

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

Document Control

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SENDCo

School:

BRIGHTON GIRLS High & Sixth Only

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TABLE OF CONTENTS

1.	PURPOSE & APPLICABILITY	2
2.	LIST OF ABBREVIATIONS & MEANINGS	2
3.	ROLES AND RESPONSIBILITIES	3
3.1.	HEAD.....	3
3.2.	SENDCO	3
3.3.	EXAMS OFFICER.....	4
3.4.	HEADS OF DEPARTMENT/TEACHING STAFF	4
3.5.	PARENTS	4
4.	WHAT ARE ACCESS ARRANGEMENTS AND REASONABLE ADJUSTMENTS?.....	4
4.1.	ACCESS ARRANGEMENTS	5
4.1.1.	SUPERVISED REST BREAKS.....	5
4.1.2.	USE OF A WORD PROCESSOR	6
4.1.3.	25% EXTRA TIME	7
4.1.4.	BILINGUAL TRANSLATION DICTIONARIES.....	7
4.1.5.	TEMPORARY ACCESS ARRANGEMENTS AND SPECIAL CONSIDERATION	8
4.2.	EVIDENCE REQUIRED	8
4.3.	IDENTIFICATION OF STUDENTS WHO MAY REQUIRE EXAM ARRANGEMENTS	9
4.4.	USE OF EXTERNALLY COMMISSIONED REPORTS	10
4.5.	ASSESSMENT, INTERNAL EXAMS AND TESTS	10
5.	APPENDIX	11
6.	DOCUMENT HISTORY	11

1. PURPOSE & APPLICABILITY

The purpose of this policy is to confirm that Brighton & Hove High School has a written record which clearly show the centre is leading on the access arrangements (AA) process and is complying with its “ ... obligation to identify the need for, request and implement access arrangements...” [JCQ General Regulations for Approved Centres, 5.5]

This policy is maintained and held by the SENDCo alongside the individual files of each access arrangement candidate. Each file 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 the 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 policy is applicable to Brighton Girls Senior School & Sixth Form only.

2. LIST OF ABBREVIATIONS & MEANINGS

AA	Access Arrangements
BG	Brighton Girls
EO	Exams Officer
GDST	Girls' Day School Trust
GR	JCQ General Regulations for Approved Centres publication
HoC	Head of Centre
JCQ	Joint Council for Qualifications
SENDCo	Special Educational Needs & Disabilities Coordinator

May / Should	Advisory
Shall / Must	Mandatory

3. ROLES AND RESPONSIBILITIES

Role	Name(s)
SENDCo	Valeria Zinola
SENDCo line manager	Wendy Fox
Head of centre	Rosie McColl
Assessor(s)	Valeria Zinola
Exams Officer	Caroline Helm

3.1. 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 and that the correct procedures are followed.

3.2. SENDCo

The SENDCo is responsible for leading on 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 SENDCo 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

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

3.3. Exams Officer

The exams 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.

3.4. 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

3.5. Parents

Parents of pupils from Year 9 who feel that their daughter 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.

4. WHAT ARE ACCESS ARRANGEMENTS AND REASONABLE ADJUSTMENTS?

Note: For all public examinations, the school follow JCQ's 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>.

Access arrangements are agreed before an assessment. They allow candidates with specific needs, such as special educational needs, disabilities or temporary injuries to access 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 their duty under the Equality Act 2010 to make 'reasonable adjustments'. [AA Definitions, page 3]

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 might be an enlarged paper for a visually impaired person. 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 individual needs of the candidate
- the effectiveness of the adjustment

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

- the cost of the adjustment
- the likely impact of the adjustment upon the candidate and other candidates

An adjustment will not be approved if it:

- involves unreasonable costs
- involves unreasonable timeframes or
- affects the security and integrity of the assessment

This is because the adjustment is not ‘reasonable’.” [AA Definitions, page 3]

4.1. Access Arrangements

For public examinations, decisions to apply for access arrangements will always be made by the school acting for and on behalf of the GCSE and GCE awarding bodies. They will be guided by a thorough understanding of the girl’s learning needs over time and in a range of circumstances, assessments by the SENDCo conducted from Year 9, recommendations from external reports (where the private provider has consulted with the school prior to the assessment taking place), the school teachers’ own knowledge of the candidate’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 SENDCo to support any access arrangements that will include teacher feedback and evidence of a pupil’s work.

A number of access arrangements are available. Their use depends upon the pupil’s needs, their normal way of working, the type of exam and the current JCQ regulations. This means that different arrangements might be allowed in different examinations.

The access arrangements currently used at Brighton Girls include:

- The use of a word processor (with spelling and grammar check disabled)
- The use of a word processor (with spelling and grammar check enabled)
- supervised rest breaks
- separate invigilation
- alternative site invigilation
- extra time
- reader
- prompt
- bilingual translation dictionary
- separate invigilation

4.1.1. Supervised Rest Breaks

Supervised rest breaks (SRB) will always be considered before making an application for extra time. The SENDCo is allowed to provide a supervised rest break if it is the candidate’s normal way of working. The SENDCo must be satisfied there is a genuine need for the arrangement due to a candidate’s disability (within the meaning of the Equality Act). Supervised rest breaks are given to girls to take account of:

- cognition and learning needs;

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

- 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 restarted when the candidate is ready to continue. The student will not have access to the examination for the duration of the SRB.

4.1.2. 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 she now wants to type rather than write in examinations or can work faster on a keyboard, or because she uses a laptop at home. The use of a word processor must reflect the candidate's normal way of working within the centre and Brighton Girls must hold evidence demonstrating the reasons why 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 pupils 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 (consultant, for example)
- traits of ASD or ADHD where the students 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 SENDCo 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 (unless the student's disability entitles them to this being enabled) 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 handwrite 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 more simplistic answers are often easier to handwrite within the answer booklet. The pupil avoids the difficulty of visually tracking between the question paper and screen.

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

The criteria that Brighton Girls uses to award and allocate word process for examinations is included as Appendix 1 of the Brighton Girls Word Process (Exams) Policy.

4.1.3. 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.

4.1.4. 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 SENDCo or EAL Co-ordinator must compile evidence to demonstrate the candidate's eligibility for this arrangement.

4.1.5. Separate invigilation

The school as exam centre will consider provision of separate accommodation where:

- the candidate's difficulties are established within the centre
- separate invigilation reflects the candidate's normal way of working in internal school tests and mock examinations as a consequence of a long term medical condition or long term social, mental or emotional needs.

Separate accommodation within the centre includes small room provision with a reduced number of candidates. If separate accommodation is required, the school will require confirmation of the candidate's disability such as a letter from CAMHS, a HCPC registered psychologist, a hospital consultant. If individual accommodation is required, the extra cost of invigilation would be at parental expense.

Where a candidate simply panics on the day of an examination or becomes anxious, then they will not be offered separate invigilation but be seated more appropriately within a main

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

examination room, seated towards the back of the Hall to minimise any disruption in case they need to leave. They will enter once all the other students are settled to reduce the stress of waiting in the hall for the exams to start.

4.1.6. Temporary Access Arrangements and special consideration

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 student has fallen off her bike and broken the wrist of her writing hand. In such a case, the school would look at the most appropriate and reasonable adjustment to make to ensure that the student 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.

4.2. Evidence Required

Note: Access Arrangements must comply with the current regulations from JCQ.

The Equality Act 2010 definition of disability is very important in helping us make a judgement about whether to consider applying for Access Arrangements or before making reasonable adjustments for girls. 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. The most complex, but, most common request we make to the exam boards is for extra time. **In order to award extra time of up to 25% the school must assess the needs of the student 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, the specialist assessor's report must also confirm that the candidate has **at least one below average standardised score of 84 or less** which relates to an assessment of:

- Reading skills; or
- Writing skills; or
- Cognitive processing measures which have a substantial and long term adverse 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 of up to 25%. 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).

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

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

- Confirms that the candidate has **persistent and significant difficulties** when accessing and processing information, and **is disabled within the definition of the Equalities Act 2010**;
- Includes evidence of the candidate's current difficulties and how they impact substantially on teaching and learning in the classroom;
- Shows the **involvement of teaching staff** in determining the need for extra time of up to 25%;
- Confirms that without the application of extra time of up to 25% the candidate would be at a **substantial disadvantage**;
- Confirms that extra time of up to 25% is the candidate's **normal way of working** within the centre **as a direct consequence of their disability**.

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

- A letter from CAMHS, a clinical psychologist, a hospital consultant; 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 (EHCP) relating to the candidate's secondary education which confirms the candidate's disability.

Please note: a GP's letter is not regarded as suitable or sufficient evidence.

4.3. Identification of Students who may require exam arrangements

Pupils on the school's SEND register in Year 9 will be automatically considered for assessment for access arrangements by the SENDCo, 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 SENDCo will meet with the pupil to discuss her needs
- The SENDCo will collate the information and decide whether or not to assess and which areas of assessment are required
- The SENDCo 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 SENDCo following the assessment
- The pupil must sign the Data Protection Notice
- The SENDCo 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

BRIGHTON GIRLS POLICY

EXAMS ACCESS ARRANGEMENTS

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.

4.4. Use of externally commissioned reports

Parents have the right to seek further diagnostic assessments for their children. However, the organisation or individual performing the assessment **must have prior contact** with the school to gather background information on the pupil and to provide evidence of their qualification(s) before going ahead with the assessment. 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 must be 'substantial' and 'long term'.

It is always at the discretion of the SENDCo 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.

4.5. Assessment, Internal Exams and Tests

For those pupils requiring access arrangements to be made for internal exams and assessments:

1. 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 SENDCo as necessary.
2. 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.
3. 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 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.
4. 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?
5. Teachers must supply the SENDCo 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.
6. 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.

BRIGHTON GIRLS POLICY
EXAMS ACCESS ARRANGEMENTS

5. APPENDIX

NIL

6. DOCUMENT HISTORY

Document Title	Version	Date of Issue	Change	Updated by	Status
BHHS Exams Access Arrangements Policy	Initial (01)	April 2018	Full Development	Valeria Zinola	Expired
BRIGHTON GIRLS Exams Access Arrangements Policy	02	January 2019	Annual Review	Valeria Zinola	Expired
BRIGHTON GIRLS Exams Access Arrangements Policy	03	January 2020	Annual Review	Valeria Zinola	Live

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