

Herne Bay High School's

Access Arrangements Policy 2022-23

Plan reviewed by	B. Jones	Date of last review	June 2022	Date of next review	July 2023	Date of ratification by Governors:	July 2022
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Key staff involved in the policy

Role	Name(s)
SENCo	Mrs L Gowers (Upper School) Mrs N Reynolds (Lower School)
SENCo line manager (Senior leader)	Ms Hobbs (Lower School) Mr Waters (Upper School)
Head of centre	Mr J Boyes
Assessor(s)	Mrs L Gowers

What are access arrangements and reasonable adjustments?

Access arrangements

Access arrangements are agreed **before** an assessment. They allow candidates with **specific needs**, such as special educational needs, disabilities or temporary injuries to access the assessment and show what they know and can do without changing the demands of the assessment. The intention behind an access arrangement is to meet the needs of an individual candidate without affecting the integrity of the assessment. Access arrangements are the principal way in which awarding bodies comply with the duty under the Equality Act 2010¹ to make 'reasonable adjustments'. (AA Definitions)

Reasonable adjustments

The Equality Act 2010* requires an awarding body to make reasonable adjustments where a candidate, who is disabled within the meaning of the Equality Act 2010, would be at a **substantial disadvantage** in comparison to someone who is not disabled. The awarding body is required to take reasonable steps to overcome that disadvantage. An example would be a Braille paper which would be a reasonable adjustment for a vision impaired candidate who could read Braille. A reasonable adjustment may be unique to that individual and may not be included in the list of available access arrangements. Whether an adjustment will be considered reasonable will depend on several factors which will include, but are not limited to:

- the needs of the disabled candidate;
- the effectiveness of the adjustment;
- the cost of the adjustment; **and**
- the likely impact of the adjustment upon the candidate and other candidates.

An adjustment will not be approved if it:

- involves unreasonable costs to the awarding body;
- involves unreasonable timeframes; **or**
- affects the security and integrity of the assessment.

This is because the adjustment is not 'reasonable'. (AA Definitions)

Purpose of the policy

The purpose of this policy is to confirm that Herne Bay High School has a written record which clearly shows the centre is leading on the access arrangements process and is complying with its ...obligation to identify the need for, request and implement access arrangements...

(General Regulations for Approved Centres², section 5.4)

This policy is maintained and held by the SENCo alongside the individual files/e-folders of each access arrangements candidate. Each file/e-folder contains detailed records of all the essential information that is required to be held according to the regulations.

Where the SENCo is storing documentation electronically they **must** create an e-folder for each individual candidate. The candidate's e-folder must hold each of the required documents for inspection. (AA 4.2)

The policy is annually reviewed to ensure that processes are carried out in accordance with the current edition of the JCQ publication Adjustments for candidates with disabilities and learning difficulties - Access Arrangements and Reasonable Adjustments³.

General principles

The principles for the centre to consider are detailed in AA (section 4.2). These include:

The purpose of an access arrangement/reasonable adjustment is to ensure, where possible, that barriers to assessment are removed for a disabled candidate preventing him/her from being placed at a substantial disadvantage due to persistent and significant difficulties. The integrity of the assessment is maintained, whilst at the same time providing access to assessments for disabled candidate.

- The SENCo **must** ensure that the proposed access arrangement/reasonable adjustment does not unfairly disadvantage or advantage the candidate.
- Access arrangements/reasonable adjustments should be processed at the **start** of the course.

¹ References to legislation are to the Equality Act 2010.

² This publication is further referred to in this policy as GR

³ This publication is further referred to in this policy as AA

- Arrangements **must** always be approved **before** an examination or assessment.
- The arrangement(s) put in place must reflect the support given to the candidate in the centre.
- The candidate **must** have had appropriate opportunities to practise using the access arrangement(s)/reasonable adjustment(s) before his/her first examination.

Equalities Policy (Exams)

A large part of the access arrangements/reasonable adjustments process is covered in the Equalities Policy (Exams) which covers staff roles and responsibilities in identifying the need for, requesting and implementing access arrangements and the conduct of exams.

The head of centre/senior leadership team will... recognise its duties towards disabled candidates, ensuring compliance with all aspects of the Equality Act 2010⁴, 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.

The Access Arrangements Policy further covers the assessment process and related issues in more detail.

The assessment process

Assessments are carried out by an assessor(s) appointed by the head of centre. The assessor is appropriately qualified as required by JCQ regulations in AA, section 7.3.

The qualification(s) of the current assessor(s)

Mrs L Gowers - CCET + AAC = CPT3A - BPS RQTU, Real Training, Middlesex University

Appointment of assessors of candidates with learning difficulties

At the point an assessor is engaged/employed in the centre, evidence of the assessor's qualification is obtained and checked against the current requirements in AA. This process is carried out prior to the assessor undertaking any assessment of a candidate.

Checking the qualification(s) of the assessor(s)

The head of centre/senior leadership team will... have a **written** process in place to not only check the qualification(s) of their assessor(s) but that the correct procedures are followed as in Chapter 7 of the JCQ publication Access Arrangements and Reasonable Adjustments... (GR 5.4)

The head of centre **must** ensure that evidence of the assessor's qualification(s) is obtained at the point of engagement/employment and prior to the assessor undertaking any assessment of a candidate.

Evidence of the assessor's qualification(s) **must** be held on file for inspection purposes and be presented to the JCQ Centre Inspector by the SENCo. (AA 7.3)

Process for the assessment of a candidate's learning difficulties by an assessor

All candidates must be assessed in the light of the picture of need and the background information as detailed within Part 1 of Form 8. The school collates all recommendations for picture of need from staff via the Learning Referrals or periodic data collection.

The internal school assessor is required to establish if the results of tests in literacy and/or cognitive abilities present evidence that the candidate has an impairment which substantially affects their performance. The assessor must personally conduct the assessments. They must not sign off assessments carried out by another professional, which includes external private assessments.

The assessor must carry out tests which are relevant to support the application and use current editions of nationally standardised tests which produce standardised scores must be used, where published. The tests

⁴ This includes any legislation in a relevant jurisdiction other than England and Wales which has an equivalent purpose and effect (GR section 5.4)

used, include the WRAT5 test, CTOPP2, and EXACT, which assesses a candidate's: Reading skills, including reading comprehension and speed; Writing skills; and Cognitive processing, including mathematical comprehension.

In most cases there is not a requirement to carry out tests of general cognitive abilities. However, in rare and exceptional circumstances the SENCo may need to refer a candidate to an alternative professional, such as a HCPC registered psychologist or a specialist assessor with a current SpLD Assessment Practising Certificate, where further investigation is warranted which may include tests of general cognitive ability. The initial assessment may have indicated specific/global learning needs, mental health or developmental concerns.

Once an assessment has taken place a Form 8 – JCQ/AA/LD must be used to record information about a candidate's access arrangements/reasonable adjustments and be presented by the SENCo for inspection when required. The form must only be used for candidates with learning difficulties or where a Language Modifier is required.

It is important to note that only Form 8 is acceptable. Spreadsheets, e-mail messages, centre devised equivalents of Form 8, educational psychologists' reports and other reports are not acceptable for processing and inspection purposes.

A fully completed Form 8 – JCQ/AA/LD may roll forward where the candidate progresses from GCSE to GCE AS and/or A-level qualifications (see below), whether at the same centre or at a different centre.

A Form 8, with Part 2 completed no earlier than the start of Year 9 for GCSE qualifications, may roll forward to GCE AS and/or A-level qualifications where a candidate requires:

- 25% extra time; and/or
- a scribe.

Where the candidate changes centre, the original or a PDF of a fully completed Form 8, together with evidence of the assessor's qualification must be provided. There is an expectation that SENCos will provide this evidence to assist their counterparts in FE colleges.

The SENCo, or an equivalent member of staff within a FE college, must ensure that 25% extra time and/or a scribe remains appropriate, practicable and reasonable.

Form 8 must be checked to ensure that all parts of the form have been completed, it has been signed and dated and that the candidate meets the current evidence requirements before a new online application for 25% extra time and/or a scribe is processed.

It is important to note that SENCos and assessors working within the centre should always carefully consider any privately commissioned assessment to see whether the process of gathering a picture of need, **demonstrating normal way of working within the centre** and ultimately assessing the candidate themselves should be instigated (AA 7.3)

Painting a 'holistic picture of need', confirming normal way of working

Before the candidate's assessment, the SENCo **must** provide the assessor with background information, i.e. a picture of need has been painted as required in Part 1 of Form 8. The SENCo and the assessor **must** work together to ensure a joined-up and consistent process.

An independent assessor **must** contact the centre and ask for evidence of the candidate's normal way of working and relevant background information. This **must** take place **before** the candidate is assessed. Additionally, the independent assessor **must** be approved by the head of centre to assess the candidate.

All candidates **must** be assessed in light of the picture of need and the background information as detailed within Part 1 of Form 8.

An independent assessor **must** discuss access arrangements/reasonable adjustments with the SENCo. The responsibility to determine and request appropriate and practicable access arrangements/reasonable adjustments specifically lies with the SENCo. (AA 7.5).

A detailed picture of need with evidence of normal way of working within the centre (i.e. Part 1 of Form 8) is required for access arrangements to be awarded. This includes:

- a sample of internal school tests/ mock exam papers showing the application of extra time;
- or an IEP/ILP referring to the need for extra time;
- or comments and observations from teaching staff as to why the candidate needs extra time and how he/she uses the extra time awarded.

Processing access arrangements and adjustments

Arrangements/adjustments requiring awarding body approval

Access arrangements online (AAO) is a tool provided by JCQ member awarding bodies for centres to apply for required access arrangement approval for the qualifications covered by the tool. This tool also provides the facility to order modified papers for those qualifications included. (Refer to AA, chapter 8 (Processing applications for access arrangements and adjustments) and chapter 6 (Modified papers).

AAO is accessed within the JCQ Centre Admin Portal (CAP) by logging in to one of the awarding body secure extranet sites. A single application for approval is required for each candidate regardless of the awarding body used.

The SENCo **must** keep detailed records, whether electronically or in hard copy paper format, of all the essential information on file. This includes a copy of the candidate's approved application, appropriate evidence of need (where required) **and** a signed candidate personal data consent form for inspection by the JCQ Centre Inspection Service. (AA 8.6)

Centre-delegated arrangements/adjustments

When dealing with the administration of access arrangements and reasonable adjustments where a candidate has moved centres, particularly at post 16, centre-delegated arrangements/adjustments may be applied. This will occur on the occasions the school has limited knowledge of the candidate's needs and little time to gather appropriate evidence before exams or GCSE re-sits.

The SENCO and assessor will ensure only those candidates who meet the published criteria, with the required evidence in place, must be awarded the arrangement(s) in line with the following JCQ guidance:

Reducing bureaucracy and burden

A key aim of the JCQ and its awarding body members is to reduce the administrative burden on schools and colleges. Principally:

- by delegating **seventeen access arrangements/reasonable adjustments** to centres. Such arrangements **do not** require an online application or, in most cases, any evidence of need. The SENCo is empowered at a local level to determine the appropriateness and reasonableness of the arrangement;
- by introducing *Access arrangements online* the process of applying for access arrangements/reasonable adjustments has been streamlined. Around 90% of applications are automatically approved by the online system where the candidate meets the published criteria for the arrangement(s);
- where a candidate has a confirmed learning difficulty, with a fully completed Form 8 in place, and will continue to require **25% extra time** and/or a **scribe**, the Form 8 may be rolled forward from one centre to another.

What checks need to be made when a Form 8 is received from another centre?

Where the school receives a fully completed Form 8 from a school, the following checks must be made by the SENCo.

- Has Part 1 of Form 8 been completed? Is there sufficient information within Part 1 showing the candidate's picture of need and normal way of working?
- Has Part 2 of Form 8 been completed?
- Has Part 3 of Form 8 been completed?
- Are the tests recorded within Part 2 of Form 8 current, age appropriate and nationally standardised?
- Was the candidate assessed no earlier than the start of Year 9?
- Has Part 2 of Form 8 been signed and dated by the assessor?
- Has evidence been provided that the assessor holds, as a minimum, a post-graduate qualification in individual specialist assessment at or equivalent to Level 7?
- Has Part 3 of Form 8 been signed and dated by the SENCo? The above checks would similarly apply where a candidate transfers to a different school at the start of Year 12.

The following examples of documents will be required if the access arrangements are to be considered by the school:

- Form 8 and any report which was used as evidence;
- Application Approved (a JCQ form held by the previous school);
- Supporting documents such as medical letters and professional reports, if necessary;
- Anecdotal evidence from teachers regarding the need for examination access arrangements;
- Pieces of work showing the use of extra time by means of a different coloured pen.

In order for Herne Bay High School to demonstrate an ongoing need for access arrangements, current in-school evidence may need to be sought in addition to the documents listed above.

Centre-specific criteria for particular arrangements/adjustments

Word Processor Policy (Exams)

An exam candidate may be approved the use of a word processor where this is appropriate to the candidate's needs and not simply because the candidate now wants to type rather than write in exams or can work faster on a keyboard, or because they use a laptop at home. The use of a word processor must reflect the candidate's normal way of working within the centre.

Word processors must reflect the student's normal way of working in school. They are provided for students who have:

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

SEND testing may need to determine whether using a word-processor is a genuine requirement for exams. It has to be remembered that word-processors in some exams may warrant the deduction of marks and will affect the exam grade. Also, the internet browser, spelling, grammar review functions etc. will be disabled for exams.

See HBHS Word Processor Policy 2021-22

Separate Invigilation Policy

A decision where an exam candidate may be approved separate invigilation within the centre will be made by the ALS lead/SENCo.

The decision will be based on:

- whether the candidate has a **substantial and long-term impairment which has an adverse effect and**
- the **candidate's normal way of working within the centre** (AA 5.16)

For example, in the case of separate invigilation, the candidate's difficulties are **established within the centre** (see Chapter 4, paragraph 4.1.4) and known to a Mentor, Year Manager, the SENCo or Head or Deputy Head of School with pastoral responsibilities.

Separate invigilation reflects the candidate's normal way of working in internal school tests and mock examinations as a consequence of a **long-term** medical condition or **long-term** social, emotional and mental health needs. (AA 5.16)



Herne Bay High School process for Access Arrangements – from September 2022

Identifying students

- Students on the SEN register are identified as students who may require access arrangements.
- Students with a formal diagnosis of a specific learning difficulty, e.g. dyslexia.
- Students with a medical condition which requires specific accommodations.
- Class teachers identify other students without a specific SEN need, students are tested and if it is deemed appropriate are then put on the list to trial arrangements. A pupil passport is created which informs all teaching staff of arrangement.
- Parents/carers raise concerns during KS3. Students are tested and if it is deemed appropriate are put on the list to trial arrangements. A pupil passport is created which informs all teaching staff of arrangement.

Establishing Need and Normal Way of Working

- Teachers use strategies from the EHCP, medical diagnosis, professional reports and the pupil passport.
- Class teachers trial access arrangements as detailed on the pupil passport.
- Students need to be aware that they must use the access arrangement or it will be removed as this will not meet the Joint Council for Qualifications requirement of normal way of working. [Regulations and Guidance - JCO Joint Council for Qualifications](#)
- New for 2021, we also have to consider supervised rest breaks before making an application for extra time. Supervised rest breaks are trialed throughout KS3.

Collecting evidence and Paperwork

- During year 9, questionnaires are sent to class teachers to establish:
 - Difficulties in the classroom
 - Normal way of working
 - Appropriateness of access arrangements
- Access Arrangement Co-ordinator collates the evidence and SENCos write up section 1 of Form 8 for all students that need to be assessed for extra time.
- Evidence is collated from every subject as arrangements are applied for on a subject-by-subject basis.

Assessments and file notes

- For all applications for extra time where an EHCP or appropriate medical diagnosis does not exist, students are assessed by our in-house assessor.
- We **do not** accept reports from private assessors for this purpose in line with Joint Council for Qualifications regulations.
- For students with EHCPs, certain medical diagnoses or for those needing a reader or scribe, we write a file note on headed paper, confirming student's need and that this is normal way of working.
- For most other access arrangements such as prompt, reading pen, word processor, modified papers etc. no formal application is required. It is a centre delegated arrangement.

Application

- Assuming that we have the correct standard scores from the assessments, an EHCP or medical diagnosis exists, we can make an online application for extra time, reader or scribe which is automatically approved if all the evidence and paperwork is correct.
- Parents/Carers are notified at the start of year 10 of the access arrangements that will be in place for their child during KS4. There is an expectation that parents/carers explain the importance of using the arrangement throughout the KS4 course – this is particularly important for extra time. If it is not used, it will be removed after the mock exams at the end of year 10. Parents will be notified.