonable adjustment needs to be approved by Crossfields Institute a member of the Quality Team will aim to respond to the request within 3 working days of receipt. If we are unable to respond in that timescale we will provide you with an estimated response date.

Definition of reasonable adjustments

A reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. They are made to an assessment for a qualification to enable a disabled learner to demonstrate his or her knowledge, skills and understanding at the levels of attainment required by the specification for that qualification.

Reasonable adjustments must not affect the integrity of what needs to be assessed, but may involve:

- changing usual assessment arrangements, for example allowing a learner extra time to complete the assessment activity
- adapting assessment materials, such as providing materials in large format, Braille or audio format

- providing assistance during assessment, such as a sign language interpreter or a reader
- re-organising the assessment room, such as removing visual stimuli for a learner on the autistic spectrum, or using a different room that is more accessible
- changing the assessment method, for example from a written assessment to a spoken assessment
- using assistive technology, such as screen reading or voice activated software
- using different colour backgrounds to screens for onscreen assessments or using different coloured paper for paper-based assessments
- providing and allowing different coloured transparencies with which to view assessment papers

Reasonable adjustments are approved or set in place before the assessment activity takes place; they constitute an arrangement to give the learner access to the programme or qualification. The use of a reasonable adjustment will not be taken into consideration during the assessment of a learner's work.

Crossfields Institute and centres are only required by law 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.

Making reasonable adjustments

These principles should be followed when making decisions about a learner's need for adjustments to assessment. The adjustment:

- should not invalidate the assessment requirements of the qualification
- should not give the learner an unfair advantage
- should reflect the learner's normal way of working
- should be based on the individual need of the learner

Crossfields Institute and our centres have a responsibility to ensure that the process of assessment is robust and fair and allows the learner to show what they know and can do without compromising the assessment criteria.

When considering whether an adjustment to assessment is appropriate, Crossfields Institute and our centres need to bear in mind the following (where appropriate for the related qualification):

- Adjustments to assessment should not compensate the learner for lack of knowledge and skills. The learner must be able to cope with the content of the assessment and be able to work at the level required for the assessment.

- Any adjustment to assessment must not invalidate the assessment requirements of the qualification or the requirements of the assessment strategy. Competence standards should not be altered. Whilst we will take all reasonable steps to ensure that a learner with a disability or difficulty is not placed at a substantial disadvantage, in comparison with persons who are not disabled, in terms of access to assessment, there is no duty to make any adjustment to a provision, criterion or practice which is defined as a competence standard. All learners' performance must be assessed against set standards. These standards cannot be altered, but it may be possible to change the delivery or process of assessment so that each learner has an equal opportunity to demonstrate what they know, understand and can do.
- Any adjustment to assessment must not give the learner an unfair advantage or disadvantage over other learners. The qualification of a learner who had an adjustment for assessment must have the same credibility as that of any other learner. As vocational qualifications may lead to employment, achievement of such qualifications must give a realistic indication to the potential employer of what the holder of the certificate can do.
- Any adjustment to assessment must be based on the individual need of the learner. Decisions about adjustments to assessment should be taken after careful consideration of the assessment needs of each individual learner, the assessment requirements of the qualification and the nature and extent of the support given as part of normal teaching practice. A Centre should not assume that the same adjustment will be required for all assessments. Different qualifications and different methods of assessments can make different demands on the learner. The learner should be consulted throughout the process.
- Any adjustment to assessment should reflect the learner's normal way of working providing this does not affect what is being assessed in any way. The learner should have experience of and practice in the use of the adjustment.
- Any adjustment to assessment must be supported by evidence which is sufficient, valid and reliable.
- All adjustments to assessment must be authorised by the Centre Manager or a member of staff with delegated authority.

The process for making the adjustment

There are two routes through which a learner may be granted adjustments to assessment. These routes are to:

- Use reasonable adjustments permitted at the discretion of the Centre

Crossfields Institute will normally permit the Centre to implement reasonable adjustments without seeking prior permission. Crossfields Institute requires centres to keep records for inspection (including any declaration that is signed and dated by a member of the Centre staff who has formally been given delegated authority for this by the Head of Centre).

- Apply to the Quality Team at Crossfields Institute for permission

Centres should keep records of adjustments they have permitted and those they have requested from Crossfields Institute. These records should be kept securely following the assessment to which they apply until such time as the Crossfields Institute EQA or member of the Quality Team have had the opportunity to review them. Records must be kept in compliance with the Centre's data protection policy. Special Category (sensitive) Data must not be kept any longer than is required to process an application or an appeal.

It is recommended that each Centre has a designated member of staff (usually the Head of Centre) to take responsibility for implementing and recording adjustments to assessments for monitoring by the Quality Team at Crossfields Institute.

Qualification specific information

Health and safety considerations for practical assessments

There are no circumstances when the health and safety of a learner should be compromised in delivering an assessment activity. In a practical activity, if there is a concern that the effects of a person's disability or difficulty may have health and safety implications for him/herself and for others, a suitably competent person in the Centre should carry out a risk assessment related to the learner's particular circumstances. The risk assessment should identify the risks associated with the particular activity, but should also take account of any reasonable adjustments put in place for the learner which may remove or reduce the risk. The risk assessment may reveal that it is not possible for the learner to fulfill all the requirements of the assessment. In this case it may be appropriate to substitute another task. The Centre should contact Crossfields Institute Quality Team to discuss individual cases where further clarification is necessary.

Assumptions should not be made about a disability posing a health and safety risk, but the health and safety of all learners and others must always be of paramount importance.

Centre-devised Assessments (externally quality assured)

With these types of assessments the Centre has some flexibility to be responsive to an individual learner's needs and choose an assessment activity and method that will allow the learner to demonstrate attainment.

These types of assessments may include, coursework, set assignments which are researched in the learner's own time, assessment activities devised by the Centre, assessments where the learner has to collect, present or describe evidence, information or opinion in order to demonstrate competence.

In these types of assessments the learner may meet the specified assessment criteria in any way that is valid. To facilitate access where there is evidence of need, the Centre may:

- allow the learner to use any mechanical, electronic or other aids in order to demonstrate achievement as long as the aids:
 - are generally commercially available
 - reflect the learner's normal way of working
 - enable the learner to meet the specified criteria
 - do not give the learner an unfair advantage.
- present assessment materials or documents in a way that reflects the learner's normal way of working and enables him or her to meet the specified assessment criteria. For example, materials do not have to be exclusively in written or spoken format, unless specified by the assessment requirements.
- allow the learner to present their answers or evidence in any format as long as it enables them to demonstrate that they have met the assessment criteria. For example, answers or evidence do not have to be in exclusively written or spoken format unless specified by the assessment criteria.

The Centre is advised to adopt a flexible approach in identifying alternative ways of achieving the assessment requirements. The Centre is advised to contact Crossfields Institute Quality Team to discuss alternative arrangements that may be appropriate for specific situations.

The outcome produced by the learner must at all times:

- meet the requirements of the qualification specification regardless of the process or method used
- be assessable
- be able to be moderated or verified.

In the case of long-term illness of an individual learner or when a permanent health condition/disability means a learner's completion of assessment takes additional time it may be possible to permit an extension to the deadline for the submission of work for certification. A Centre should note that it will not be possible to allow time extensions for all qualifications.

Where reasonable adjustments are put in place for these types of assessments, the Centre should check whether permission needs to be obtained from the Quality Team at Crossfields

Institute. The Centre should ensure that they adhere to Crossfields Institute's requirements for record keeping and supporting evidence.

Most Crossfields Institute qualifications require learners to compile a portfolio of evidence which can consist of a mixture of work products, observation reports, witness statements, reflective accounts, etc. Making appropriate access arrangements in qualifications of this type can be more straightforward than in qualifications where the mode of assessment is more firmly fixed.

The benefits of being able to vary the assessment evidence and choose the most appropriate method of obtaining evidence should be considered when the learner is first accepted onto a programme.

Where there is an identified need, the learner may present their evidence in any format as long as it enables them to demonstrate that they have met the specified assessment criteria. For example, a learner may present their evidence through the medium of Braille, on audio cassette or on video. Alternatively, oral questioning or witness statements may replace written or signed responses.

Where evidence is produced in Braille or signed onto video, it is the Centre's responsibility to ensure that a person who is suitably qualified in Braille or sign language is available to translate the material for the assessor, internal and external quality assurer if this is required.

Where the learner uses alternative means of providing evidence, the method must have equal rigour to those used for other learners.

The learner must fulfill the demands of the criteria consistently over a period of time, regardless of the method used to obtain evidence. The assessment criteria may not be amended, re-worded or omitted.

The learner may use any mechanical or electronic aids which are available in the workplace or which are commercially available in order to demonstrate competence. For example, these may include specially adapted equipment or assistive technology. The Centre is required to ensure that a learner has the necessary and appropriate resources to enable the learner with access-related needs to produce evidence of developing the portfolio.

All adjustments should be consistent with the learner's normal way of working and must not give the learner an unfair advantage over others.

While assessors, internal and external quality assurers normally prefer to see a portfolio made up of evidence which is varied, the Centre should be prepared to accept a more restrictive variety of evidence as a means of enabling access. It is sensible, however, to discuss this matter with the internal and/or external quality assurer at an early stage.

Where reasonable adjustments are put in place for verified types of assessments, the Centre should check whether permission needs to be obtained from Crossfields Institute Quality Team or the external quality assurer. The Centre should ensure that they adhere to Crossfields Institute's requirements for record keeping and supporting evidence.

Crossfields Institute does not use assessments which are taken under externally set examination conditions

Identifying learners who are eligible for reasonable adjustments

Learners will only be eligible for reasonable adjustments if their disability or difficulty places them at a substantial disadvantage in the assessment situation, in comparison to a person who is not disabled or affected.

Any adjustment to assessment will be based on what the learner needs to access the assessment. Below are some examples of learner needs that may be eligible for adjustments to assessments. This list is not exhaustive and it should be noted that some learner needs will fall within more than one of the categories set out below.

Communication and interaction needs

A learner with communication and interaction difficulties may have problems with reading or writing, the effects of which could be reduced through the use of a reader, word processor, scribe, British Sign Language (BSL)/English interpreter, screen reading software or voice activated software. They may also benefit from extra time to complete assessments that are time-constrained to allow them to demonstrate their skills and knowledge.

Cognition and learning needs

A learner with learning difficulties and difficulties with comprehension may need assistance and/or extra time for time-constrained assessments involving reading and writing.

Sensory and physical needs

A learner may need to have assessment material modified for hearing impairment and visual impairment. They may also need to use a BSL/English interpreter, practical assistant, reader and scribe. In addition they may benefit from the use of assistive technology and extra time to complete assessments.

Learners for whom English is an additional language

A learner may benefit from extra time to complete assessments that are time constrained and may need access to a bilingual dictionary.

Identifying learners' needs

Any adjustment to assessment should be based on the individual learner's needs to access the assessment.

The Centre has a responsibility to ensure it has effective internal procedures for identifying learners' needs and that these procedures comply with the requirements of GDPR, disability and equal opportunity legislation.

A Centre may choose to use the following process:

- **Identify those learners who are having difficulties or are likely to have difficulties accessing assessment**

A learner should be encouraged to make any access-related assessment needs known to the Centre at the earliest opportunity, and preferably before they are registered or entered for a qualification. To assist with the early identification of learners with access-related assessment needs, the Centre should ensure that all staff who recruit, advise or guide potential learners have had training to make them aware of access-related issues. Once the learner's need has been identified, it should be documented for audit purposes in accordance with current data protection policy and procedure.

- **Identify whether reasonable adjustments may be needed**

Relevant Centre staff should decide, in conjunction with the learner, whether he or she will be able to meet the requirements of the planned assessment activities or whether adjustments will be required. It is important that the learner is involved in this discussion as he or she knows best what the effect of their particular disability or difficulty is on how they do things. Where the implications of a particular difficulty are unclear, the Centre should make use of specialist advice in order to determine how the difficulty will affect the learner's performance in the planned assessment activity. The Centre should avoid making assumptions, on the basis of previous experience, about whether adjustments may be necessary. Judgments should be made on the basis of individual need. If an adjustment is needed, it should be documented for audit purposes, but without the inclusion of identifiable Special Category data¹ should not be retained any longer than unless necessary.

- **Identify the appropriate adjustment**

When identifying which adjustments the learner will need in the assessment activity, Centre staff should take into consideration the learner's normal way of working, history of provision during teaching and during informal assessments and the assessment requirements of the qualification. The same learner may not require the same adjustment for all types of assessment. Different qualifications make different demands. For example, a dyslexic learner may need extra time to complete a written assignment,

¹ <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

but may not need extra time for a purely practical activity. Once the adjustment has been identified, it should be documented for audit purposes.

- **Ensure that the adjustment is in accordance with the guidelines in this policy**

The Centre must ensure that the adjustment will not impair the ability to assess the learner's performance, skill or knowledge fairly in each assessment.

Identifying and obtaining supporting evidence

In order to ensure that any adjustment to assessment will only provide the learner with the necessary assistance without giving him or her an unfair advantage over others, the Centre must be clear about the extent to which the learner is affected by the disability or difficulty.

Where the Centre can verify evidence of the disability or difficulty and where the implications are clear, such as for a learner with physical difficulties, profound hearing impairment or who are registered as blind or partially sighted, the Centre does not need to provide further evidence of these physical difficulties.

Where the implications of the difficulty are not obvious, such as for learning difficulties, or mental health difficulties, the Centre should collect and record additional evidence of the effect of the impairment on the learner's performance in the planned assessment activities.

Documentation

It is the Centre's responsibility to ensure that all applications for reasonable adjustments are based on the individual need of the learner and that the evidence in support of the application is sufficient, reliable and valid. A Centre should maintain records of all cases for audit purposes and to monitor the effectiveness of the reasonable adjustments that have been made. The records should include the following information:

- learner's name and qualification information
- nature of, and reason for, the request
- supporting information/evidence (this should identify if medical evidence has been provided or a statement from the assessor or any other appropriate information, but Special Category data should not be retained once the reasonable adjustment has been approved or an opportunity has been given for appeal)

Range of reasonable adjustments

The Permissions Table (in Appendix 1) lists the most commonly requested adjustments to standard assessment arrangements. It is not intended to be a comprehensive list and Centres and EQAs have a duty to seek advice from the Crossfields Institute Quality Team in any case where they do not consider that they have the necessary expertise to judge whether a reasonable adjustment is needed, and/or how it should be applied.

Centres should note that:

- not all the adjustments to assessments described below will be reasonable, permissible or practical in particular situations. If in doubt, the Centre is advised to contact Crossfields Institute Quality Team for advice. In some circumstances it may be more appropriate to select an alternative assessment task for the learner.
- the learner may not need, nor be allowed, the same adjustment for all qualifications. Some learners may need a single adjustment; others may require a combination of several adjustments.
- adjustments to assessments are not often required for centre-devised, portfolio based assessment.

The list of reasonable adjustments is organised under the following headings:

- Use of bilingual dictionaries
- Alternative ways of presenting responses
- Use of access facilitators

Use of bilingual dictionaries or bilingual translation dictionaries (manual or electronic)

- The use of bilingual dictionaries and bilingual translation dictionaries (including BSL/English dictionaries/glossaries) can be allowed in all vocational assessments unless its use is expressly forbidden by the assessment requirements.
- An additional allowance of extra time may be permitted for timed assessments, if the Centre is satisfied that the learner can cope with the subject content, but the learner's knowledge and comprehension of English, impairs his/her ability to complete the assessment within the normal time allocated,
- The Centre should note that the regulatory authorities state that:

A Learner taking a qualification may be assessed in any other language where it is one of the primary objectives of the qualification –

(a) for the Learner to gain knowledge of, skills in, and understanding of that language, or

(b) to support a role in the workplace, providing that proficiency in English or Irish is not required for the role supported by the qualification.

Ofqual's General Conditions of Recognition 2016

The use of a bilingual dictionary should not give the learner an unfair advantage over other learners or invalidate the assessment criteria.

Alternative ways of presenting learner responses

A learner should be provided with the means to present their responses by the method most appropriate and familiar to them, as long as the use of methods will not invalidate the requirements of the assessment. The use of ICT is generally perceived to have a positive impact on helping learners to access assessment.

ICT can normally be used for Centre-devised and portfolio work unless the use of ICT is expressly prohibited by the qualification specification.

Use of ICT to present evidence

- The use of ICT in this context should be taken to include word processors, personal computers (PCs) and other microprocessor controlled devices producing output in text or other forms such as graphics and diagrams.
- For many learners with additional support needs, computers provide an effective means of independent communication. Consideration should be given to whether the learner can meet the assessment criteria using ICT.
- ICT should only be used if it is appropriate to the learner's needs and if the learner is confident in its use, can use it effectively and if it reflects his / her normal way of working. The learner should be consulted before a decision is taken whether the use of ICT is an appropriate adjustment.
- The use of the computer should not create a misleading impression of the learner's attainment or confer an unfair advantage over other learners.
- The Centre should ensure that workstations are adapted for the needs of the learner, and that enabling technologies, (for example screen reading software, coloured background, adapted keyboard, large tracker ball mouse, sticky keys) are available.
- Where it is apparent that assessment objectives cannot be met fully if a computer is used, the Centre should suggest alternative arrangements.

Spoken responses using electronic recording devices, for example MP3 files, CD ROMs, memory sticks

- Where there is evidence of need, the learner may be permitted to record their responses electronically.
- Spoken responses should only be used for assessments where there is no requirement for the learner to produce visual material.
Where the learner's responses are recorded electronically, the Centre should provide an authenticated audio recording of the learner's responses.
It will be the Centre's responsibility to keep the original recording as a record of the assessment.

- Recording the learner's responses electronically should not be allowed where it will invalidate the assessment requirements.
- The Centre should ensure that the appropriate recording equipment is provided in full working order.

Responses in BSL

- Where there is evidence of need, the learner may be allowed to sign their responses to questions.
- Signing of responses should not be permitted if the ability to write or speak English, Welsh or Irish (Gaelige) is being assessed.
- A learner can sign full responses in BSL. Where the learner is required to show knowledge of an expression / name in their response, this must be finger spelt.
- The Centre will provide a paper translation of the responses for validation purposes.
- The Centre should ensure that the person doing the translation is appropriately qualified.
- Where the Centre provides a transcript of the learner's response, the Centre should ensure that the transcript is authenticated and an accurate reflection of the learner's responses. The Centre should keep this as a record of the assessment.

The Centre should check whether permission should be sought from Crossfields Institute to use BSL for assessment purposes.

Responses in Braille

- Where there is evidence of need, a learner may be permitted to present their responses in Braille.
- In these cases an authenticated paper transcript of the learner's responses should be provided by the Centre.
- It will be the Centre's responsibility to ensure that the transcript is an accurate reflection of the learner's responses and to keep the transcript for their records.

The Centre should select a transcriber with the required level of skill in Braille and fully brief him / her on their responsibilities.

Use of access facilitators (Readers or Scribes)

- The Centre should check that the use of a reader and/or scribe is the most appropriate arrangement to enable the learner to undertake the assessment activity.
- The Centre should ensure that readers and/or scribes are fully briefed on their responsibilities.
- The Centre should make arrangements to ensure that work produced using a reader and/or scribe is authenticated.

British Sign Language (BSL)

- Although British Sign Language (BSL) is now recognised as an official language of the UK, it is not a statutory language, unlike English, Welsh and Irish (Gaelige).
- The regulatory criteria state: *“A Learner taking a qualification may be assessed in British Sign Language or Irish Sign Language where it is permitted by an awarding organisation for the purpose of Reasonable Adjustment” (Ofqual’s General Conditions of Recognition August 2018 – G2.2)*
- Where BSL is the primary means of communication for a deaf learner, these learners may have the support of a BSL/English interpreter to produce evidence for assessment where the ability to speak and listen is essential to meet the assessment criteria.
- The Centre should ensure that the BSL interpreter has an appropriate qualification in the sign language and a good working knowledge of the content of the assessment activity.
- A learner should, wherever possible, have had previous experience of working with a BSL/English interpreter and should have used this arrangement during the learning programme leading up to the assessment activity.
- The Centre should ensure that the learner and the person providing the interpretation is clear about the limitations of the latter’s role in the assessment situation.
- The Centre should ensure that the person providing the interpretation has access to relevant assessment material in advance of the assessment, to prepare for the signing. This arrangement should be agreed with Crossfields Institute.
- The interpretation should not give the learner an unfair advantage and care must be taken not to indicate the meaning of technical words, where the learner’s understanding of these words is being assessed. The interpretation should not explain or clarify. In some instances it may be more appropriate to finger-spell a word.

The BSL interpreter:

- should have access to relevant assessment material in advance of the assessment activity to prepare for the signing. Examples of such material would be questions that the learner has to answer or documents that they have to respond to. Crossfields Institute will advise how long before the assessment the BSL/English interpreter should have access to relevant assessment material
- should not interpret technical language or give additional explanations
- may, at the learner’s request, sign any labels or text connected with reference material such as maps, diagrams or graphs. The learner should, however, study the reference material independently.

Summary:

- The Centre should check that the use of BSL/English interpreter is the most appropriate arrangement to enable the learner to undertake an assessment activity.
- The Centre should select a BSL/English interpreter and fully brief him / her on their responsibilities.
- A BSL/English interpreter should not be allowed where such use would invalidate the assessment requirements.
- The BSL/English interpreter should have an appropriate qualification in the sign language so as not to disadvantage the learner.

Other languages and use of translators

- Crossfields Institute primarily offer its qualifications in the language of English. Nonetheless Crossfields Institute will undertake to support the delivery of our qualifications in other languages, most notably Welsh, Irish (Gaeilge) and British Sign Language where appropriate and upon request and evidence of sufficient demand. For example a learner may be assessed in any other language where it is one of the primary objectives of the qualification:
 - for the Learner to gain knowledge of, skills in, and understanding of that language, or
 - to support a role in the workplace, providing that proficiency in English, Irish or Welsh is not required for the role supported by the qualification.
- In implementing any arrangements to support other UK-based languages, Crossfields Institute may engage with the relevant regulatory body to seek further advice and guidance on the most appropriate arrangements to put in place to ensure comparability of assessments, moderation and awarding.
- Assessments in other languages will only be allowed where proficiency in English, Welsh or Irish is not required in the workplace for individuals to be deemed capable of carrying out the role (associated with the qualification). At all times requests from Centres/learners for reasonable adjustments in relation to the use of other languages must be approved by Crossfields Institute in advance so as to ensure that final assessments would be comparable to that offered in English (Welsh and/or Irish)

Summary

- Crossfields Institute may permit the user of a translator if there is a strong rationale and it is clear that the lack of English, Welsh or Irish would not prevent a learner carrying out the role associated with the qualification.

- Crossfields Institute will not permit the use of an interpreter.
- If the Centre employs the translator themselves Crossfields Institute reserves the right to quality assure the assessment evidence and the Centre must be able to produce evidence of the translator's credentials.
- Crossfields Institute also reserves the right to employ its own translator to support an assessment activity and/or support our quality assurance of the Centre's arrangements.
- Should a translator be used at the Centre then the Crossfields Institute's EQA or Quality Team will include learners that have had the support of a translator within their monitoring sample.

Transcriber

- This arrangement may be used by a learner in the following circumstances:
 - Where the learner's handwriting is illegible, but he or she is unable to use a computer or dictate responses - it may not be allowed where writing by hand is the competence being assessed;
 - Where the learner's responses are produced in Braille or in BSL.
- The transcriber will produce a transcript to assist the assessor in the assessment of a learner's work. The assessor will assess the learner's work and will only refer to the transcript if it is impossible to decipher any part of the learner's response(s). (For responses produced in Braille or BSL the assessor may refer solely to the transcript).
- The Centre should, in consultation with the learner, decide whether the use of a transcript will be an effective arrangement.
- The Centre should give the transcriber clear instructions regarding what he/she is required to do after the assessment.
- The transcript should be produced by a member of the Centre's staff (or someone employed for this purpose) who is familiar with the learner's handwriting, is fully competent in Braille (where the transcription is for learner's responses produced in Braille), or who has the required skills in BSL (where the transcription is for learner's responses produced in BSL).
- The transcript(s) should be securely attached to the learner's work and be included with the other work from the learner for assessment in the normal way. The production of the transcript should not delay assessment.

The transcriber should:

- produce the transcript on lined or unlined white paper as appropriate.
- may handwrite or word process the transcript. If handwritten, dark blue or black ink should be used. Pencil must never be used.
- should not involve the learner in the production of the transcript.

- should normally transcribe complete answers. In cases where only occasional words need to be transcribed, these may be written on a photocopy of the learner's script. On no account should the learner's original work be marked or annotated in any way.
- should normally be a word-for-word transcription, ie. an exact copy of what the learner has written. The transcriber may not insert or omit words or alter their order. In an English qualification, any errors, including those of spelling, punctuation and grammar, must be transcribed as given by the learner and must not be corrected. In other qualifications, the transcriber may correct the spelling of non-technical words.
- should indicate any corrections to spelling on the verbatim transcript using a different colour ink. Pencil must not be used for this purpose.
- should not transcribe diagrammatical material. Assessment of such material will be based on the learner's own work.

Summary:

- The Centre should check that the use of a transcriber is the most appropriate arrangement to enable the learner to undertake the assessment activity.
- The Centre should select a transcriber and fully brief him / her on their responsibilities.
- A transcriber should not be allowed where such use would invalidate the assessment requirements.

SPECIAL CONSIDERATIONS

There are three circumstances where students may request special consideration:

1. For an extension to an assessment submission date - this is an internal decision and can be managed by the Centre
2. For special consideration in the case of an examination or specified practical assessment - this must be referred to Crossfields Institute
3. For special consideration to defer a completion date for a qualification - this must be referred to Crossfields Institute

1. Process for requesting an extension

Extensions to assessment deadlines are permitted at the discretion of the Centre. This is an internal decision for the Centre.

If a Centre is asked for extension to an assessment deadline, a record of the application should be completed by the learner and tutor/assessor. **This must be sent for approval to the Programme Coordinator or Head of Centre.** Ideally, the request for an extension should be made in advance of the assessment submission date. If not, requests for extensions should be submitted as soon as possible after the assessment submission date has passed.

The Centre must record the extension agreed. This will be reviewed by the EQA or a member of Crossfields Institute Quality Team at the annual Centre Review.

2. Process for requesting a special consideration for an examination or specified practical assessment

The Centre needs to review the circumstances and evidence surrounding each request for a special consideration to ensure that the decision made maintains the equity, validity and reliability of the assessment for the learner and does not give the learner an unfair advantage.

A learner who is fully prepared and present for a scheduled examination/practical assessment activity may be eligible for special consideration if:

- performance in an examination/practical assessment is affected by circumstances beyond the control of the learner e.g. recent personal illness, accident, bereavement, serious disturbance during the assessment activity
- alternative assessment arrangements which were agreed in advance of the examination/practical assessment proved inappropriate or inadequate
- part of an examination/practical assessment activity has been missed due to circumstances beyond the control of the learner
- there is a sufficient difference between the part of the assessment activity to which special consideration is applied and other parts of the qualification that have been achieved to infer that the learner could have performed more successfully in the assessment activity

A learner will not be eligible for special consideration if:

- no evidence is supplied to the Centre that the learner has been affected at the time of the examination/practical assessment by a particular condition
- any part of the examination/practical assessment is missed due to personal arrangements including holidays, house moves, or anything that could have been reasonably predicted and planned for.
- preparation for a component is affected by difficulties during the course, eg disturbances through building work, lack of proper facilities, changes in or shortages of staff, or industrial disputes.

Special consideration can be applied after an examination/practical assessment if there was a reason the learner may have been disadvantaged during the examination/practical assessment.

For example, special consideration could apply to a learner who had temporarily experienced:

- an illness or injury
- some other event outside of their control

and which has had, or is likely to have had, a material effect on that learner's ability to take an examination/practical assessment or demonstrate his or her level of attainment.

Special consideration should not give the learner an unfair advantage, neither should its use cause the user of the certificate to be misled regarding a learner's achievements. The learner's result must reflect his / her achievement in the examination/practical assessment and not necessarily his / her potential ability.

Special consideration, if successful, may result in a small post-assessment adjustment to the mark of the learner. The size of the adjustment will depend on the circumstances and reflect the difficulty faced by the learner.

Centres should note that

- where an examination/practical assessment requires the learner to demonstrate practical competence or where criteria have to be met fully, or in the case of qualifications that confer a License to Practice, it may not be possible to apply special consideration.
- in some circumstances it may be more appropriate to offer the learner an opportunity to take the examination/practical assessment at a later date.

Requests for special considerations may only be accepted after the results of examination/practical assessment have been released in the following circumstances:

- the application has been overlooked at the Centre and the oversight is confirmed by the Head of Centre
- medical evidence comes to light about a learner's condition, which demonstrates that the learner must have been affected by the condition at the time of the examination/practical assessment, even though the problem revealed itself only after the assessment

If the application for special consideration is successful, the learner's performance will be reviewed in the light of available evidence. It should be noted that a successful application of special consideration will not necessarily change a learner's result.

Requesting a special consideration for an examination or practical assessment

There is a Special Consideration Application Form on the Crossfields Institute website <https://www.crossfieldsinstitute.com/resources/> which can be used by the Centre. The form must be emailed to the Quality Assurance Team for approval at: qualityassurance@crossfieldsinstitute.com

Process for requesting a special consideration for a deferral of the completion date of a qualification

There are time limits for open registrations on qualifications.

How long can a learner have an “open” registration on a Crossfields Institute qualification?

All Crossfields Institute qualifications are assessed using centre-devised assessment, and a learner normally generates a portfolio of evidence of achievement to be assessed against the outcomes and criteria in the qualification specification.

Evidence presented by the learner must be valid, current, sufficient, reliable and authentic.

For evidence to be valid, it must relate to the criteria in the specification, and also to any occupational standards mapped to the qualification. If the qualification or the standards are revised then any earlier version of the qualification would have a time limit set for completion, beyond which it would not be valid.

For evidence to be current, it must have been completed within the time that the qualification specification and/or occupational standards to which it relates applied.

For evidence to be sufficient, reliable and authentic it must meet the requirements of the qualification in full, be replicable in equivalent circumstances and be confirmed as attributable to the learner. These aspects can be harder to assure over a long period of time.

Crossfields Institute allows the following:

A learner taking a qualification will normally be allowed to take an additional amount of time to complete that is *equivalent to the normal length of time taken for the qualification*. For example, a learner taking a qualification that is delivered in 3 months can be allowed an additional 3 months, allowing a total of 6 months to complete. A learner taking a three year qualification could be allowed another three years to complete, allowing a total of 6 years.

If a qualification, or the related occupational standards, is reviewed and the outcomes and criteria changed in any way, a learner can only have additional time equivalent to the length that the qualification is still valid. For example, a learner embarks on a three year qualification. At the end of the first year the occupational standards are revised and changed. The qualification is deemed to be valid for a further three years. A learner could then only extend the time taken to complete by one additional year, allowing four years in total.

After the allowed period of extension has elapsed learner registrations will be withdrawn. Learners can have their registrations reactivated if the relevant qualification is still available, but they may need to use an RPL process to demonstrate that their evidence of achievement is still valid, if this is allowed by the qualification specification. The EQA for the centre and qualification should always be advised and consulted in such a case.

If a learner needs more than double the intended time to complete a qualification a request must be made to the Head of Quality at Crossfields Institute, presenting compelling reasons for the extension.

Requesting a deferral to the completion date for a qualification

Application for deferral should be submitted to:
Head of Quality
Crossfields Institute
Stroud House
Russell Street
Stroud
GLOS
GL5 3AN
Or by email to: qualityassurance@crossfieldsinstitute.com

Review of Reasonable Adjustment and Special Consideration Decisions

The Head of Quality will review all Reasonable Adjustment and Special Consideration applications and arrangements at 6 monthly intervals, and will present a report to the Senior Management Team. Any questions or concerns in relation to consistency or fairness will be reviewed within the Quality Team, and guidance given or adjusted accordingly.

Last reviewed: September 2019

Next review: September 2020

Reviewed by: Responsible Officer, Alison Richards

Contact us

If you have any queries about the contents of the policy, please contact the Head of Quality (Telephone) 01453 808118 or via email qualityassurance@crossfieldsinstitute.com or via post to Crossfields Institute, Stroud House, Russell Street, Stroud GL5 3AN.

Appendix 1 – Reasonable adjustments permissions table

This table outlines some of the decisions on reasonable adjustments that can be made. However, Centres and external quality assurers have a duty to seek advice from Crossfields Institute in any case where they are in doubt if an adjustment is needed or how it should be applied.

- Permitted – Reasonable adjustment permitted at the discretion of the Centre
- Apply – Apply to Crossfields Institute for permission

Reasonable adjustment	Assessments NOT taken under examination conditions
Use of bilingual and bilingual translation dictionaries	Permitted
Assessment Material in enlarged format	Permitted
Assessment activity material in Braille	Permitted
Language modified assessment activity material	Permitted
Assessment activity material in BSL	Permitted
Assessment activity material on coloured paper	Permitted
Assessment activity material in audio format	Permitted
Use of ICT	Permitted *
Responses using electronic devices	Permitted
Responses in BSL	Permitted
Responses in Braille	Permitted
Reader	Permitted
Scribe	Permitted
Transcriber	Permitted
Other	Apply

* Permitted at the discretion of the Centre unless ICT is explicitly excluded in the qualification specification or in the Centre's Assessment Strategy or Learner Handbook

Appendix 2 - Glossary

Term	Definition
Access to Assessment	The removal of artificial and unnecessary barriers to the process of judging an individual's competence.
Appeal	A process through which an awarding organisation or Centre may be challenged on the outcome of a decision
Assessment	The process of making judgements about the extent to which a learner's work meets the assessment criteria for a qualification or unit, or part of a unit.
Assessment criteria	The requirements that a learner needs to meet in order to achieve success (or a given grade) in a qualification or unit, or part of a unit.
Assessment method	The means by which an individual's competence is judged.
Assessment needs	The adjustments that some individuals require to the assessment strategy and/or assessment task in order to demonstrate that they can meet the required standard.
Assessment task	An activity undertaken by an individual learner to show that he or she can meet the required standard.
Assessor	The person who assesses a learner's work.
Assistive technology	Mechanical or electronic devices which help individuals with particular needs to overcome limitations.
BSL/English interpreter	An individual who interprets communication into and from British Sign Language
Centre	An organisation or consortium accountable to an awarding body for the assessment arrangements leading to a qualification.
Competence	The ability to perform to the required standard
Enabling technologies	See assistive technology
Externally set	Examinations or assessment tasks or assignments which are determined by the awarding body (not currently used by Crossfields Institute)
External Quality Assurer (EQA)	Person who checks that a Centre's assessment and quality assurance procedures comply with the requirements of the awarding organisation and the regulators.
Internal Quality Assurer (IQA)	Person who works within the Centre to ensure assessment complies with the requirements of the awarding organisation and the regulators
Invigilator	A person who supervises individuals taking an examination or assessment (not currently used for Crossfields Institute qualifications)
Learning programme	A course of study
Malpractice	Actions and practices which threaten the integrity of qualifications
Moderation	The process of checking that assessment standards have been applied correctly and consistently between assessors, between Centres and over time, and making adjustments to results where required to compensate for any differences in standard that are encountered.
Portfolio	A collection of work submitted for assessment.
Reasonable adjustment	Any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. Arrangements are approved in advance of an assessment activity.

Risk assessment	An estimation of the likelihood of something harmful happening as a result of a course of action.
Scribe	Person who writes down or word processes a learner's dictated responses
Qualification specification	A detailed statement or document which sets out the aims, purpose, content, structure, and assessment arrangements for a qualification.
Standards	The combination of knowledge, understanding and skills required to perform a job or task to the level of competence required in the workplace.
Sector body	A body (such as a Sector Skills Council) recognised by the regulatory authorities as responsible for formulating and reviewing standards of occupational competence for an employment sector.
Special consideration	Procedures implemented at the time of an assessment activity to allow attainment to be demonstrated by a learner who has been disadvantaged by temporary illness, injury, indisposition or adverse circumstances at the time of the assessment activity.
Speech software	A computer programme that reads text
Transcript	A full written or typewritten copy of information or material originally provided in writing, speech or sign language.
Voice activated software	A computer programme which responds to spoken instructions.