

EXAMINATION ACCESS ARRANGEMENTS POLICY

This policy is reviewed annually to ensure compliance with current regulations

Key staff involved in the policy

Role	Name(s)
ALS lead/SENCo	Gayle Ripper
ALS lead/SENCo line manager (Senior leader)	Ann Goddard (Pastoral) Jennie Hodson (Exams)
Head of centre	Helen Jeys
Assessor(s)	Gayle Ripper / Benjamin Eaton
Access arrangement facilitator(s)	Gayle Ripper / Benjamin Eaton

INTRODUCTION

This is intended as a guidance document with teachers and parents being the target audience.

The Examination Access Arrangements Policy explains the actions taken to ensure inclusion throughout the school for all students with additional learning needs (ALN), including those with formally diagnosed Special Educational Needs and Disabilities (SEND). The policy forms an integral part of our teaching and learning philosophy, which seeks to create a learning environment whereby every individual student may fulfil her potential.

The purpose of this policy is to confirm that Manchester High School for Girls 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 Centres, 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.

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.

DEFINITIONS

The term **Additional Learning Need** is used as an umbrella term to incorporate <u>ALL</u> students known to be receiving intervention Learning Support provision including those pupils identified as having SEND.

DISABILITY

Section 6 of the Equality Act 2010 defines **disability** as a 'physical or mental impairment which has a substantial and long term adverse effect on someone's ability to carry out normal day to day activities'.

SPECIAL EDUCATIONAL NEEDS

A candidate has "special educational needs" as defined in the SEND code of practice: 0 to 25 years. Children have special educational needs if they have a learning difficulty or disability which calls for special educational provision to be made for them.

The Equality Act 2010 definition of disability includes substantial and long-term sensory impairments such as those affecting sight or hearing, mental health difficulties and long-term health conditions such as asthma, diabetes, epilepsy and cancer. Children and young people with such conditions do not necessarily have SEN, but there is a significant overlap between disabled children and young people and those with SEN.

WHAT ARE ACCESS ARRANGEMENTS?

Access arrangements are agreed before an assessment. They allow students to demonstrate their skills, knowledge and understanding without changing the demands of the assessment. The intention behind access arrangements is to meet the particular needs of a 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 disabled person would be at a substantial disadvantage in undertaking 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.

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'.

There is no duty on the Awarding Bodies to make any adjustment to the assessment objectives being tested in an assessment.

Special Consideration

Special Consideration is a post examination adjustment to a candidate's mark or grade to reflect temporary injury, illness or other indisposition at the time of the examination/assessment requiring authoritative support and at the discretion of the examining body.

Access Arrangements at Manchester High School for Girls

MHSG aims to ensure that all students have equal access to examinations and are neither advantaged nor disadvantaged over their peers by any long term, substantial SEND/or ALN which fall into the following four categories: -

- 1. Communication and interaction.
- 2. Cognition and learning.
- 3. Social, emotional and mental health.
- 4. Sensory and/or physical needs.

We will do this by applying the rules for Access Arrangements as set out in the most recent Joint Council for Qualifications guidelines. These are updated every year on the Ist September and run through until 31st August. The currently released document will always be the first reference point in determining the correct access arrangement for a student. We believe it is important to abide by the JCQ regulations, so that there is parity in how access arrangements are awarded throughout a student's secondary schooling.

We will use every opportunity to identify students' needs from their first contact with the school. Professional reports are requested that demonstrate a SEND/ALN and a recommendation for a reasonable adjustment to be made to meet the student's needs and the type of access arrangements that are appropriate. Access arrangements reflect the support that is usually given to the student in the classroom (within reason), internal exams and mock examinations. This is commonly referred to as 'normal way of working'.

When might students need to be given Exam Access Arrangements?

An Exam Access Arrangement (EAA) is a provision or type of support given to a student (subject to exam board approval) in an exam, where a particular need has been identified and is provided so that the student has appropriate access to the exam.

The general principles of access arrangements 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 **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 their first examination.

What evidence is needed to apply for EAA?

There are a number of pieces of evidence that can be used to apply for EAA to the Joint Council for Qualifications (JCQ):

- Form 8 report from a Specialist Teacher or Specialist Assessor completed no earlier than the beginning of Year 9
- Form 9 is required to confirm that a candidate needs supervised rest breaks however there is not a requirement to process an application for rest breaks.
- Electronic Form 8 via Access Arrangements Online (note: this version of the form cannot be used for
 evidence of the new Mathematical Processing measure, the downloadable paper version must be used for
 this)
- Previous EAA from Primary Schools/other education providers (please note a Form 8 will still need to be completed for GCSE and A-level examinations)
- Subject teachers examples of worksupporting evidence as appropriate, when a higher level of evidence is requested
- Results of baseline tests e.g. reading/comprehension age, writing tests, standardised psychometric testing

Private Educational Psychologists' Reports

A growing number of parents have their children assessed by private educational psychologists and specialist assessors and submit the reports to the SENCO as evidence that their child should be awarded extra time, or an additional form of EAA. These assessment reports are often very detailed but also cost a significant amount of money. This means that parents who are unable to obtain a private report through their financial circumstances are put at a disadvantage. As an exam centre we must be consistent in our decisions and ensure that no student is 'either given an unfair advantage or be disadvantaged' by any arrangements in place. Often private educational psychologists recommend that children should receive EAA which can be in conflict with the history of need seen in school, or which would not be considered as reasonable adjustments given the nature of the child's SEND/ALN.

The school will accept private assessments provided that:

- a) the parents have informed us that a private assessment is taking place
- b) the details of the private assessor, including details of their appropriate qualifications, have been passed on to the school
- c) the private assessor makes formal verbal or written contact with the SENCO to discuss the student and the school's perspective of her potential needs.

A private assessment, even if it meets the criteria outlined above, will only be accepted as an application for an internal investigation into an access arrangement, and the existence of such an assessment does not constitute a guarantee that an access arrangement will be granted, especially if it conflicts with the stipulation for normal way of working.

Per the JCQ regulations, dated Ist September 2023, "Where a candidate has an impairment other than a learning difficulty, the SENCo should have explored and trialled the option of supervised rest breaks through timed internal tests and/or mock examinations before making an application for 25% extra time."

If the advice of the private assessor for EAA conflicts with the centre tester (a member of staff holding a current formally recognised qualification enabling them to assess for EAA) then the recommendations of the centre tester will take precedence.

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

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

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

Procedures

How students would be identified for Exam Access Arrangements:

- They have qualified for EAA at KS2 for their SATs
- They have qualified for EAA for the Entrance Examination based upon evidence received by and accepted by the school
- Baseline screening in the September of Year 7 using MidYIS testing, Term 1 using dyslexia screener and additional assessments
- Parental referral
- Subject teacher referral
- Information from previous school/education provider
- Evidence from learning need screening in school

An important principle is that just because a student has received EAA in the past, it does not necessarily follow that they will continue to receive EAA as their needs may very well have changed. For example, students for whom baseline testing at KS2 shows a reading speed score below the threshold required for EAA may not qualify for the EAA at KS4 as their reading speed may have improved to the extent that it no longer meets the exam board criteria.

Baseline Testing in Year 7

All students in Year 7 are tested using MidYIS, which provides standardised and UK-normed scores for vocab, non-verbal, skills and maths. These tests can help identify students with weakness in one or more areas. If a major concern is uncovered at this stage, the SENCO will, in discussion with the Head of Year, contact the parents and obtain permission for further testing.

Parental Referral

Parents can contact the school to ask for advice about testing if they have concerns with the progress and learning of their child. Once contact has been made with the parent, the SENCO will investigate their concerns by sending a "round robin" to the child's teachers to gather information. Following this, a decision will be made as to whether it is appropriate to obtain permission to screen the student to explore the potential need for formal testing for EAA.

Teacher Referral

As with Parental Referrals, teachers can refer a student to the SENCO where they have concerns about the learning and progress of a student in their class. All of the student's current teachers will be asked to give feedback to gain information, and following this a decision will be made as to whether to test a student for EAA. Teachers are asked to refer students to the SENCO initially if they feel a child may be dyslexic rather than contacting the parents about their concerns. The SENCO will then contact the parents if the concerns are founded. Permission may be requested to screen the student to explore the potential need for formal testing for EAA.

How do staff and parents know whether a student has EAA?

- Teaching and support staff can access the inclusion register and Exam Access Arrangements organised in Year groups on the staff shared area, under the Learning Support directory. The information about results of assessments for EAA are kept confidentially in line with school policy and are shared only on a need to know basis.
- Staff are informed of changes to the SEN list via email and notification in the weekly staff briefing.
- Parents will be contacted by the SENCO to discuss what they are entitled to, why and when.

How are Exam Access Arrangements applied for?

Students need to be tested at each Key Stage for EAA. Just because they were entitled to EAA at KS2 does not automatically entitle them to it at KS3, KS4 or KS5 (Sixth Form).

The members of staff qualified to assess for access arrangements will use a variety of nationally recognised tests such as:

- Comprehensive Test of Phonological Processing 2nd Edition (CTOPP2)
- Lucid EXACT (in accordance with the guidance from JCQ governing the application of online testing)
- Detailed Assessment of Speed of Handwriting (DASH)
- Test of Word Reading Efficiency 2nd Edition (TOWRE-2)
- Weschler Individual Achievement Test Third UK Edition for Teachers (WIAT-III^{UK}-T)
- Test of Memory and Learning 2nd Edition (TOMAL-2)
- Spelling Processing Speed and reading comprehension Speed (SPaRCS)

This is not an exhaustive list, and is subject to change, as the assessments are replaced/updated periodically in line with current practice. The test that the assessor uses depends very much upon the type of barrier to learning that the student may have. Should the student need further testing to assess for other learning issues or further EAA, the assessor will arrange this. Following a report produced by the assessor an application is made to the Awarding Bodies for permission to implement the specified arrangement(s).

There are some considerations with this access arrangement application:

- The authorisation granted by the Awarding Bodies lasts 26 months, therefore it is prudent to assess and apply for EAA in the April/May of Year 9 in order that any permitted exam access arrangements are in place for the full GCSE period of both Year 10 and 11.
- A reapplication must be made in Year 12 in order to cover Year 12 and 13. Per the JCQ guidelines, it is
 possible to "roll forward" the application for EAA, however the student ideally should be re-assessed to
 provide up to date information for the SENCO, to be considered alongside history of need when
 considering the case for reapplication.
- There is a deadline imposed by the Awarding Bodies for when exam access arrangements can be applied for. This is 21st March 2024. This date can move between February and March, therefore all determinations of EAA to cover any external examinations taken in Year 10 should ideally be completed before the Christmas holiday.
- Applications for modified papers must be made before the deadline imposed by the Awarding Bodies and laid out in the JCQ Regulations document. For the academic year 2023/2024, this deadline is 31st January 2024.

- "Normal way of working" is a very important principle, sometimes even considered the *most* important. An application for EAA made late in Year 11 or Year 13 lacks validity as there is little evidence of whatever EAA is granted being the "normal way of working". However, within this concept, Manchester High School for Girls does recognise that the atypically high ability profile of our students, in terms of the national context, does mean that many learning difficulties can be far less apparent, and significant concerns raised in Year 11 or Year 13 will still be investigated. In these situations, greater weight will be given to in-school evidence such as Teacher Referrals and academic and EAA assessment results. While Parental Referrals are valuable, the phenomenon of issues being suddenly and unexpectedly raised in the weeks and months before external examinations is a valid concern, and it is highly likely that EAA will not be granted at such a late stage.
- Medical evidence for EAA, such as information from a specialist, will always be considered for EAA even if it is received past the deadline imposed by the examination board. The JCQ Regulations offer several examples of specialists of the types of specialist opinion that are valid. Generally, the information *must* come from a specialist rather than a General Practitioner (GP).

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 access arrangements/adjustments

Centre-delegated access arrangements are those that do **not** require awarding body approval e.g. supervised rest breaks or the use of a word processor. In most cases, unless a temporary or emergency arrangement, these will be detailed in the candidate's e-folder as part of the Form 9 file note, or as a hard copy in their paper file.

What are the procedures for processing an application?

Once the tests have been conducted and there is a recommendation from the tester for EAA, the SENCO then applies to the Awarding Bodies. The feedback is instant at this point; the EAA is added to the SEN list and the parents are informed of the EAA.

The application will require evidence of need, and the centre needs to hold evidence in its files that can be inspected at short notice. This can include:

- Recommendations by teachers
- Educational psychologists' reports
- Letters from outside agencies such as CAMHS (Children and Adolescent Mental Health Services), hospitals or doctors
- A current Education, Health and Care Plan (EHCP)

Permission from the Awarding Bodies for the arrangement(s) requires:

- A signed copy of the Form 8 report by the designated tester
- A data protection form signed by the student
- For Extra Time if required, a history of evidence of need in the form of copies of work where a student has regularly used more than the allotted time.

Centre-specific criteria for arrangements/adjustments Word Processor Policy

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.

Please see the Word Processor Policy.

Alternative Rooming Arrangements

A decision where an exam candidate may be approved alternative rooming arrangements within the centre will be made by the 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)

See Appendix I for more detailed information.

Any alternative room will be set up and invigilated as if it is a normal examination room, with all pertinent signs and notices.

Additionally, due to the more complex needs of the candidates who require alternative rooming arrangements, where possible we will endeavour to use invigilators who are familiar to the candidates. The invigilator will be briefed on the needs of the individual candidates in the alternative room.

Deadlines for submitting applications for access arrangements and modified papers on-line for GCSE and GCE qualifications

Access arrangements may cover the entire course and for GCSE and GCE qualifications **must** be processed using access arrangements online **as early as possible**.

The dates are set by the JCQ and we will endeavour to test students after the dates published but they will not receive dispensation for that period. This is due to allocation of time to test late entries.

- From referral to point of access arrangements being awarded takes up to 4 weeks with Pearson (formerly Edexcel). Other Awarding Bodies tend to respond more quickly.
- The deadline set by the JCQ is final, late entries may incur further inspections by the JCQ.
- The decision to apply for access arrangements is based upon evidence of a history of need, history of provision and a specialist assessor access arrangements report.

Policy written by Mr Benjamin Eaton, Learning Support Co-ordinator, April 2017

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APPENDIX I: Common access arrangements

Seating – generally students with access arrangements are seated at the back of the main hall, under the balcony area. This ensures minimal disruption at the end of the main examination, as the rest of the students are dismissed towards the front of the hall. Some students, who do not have access arrangements, may be seated strategically at the back, but this is rare. Students with rest breaks will be seated close to a door in case they need to leave and stand out in the corridor.

An explanation of assessment scores - In the following arrangements, when scores are referred to, these are the standardised scores from testing for access arrangements. They are standardised to 100 being the average for the age group of that student, with a standard deviation of 15. In other words, 67% of students will have scores from 85 to 115, with approximately 84% of students scoring 85 or above.

Access arrangements are considered for students in the 16% with at least two scores of 84 or below in the area of speed of working.. The criteria are set out in the current edition of the JCQ Regulations.

Where possible, these scores will be obtained and put onto Form 8 via testing in school from a qualified assessor teacher. The school will also accept scores from external assessors, provided they have been correctly obtained and the assessor has an established relationship with the school and proof of their qualification is sent to the school in advance of the assessment maintained contact with the school as outlined in the main policy.

Where possible the scores should have confidence intervals. For example, a score of 89 may have an interval from 83 to 95. This would imply that on a "bad day" the student will experience difficulties similar to someone with a score of 84 or less, but the majority of the time we would not expect to see this. These scores *must* be presented as a 95% confidence interval i.e. we are 95% confident that the true score for the student lies in that range.

• 25% Extra Time – the student is granted an additional 25% extra time for the examination, usually to compensate for two below average scores relating to processing, reading, comprehension speed and speed of working (a score of 84 or less in appropriate standardised testing). This is evidenced by Form 8 and work gathered in school to demonstrate the normal way of working. This arrangement can also be granted by medical evidence or other evidence from appropriate third parties, such as CAMHS. In these cases, the student does not require the Form 8, but does require a signed, authorised letter (i.e. on headed paper) from the representative of the agency making the request. Additionally, supervised rest breaks will always considered before the consideration of granting extra time since they may be more appropriate for students with an impairment other than a learning difficulty.

- **50% Extra Time** the student is granted an additional 50% extra time for the examination, to compensate for very low standardised scores (69 or less) in two or more assessed areas. This is evidenced in a more comprehensive manner as 25% extra time.
 - This is a highly unusual access arrangement for students at MHSG and as the regulations change and increase the requirements to qualify for it, it will become rarer.
- 100% Extra Time the student is granted 100% extra time for the examination. This is relevant only in very exceptional circumstances and is used primarily where a medical need that significantly impacts the examination exists, e.g. visual impairment. It is evidenced through medical information.
- Supervised rest breaks these are non-evidenced. The purpose of a supervised rest break is for a break from the examination and should not be used as "thinking time". The student is allowed to "pause" the exam for brief periods of time and will not be permitted to have sight of their paper during a rest break. This is often to compensate for physical issues (e.g. a recently sprained wrist causing discomfort when writing), calming down (e.g. if the student is prone to panic attacks, or suffers from ADHD and needs to re-focus) or extreme cases of exam anxiety. Generally the School will limit the student to 6 minutes every half an hour of the exam, but this is adaptable to the student's needs and should reflect their normal way of working. This access arrangement is discretionary and can be withdrawn at any time if it is evident that a student does not use nor need supervised rest breaks. A file note A Form 9 must be kept explaining the reason for the Rest Break arrangement and the use of rest breaks must be "thoroughly explored" prior to the application of extra time.
- Alternative room arrangements the student is invigilated separately or in a small group from the rest of the students sitting the exam. While it is very common for educational psychologists to recommend this, it is viewed as a "last resort" option, due to the impact upon rooming and staffing. Students who have been granted this arrangement have received it due to medical issues (e.g. visual impairment requiring specific environmental adjustments), and specific learning needs (e.g. complex combinations of multiple severe learning needs such as Tourette's, ADHD, ASD and OCD). (AA 5.16): Nervousness, low level anxiety or being worried about examinations is not sufficient grounds for alternative rooming arrangements .

 Alternative rooming will not be considered in the vast majority of cases as very often the student will be sitting normal internal assessments with her classmates, and therefore the evidence of need and evidence for "normal way of working" is not there. Alternative seating positions in the hall (e.g. at the very front next to a door) will always be considered and trialled first.

An example of alternative rooming arrangements according to JCQ regulations would be if a student has a formal diagnosis of a tic disorder which may cause grunting or shouting out words. Alternative rooming arrangements may be considered appropriate based on these established difficulties.

• Use of assistive technologies

In all cases, the student must be used to using the assistive technologies, and must ideally have started no later than the beginning of Year 10. It is envisioned that where possible, the provision for the use of assistive technologies is in place from Year 9 onwards.

- Reader Pens if "reader pens" are to be used, they must be of a type approved by the JCQ.
 Currently the preferred option is the "C-Pen" reader. Students using this are allowed to plug headphones in so that the pen "reads" the words to them without disturbing others. As such, they are allowed to use it in the main exam hall.
- o iPads these are allowed for use on a case by case basis and permission must be sought from the Awarding Bodies. The iPad must be locked into Guided Access Mode, preventing the student from accessing anything outside of the specific app required for the exam (normally iBooks or an equivalent PDF reader). The iPad must be placed in Airplane Mode (i.e. all radios switched off) and the Guided Access Mode will be PIN-locked by the SENCO. This PIN will be made known to the Exams Officer, and the ICT staff.
- Laptops if a student uses a laptop in her day to day lessons then it is her normal way of working and she may be allowed the use of one in an examination. The laptop will not be her "usual" one and will be provided with a "clean" image, with external communications disabled, and spelling and grammar checking disabled. Please see the schools "Word Processor Policy".
- Scribes and Readers these are very often recommended by external educational psychologists, however, they are increasingly being discouraged as an examination access arrangement. Both arrangements require a degree of familiarity between the student and the scribe/reader and need to be in place from Year 9 onwards at the very latest in order to be effective. There is also the concern that there is an implication for marks that are based on quality of communication, which are generally not attainable for the users of these arrangements.
- Coloured Paper Where a student has been assessed and diagnosed with Irlen Syndrome or visual stress and requires coloured paper and/ or enlarged from A4 to A3 as a normal way of working then a PDF question paper can be ordered via Access arrangements online by 31st January with some exam boards, in some cases. In other cases, it may be possible to open a packet of papers, in a secure room, 90 minutes prior to the published starting time in order to copy and enlarge; JCQ regulations must be followed to ensure the security of the examination papers.