

Reasonable Adjustment Policy

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Reasonable Adjustment Policy

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Overview

Trinity College London ('Trinity') recognises that many people with a disability, face barriers to access and achievement. Any assessment should be a fair test of a learner's knowledge, skill and understanding. However, for some learners, the usual format of assessment may not be suitable.

Accordingly, Trinity is committed to the following aims in all that we do:

- Encouraging people with a disability, special educational needs or a health condition to declare their circumstances to us so that we can assist them appropriately
- Eliminating any discriminatory practices as far as possible
- Enabling individuals to demonstrate their knowledge, skills and understanding by removing unnecessary barriers
- Working with learners on an individual basis to understand the barriers they face as a result of their disability, special educational needs or health condition and to consider any reasonable adjustments they may need to enable them to take a Trinity assessment and be assured of a valid and fair outcome
- Ensuring the quality, validity, integrity, comparability and reliability of assessments is not compromised.

Purpose

The purpose of this Policy is to set out our commitment and approach to making reasonable adjustments to ensure that we do not discriminate either directly or indirectly against learners with a disability.

Scope

This Policy applies to all candidates taking Trinity qualifications and to all registered exam centres offering them.

Roles and Responsibilities

It is the responsibility of every individual working for or on behalf of Trinity to treat people with respect, regardless of their disability status, and to make a positive difference to disability equality and equity at Trinity.

This policy is reviewed on an ongoing basis by the General Counsel in consultation with the Executive Director of Quality and Standards and the Policy Management Group.

Definition of disability discrimination

Disability is defined 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' (Equality Act 2010).

Disability Discrimination is defined as:

‘Treating someone less favourably than someone else for a reason relating to disability. Discrimination can be direct, indirect or arise from the disability.’

Trinity recognises that disability is often the result of the attitudes and barriers created by others and can result in people with disabilities being disadvantaged. By adopting an accessible and inclusive approach, Trinity aims to make its services accessible to all.

Direct disability discrimination is treating someone less favourably than someone who does not have a disability. An example would be deciding that no visually impaired people can take certain exams.

Indirect disability discrimination is where there is a policy that applies in the same way for everybody but disadvantages people with a disability. For example, holding exams in a building without wheelchair access when an alternative venue is available. Indirect discrimination can sometimes be justified – if the organisation can show there was a good reason for applying the Policy despite the level of disadvantage to people with a disability and that this was proportionate. For example, a good reason would be that there were no appropriate wheelchair accessible venues available.

Discrimination arising from a disability is where someone is treated less favourably due to something related to their disability where this cannot be shown to be justified (i.e. there is not a good reason for the treatment or there is, but the treatment is not proportionate). An example of this type of discrimination might be not allowing a candidate with hearing loss to wear their hearing aids during an exam because there is a rule that candidates must not bring electronic equipment into the exam room with them.

The duty to make reasonable adjustments

The Equality Act 2010 requires centres and/or awarding organisations (as the case may be) to make reasonable adjustments where a learner with a disability would be at a substantial disadvantage in undertaking an assessment in comparison to learners who are not disabled.

As far as possible, Trinity will act in an anticipatory way – in that we will not wait until we are approached to ensure we are not discriminating against learners with a disability. We will aim to anticipate how our actions may be discriminatory and address these where possible at the earliest stage by completing a Disability Impact Assessment. We will make reasonable adjustments to ensure we remove any substantial disadvantage that people with a disability may face in accessing our qualifications, exams/assessments and any associated support materials and services.

What is a reasonable adjustment?

A Reasonable Adjustment is defined as:

‘An adjustment made to an assessment for a qualification so as to enable a disabled Learner to demonstrate his or her knowledge, skills and understanding to the levels of attainment required by the specification for that qualification.’ (Ofqual, General Conditions of Recognition 1 October 2020)

A learner does not necessarily have to have a disability (as defined by the Equality Act 2010) to be entitled to reasonable adjustments to assessment under this Policy. Every learner who has a disability will also not necessarily be entitled to or need an adjustment to assessment. The learner may have developed coping mechanisms which minimise or remove the need for reasonable adjustments.

A reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. They are made to an assessment for a qualification to enable a learner with a disability to demonstrate his or her knowledge, skills and understanding of the levels of attainment required by the specification for that qualification.

Reasonable adjustments are approved or set in place before the assessment activity takes place; they constitute an arrangement to give the learner access to the programme. The use of a reasonable adjustment will not be taken into consideration during the assessment of a learner's work.

How will we decide what is a reasonable adjustment?

In determining what is reasonable, Trinity will assess each individual circumstance as well as the cost implications, practicality and effectiveness of a proposed adjustment. Other factors, such as the need to maintain competence standards and health and safety, will also be taken into consideration.

Determining whether reasonable adjustments are required and the type of reasonable adjustment which may be put in place, will depend on:

- the specific assessment requirements of the qualification
- the type of assessment
- the needs and circumstances of the individual learner
- the effectiveness of the adjustment
- the cost of the adjustment
- how practical it is to make the adjustment and the disruption it may cause to us and others in making it; and
- the likely impact of the adjustment on the learner and any other learners.

Examples of reasonable adjustments we make

Trinity will endeavour to anticipate the type of reasonable adjustments that might be required to access our qualifications and assessments. However, there is no prescribed list of reasonable adjustments, and they will depend on:

- the individual's needs
- the barriers / difficulties the person is facing when accessing our qualifications and assessments
- what is reasonable for Trinity to provide.

Reasonable adjustments must not affect the integrity of the assessment. They may involve but are not limited to:

- revising usual assessment arrangements (e.g., extra time, rest breaks)
- adapting / modifying assessment materials (e.g., enlarged / braille tests)
- changing the format/ content of assessment (e.g., replacing visual/ aural elements)
- using assistive technology (e.g., word processors, hearing aid compatible technology)

Requesting reasonable adjustments

In most cases, Trinity will agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases, more time may be required to consider in more detail how best to

overcome the difficulty a disabled person is experiencing or seek advice from expert disability organisations that can assist.

Please note that if a learner chooses not to disclose a disability at all, this may limit the level and type of support Trinity can provide. It may not be possible to make reasonable adjustments on the day of the assessment and this may impact the outcome of the assessment for the learner.

A learner can submit a request for reasonable adjustments by completing the appropriate form (links below at Reference Documents) and sending this to trinity.csn@trinitycollege.co.uk.

Requests can also be submitted on a learner's behalf by any Trinity Registered Exam Centre.

Requests for face-to-face exams in Music, Rock & Pop, Speech and Drama, and English Language (except SELT), must be submitted no later than **28 working days** before the assessment.

Requests for SELT exams should be submitted a minimum of **2 working days** before the assessment date.

Requests for Digital Grades and Diplomas should be submitted **at the time of enrolment** (and must be before uploading the exam video).

We require evidence of need for any adjustments which could potentially give an advantage to any learners who do not need them, or which alter the content of the assessment. Evidence should be from a qualified medical or educational professional and should demonstrate how the learner's condition may affect access to the assessment in question. Trinity reserves the right to turn down requests for adjustments, or request additional evidence, if sufficient information is not provided.

Details of the most common reasonable adjustments for which evidence may be required

Access to buildings

Candidates who require any additional arrangements for access to the centre, such as wheelchair ramps, should notify their centre representative at the earliest opportunity. Additional time may be scheduled into the timetable between assessment to allow the candidate time to get to the exam room.

In some instances, it will not be possible to make adjustments to the exam venue. In these cases, Trinity will strive to find an alternative suitable venue.

Extra time for practical and written exams

This may be required for candidates where the evidence supplied indicates that additional time in an exam situation would be beneficial. The standard extra time allocation is 25%, although this may be increased (up to a maximum of 100%) in exceptional circumstances.

Printed materials

Candidates can request printed materials to be modified depending on their requirements.

Printed materials can be provided in enlarged format or printed on coloured paper. Materials may also be transcribed into braille (a minimum of 6 weeks' notice required).

Word Processors/Laptops

The use of a word processor or laptop (with spelling and grammar functions disabled) for written exams may be requested where the candidate has difficulty with handwriting. Evidential support must accompany the provision request when a word processor or laptop is required.

Scribe (Amanuensis)

A scribe can be requested for Music and Drama theory exams where the candidate requires someone to write down the answers as they dictate. This adjustment is not available for exams testing written English.

Readers

A reader can be requested for theory exams where the candidate requires someone to read the questions to them. This adjustment is not available for exams testing candidates' understanding of written English.

Sign language interpreters

A sign language interpreter can be requested during practical Music exams and for some aspects of Speech and Drama examinations. It is the responsibility of the candidate or centre to arrange the interpreter, and this must not be the candidate's teacher.

Sign language interpreters are not allowed for exams testing English language (apart from giving general instructions).

Informing the Examiner

Where no reasonable adjustments are required, candidates may request that the examiner is briefed about a candidate's condition so that they can be sensitive in the way they deliver the exam. The assessment criteria remain the same for all candidates.

Appeals

If the learner (or their representative) is not satisfied with the decision made by Trinity with regards to a reasonable adjustment request, the learner has the right to appeal. Any appeal must be submitted in writing to appeals@trinitycollege.co.uk with supporting evidence as appropriate.

While an appeal will be considered and concluded within 30 days of receipt, this may prevent the learner from sitting the exam on the chosen date.

Risks and consequences for Trinity

Breaches of this Policy may result in legal or regulatory action.

Notes

This policy is subject to review at the discretion of the Policy Management Group and/or as required by changes to legislation.

Change Control and Change History

The following changes have been made to this document:

Version	Date	Author	Change Summary
0.1	2019.01.22	Delivery Director	Reviewed
0.2	2022.09.07	Legal Team	Updated Policy
0.3	2023.03.07	Policy Management Group	Reviewed and Amended Policy
0.3	2024.04.03	Policy Management Group	Annual policy review. Minor changes made.

Change Approval

The changes to this document have been approved by the following personnel:

Version	Date	Approver
0.2	2022-09.08	General Counsel & Executive Director of Quality and Standards
0.3	2023-3-07	Policy Management Group
0.3	2024-04-03	Policy Management Group