

Access Arrangements and Reasonable Adjustments Policy

Luton Adult Learning

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This policy is applicable to all Adult Learning members of staff including volunteers, subcontracting organisations and other staff involved in the projects.

This is additional to Luton Council (<https://lutonbc.sharepoint.com/>) and Luton Adult Learning (\\corporate\AdultEducation\AdultEdData\Resources\Policies) policies and procedures.

Changes in content since previous version **highlighted in yellow** for easy identification

Summary of key changes	Page No	Date amended
Clarification of Special Consideration	2	3/8/26
Compliance with March 2026 version of JCQ documents	2	3/8/26
Clarification of Centre Delegated Access Arrangements	5	3/8/26

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Context

Access Arrangements

Access arrangements are agreed before an assessment based on evidence of need and how a learner normally works. 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 a number of factors which will include, but are not limited to:

- the needs of the candidate;
- the effectiveness of the adjustment;
- 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 to the awarding body;
- involves unreasonable timeframes;
- affects the security and integrity of the assessment.

This is because the adjustment is not ‘reasonable’.

Special Consideration

This is a different process entirely from Access Arrangements. It provides adjustments to marks or grades after exams for students who were affected by temporary illness, injury or other circumstances at the time of assessment.

Purpose of the policy

The purpose of this policy is to confirm that Luton Adult Learning has a whole centre approach and maintains 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 as described in [JCQ General Regulations for Approved Centres, 25-26](#).

This policy is maintained by the Adult Skills Delivery Manager and held by the Examinations Officer 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 \(AA\)](#).

Failure to comply with the regulations contained in this document has the potential to constitute malpractice, which may impact on the candidate's result(s).

Identifying need for access arrangements

Disability or learning difficulty that may affect assessment or exam performance should be identified at learner enrolment and Initial Assessment.

The initial collection of information should be recorded on the **Initial Assessment** and centre Additional Learning Support (ALS) form by Curriculum Support Officers (CSOs) or **Teacher Practitioner (TP)**. Delivery staff should meet with the learner to discuss and explore support requirements if not before, within the first week of class. Details of this support should be documented within the planning section (section 1) of the centre Normal Way of Working Report (NWOW).

If disability or learning difficulty is not disclosed at enrolment or is suspected by teaching staff, a disability and disclosure form should be completed with the learner to explore and capture the need for support and access arrangements.

Requirements

Normal Way of Working (NWOW)

The NWOW report is a live document completed by delivery staff to paint a picture of need and to gather evidence of the learners' normal way of working. Teachers should document in section 2 (delivery) of the NWOW report showing both how the learner has been supported in teaching and learning along with examples of how they have worked that may influence the need for access arrangements or reasonable adjustment to be made in assessment or examinations. Once the need has become clear, the request for access arrangements should be made in line with the information within the processing access arrangements section of this document. This document will also be utilised to enable a SENCo to complete part 1 of form 8 if required under current access arrangement regulations.

Evidence of Need

For all awarding bodies we will follow the Guidance within AA section 5: **The principle will be the same across all qualification types: access arrangements and adjustments must not be allowed to interfere with the integrity of the assessment or to give credit for skills, knowledge and understanding which cannot be demonstrated by the candidate.**

Learning Difficulty:

- Education, Health and Care Plan
- **Current** Statement of Special Educational Needs **or**
- A fully completed Form 8 with an assessment (Part 2 of Form 8) completed by a qualified SEN assessor appointed by the centre to confirm a learning difficulty relating to secondary/further education (supplemented by a detailed picture of need - see page 29 of

AA). The Form 8 should be perceived as a 'passport to access arrangements' which travels with the candidate.

- However, a Form 8 cannot roll forward from GCSE qualifications to GCE AS, A level and/or other Level 3 qualifications where a candidate will continue to require extra time of more than 25% (26% to 50%) and/or a Language Modifier. A new Form 8 must be completed and the candidate must be reassessed.

Complex Needs:

SENCo will complete Form 9 confirming:

- the candidate's normal way of working within the centre
- Evidence from teaching staff that the candidate has persistent and significant difficulties and how these impact upon teaching and learning.

This will be supported by specialist evidence confirming candidates' disability:

- A letter/report from CAMHS, a HCPC registered psychologist, a medical consultant, a psychiatrist or a Speech and Language Therapist (SaLT); **or**
- A letter/report from the Local Authority Specialist Service, Local Authority Sensory Impairment Service or Occupational Health Service; **or**
- A current Statement of Special Educational Needs, or an Education, Health and Care Plan, which confirms the candidate's learning difficulty, medical condition, physical disability, sensory or multi-sensory impairment.

Form 8 should not be used for complex needs. The specialist evidence is not required to recommend 25% extra time but to simply confirm the candidate's disability. The specialist evidence may relate to any age provided it remains current.

The Assessment Process

Assessments utilised within Form 8 and Form 9 (including AA online) will be carried out by a SEN assessor appointed by the Adult Skills Delivery Manager. The assessor will be appropriately qualified as required by JCQ regulations in AA. At the point the SEN assessor is engaged 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 learner.

Checking the qualifications of the assessor

The Adult Skills Delivery Manager will be satisfied that the AA assessor will meet all regulations outlined within 7.3.2 to 7.3.4 with the AA. The Assessor will:

- Have completed a post-graduate course at or equivalent to L7 including at least 100 hours relating to individual specialist assessment.
- Be a specialist assessor with a current SpLD Assessment Practising Certificate, as awarded by BDA, the dyslexia guild or Patoss and listed on the SASC website
- Be an appropriate qualified psychologist registered with the Health & Care Professions Council.
- In addition, all assessors will have a thorough understanding of the current JCQ Access Arrangements and Reasonable Adjustments, be familiar with the Equality Act 2010 and hold either an appropriate qualification to teach and make recommendations for adult learners who have learning difficulties or be a HCPC registered psychologist.

Reporting the appointment of the assessor

We will hold evidence that all assessors are suitably qualified and record names into Form 8 and 9/Access Arrangements Online to confirm their status.

Processing Access Arrangements

Centre Delegated Access Arrangements:

- Alternative rooming arrangements, e.g. a room for a smaller group of candidates with similar needs.
- Amplification equipment.
- Bilingual dictionary
- Blank sheet of paper for doodling, where a candidate has persistent and significant concentration difficulties (this must be included with the candidate's completed answer booklet).
- Brailers.
- Colour naming by the invigilator for candidates who are colour blind.
- Coloured overlays (this would also include reading rulers, virtual overlays and virtual reading rulers).
- Examination question paper on coloured paper and/or enlarged from A4 to A3 (SENCoS should refer to paragraph 6.5.3).
- Fidget toys and stress balls
- Live speaker for pre-recorded examination components
- Low vision aid/magnifier.
- Non-electronic ear defenders/ear plugs.
- Non-electronic headphones.
- Optical Character Reader (OCR) scanners.
- Timer on a candidate's desk – a small countdown clock, a small analogue or digital clock, digital timer, sand timer or stopwatch (the candidate must have an established difficulty and control the device themselves).
- Separate invigilation within the centre
- Squared paper for a candidate with visual spatial difficulties.
- Sign Language Interpreter
- Supervised rest breaks
- Word processor

The SENCo must make their decision 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.

Evidence of need: Evidence of need should be apparent within NWOW Document only

How to Apply: Not required but keep list of Access Arrangements

Documents Required: Good practice to have NWOW but doesn't need to be held on file

Self-Approval Access Arrangements

- 25 % Extra Time
- 10% Extra time with Bilingual Dictionary

For Entry Level Only:

- Computer Reader/Reader
- Practical Assistant
- Scribe

Evidence of need: Separate evidence of need

Normal Way of Working

How to Apply: Self-Approval on Awarding Body Website

Documents Required: Evidence of need and Normal Working held on individual learner file for 3 years. *Entry level candidates need SENCo statement plus normal way of working – no requirement for separate evidence of need.*

Access arrangements requiring awarding body approval

- Access to mobile phone for medical purposes
- Bilingual dictionary with 25% extra time (for qualifications listed AA 5.18.2)
- Computer reader/human reader
- Exemptions
- Extra time over 25%
- Practical Assistant
- Remote invigilation
- Scribe/speech recognition technology
- Timetable variation for candidate with a disability

Evidence of need: Specific evidence of need – consult with awarding bodies

Normal Way of Working

How to Apply: Prior approval from Awarding Body

Documents Required: Evidence of need and Normal Working held on individual learner file for 3 years.

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 this is the candidate's preferred way of working within the centre.

Centres are allowed to provide a word processor (e.g. computer, laptop or tablet) with the spelling and grammar check/predictive text disabled to a candidate where it is their normal way of working within the centre, unless an awarding body's specification says otherwise. For example, where the curriculum is delivered electronically and the centre provides word processors to all candidates.

A word processor cannot simply be granted to a candidate because he/she now wants to type rather than write in examinations or can work faster on a keyboard, or because he/she uses a laptop at home.

The use of a word processor must reflect the candidate's normal way of working within the centre. For example, where the curriculum is delivered electronically and the centre provides word processors to all candidates.

Separate Invigilation within Centre

A decision where an exam candidate may be approved separate invigilation within the centre will be made by the Adult Skills Delivery Manager. 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

Separate invigilation reflects the candidate's normal way of working in internal tests and mock examinations as a consequence of a long term medical condition or long term social, mental or emotional needs.