



**BEDFORD**  
FREE SCHOOL

# Access Arrangements Policy

## 2023/2024

This policy is reviewed annually to ensure compliance with current regulations

Approved by: E Forster

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Last reviewed on: Feb 2024

Next review due by: Feb 2025

### Key staff involved in the policy

Role	Name(s)
Acting SENCO	Janet Lewis
Assistant SENCO line manager (Senior Leader)	Jane Herron
Head of centre	Jane Herron
Assessor	Janet Lewis
Assistant SENCO	Piera Hutton
Exams Officer	Elaine Forster

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## What are access arrangements and reasonable adjustments?

### Access arrangement

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.

([1AA](#), 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 a number of 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'. ([1AA](#), Definitions)

\*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

### Purpose of the policy

The purpose of this policy is to confirm that Bedford Free 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.

[JCQ's General Regulations for Approved Centres, 5.5]

This publication is further referred to in this policy as [GR](#)

This policy is maintained and held by the SENCO/Assistant 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/Assistant SENCO is storing documentation electronically he/she **must** create an e-folder for each individual candidate. The candidate's e-folder must hold each of the required documents for inspection.

([AA](#), section 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 Adjustments.**'

This publication is further referred to in this policy as [AA](#)

## 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 a disabled candidate.

The SENCO/Assistant SENCO, or an equivalent member of staff within a FE college, **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.

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 Disability Policy (exams) which covers staff roles and responsibilities in identifying the need for, requesting and implementing access arrangements and the conduct of exams.

**The Disability policy will be kept on file with all policies on the shared Idrive and be available on the school website.**

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(s) is (are) appropriately qualified as required by JCQ regulations in [AA](#), section 7.3.

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

Janet Lewis Level 7: Assessing and Teaching Learners with Specific Learning Difficulties (Dyslexia) OCR

The appointment is that of a part time capacity and currently the assessor works for Bedford Free School as an in-house assessor.

## 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 SENCO/Assistant SENCO must ensure

- that qualification(s) of their assessor(s) are checked and ensure that the correct procedures are followed as in Chapter 7 of the JCQ publication Access Arrangements and Reasonable Adjustments... (GR, section 5.4)
  - 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, section 7.3)
- 
- The assessor was appointed in line with Bedford Free Schools appointment process.
  - Bedford Free School's HR/Admin department take copies of all relevant qualifications assigned to the assessor at the time of interview for their position.

## Reporting the appointment of the assessor(s)

After the appointment of the external assessor, their details are entered onto the JCQ Centre Admin Portal (CAP)

The appointment of the assessor and the evidence held of qualifications can be found in the Operations office, in a locked filing cabinet in line with GDPR, overseen by Mr Simon Campbell, Operations Manager.

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

Students will be identified for possible access arrangements through a combination of the following criteria:

- From Year 7 as a result of information from primary schools, prior access arrangements and/or low attainment scores in relevant assessments
- Referral from a teacher and evidence supporting student's area of need
- Exam Access arrangements (EAAs) granted/officially approved by previous secondary school – subject to relevant paperwork being sent to the SEND department at Bedford Free School, in addition to clear evidence of need and confirmation of qualifications of prior school's specialist assessor.
- Presentation of a recent medical letter/diagnosis from a qualified health care professional
- Parental concern expressed

'Provisional' access arrangements granted in Years 7, 8 or 9 or below are not automatically guaranteed for GCSE exams. Official approval is normally requested in the Autumn Term of Year 10 and is subject to results from the School's designated specialist and/or a medical diagnosis/report. EAAs have to be officially approved for all students taking GCSEs. However, it is our aim to have 'provisional' access arrangements in place for internal assessments for students in younger years as soon as additional needs are identified so this becomes the students' normal way of working.

Students who are deemed eligible for access arrangements in Key Stage 4 will be tested (at the earliest in Year 9) by the school's designated 'specialist assessor' to ensure the results are valid for official approval for the entire GCSE period.

Exam access arrangements for students in Years 11 **will only** be considered for those students identified before the autumn half term break commences. This allows the school sufficient time to gather evidence of need in the classroom, evidence of picture of need/normal way of working (including the mock exams) and assessment by the School's designated 'specialist assessor'. This evidence is required to meet the JCQ deadline for submissions (currently set in February).

Where the candidate does not have an EHCP or a Statement of Special Educational Needs a Form 8, Part 1 is completed by the SENCO/Assistant SENCO prior to the candidate being assessed.

**The guidelines for the assessment of the candidates learning difficulties as assessed by the assessor may include SEN needs 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.

This list is not exhaustive.

As advised by the JCQ, the School **will not** accept privately commissioned assessments as **sole** evidence for exam access arrangements. Privately commissioned assessments will only be considered as background evidence additional to qualitative and quantifiable evidence gathered by the School to reflect the candidates' significant, persistent and long-term need and their normal way of working in school.

With the exception of temporary illness or injury on the day of the examination, students who require EEA provision for medical purposes will need to provide written evidence from an appropriate medical professional by March of the year they will be sitting exams, stating their current diagnosis, treatment and details of how it might affect their performance. The information needs to be relevant to the secondary school context. Any EEA provision will then be put in place to comply with current JCQ regulations, which may differ from that suggested by the medical professional.

Potential candidates for access arrangements (AA) may be identified by any member of teaching/support staff. A recommendation for assessment, including evidence and/or observations to support the request, should be submitted in writing/email to the SENCO/Assistant SENCO. A referral form is available. Evidence of 'normal way of working' (NWOW) must be submitted e.g. PPE's or classroom assessments annotated, dated and signed by the teacher indicating what AA have been used previously.

Some students may have received, prior to this a diagnostic assessment for Specific Learning Difficulties (identifying Dyslexia) if this identification has been made the diagnostic test for reading and writing will need to be repeated in Year 9.

The SENCO/Assistant SENCO is responsible for authorising an assessment, obtaining necessary permissions and instructing assessors. Where a candidate has learning difficulties and is not subject to a current Education, Health and Care Plan or Statement of Special Educational Needs the SENCO/Assistant SENCO will paint a picture of need and demonstrate the candidate's NWOW and complete Part 1 of Form 8 prior to the candidate being assessed.

The specialist assessor will conduct the appropriate assessments to identify students requiring AA. The specialist assessor will pass the results of the testing to the SENCO/Assistant SENCO and will recommend AA as appropriate.

Care is taken not to provide support which gives them either an advantage or a disadvantage for the upcoming exams, but instead fair support is provided based on their need and abilities.

The SENCO/Assistant SENCO will then process these through AA online.

Following meetings with teachers and - LMs pupils are given appropriate support based on their need for the examinations.

### ***Painting a picture of need and gathering evidence to demonstrate normal way of working***

Potential candidates for access arrangements (AA) may be identified by any member of teaching/support staff. A recommendation for assessment, including evidence and/or observations to support the request, should be submitted in writing/email to the SENCO/Assistant SENCO. A referral form is available. Evidence of 'normal way of working' (NWOW) must be submitted e.g. PPE's or classroom assessments annotated, dated and signed by the teacher indicating what AA have been used previously.

Before the candidate's assessment, the SENCO/Assistant 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/Assistant 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/Assistant SENCO. The responsibility to determine and request appropriate and practicable access arrangements/reasonable adjustments specifically lies with the SENCO/ASSISTANT SENCO [AA 7.5]

### **Processing access arrangements**

#### **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 is required for each candidate regardless of the awarding body used.

Statements of need, observations from staff and assessment documentation including part 1 of JCQ Form 8 should be used and kept in candidates access arrangements file held by the SENCO/Assistant SENCO.



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 inspection purposes. [AA 7.6]

A privately commissioned assessment carried out without prior consultation with the centre cannot be used to award access arrangements and cannot be used to process an application using Access arrangements online.

Where a privately commissioned report, or a report from an external professional, is rejected by a centre, the head of centre or a member of the senior leadership team should provide a written rationale supporting their decision to the parent/carer. [AA 7.3]

Background information to confirm 'normal way of working' as necessary should be included in the candidate's access arrangements file and be used to complete Form 8.

- Classroom support records
- Internal Exams records
- Teacher statements

The Assistant Principal i/c inclusion, the SENDco and the LMs meet on a weekly basis to discuss individual pupils, their needs and support required to allow them to learn in lessons. The best way to support pupils in lessons to allow them to develop, including access arrangements is discussed at these meetings

Bedford Free School follows the advice given by JCQ and maintains a record of the use of AA, particularly in the case of the use of word processors. If an AA is never used then it is not a candidate's normal way of working and the arrangement should not be awarded for examinations. Mock examinations allow a judgement to be made on support offered and slight alterations can be made to pupil's access arrangements if necessary. Bear in mind normal way of working (NWOW) as defined by JCQ. The arrangement(s) put in place must reflect the support given to the candidate in the centre †, for example:

- in the classroom (where appropriate);
- working in small groups for reading and/or writing;
- literacy support lessons;
- literacy intervention strategies;
- in internal school tests/examinations;
- mock examinations.

This is commonly referred to as 'normal way of working'. For candidates with learning difficulties this is typically the background information recorded within part 1 of Form 8 by the SENCO/Assistant SENCO or the assessor working within the centre. SENCO/Assistant SENCO's and assessors must refer to chapter 7 section 7.6.1, page 82, for information on how to confirm 'normal way of working'. †The only exception to this is where an arrangement is put in place as a consequence of a temporary injury or impairment. [AA 4.2]

The SENCO/ASSISTANT SENCO is responsible for the centre's processes for using AAO and the detailed keeping of records. The SENCO/Assistant SENCO submit AA Online. All evidence is collected by the SENCO/Assistant SENCO prior to the AA online request. Form 8 is Completed Prior to AA online request by the SENCO/Assistant SENCO and external assessor. Candidate Signature sheet is completed prior to AA online request, along with relevant GDPR statements.

The SENCO/Assistant SENCO is responsible for the submission of the AA online. The candidate AAO file is updated and stored securely in the SEN office. The SENCO/Assistant 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

All arrangements that do not require an approved AAO application should be authorised by SENCO/Assistant SENCO.

- The SENCO/Assistant SENCO will gather the evidence of need and file accordingly.
- The SENCO/Assistant SENCO and Exams Officer discuss the appropriateness of arrangements
- The SENCO/Assistant SENCO and Exams officer liaise to ensure all arrangements are in place prior to all internal and external exams.

Form 9 (new requirement from September 2023)

Form 9 is used for candidates with:

- Communication and interaction needs
- A medical condition (formally diagnosed by a registered specialist)
- Sensory and/or physical need
- Social, emotional and mental health needs
- An EHCP (England), IDP (Wales) or SEN Statement (Northern Ireland)
- Any candidate requiring supervised rest breaks

### Centre-specific criteria for particular access arrangements

#### 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.

**The Word Processor policy will be kept on file with all policies on the shared Idrive and be available on the school website.**

The SENCO/Assistant SENCO will decide if an exam candidate may be approved the use of a word processor where it is appropriate to the candidate's needs and not simply because this is the candidate's preferred way of working within the centre. There are also exceptions where a candidate may be awarded the use of a word processor in exams where he/she has 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 of a standard that would impair marking
- a mental health condition

### Allocating word processors

Appropriate exam-compliant word processors will be allocated by the Exams Officer. 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.

**Alternative Rooming Arrangements** A decision where an exam candidate may be approved alternative rooming arrangements, e.g. a room for a smaller group of candidates with similar needs (formerly known as separate invigilation) will be made by the SENCO/Assistant SENCO and the Exams Officer.

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]

The 'normal way of working' for exam candidates, as directed by the head of centre, is that candidates handwrite their exams. An exception to this is where a candidate may have an approved access arrangement in place, for example the use of a scribe/speech recognition technology. In the case of alternative rooming arrangements, the candidate's difficulties are established within the centre and known to a Form Tutor, a Head of Year, the SENCO/Assistant SENCO or a senior member of staff with pastoral responsibilities.

Alternative rooming arrangements must reflect 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]

Nervousness, low level anxiety or being worried about examinations is not sufficient grounds for separate invigilation within the centre. (AA, section 5.16)