



## **Croydon High School GDST**

### **Senior School Public Examination Equal Opportunities & Access Arrangement Policy**

**Responsibility:** Examinations, Assessment and Data Officer

**Last Review:** September 2022

**Next Review:** September 2023

#### **Girls' Day School Trust Equal Opportunities Policy Statement**

The Council of the Girls' Day School Trust (the "Trust") is committed to equal opportunities in education and will not unlawfully discriminate against, or treat less favourably, any pupil at, or applicant to, its schools on the ground of race, disability, sexual orientation, religion or belief (or lack thereof), gender reassignment or pregnancy or maternity ('protected characteristics'). The Trust will also not discriminate against, or treat less favourably, any pupil at, or applicant to, its schools because they are perceived to have one of the protected characteristics or are associated with someone who has a protected characteristic. All pupils and staff shall be encouraged to value and respect others and to challenge inappropriate attitudes, behaviour and practices.

#### **Purpose of this Policy**

The purpose of this policy is to confirm the Croydon High School fulfils its "obligations in respect of identifying the need for, requesting and implementing access arrangements" as specified in the JCQ General regulations for approved centres.

#### **What are Access Arrangements?**

Extracts from the JCQ website:

#### **Access Arrangements**

Access Arrangements are pre-examination adjustments for candidates based on evidence of need and normal way of working. Access Arrangements fall into two distinct categories: some arrangements are delegated to centres, others require prior JCQ awarding body approval.

Access Arrangements allow candidates/learners with special educational needs, disabilities, or temporary injuries to access the assessment without changing the demands of the assessment. For example, readers, scribes and Braille question papers. In this way Awarding Bodies will comply with the duty of the Equality Act 2010 to make 'reasonable adjustments'.

#### **Reasonable Adjustments**

The Equality Act 2010 requires an Awarding Body to make reasonable adjustments where a disabled person would be at a substantial disadvantage in undertaking an assessment compared to someone who is not disabled. Schools and examination boards are required to take reasonable steps to overcome that disadvantage. There is no duty on the Awarding bodies to make any adjustment to the assessment objectives being tested in an assessment.

A reasonable adjustment for a particular person may be unique to that individual and may not be included in the list of available Access Arrangements.

How reasonable the adjustment is will depend on a number of factors including the needs of the disabled candidate/learner, the effectiveness of the adjustment, the likely impact of the adjustment upon the candidate and other candidates, the cost/practicality of the adjustment, whether the adjustment would affect the reliability or validity of the assessment outcomes, or whether the adjustment would unfairly advantage or disadvantage the candidate.

No additional fee is charged for access arrangements/reasonable adjustments.

The school SENCO, Helen Sharples is responsible for determining and requesting appropriate, practicable and reasonable adjustments.

### **The Assessment Process**

Assessments are carried out by the SENCO who is qualified to undertake such assessments. That person will liaise with teaching staff and give candidates support appropriate to their needs and with reference to the JCQ Access Arrangements and Reasonable Adjustments booklet. Care is taken not to provide support which gives candidates either an advantage or disadvantage in examinations. Monitoring of such candidates is on-going from the time of their assessment to ensure that the support remains appropriate to their needs.

### **Recording Evidence of Need**

After the initial assessment, a record of evidence of need is kept. In school examinations, candidates are asked to change to a different colour pen (or font when using a laptop) so that it is clear where they have started using extra time.

### **Gathering Evidence of Normal Way of Working**

The SENCO works closely with access candidates and their teachers and collects the necessary evidence. From this, it is possible to review and, if necessary, adjust the support given.

### **Applying for Access Arrangements**

Where access arrangements require JCQ approval, the applications are made online by the SENCO and the Examinations Officer together and these are renewed at the appropriate times.

Access arrangements will be applied for in the same way for Pearson/Edexcel qualifications through the Pearson Access Arrangement Online Portal and for Cambridge Assessment International Education, via the access arrangement forms on their website.

### **Separate Invigilation**

The decision to allow a candidate to be invigilated in a separate room lies with the SENCO and the Head of Year. It is usually arranged where a candidate would be disadvantaged by having to work in the main examination room or where a candidate has a particular physical need.

### **Public Examinations**

For all public examinations, the school follows the Joint Council for Qualifications (JCQ) Access Arrangement and Reasonable Adjustments regulations. These are accessible via the following link: <https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration>. Failure to comply with these regulations may constitute malpractice, which could in turn affect a candidate's result(s).

Decisions to apply for access arrangements will always be made by the school acting for and on behalf of the GCSE, iGCSE and GCE awarding bodies. The school will be guided by a thorough understanding of a pupil's learning needs over time and in a range of circumstances, assessments by the SENCO conducted from Year 9, recommendations from external reports (where the private assessor has consulted with the school prior to the assessment taking place), and the school teachers' own knowledge of the pupil's needs and her normal way of working both in school and at home. A portfolio of 'evidence of need' will be put together by the SENCO to support any application for access arrangements; this will include teacher feedback and evidence of a pupil's work.

## **Roles and Responsibilities**

### **Head**

The Head as Head of Centre is responsible for ensuring that all public examinations held at the school are administered according to the JCQ regulations, and must therefore be familiar with the JCQ 'Access Arrangements and Reasonable Adjustments' document. The Head is also responsible for the appointment of assessors, and ensuring that those assessing candidates have the required level of competence and training and appropriate qualifications.

### **SENCO**

The SENCO is responsible for leading the access arrangements process within the centre. This includes:

Liaising with parents and external assessors (in cases where assessment is not carried out in school). If an assessor is used, the SENCO must provide background information on the pupil before the assessment takes place, and work with the assessor to ensure a joined up and consistent process

Managing the application procedure, ensuring that full supporting evidence is available before starting the application

Maintaining a portfolio of all the required documentation, including evidence of need, updating this as required (e.g. transfer into the Sixth Form). This evidence must be available for JCQ inspection

Keeping evidence of the qualifications of any assessor used by the centre: this must be available for JCQ inspection. Assessors not directly employed within the centre must also be entered on Access Arrangements Online to confirm their status

Liaising with the Examinations Officer to ensure access arrangements are applied correctly for all relevant examinations

Liaising with Heads of Department and teaching staff to ensure that they know which pupils are entitled to access arrangements, that these should correspond to the pupil's normal way of working, and that access arrangements should also be made for internal school texts, examinations and mock examinations

### **Examinations Officer**

The examinations officer is responsible for the practical application of access arrangements in public examinations. This will involve:

Being aware of which pupils are eligible for access arrangements, and any particular conditions (e.g. arrangements being appropriate in some examinations and not others)

Putting access arrangements in place according to the regulations

Making practical arrangements, e.g. for extra rooms, extra invigilation etc.

### **Heads of Department/Teaching Staff**

Heads of Department and teaching staff must support the SENCO in determining and implementing appropriate access arrangements. This will involve:

Being aware of which pupils are eligible for access arrangement

Ensuring that access arrangements are made for these pupils in internal tests, examinations and mock examinations

Collaborating with the SENCO to provide evidence of pupils' normal way of working

### **Parents**

Parents of pupils from Year 9 who feel that their child should be assessed for access arrangements due to learning difficulties should contact the school SENCO as early as possible, bearing in mind that access arrangements are only made for pupils who have difficulties which amount to a substantial impairment. Parents wishing to commission a private assessment must contact the school in advance – an assessment carried out without prior consultation cannot be used to award access arrangements. Private assessors must be fully conversant with the JCQ regulations.

### **Types of Access Arrangement**

A number of access arrangements are available. Their use depends upon the pupil's needs, their normal way of working, the type of examination and the current JCQ regulations. This means that different arrangements might be allowed in different examinations, and SENCOs are expected to consider the need for access arrangements on a subject-by-subject basis.

The access arrangements most commonly used at the school include:

Supervised rest breaks;

Use of a word processor (with spelling and grammar check disabled);

25% extra time;

Bilingual translation dictionary.

Other types of access arrangement are available and may be considered depending on the exact nature of a pupil's needs. Details of such possible arrangements can be found in the JCQ regulations.

### **Supervised Rest Breaks**

Supervised rest breaks (SRB) must always be considered before making an application for extra time. The SENCO is allowed to provide a supervised rest break if it is the candidate's normal way of working. The SENCO must be satisfied that there is a genuine need for the arrangement due to a candidate's disability. The candidate's difficulties must also be evidenced and established within the centre, i.e. known to a Form Tutor, Head of Year and/or a senior member of staff with pastoral responsibilities.

Supervised rest breaks may be given to pupils to take account of:

Cognition and learning needs;  
Communication and interaction needs;  
A Medical condition;  
Sensory and physical needs;  
Social, mental and emotional needs.

At the start of the SRB, the timing of the examination will be paused and then restarted when the candidate is ready to continue. The pupil will not have access to the examination for the duration of the SRB.

### **Use of a Word Processor**

In some instances, a pupil may be advised to consider the use of a word processor for her examinations. A word processor cannot simply be granted to a pupil because they now want to type rather than write in examinations 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 and the school must hold evidence demonstrating the reasons why the use of a word processor has been awarded. Although not an exhaustive list, the reasons may include:

- a learning difficulty which has a substantial and long term adverse effect on a pupil's ability to write legibly;
- A physical disability;
- A sensory impairment;
- Illegible handwriting
- Planning and organisational problems when writing by hand;
- Slow handwriting speed but no other below average scores;
- The quality of language significantly improves as a result of using a word processor due to problems with planning and organisation when writing by hand;
- A medical condition with evidence supplied by a medical professional;
- Traits of ASD or ADHD where the pupils is able to concentrate much better with the use of a screen;
- Slow handwriting speed alongside slow processing and reading speeds would require use of a word processor in addition to extra time.

In all cases the SENCO will make the final decision, based on the pupil's needs and the evidence available, as to whether the use of a word processor will be permitted as an access arrangement.

If a pupil uses a word processor, they must do so with the spelling and grammar check facility/predictive text disabled and this must be the pupil's normal way of working within school.

It is permissible for a pupil using a word processor in an examination to type certain questions, i.e. those requiring extended writing, and hand write shorter answers. Examinations that have a significant amount of writing, as well as those that place a greater demand on the need to organise thought and plan extended answers, are those where pupils will frequently need to type. Examinations that require simpler shorter answers are often easier to handwrite within the answer booklet. The pupil thus avoids the difficulty of visually tracking between the question paper and screen.

## **25% Extra time**

25% extra time may be granted to candidates with learning difficulties, or for other difficulties such as sensory, physical or mental and emotional needs. The documentation supporting an application for 25% extra time must make a compelling case and present a clear and detailed picture of current need (see section on evidence of need below).

When a candidate progresses from GCSE to A Level qualifications, whilst an assessment conducted no earlier than the start of Year 9 recommending 25% extra time for GCSE examinations will be valid for A Level examinations, an application for extra time must be re-submitted in relation to A Level examinations, and the school must have available detailed evidence that 25% extra time is still needed and continues to be the candidate's normal way of working, so that the SENCO can confirm that the adjustment remains appropriate, practicable and reasonable.

## **Bilingual Translation Dictionaries**

Bilingual translation dictionaries may be used by candidates whose first language is not English, Irish or Welsh as long as this reflects their normal way of working in the centre. There are certain examinations in which the dictionary may not be used, e.g. English Language examinations or Modern Foreign Language examinations testing one of the languages of the dictionary. The dictionary may be paper or electronic but must be a standard dictionary, i.e. not contain supplementary information such as pictures or explanations of words. Dictionaries to be used in examinations must be held in the centre and checked thoroughly before use.

In addition, 10% extra time may be awarded to a candidate for use of the dictionary where the candidate entered the UK within 3 years of the examination with no prior knowledge of the English Language. In such cases the SENCO or EAL Coordinator must compile evidence to demonstrate the candidate's eligibility for this arrangement.

Temporary Access Arrangements and applications for special consideration can also be made in certain situations. These arrangements can be processed as the need arises. An example could be, a Year 11 pupil has broken the wrist of their writing hand. In such a case, the school would look at the most appropriate and reasonable adjustment to make to ensure that the pupil can access the exam but is not given an unfair advantage. As with all applications, the school must ensure that the appropriate documentation is held on file to support any arrangement made.

## **Evidence Required**

The Equality Act 2010 definition of disability is very important in helping to make a judgement about whether to consider applying for access arrangements or before making reasonable adjustments for pupils. To quote the Act, disability means, 'limitations going beyond the normal differences in ability which may exist among people.' Any arrangement or reasonable adjustment we consider has to be evidenced, with the extent and type of evidence required depending on the nature of the access arrangement. The most complex, but most common request the school makes to the exam boards is for extra time.

In order to award extra time of up to 25% for learning difficulties the school must assess the needs of the pupil based on one of the following documents:

A current Education, Health and Care Plan (EHCP) or Statement of Special Educational Needs relating to secondary education which confirms the candidate's disability; or

An assessment carried out from the start of Year 9 by a specialist assessor confirming a learning difficulty relating to secondary education.

So as not to give an unfair advantage, in all but exceptional circumstances the specialist assessor's report must confirm that the candidate has two below average standardised scores (84 or less) OR one below average score and one low average score (85-89), which relate to two different areas of speed of working or cognitive processing (which have a substantial and long-term effect on speed of working).

The assessor's report must be presented in the prescribed format (Form 8).

In addition to this core evidence, the school must collate a portfolio of evidence of the normal way of working for the candidate, clearly demonstrating the need for extra time. This may include, but is not limited to: unfinished mock examinations or other timed assessments or comments from teaching staff; a significant improvement in legibility or quality of language when extra time is applied. Extra time may not be appropriate in practical examinations where the impairment has a minimal effect on the assessment (e.g. Art, Drama).

For extra time for difficulties such as sensory, physical or mental and emotional needs, so as not to give an unfair advantage, the SENCO must produce a letter or file note, written on centre headed paper/template, signed and dated, which:

Confirms that 25% extra time is the candidate's normal way of working within the centre;

Provides evidence from teaching staff that the candidate has persistent and significant difficulties, and how these substantially impact on teaching and learning.

It is expected that this detailed information will be supported with, for example:

- a letter from CAMHS, an HCPC registered psychologist, a medical consultant, a psychiatrist; or
- a Speech and Language Therapist; or
- a letter from a Local Authority Psychology Service or Local Authority Sensory Impairment Service; or
- a current EHCP or Statement of Special Educational Needs which confirms the candidate's disability.
- A GP's letter is not regarded as suitable or sufficient evidence.

### **Identification of pupils who may require exam arrangements and application process**

Pupils on the school's SEN register in Year 9 will be automatically considered for assessment for access arrangements by the SENCO, who will have firmly established a picture of need and normal way of working in Years 7-9. Otherwise a pupil may self-refer or be referred by a parent or teacher. In normal circumstances the application will be made at the start of a GCSE or A Level course.

In all cases, the following steps will be followed to ensure that the required evidence is collated and the correct application procedure followed:

- Teachers will complete a 'Normal way of working' questionnaire
- The SENCO will meet with the pupil to discuss her needs
- The SENCO will collate the information and decide whether or not to assess and which areas of assessment are required
- The SENCO will complete Part 1 of the JCQ Form 8
- Assessments will take place.
- The assessor will assess the pupil and complete, sign and date Part 2 of Form 8
- Part 3 of Form 8, making recommendations for access arrangements, must be completed by the SENCO following the assessment
- The pupil must sign the Data Protection Notice.

- The SENCO will make an application for access arrangements to the JCQ through Access Arrangements Online. Applications must be processed and approved no later than the JCQ published deadline. Late applications are only permitted in very specific circumstances and may be subject to scrutiny
- The pupil, parents, teachers and the Examinations Officer will be notified of the outcome and implications for school work and internal tests (see below)
- Evidence will be kept on file for inspection by the JCQ inspector, including the Form 8, the signed Data Protection Notice, confirmation of approval of the access arrangement and the portfolio of evidence of need/normal way of working. Evidence may be stored electronically (in an e-folder for each candidate) or in hard copy.

### **Use of Externally Commissioned Reports**

Parents have the right to seek further diagnostic assessments for their children. However, before carrying out an assessment the organisation or individual performing the assessment must provide evidence of qualifications and be approved by the Head of Centre, and liaise with the SENCO to gather background information.

A privately commissioned assessment carried out without prior consultation with the centre cannot be used to award access arrangements, and external assessors must follow the procedure set out in the JCQ regulations. In order for the report to be used for an application for access arrangements, it must evidence the pupil's disability as being 'limitations going beyond the normal differences in ability which may exist among people'. The report must state that the pupil's disability is 'substantial' and 'long term'.

It is always at the discretion of the SENCO as to whether the recommendations contained within the report are followed. The decision will be made based on whether the recommendations fit with the picture of need already established within the centre and the pupil's normal way of working.

### **Assessment, Internal Exams and Tests**

For those pupils requiring access arrangements, the following steps will be followed in relation to internal examinations and assessments:

From Year 9, departments will be informed of which pupils are eligible for access arrangements, and individual departments will then coordinate this with guidance from the SENCO as necessary.

Access arrangements must be put in place for relevant pupils for formal internal school tests, examinations and mock examinations. For less formal assessments, the teaching staff will use their discretion as to how to allow for a pupil's needs in the classroom – either by allowing some form of access arrangement or accounting for the conditions of the test when marking.

For formal internal assessments, pupils with extra time are to write in their normal way and to participate within normal exam conditions. However, they should change their pen colour when their 25% becomes available. Pupils use coloured pen until the 25% is finished, or when they have finished – this contributes to providing essential evidence of need.

Teachers should mark exam scripts or other assessments with and without the 25% extra time and comment on the qualitative differences with 25% extra time, e.g. Has a pupil's work moved into an A grade from a B grade or vice versa?



Teachers must supply the SENCO with copies of exams scripts where 25% extra time has been used; scripts should be accompanied by teachers' comments, i.e. the qualitative differences AND comment on how extra time affected exam performance.

Pupils may use a laptop for internal assessments if this has been their normal way of working. If a laptop is used, this will be used with the internet, spelling and grammar check disabled.

**Related Policies and Other Documents:**

SEN Policy

Accessibility Policy