

REASONABLE ADJUSTMENT POLICY EPAO STANDARDS

**END-POINT
ASSESSMENT
ORGANISATION**



Document Version Control

Document Ref:	Reasonable Adjustment Policy
Version:	V1.1
Owned By:	Head of UK Business Development
Created By:	KE
Approved By:	J Horton Senior Responsible Officer
Confidentiality Level:	

Amendment history

Date	Version	Created by	Description of change
14/10/21	0.1	KE	Draft
11/11/21	1.0	KE	Final Draft
11/11/21	1.1	CM	Minor Amends - logo

CONTENTS

1 INTRODUCTION	4
2 LEGISLATION	4
3 TERMS & DEFINITIONS	4
4 RESPONSIBILITY	5
5 REASONABLE ADJUSTMENT POLICY	5
5.1 Examples of Reasonable Adjustments	5
5.2 Application of Reasonable Adjustments	6
6 REASONABLE ADJUSTMENT PROCEDURE	6
6.1 Reasonable adjustment process for centres	8
7 APPLICATION OF ADJUSTMENTS	8
8 DATA RETENTION	8
9 APPEALS	8
10 EVALUATION	9
11 CONTACT US	9
APPENDIX A - REASONABLE ADJUSTMENT APPLICATION	10
APPENDIX B - INSTITUTE FOR APPRENTICESHIPS MATRIX	12

1 INTRODUCTION

The purpose of this policy is to ensure that all standards which the IMechE assesses against are accessible for all apprentices and do not discriminate against anyone. The IMechE is committed to delivering an End Point Assessment Service that is rigorous, fair, valid, reliable, and accessible, recognising that in agreed and specified instances of disability or difficulty, certain apprentices may require alternative arrangements for aspects of their end-point assessments so that they are not disadvantaged by the assessment format itself. This is known as a reasonable adjustment.

This policy sets out the process that should be followed to request a reasonable adjustment, and

2 LEGISLATION

the process for decision and implementation.

The Equality Act 2010 defines disability as a physical or mental impairment which has substantial and long-term adverse effect on a person's ability to perform normal day to day activities. This policy ensures that an apprentice who is disabled, as defined in the Act, are not placed at a substantial disadvantage in comparison to apprentices who are not disabled.

Section 53 of the Equality Act makes specifically applies to qualifications bodies and their duty to provide reasonable adjustments. A copy of the Equality Act 2010 can be found here:

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

3 TERMS & DEFINITIONS

Title	Definition
IMechE	Institution of Mechanical Engineers
EPAO	End Point Assessment Organisation
EPA	End Point Assessment
ESFA	Education & Skills Funding Agency
Ofqual	The Office of Qualifications & Examinations Regulation
SRO	Senior Responsible Officer
IfATE	Institute for Apprentices & Technical Education
PDC	Professional Development Consultant
Centre	Where an organisation takes part in the delivery of an end point assessment. Activities related to delivery include: <ul style="list-style-type: none">- taking delivery of written question papers in advance of the assessment- handing out written question papers to Learners- setting up online assessments- delivering instructions to Learners before the assessment commences- invigilating assessments- collecting assessment paper and sending then to IMechE
Third Party	An organisation that IMechE have arranged to undertake, on their behalf, any part of the development, delivery or award of qualifications. It does not include organisations involved in the delivery of assessment, as they are centres.

4 RESPONSIBILITY

It is the responsibility of the IMechE as the EPAO to ensure that all IMechE administrative staff, assessors and Approved Centres are aware of the contents of this policy as part of our responsibilities as an Ofqual Recognised EPAO. Centre responsibilities can be found in section 6 of this policy.

The responsibility for the policy rests with the Senior Responsible Officer at IMechE. In some cases, external independent advice may need to be sought to resolve a request.

5 REASONABLE ADJUSTMENT POLICY

A reasonable adjustment relates to an adjustment that helps to reduce the effect of a disability or a physical or mental health condition, which may place the apprentice at a disadvantage compared to others.

IMechE will make reasonable adjustments to ensure apprentices with disabilities or physical or mental health conditions aren't substantially disadvantaged during assessment. This is a required duty as part of the [Equality Act 2010](#).

Reasonable adjustments must not give the apprentice an unfair advantage, and must not affect the integrity of what is being assessed. When a reasonable adjustment has been agreed and applied, the work produced by the learner will be marked to the same standards and assessment requirements as the work assessed of the other learners.

Reasonable adjustments, during end-point assessment, should mirror the types of reasonable adjustments and additional support that the apprentice had received from their employer and/or training provider during their apprenticeship programme.

5.1 Examples of Reasonable Adjustments

During the end-point assessment the types of adjustments offered may include, but aren't limited to, changes to elements such as (refer to **appendix B** for more detail):

- Extra time allowance
- Scribe
- Reader
- Personal support worker in attendance
- Timed rest breaks
- Bathroom breaks
- Voice explanation
- BSL interpreter + extra time

- Assistive technology
- Flexibility with location
- Flexibility of time of assessment
- Flexibility within the method of assessment
- Pre-recorded evidence / delivered by video link
- Permission to write or bring notes
- Info presented in required format – size, font style, colour
- Individual testing
- Paper-based option
- Supervised assessment taken at home
- Written questions to back up verbal
- Rewording of questions / clarification if needed
- Time allowance for processing verbal questions
- Information presented in small chunks

5.2 Application of Reasonable Adjustments

It is the responsibility of IMechE to ensure that the assessment is practically able to operate within available resources, following the application of any reasonable adjustments.

What is reasonable will depend on the individual circumstances, cost implications and the practicality and effectiveness of the adjustment. Other factors, such as the requirements of the apprenticeship standard, and health and safety, will also be taken into consideration.

The outcome produced by the apprentice will at all times:

- meet the requirements of the occupational standard regardless of the process or methods used;
- be as rigorously assessed as outcomes generated by other apprentices;
- be assessable;
- be a valid measure of occupational competence; and
- be able to be moderated or verified.

6 REASONABLE ADJUSTMENT PROCEDURE

When an Apprentice wishes to request a reasonable adjustment for their End Point Assessment, the employer, with input from the training provider and the apprentice, must apply to IMechE in relation to the professional assessment for reasonable adjustments to be applied to the end-point assessment, should the request be in relation to the occupational assessment then the employer, with input from the training provider and the apprentice should apply directly to the centre (see section 6) This will be through the completion of the Reasonable Adjustment application form (**appendix A**) which is to be submitted to the EPA Manager kery.ellis@imeche.org

In order to ensure that any adjustment to assessment will only provide the apprentice with the necessary assistance without giving them an unfair advantage over others, the applicant must be clear about the extent to which they are affected by the disability or difficulty, and include supporting evidence. This is particularly important where the implications of the difficulty are not obvious, whereby evidence must be included of the effect of the impairment on the apprentice's performance in an assessment. Evidence can be:

- Evidence of assessment of the apprentice's needs by a member of staff with competence and responsibility in the areas, such as learning support staff, trainers, and other specialist staff.
- History of the provision provided by the employer and provider during the apprentice training
- Written evidence produced by independent, authoritative, specialists. This could take the form of medical, psychological or professional reports or assessments. These reports should state the name, title and professional credentials of the person who wrote the report, and the report should detail the nature of the difficulty and extent to which the apprentice is affected by the difficulty, including the effects of any medication that the apprentice may be taking.

An apprentice with an Education and health Care Plan (EHCP) does not automatically qualify for reasonable adjustments, but it will be taken into account with any request.

IMechE requires the reasonable adjustment request to be made no later than 4 weeks prior to the EPA date.

IMechE will confirm receipt of the request within 5 days and will aim to confirm a decision regarding reasonable adjustments within 15 working days of acknowledging the request. The adjustment would then be further confirmed by email to the Training Provider and Employer prior to the assessment taking place.

All requests will be considered on the information received. 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 apprentice;
- the types of adjustment requested as compared to the adjustments provided on-programme;
- the effectiveness of the adjustment;
- the cost of the adjustment; and
- the likely impact of the adjustment upon the Apprentice and other Apprentices.

As it is a legal duty the IMechE may only reject applications for a reasonable adjustment in circumstances where:

- Any adjustment may create a serious loss of validity or independence within the assessment process.
- Any adjustment may constitute a serious safety hazard.

Where a request is rejected or partially accepted LEIA will provide a written justification behind the decision.

6.1 Reasonable adjustment process for centres

When an Apprentice wishes to request reasonable adjustment in relation to the occupational assessment, this must be made directly to the centre. The employer should, with the support of the training provider and apprentice make the request for the adjustment by completing the Reasonable Adjustment application form (**appendix A**) which is to be submitted to the EPA operational team epaservices@eal.org.

The centre will then follow their own reasonable adjustment policy but will inform IMechE of the request and outcome of this.

7 APPLICATION OF ADJUSTMENTS

It is the responsibility of IMechE and their approved Centres to ensure that the reasonable adjustments are in place for the assessment, which may mean that additional checks and tests of the equipment for use are carried out prior to the assessment.

It is the responsibility of IMechE to ensure any approved requests for reasonable adjustments are put into place, centres are requested to inform the EPA Manager of the outcome of a request and the actions taken to put the adjustments into place.

8 DATA RETENTION

IMechE will keep on record all reasonable adjustment applications and evidence for a period of 6 years after the assessment in line with the document retention period specified within the conditions for acceptance for end-point assessment organisations.

Information about an apprentice's disability is deemed 'sensitive personal data' and therefore IMechE, the employer and / or the training provider, if appropriate, are required by law (under the Data Protection Act) to process the information 'fairly and lawfully'.

IMechE will keep in confidence all correspondence and documentation received in accordance with the Data Protection Act, and in line with our data policy.

An apprentice can request that information be destroyed once an assessment has been passed, if preferred.

9 APPEALS

If an apprentice, for any reason, considers that they have been wrongly refused access to fair assessment and wishes to appeal, they should follow IMechE's appeals policy and procedure.

If an employer for any reason, considers that their apprentice(s) have been wrongly refused access to fair assessment and wish to appeal, they should follow IMechE's appeals policy and procedure.

10 EVALUATION

This policy will be reviewed on annual basis by the Head of UK Business Development approved by the EPA Executive Board and endorsed through delegation by the Trustee Board.

IMechE will monitor requests for reasonable adjustments and recognise that if regular or repeated request for reasonable adjustments are made, it may indicate that an element of the end-point assessment may need to be reviewed in order to ensure the inclusivity of design. This may involve reports to the external quality assurance provider / regulator, and / or the original apprenticeship trailblazer design group. No reports to other agencies will include apprentice details, or the means to identify the apprentices that received adjustments.

11 CONTACT US

If you have any queries about the contents of this policy, please contact the Head of UK Business Development claire.maycock@imeche.org

APPENDIX A - REASONABLE ADJUSTMENT APPLICATION

Name of the apprentice:		Apprentice ULN	
Name of the Employer:			
Name of the Training Provider:			
Contact Details			
Title and Level of the Apprenticeship:			
Date of end-point assessment:			
Disability or Learning Difficulty Code	<ol style="list-style-type: none"> 1. No known disability 2. Cognitive processing need, such as dyslexia, dyspraxia; a need in executive function, visual processing speed, visual perception, literacy, numeracy, verbal reasoning, verbal memory, nonverbal memory 3. Social/ communication need such autistic spectrum condition 4. Long standing illness such as cancer, epilepsy, Crohn's, IBS, Chronic Fatigue 5. A mental health condition 6. A physical need such as crutches or wheelchair user, arthritis, paraplegia, quadriplegia, cerebral palsy 7. Hearing need 8. Visual need 		
Details of the reasonable adjustments and additional support that the apprentice has received during their apprenticeship programme			
End-point Assessment Component (eg, VIVA)	Disability or Learning Difficulty Code	Reasonable Adjustment(s) Requested *	Supporting Evidence**
<p>* for example: wheelchair access/adapted equipment, printed materials in accessible format, specialist software, reader, scribe, coloured overlays, extra time, rest breaks (please use the chart in appendix B to determine appropriate adjustment request). The request should mirror the types of reasonable adjustments and additional support that the apprentice has received from their employer and/or training provider during their apprenticeship programme</p> <p>** copy of diagnosis, expert supplying the diagnosis and date</p>			
Declaration			
I confirm that the above apprentice(s) have been assessed as requiring reasonable adjustments, that the apprentice(s) have been fully involved in any discussion about requests for adjustments / adaptations.			
Role and Signature of employer representative			
Signature of training provider representative			
Date			

IMechE Decision

End-point Assessment Component (eg, VIVA)	Disability or Learning Difficulty Code	Reasonable Adjustment(s) Decision (approved / rejected)	Detail of provision approved OR Reason for rejection
Declaration			
<p>This is to confirm that the decision regarding reasonable adjustments has been made without any conflict of interest, and that where:</p> <ul style="list-style-type: none"> the application has been rejected; a full explanation has been provided alongside the rights to appeal the application has been approved; the reasonable adjustments approved have been detailed, and are in line with those expected of industry standards and health and safety requirements, and that the adjustment will not impact upon the integrity of the assessment. 			
Name of IMechE Signatory			
Signature			
Date			

APPENDIX B – INSTITUTE FOR APPRENTICESHIPS MATRIX

<https://www.instituteforapprenticeships.org/quality/end-point-assessment-reasonable-adjustments-guidance/>

1. No known disability
2. Cognitive processing need such as dyslexia, dyspraxia; a need in executive function, visual processing speed, visual perception, literacy, numeracy, verbal reasoning, verbal memory, nonverbal memory
3. Social/ communication need such autistic spectrum condition
4. Long standing illness such as cancer, epilepsy, Crohn's, IBS, Chronic Fatigue
5. A mental health condition
6. A physical need such as crutches or wheelchair user, arthritis, paraplegia, quadriplegia, cerebral palsy
7. Hearing need
8. Visual need

Assessment method Reasonable adjustment	Observation	Practical Skills Test	Test	Project	Presentation	Professional Discussion
Extra time allowance	2,3,4,5,6,7,8	2,3,4,5,6,7,8	2,3,4,5,6,7,8	2,3,4,5	2,3,4,5,7	2,3,5,6,7
Scribe			2, 6, 8			
Reader			2, 8			
Personal support worker in attendance	2,5,6,8	2,5,6,8	2,5,8	2,5,8	2,5,6,8	2,5,8
Timed rest breaks	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8	2,4,5,6,7,8
Bathroom breaks	4, 6	4, 6	4, 6	4, 6	4, 6	4, 6
Voice explanation	2,8	2, 8				
BSL interpreter + extra time	7	7	7	7	7	7
Assistive technology			2, 4, 6			

Assessment method Reasonable adjustment	Observation	Practical Skills Test	Test	Project	Presentation	Professional Discussion
– voice recognition						
Assistive technology – screen reader			8			
Assistive technology – text to speech			2, 4			
Flexibility with location				3, 4, 5, 6	3, 4, 5, 6	3, 4, 5, 6
Flexibility of time of assessment	4	4	4	4	4	4
Flexibility within the method of assessment		6	3, 4, 5, 6	3, 4, 5, 6	3, 4, 5, 6	3, 4, 5, 6
Pre-recorded evidence / delivered by video link				2, 3, 4, 5	2, 3, 4, 5	
Permission to write notes						2, 4, 5
Permission to bring notes				2, 4, 5		2, 4, 5
Info presented in required format –			2, 8			

Assessment method Reasonable adjustment	Observation	Practical Skills Test	Test	Project	Presentation	Professional Discussion
size, font style, colour						
Individual testing			3, 4, 5			
Paper-based option			2, 4			
Supervised assessment taken at home			3, 4, 5, 6			
Written questions to back up verbal					2, 4, 5, 6	2, 4, 5, 6
Rewording of questions / clarification if needed					2, 3, 7	2, 3, 7
Time allowance for processing verbal questions					2, 4, 5, 7	2, 4, 5, 7
Information presented in small chunks					2, 4, 7	2, 4, 7