

# Inclusion School (exams) Equalities Policy 2023/24

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Approved by:	Head of Centre	Date: January 2024
Name:	Matthew Atkinson	Position: Headteacher
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### Monitoring arrangements

This policy is reviewed annually by the SLT to ensure compliance with current regulation

Author: E Barnard	Title: Equalities Policy	Ref: 2023-2024	Date: 26/01/2024	
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## Abbreviations used in this information

JCQ publications:

- AA: Access Arrangements and Reasonable Adjustments
- GR: General Regulations for Approved Centres
- ICE: Instructions for Conducting Examinations
- NEA: Instructions for conducting non-examination assessments
- PRS: Post-Results Services
- EHCP: Education and Health

## Purpose of this Policy

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

"recognise its duties towards disabled candidates, ensuring compliance with all aspects as defined under the terms of the Equality Act 2010, particularly Section 20 (7). This must include a duty to explore and provide access to suitable courses, through the access arrangements process submit applications for reasonable adjustments and make reasonable adjustments to the service the centre provides to disabled candidates. Where the centre is under a duty to make a reasonable adjustment, the centre must not charge a disabled candidate any additional fee in relation to the adjustment or aid.

[JCQ's GR section 5.4]

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

- Identifying the need for appropriate arrangements, reasonable adjustments and/or adaptations (referred to in this policy as 'access arrangements')
- Requesting access arrangements
- Implementing access arrangements and the conduct of exams
- Good practice in relation to the Equality Act 2010.

## The Equality Act 2010 Definition of Disability

A definition is provided in the JCQ publication (Adjustments for candidates with disabilities and learning difficulties) Access Arrangements and Reasonable Adjustments 2023-2024 (Definitions section) This publication is further referred to in this policy as AA

## Identifying the Need for Access Arrangements

## Roles and responsibilities

## Head of centre

- Is familiar with the entire contents, refers to and directs relevant centre staff to the annually updated JCQ publications including <u>GR</u> and <u>AA</u>
- Support the Lead for SEND in determining the need for implementing access arrangements

## Senior leaders

- Are familiar with the entire contents of the annually updated JCQ publications including  $\underline{GR}$  and  $\underline{AA}$
- Ensures staff roles, responsibilities and processes in identifying, requesting and implementing access arrangements for candidates (including private candidates) are clearly defined and documented

- Defines and documents roles, responsibilities and processes in identifying, requesting and implementing access arrangements (Access arrangements policy)
- Ensure a statement is provided which details the criteria the centre uses to award and allocate word processors for exams.

## Exams Officer (EO)

- Is familiar with the entire contents, refers to and directs relevant centre staff to the annually updated to the Awarding Organisation (AO)JCQ publications including GR and AA.
- Ensures the quality of the access arrangements process within the centre.
- Ensures staff roles, responsibilities and processes in identifying, requesting and implementing access arrangements are clearly defined and documented.
- Ensures an appropriately qualified assessor(s) is appointed and that evidence of the qualification(s) of the person(s) appointed is held on file.
- Ensures the assessment process is administered in accordance with the regulations.
- Support the Lead for SEND in determining the need for and implementing access arrangements

## SEND Lead

- Has full knowledge and understanding of the contents, refers to and directs relevant centre staff to the annually updated AO/JCQ publications
- Leads on the access arrangements process to facilitate access for candidates
- Defines and documents roles, responsibilities and processes in identifying, requesting and implementing access arrangements (Access arrangements policy)
- Works with teaching staff, relevant support staff and the exams officer to ensure centre delegated and awarding body approved access arrangements are put in place for candidates taking internal and external exams/assessments
- Ensures arrangements put in place for exams/assessments reflect a candidate's *normal* way of working within the centre
- Ensures the need for access arrangements for a candidate will be considered on a subject by subject basis
- Ensures an appropriately qualified assessor(s) is appointed, evidence of the assessor's qualification(s) is obtained before they assesses candidates and that evidence of the qualification(s) of the person(s) appointed is held on file
- Ensures the qualified assessor(s) has access to the assessment objectives for the relevant specification(s) a candidate is undertaking
- If not the appropriately qualified assessor, works with the person/persons appointed, on all matters relating to assessing candidates and the administration of the assessment process
- Completes appropriate documentation as required by the regulations of JCQ and the awarding body
- Presents when requested by an AO / JCQ Centre Inspector, evidence of the assessor's qualification.
- Provide information to evidence the normal way of working of a candidate
- Provides appropriate evidence to confirm the need(s) of a candidate.

## Teaching staff

- Support the SEND Lead in determining the need for and implementing access arrangements
- Inform the SEND Lead of any support that might be needed by a candidate
- Provide information to evidence the normal way of working of a candidate
- Provides appropriate evidence to confirm the need(s) of a candidate.

#### Assessor of candidates with learning difficulties

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

- Has detailed understanding of the JCQ publication <u>AA</u>
- Conducts appropriate assessments to identify the need(s) of a candidate.

#### Use of word processors

The Word Processing Policy can be found on the school's website.

The centre will provide a word processor (e.g. computer, laptop or tablet) with the spelling and grammar check/predictive text disabled to a candidate where it is their normal way of working within the centre, unless an awarding body's specification says otherwise. For example, where the curriculum is delivered electronically and the centre provides word processors to all candidates. This also includes an electronic brailler or a tablet.

### Awarding word processors

There are also exceptions where a candidate may be **awarded** the use of a word processor in exams where they have a firmly established need, it reflects the candidate's normal way of working and by not being awarded a word processor would be at a substantial disadvantage to other candidates.

Exceptions might include where a candidate has, for example:

- A learning difficulty which has a substantial and long term adverse effect on their ability to write legibly
- A medical condition
- A physical disability
- A sensory impairment
- Planning and organisational problems when writing by hand
- Poor handwriting.

#### Allocating word processors

Appropriate exam-compliant word processors will be **allocated** by the SEND Lead and the Head of Centre. In exceptional circumstances where the number of appropriate word processors may be insufficient for the cohort of candidates approved to use them in an exam session, the cohort will be split into two groups. One group will sit the exam earlier than or later than the published start time. The security of the exam will be maintained at all times and candidates will be supervised in line with section 2.11 of ICE.

#### **Requesting access arrangements**

#### Roles and responsibilities

#### SEND Lead

- Determines if the arrangements identified for a candidate require prior approval from the awarding body before the arrangements are put in place or if approval is centre-delegated
- Follows guidance in <u>AA</u> Section 8 to process approval applications for access arrangements for those qualifications included <u>AA</u>
- Ensures where JCQ forms are required to be completed, forms are signed (a handwritten, electronic or typed signature is acceptable) and dated as required prior to approval being sought and that the form is provided for processing and inspection purposes. (This may be hard copy paper version or an electronic version)
- Applies for approval where this is required, through *Access arrangements online* (AAO), or through the awarding body where qualifications sit outside the scope of AAO
- Confirms by ticking the 'Confirmation' box prior to submitting the application for approval that the 'malpractice consequence statement' has been read and accepted
- Makes an *awarding body referral* through AAO where the initial application for approval may not be approved by AAO, where it is deemed by the centre that the candidate does meet the criteria for the arrangement(s)
- Ensures the names of all other assessors, who are assessing candidates studying qualifications covered by AAO are entered into AAO to confirm their status including any professionals working outside the centre

• Ensures that the agreed adjustment has been put in place before the candidate's first examination, e.g internal tests and mock examinations.

#### Exams officer

- Is familiar with the entire contents of the annually updated JCQ publication <u>GR</u> and is aware of information contained in <u>AA</u> where this may be relevant to the EO role
- Assists the SEND Lead in completion of relevant documentation for the application for access arrangements.
- Ensures that, were approval required the application is processed on time and no later than the awarding body's published deadline.
- Ensures that arrangements, and approval where required, are in place before a candidate takes their first exam or assessment (which is externally assessed or internally assessed/externally moderated)
- Ensures appropriate and required evidence is held on file to confirm validation responses in AAO including (where required) the completion of relevant JCQ Forms, such as Form 8 (Application for access arrangements Profile of Learning Difficulties), Form 9 (Profile of need), Form 8RF, Form BD25, etc. supplemented by written statements, where required etc.
- Ensures that the full supporting evidence is in place before an online application is processed
- Reviews the evidence before an online application is processed, ensuring that the candidate does meet the published criteria for the respective arrangement
- Holds all supporting evidence and presents such evidence to a JCQ Centre Inspector upon request
- Maintains a file/e-folder for each candidate (the required documentation for a candidate will be in hard copy within the candidate's file/ each of the required documents held electronically within the candidate's e-folder) that will include:
  - completed JCQ/awarding body application forms and evidence forms
  - appropriate evidence to support the need for the arrangement where required
  - appropriate evidence to support normal way of working within the centre
  - in addition, for those qualifications covered by AAO (where approval is required), a printout/PDF of the AAO approval and a signed candidate personal data consent form (which provides candidate consent to their personal details being shared).
  - (where applicable) 'Data protection confirmation by the examinations officer/SEND Lead' acknowledged before an application is processed online
- Presents the files/e-folders when requested by a JCQ Centre Inspector and addresses any queries/questions raised
- Liaises with teaching staff regarding any appropriate modified paper requirements for candidates
- Liaises with the SEND Lead to ensure arrangements are in place to either order a non-interactive electronic (PDF) question paper / to download a PDF copy of the standard question paper where provided, or to open a question paper packets in the secure room within 90 minutes of the published starting time for the exam where the centre is permitted to modify a timetabled written component exam paper (copy on coloured paper, enlarge to A3 or copy to single sided print)
- Following the appropriate process (using AAO for those qualifications included in the tool; using *Form VQ/EA*), orders published modified papers, by the awarding body's deadline for the exam series, where these may be required for a candidate.

## Implementing access arrangements and the conduct of exams

#### Roles and responsibilities

#### External assessments

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

### Head of Centre / SLT Lead for exams

• Supports the SEND Lead, the exams officer and other relevant centre staff in ensuring appropriate arrangements, adjustments and adaptations are in place to facilitate access for those candidates that need them to exams

#### SEND Lead

- Ensures appropriate arrangements, adjustments and adaptations are in place to facilitate access for candidates where there is a disability within the meaning of the Equality Act (unless a temporary emergency arrangement is required at the time of an exam)
- Ensures a candidate is involved in any decisions about arrangements, adjustments and/or adaptations that may be put in place for them and ensures the candidate understands what will happen at exam time
- Ensures that any arrangements put in place do not unfairly disadvantage or advantage such candidates
- Ensures that prior to any arrangements being put in place checks are made that arrangements do not impact on any assessment criteria/competence standards being tested
- Liaises with the exams officer (EO) regarding facilitation and invigilation of access arrangement candidates in exams
- Monitors, in internal tests/mock exams, the use of arrangements granted to a candidate and where a candidate has never made use of the arrangement, may consider withdrawing the arrangement, provided the candidate will not be placed at a substantial disadvantage

Supported by the Exams Officer;

- Appoints appropriate centre staff as facilitators to support candidates (practical assistant, prompter, Oral Language Modifier, reader, scribe or Sign Language Interpreter)
- Ensures facilitators supporting candidates are appropriately trained and understand the rules of the particular access arrangement(s)
- Ensures the facilitator is known by or introduced to the candidate prior to exams.
- Ensures a facilitator acting as a prompter is aware of the appropriate way to prompt depending on the needs of the candidate.
- Liaises with the EO to ensure that invigilators are made aware of the Equality Act 2010 and are trained in disability issues.
- Ensures cover sheets, where these are required by the arrangement are completed as required by facilitators.
- Liaises with the EO where a facilitator may be required to support a candidate requiring an emergency (temporary) access arrangement at the time of exams.
- Ensures appropriate seating arrangements are in place where different arrangements may need to be made for a candidate to facilitate access to his/her exams.
- Ensures invigilators are briefed prior to each exam session of the arrangements in place for a disabled candidate in their exam room.
- Ensures where a person is appointed to facilitate an access arrangement, the person appointed is not normally the candidate's own subject teacher but where the candidate's own subject teacher has to be used, ensures a separate invigilator is always present
- Ensures where a person is appointed to facilitate an access arrangement, the person appointed is not a relative, friend, peer or private tutor of the candidate.
- Checks in advance of dated exams/assessments that modified paper orders have arrived (and if not will contact the awarding body to ensure that papers are available when required).
- Makes modifications that are permitted by the centre (a question paper copied onto coloured paper, an A4 to A3 enlarged paper or a paper printed on single sheets or where a question paper may need to be scanned into PDF format where a candidate is approved the use of a computer reader) that may be required and, where approved, opens the exam question paper packet in the secure room no earlier than 90 minutes prior to the published start time of the exam.
- Understands that where permitted/approved, secure exam question paper packets may need

to be opened early where preparation is required by the facilitator (Oral Language Modifier, Live Speaker, Sign Language Interpreter only)

- Provides cover sheets prior to the start of an exam where required for particular access arrangements and ensures that these have been fully completed before candidates' scripts are dispatched to examiners/markers
- Prints pre-populated cover sheets from AAO where this is required for GCSE and GCE qualifications.
- Where required for emergency (temporary) access arrangements, applies for approval through AAO or through the awarding body where qualifications sit outside the scope of AAO.

#### **Exams officer**

- Is familiar with the instructions for Invigilation arrangements for candidates with access arrangements and Access arrangements in <u>ICE</u> 2023-24
- Is familiar with the *Checklist for heads of centre and examination officers The Equality Act 2010 and conduct of examinations* provided in the current <u>ICE</u> (page 44)
- Liaises with the SEND Lead regarding facilitation and invigilation of access arrangement candidates in exams
- Liaises with other relevant centre staff regarding the provision of appropriate rooming and equipment that may be required to facilitate access to exams
- Ensures facilitators supporting candidates are appropriately trained and understand the rules of the particular access arrangement(s)
- Ensures the facilitator is known by or introduced to the candidate prior to exams
- Ensures a facilitator acting as a prompter is aware of the appropriate way to prompt depending on the needs of the candidate
- Ensures cover sheets, where these are required by the arrangement are completed as required by facilitators
- Liaises with the SEND Lead to ensure appropriate arrangements, adjustments and adaptations are in place to facilitate access for those who require it
- Liaises with the SEND Lead to ensure exam information (JCQ information for candidates' documents, individual exam timetable etc.) is adapted where this may be required for a such candidates to access it
- Liaises with the SEND Lead regarding the facilitation and invigilation of access arrangement candidates
- Liaises with the SEND Lead regarding rooming of access arrangement candidates
- Liaises with the SEND Lead to ensure that invigilators are made aware of the Equality Act 2010 and are trained in disability issues
- Ensures appropriate seating arrangements are in place where different arrangements may need to be made for a candidate to facilitate access to their exams
- Ensures candidates with access arrangements are identified on exam room seating plans and invigilators are made aware of the arrangements awarded and invigilators informed of those candidates with access arrangements and made aware of the access arrangement(s) awarded
- Ensures invigilators supervising access arrangement candidates are trained in their role and understand the invigilation arrangements required for access arrangement candidates and the role of any facilitator
- Checks in advance of dated exams/assessments that modified paper orders have arrived (and if not will contact the awarding body to ensure that papers are available when required)
- Has a process in place to deal with emergency (temporary) access arrangements as they arise at the time of exams in terms of rooming and invigilation.
- Liaises with the SEN Lead and Provision Managers where a facilitator may be required to support a candidate requiring an emergency (temporary) access arrangement at the time of exams.
- Responsible for the centre's emergency evacuation procedures and the arrangements that

may need to be in place for a candidate with a disability who may need assistance when an exam room is evacuated and understands and follows instructions for Invigilation arrangements for candidates with access arrangements and Access arrangements in <u>ICE</u> <u>2023-2024</u>

- Understands that where permitted/approved, a secure question paper packet may need to be opened early in the secure room to facilitate the following:
  - a Language Modifier may have access to the question paper 60 minutes prior to the awarding body's published start time for the exam to prepare
  - the Communication Professional may have access to the question paper 60 minutes prior to the awarding body's published start time for the exam to prepare
  - the Live Speaker may have access to the transcript of the Listening examination 60 minutes prior to the awarding body's published start time for the exam to prepare
- Makes modifications that are permitted by the centre (a question paper copied onto coloured paper, an A4 to A3 enlarged paper or a paper printed on single sheets or where a question paper may need to be scanned into PDF format where a candidate is approved the use of a computer reader) that may be required and either accesses a non-interactive electronic (PDF) question paper or opens the exam question paper packet in the secure room no earlier than 90 minutes prior to the awarding body's published start time of the exam
- Provides cover sheets prior to the start of an exam where required for particular access arrangements and ensures that these have been fully completed before candidates' scripts are dispatched to examiners/markers: Prints pre-populated cover sheets from AAO where this is required for those qualifications listed on page 2/92 of <u>AA</u>
- Has a process in place to deal with emergency (temporary) access arrangements as they arise at the time of exams in terms of rooming and invigilation
- Liaises with the SEND Lead and SLT Lead for exams where a facilitator may be required to support a candidate requiring an emergency (temporary) access arrangement at the time of exams
- Where required for emergency (temporary) access arrangements, applies for approval through AAO or through the awarding body where qualifications sit outside the scope of AAO
- Ensures a record of the content of training given to those facilitating an access arrangement for a candidate under examination conditions is kept and retained on file until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later

## Other relevant centre staff

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

## Internal assessments

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

## SEND Lead

- Liaises with teaching staff to implement appropriate access arrangements for candidates
- With support from the EO provide exam materials that may need to be modified for a candidate
- Ensures centre-delegated and awarding body approved arrangements are in place prior to a candidate taking their first formal supervised assessment
- Ensures candidates are aware of the access arrangements that are in place for their assessments
- Ensures a candidate has had appropriate opportunities to practise using the access arrangement(s) before their first examination
- Ensures facilitators supporting candidates are appropriately trained and understand the rules of the particular access arrangement(s)
- Liaises with the teacher where a facilitator may be required to support a candidate requiring an

emergency (temporary) access arrangement at the time of their formal supervised assessment.

#### Teaching staff

- Support the SEND Lead in implementing appropriate access arrangements for candidates
- Provide the SEND Lead with internal exam timetable to ensure arrangements are put in place when required.
- Ensures cover sheets are completed as required by facilitators
- Provide the Assessor with assessment schedules to ensure arrangements are put in place when required
- Liaise with the Assessor regarding assessment materials that may need to be modified for a candidate
- Ensures a candidate has had appropriate opportunities to practice using the access arrangement(s) before their first examination.

#### **Exams Officer**

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

#### Internal exams

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

#### SEND Lead supported by the Exams Officer

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

## SLT Lead for exams

- Support the SEND Lead in implementing appropriate access arrangements for candidates
- Provide the SEND Lead with assessment schedules to ensure arrangements are put in place when required
- Liaise with the SEND Lead regarding assessment materials that may need to be modified for a candidate

#### **Teaching staff**

- Support the Assessor in implementing appropriate access arrangements for candidates
- Provide the Assessor with internal exam timetable to ensure arrangements are put in place when required.

#### **Exams Officer**

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

#### Facilitating access – examples

The following information confirms the centre's good practice in relation to the Equality Act 2010

and the conduct of examinations.

On a candidate by candidate basis, consideration is given to:

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

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

Example of candidate need(s)	Arrangements explored	Centre actions
A medical condition which prevents the candidate from taking exams in the centre	Alternative site for the conduct of examinations Supervised rest breaks	SEND Lead gathers evidence to support the need for the candidate to take exams at home Pastoral Manager / Headteacher provides written statement for file to confirm the need Approval confirmed by SEND Lead; AAO approval for both arrangements not required
		Pastoral Manager/SEND Lead discussion with candidate to confirm the arrangements should be put in placeEO submits 'Alternative site form' for timetabled written exams to awarding body/bodies online procedure for qualifying examsEO / Admin provides candidate with exam timetable and
		JCQ information for candidatesPastoral Manager/ SEND Lead confirms with candidate the information is understoodPastoral Manger/ SEND Lead agrees with candidate that prior to each exam will call to confirm fitness to take
		exam EO allocates invigilator(s) to candidate's timetable; confirms time of collection of exam papers and materials Invigilator monitors candidate's condition for each exam
		and records any issues on incident log Invigilator records supervised rest breaks (time and duration) on incident log and confirms full time given for exam
		Invigilator briefs EO after each exam on how candidate's performance in exam may have been affected by their condition
		<ul> <li>EO discusses with pastoral Manager / SEND Lead if</li> <li>candidate is eligible for special consideration (candidate</li> <li>present but disadvantaged)</li> <li>EO processes request(s) for special consideration</li> </ul>
		where applicable; incident log(s) provides supporting evidence, supported by appropriate evidence signed by a member of the senior leadership team (Evidence retained until after the publication of results)

		Pastoral Manager/ SEND Lead informs candidate that special consideration has been requested
Persistent and significant difficulties in accessing written text	Reader/computer reader 25% Extra time Alternative rooming arrangements	Confirms candidate is disabled within the meaning of the Equality Act 2010 Papers checked for those testing reading Computer reader/examination reading pen sourced for use in papers (or sections of papers) testing reading OR up to 25% extra time awarded
		SEND Lead produces a statement, confirming the nature of the candidiate's impairment and that the use of a compluter reader and/or a reader reflects their normal and current way of working within the centre and completes appropriate form/documentation for the evidence of need.
		AAO application for approval processed
		Supporting evidence, AAO approval, signed candidate personal data consent form and completed Data protection confirmation by the EO or SEND Lead kept on file.

Significant difficulty in concentrating	Prompter	Gathers evidence to support substantial and long term adverse impairment
	Alternative rooming	Confirms with candidate how and when they will be prompted
	arrangements	Briefs invigilator to monitor candidate and the method of prompting (call out his name to bring his attention back to the paper - confirms requirement for separate room)
A wheelchair user	Desk Rooms Facilities Seating arrangements Practical assistant	Applies for practical assistant to help candidate set up wheelchair and other equipment in a practical assessment; approval automatically fails so awarding body referral lists the tasks that will be performed Provides height adjustable desk in exam room Allocates exam room on ground floor near adapted bathroom facilities Spaces desks to allow wheelchair access Seats candidate near exam room door Confirms arrangements in place to assist the candidate in case of emergency evacuation of the exam room Practical assistant cover sheet printed from AAO/ AO; to be completed by facilitator and inserted inside the candidate's work where this may be applicable to the assessment