



Access Arrangements & Equal Opportunities Policy

Croydon High School

Access Arrangements Policy

Centre Name	Croydon High School
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Current policy approved by	Ben Rew
Current policy reviewed by	Grace Lewis
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Key staff involved in the policy

Role	Name
Head of Centre	Annabel Davies
Senior leader(s)	Ben Rew
Exams officer	Grace Lewis
ALS lead/SENCo	Helen Sharples
Other staff (if applicable)	Lynn Martin

This policy is reviewed and updated annually to ensure that access arrangements process at Croydon High School is managed in accordance with current requirements and regulations.

References in this policy to GR, ICE and AA refer to the JCQ publications **General Regulations for Approved Centres, Instructions for conducting examinations** and **Access Arrangements and Reasonable Adjustments**.

References to legislation are to the Equality Act 2010. Separate legislation is in place for Northern Ireland (see AA 1.8). The definitions and procedures in AA relating to access arrangements and reasonable adjustments will also apply in Northern Ireland.

Introduction

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.

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 particular 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 2010 to make 'reasonable adjustments'.

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'.

Purpose of the policy

The purpose of this policy is to confirm that Croydon 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 (GR 5.4)
- has a written process in place to not only check the qualification(s) of its assessor(s) but that the correct procedures are followed as per Chapter 7 of the JCQ publication Access Arrangements and Reasonable Adjustments (GR 5.4)

1. General principles

The principles for Croydon High School to consider 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 a disabled candidate (AA 4.2)
- Modified papers must be ordered in advance of a specific examination series, no later than the published deadline for the series concerned (AA 6.1)
- Although access arrangements are intended to allow access to assessments, they cannot be granted where they will compromise the assessment objectives of the specification in question (AA 4.2)
- Candidates may not require the same access arrangements/reasonable adjustments in each specification. Subjects and their methods of assessments may vary, leading to different demands of the candidate. The need for access arrangements/reasonable adjustments must be considered on a subject-by-subject basis (AA 4.2)
- Access arrangements/reasonable adjustments should ideally be processed at the start of the course (AA 4.2)
- Arrangements must always be approved before an examination or assessment (AA 4.2)
- The arrangement(s) put in place must reflect the support given to the candidate in the centre (AA 4.2)
- The candidate must have had appropriate opportunities to practise using the access arrangement(s)/reasonable adjustments before their first examination (AA 4.2)

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 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 the 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.

The assessment process

At Croydon High School, assessments are carried out by:

- an appropriately qualified assessor(s) appointed by the head of centre in accordance with the JCQ requirements (AA 7.3)

Details and qualification(s) of the current assessor(s)

- Mrs Helen Sharples

Level 7 Post Graduate Award of Proficiency in Assessment for Access Arrangements
Level 7 Professional Studies in Children with Literacy Difficulties (OU)

Appointment of assessors of candidates with learning difficulties

At the point an assessor is engaged/employed at Croydon High School:

- Evidence of the assessor's qualification is obtained and checked against the current requirements (AA 7.3)
- This process is carried out prior to the assessor undertaking any assessment of a candidate (AA 7.3)
- A photocopy of the assessor's certificate(s) (or a printout of screenshot of HCPC or SASC registration, or screenshot of other relevant qualification listing) is kept on file (AA 7.3, 7.4)

Additional information:

Reporting the appointment of the assessor(s)

- Evidence that the assessor(s) is/are suitably qualified is held on file for inspection purposes (AA 7.4)

When requested, the evidence will be presented to the JCQ Centre Inspector by Mrs Helen Sharples.

- In the case of appropriately qualified psychologists (registered with the Health & Care Professions Council), or specialist assessors holding a current SpLD Assessment Practising Certificate, who are directly employed within the centre, there is no need to record the names of these individuals within **Access arrangements online**. (AA 7.4)
- The names of all other assessors, who are assessing candidates studying qualifications as covered by AA must be entered into **Access arrangements online** to confirm their status (AA 7.4)

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

Croydon High School confirms:

- Guidelines for the assessment of the candidate's learning difficulties by an assessor will be followed and Form 8, Form 9 or Form 8RF (whichever is relevant to the circumstances) (JCQ/AA/LD - Profile of Learning Difficulties) will be completed (AA 7.5, 7.6)
- Arrangements must be made for the candidate to be assessed by the centre's appointed assessor (AA 7.5)
- Assessors **must** personally conduct the assessments. They **must not** sign off assessments carried out by another professional (AA 7.5)
- The assessor must carry out tests which are relevant to support the application (AA 7.5)
- A privately commissioned assessment carried out without prior consultation with the centre cannot be used to award access arrangements (AA 7.3)
- Relevant staff 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)

Additional information:

Picture of need/normal way of working

Croydon High School confirms:

- Before the candidate's assessment, the person appointed in the centre 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 centre and the assessor must work together to ensure a joined-up and consistent process. (AA 7.5)

Processing access arrangements/adjustments requiring awarding body approval

Access arrangements online (AAO) is used to apply for approval of arrangements/adjustments for the qualifications listed within the JCQ publication Access Arrangements and Reasonable Adjustments.

AAO is accessed through 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.

Deadlines apply for each examination series for submitting applications for approval using AAO.

Centre delegated arrangements/adjustments

Decisions relating to the approval of centre delegated arrangements/adjustments are made by Mrs Helen Sharples. Appropriate evidence, where required by the arrangement, is held on file by Mrs Helen Sharples.

- The use of a word processor

The Word Processor Policy details the criteria Croydon High School specifically uses to award and allocate word processors for examinations and assessments.

- Alternative rooming arrangements

The Senior School Public Examination Equal Opportunities & Access Arrangement Policy details the criteria Croydon High School uses to award alternative rooming arrangements, e.g. a room for a smaller group of candidates with similar needs (formerly known as separate invigilation).

Additional information:

Modified papers

Modified papers are ordered using AAO.

- Modified papers must be ordered in advance of a specific examination series, no later than the published deadline for the series concerned (AA 6.1)
- Modified papers are individually prepared for candidates for whom other adjustments are unsuitable. The modification of papers involves additional resources. Therefore centres are required to provide the awarding bodies with early notification that a candidate will require a modified paper. (AA 6.1)
- Modified papers must not be ordered for candidates unless the centre intends to enter them for the relevant examination series (AA 6.1)

- For the adjustment to be effective, the candidate must have had appropriate opportunities to practise using an awarding body's past modified papers before his/her first examination (AA 6.1)

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, 25% 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.

Roles and responsibilities

When an access arrangement/reasonable adjustment has been processed on-line and approved, the evidence of need (where required) must be made available to a JCQ Centre Inspector upon request. An awarding body may also request evidence of need when considered necessary. This can either be in hard copy paper format or electronically. (AA 4.2)

Where documentation is stored electronically an e-folder for each individual candidate must be created. The candidate's e-folder must hold each of the required documents for inspection. (AA 4.2) It is the responsibility of:

- Mrs Helen Sharples to collect a candidate's consent (a completed candidate Personal data consent form) to record their personal data on-line through AAO
- Mrs Helen Sharples to complete the Data protection confirmation by the examinations officer or SENCo, prior to the processing of the online application
- Mrs Helen Sharples to submit applications for approval using AAO
- Mrs Helen Sharples to keep detailed records for inspection purposes, whether electronically or in hard copy paper format, of all the essential information on file. This includes a signed candidate personal data consent form; a completed Data protection confirmation by the examinations officer or SENCo form; a copy of the candidate's approved application; appropriate evidence of need (where required); evidence of the assessor's qualification (where required) (AA 8.6)
- Mrs Helen Sharples to submit applications for approval directly to an awarding body for any qualification that does not fall within the scope of AAO
- Mrs Helen Sharples and Mrs Grace Lewis to order modified papers

Additional 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.

