

# **EPA FAIR ACCESS TO ASSESSMENT POLICY**

March 2021

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**(INSIDE COVER)**

<b>EPA Fair Access to Assessment Policy</b>	
<b>Applies to</b>	Employers, Training Providers, CMI Apprentices, CMI Staff and Associated Third Parties
<b>Effective from and replaces all previous versions prior to</b>	26/3/2021
<b>Owned by</b>	Awarding Body Team
<b>Reviewed and monitored by</b>	Senior Quality Manager (EPA) & Head of Awarding Body and Compliance
<b>Document Location</b>	Website & EPA Toolkit
<b>Review Frequency</b>	Annually

## Version Control

This is version 1 of the Chartered Management Institute (CMI) EPA Fair Access to Assessment Policy. This version replaces all previous ones, and it is each stakeholder's responsibility to ensure that all employees involved in the provision of CMI apprenticeships familiarise themselves with this version of the document.

This document is subject to revision and is maintained electronically. Electronic copies are version controlled. Printed copies are not subject to this control.

<b>History</b>			
<b>Page No.</b>	<b>Chapter Title</b>	<b>Amendments Made</b>	<b>Date Amended</b>
Whole Policy	Whole document	Thorough review and update	10/03/2021

# EPA Fair Access to Assessment Policy

## 1. Introduction

This procedure provides clear arrangements for making reasonable adjustments and for special considerations in relation to the end-point assessment for all apprenticeship standards that CMI is recognised to provide.

## 2. Purpose

The Equality Act (2010) requires End-Point Assessment Organisations (EPAOs) to make reasonable adjustments to ensure any apprentice who is disabled as defined in the Act (see next section) is not placed at a **substantial** disadvantage in comparison to apprentices who are not disabled.

End point assessment should be a fair test of an apprentice's knowledge, skills and behaviours; however, for some apprentices, the usual format of assessment may not be suitable. Therefore, some apprentices may require reasonable adjustments to allow them to access end point assessments fairly.

There are two ways in which access to fair assessment can be maintained:

- Reasonable adjustments – agreed before the assessment takes place; or
- Special considerations – applied post assessment.

A reasonable adjustment or special consideration is any action that helps to reduce the effect of a disability, temporary injury or difficulty that places the apprentice at a substantial disadvantage in the assessment situation.

Reasonable adjustments and/or special considerations should not give the apprentice an unfair advantage. The apprentice's result must reflect his or her achievement in the assessment and not necessarily their potential ability. Adjustments **must not** affect the integrity of what is being assessed.

The provision for reasonable adjustments and/or special consideration arrangements are made to ensure that apprentices receive recognition of their achievement so long as the equity, validity and reliability of the assessments can be assured. Such arrangements are not concessions to make assessments easier for apprentices, nor are they to give apprentices a head start.

All apprentices, regardless of their reasonable adjustment or special consideration, must still meet the minimum requirements to achieve their apprenticeship.

## 3. Reasonable Adjustments

EPAOs and partners are required by law to do what is 'reasonable' in terms of giving access. What is reasonable will depend on the individual circumstances, cost implications and the practicality and effectiveness of the adjustment. Other factors, such as the need to maintain competence standards and health and safety, will also be taken into consideration.

An adjustment will not be approved if it:

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

Each assessment will be subject to some variance due to job role, employment context and apprentice support needs, and should be adapted as necessary. The support needed for a particular person will be unique to that individual, and may not be listed as a need in the relevant category in the disability grouping framework, so flexibility is required. It is also important to remember that appropriate adjustments are likely to be a continuation of the additional support that the apprentice has received during their apprenticeship.

The outcome produced by the apprentice must 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.

IfATE provides guidance on reasonable adjustments for End Point Assessment, which includes a link to a helpful matrix for determining reasonable adjustment requirements. To access this, please use the following link:

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

#### 4. The Equality Act 2010 Definition of Disability

Generally, impairments that require reasonable adjustments have to meet the statutory requirements set out in section 6 and Schedule 1 to the Equality Act 2010 and associated regulations.

The Equality Act 2010 definition of disability is usually considered cumulatively in terms of:

- Identifying a physical or mental impairment;
- Looking into adverse effects and assessing which are substantial;
- Considering if substantial adverse effects are long term;
- Judging the impact of long term adverse effects on normal day to day activities.

Statutory guidance on the Equality Act 2010 definition of disability has been produced by the Office for Disability Issues (within the Department for Work and Pensions) to help better understand and apply this definition: <http://odi.dwp.gov.uk/docs/wor/new/ea-guide.pdf>

The clear starting point in the statutory guidance is that disability means '**limitations going beyond the normal differences in ability which may exist among people**'.

'**Substantial**' means 'more than minor or trivial'. Substantial adverse effects can be determined by looking at the effects on a person with the impairment, comparing those to a person without the impairment, to judge if the difference between the two is more than minor or trivial.

'**Long term**' means the impairment has existed for at least 12 months, or is likely to do so.

'**Normal day to day activities**' could be determined by reference to the illustrative, nonexhaustive list of factors in pages 47 to 51 of the statutory guidance relating to the Equality Act 2010. (Study and education related activities are included in the meaning of 'day to day' activities.)

The guidance from the Office for Disability Issues referred to above illustrates the factors which might reasonably be regarded as having a substantial adverse effect on normal day to day activities. Factors that might reasonably be expected not to have a substantial adverse effect are also provided.

Factors that might reasonably be expected to have a substantial adverse effect include:

- persistent and significant difficulty in reading and understanding written material where this is in the person's native language, for example because of a mental impairment, a learning difficulty or a sensory or multisensory impairment;
- persistent distractibility or difficulty concentrating;
- difficulty understanding or following simple verbal instructions;
- physical impairment – for example, difficulty operating a computer because of physical restrictions in using a keyboard.

Factors that might reasonably be expected not to have a substantial adverse effect include:

- minor problems with writing or spelling;
- inability to read very small or indistinct print without the aid of a magnifying glass;
- inability to converse orally in a language which is not the speaker's native spoken language.

Although many adjustment requests may be covered under the Equality Act 2010, Training Providers may also apply for adjustment where an Apprentice may be unfairly disadvantaged due to temporary illness or injury. The application process remains the same in these circumstances.

## **5. When is a Reasonable Adjustment or Special Consideration applied?**

**5.1 Reasonable adjustments** are approved or set in place **before** the assessment activity takes place; they constitute an arrangement to give the apprentice access to the assessment activity.

The reasonable adjustment will then be made to the assessment arrangements. The use of a reasonable adjustment will not be applied during the assessment of an apprentice's written work.

CMI must have approved all necessary reasonable adjustment arrangements before the time of the apprentice completing any end point assessments. Only reasonable adjustments that have been approved by CMI should be applied.

Reasonable adjustments must not affect the integrity of what needs to be assessed, but may involve:

- Changing usual assessment arrangements, for example allowing an apprentice extra time to complete the assessment activity.
- Adapting assessment materials, such as providing materials in Braille.
- Providing assistance during assessment, such as a sign language interpreter or a reader.
- Re-organising the assessment room, such as removing visual stimuli.
- Changing the assessment method, for example from a written assessment to a spoken assessment.
- Using assistive technology, such as screen reading or voice activated software.
- Providing the mechanism to have different colour backgrounds to screens for onscreen assessments or asking for permission for copying to different coloured paper for paper-based assessments.
- Providing and allowing different coloured transparencies with which to view examination papers.

**5.2 Special considerations** can be applied **after** an assessment if there is a reason the apprentice may have been disadvantaged during the assessment. Reasons for special consideration could be temporary illness, injury or adverse circumstances during the assessment.

Where an assessment requires a competence, criterion or standard to be fully met, it may not be possible to apply special considerations. It may be more appropriate to offer the apprentice an opportunity to retake the assessment at a later date.

## **5. How to request a Reasonable Adjustment or Special Consideration**

### **5.1 Reasonable Adjustments**

The Training Provider or Employer should liaise with the apprentice to identify any reasonable adjustment requirements that they may have as soon as possible after starting their apprenticeship.

The Training Provider or Employer should deem what is reasonable depending on the individual circumstances of the case, including how important the adjustment is, how practical it is, and the financial implications and effects on other resources.

The Training Provider or Employer must complete the form attached in **Annex 1** and upload this to Skillsure at 3 months prior to submitting the Gateway documentation and booking the Live Assessment. The training provider or employer is responsible for ensuring that the form clearly details the adjustments that are being requested and the reasons why. Evidence of the difficulty/disability will be required to support the application, along with evidence of any existing adjustments or additional support provided by the employer or training provider.

## 5.2 Special Considerations

Requests for a Special Consideration should be submitted within 5 working after the final element of end point assessment has concluded for that apprentice.

The Training Provider or Employer must complete the form attached in **Annex 2** and send this to [epa@managers.org.uk](mailto:epa@managers.org.uk) within 5 working days of the final element of end point assessment being completed. These forms will be logged and forwarded to the End Point Assessment Quality Manager (or their nominated deputy) for consideration and response. Each request will be considered individually based on the circumstances, and the end point assessment will automatically be selected for internal quality assurance so that it can be reviewed. A response will be provided within 15 working days after receipt of the request, and responses will be monitored and tracked by the EPA admin team.

## 6. Timescales

Reasonable Adjustments	<p>Training Providers or Employers are required to submit reasonable adjustment requests <b>3 months prior to gateway</b> by uploading the required ALN documentation to the apprentice's record in Skillsure. Any requests submitted outside of this time-frame may not be approved, or CMI may not be able to meet the requirements for planned assessment dates.</p> <p>Once a request for a reasonable adjustment is received, CMI will review the request and evidence provided within <b>10 working days</b> of it being received. Reasonable adjustments will not be approved until sufficient evidence is provided.</p>
Special Considerations	<p>To request a special consideration you should email <a href="mailto:epa@managers.org.uk">epa@managers.org.uk</a> within 5 working days after the completion of the final element of end point assessment for that apprentice.</p> <p>Once a request for a special consideration is received, CMI will review the request and evidence provided within <b>15 working days</b> of it being received. Special consideration(s) will not be approved until sufficient evidence is provided.</p>

## 7. Appeals

If a Training Provider or Employer remains dissatisfied following the outcome of a request that has been submitted, they may submit an appeal in line with our EPA Enquiries and Appeals Policy. Please contact the Awarding Body Team at [epa.absupport@managers.org.uk](mailto:epa.absupport@managers.org.uk) for additional information.

## 8. Policy Review Arrangements

We will review this policy annually as part of our self-evaluation arrangements and revise it in line with any feedback from customers, learners, regulatory authorities or external agencies, or changes in our practices.

## 9. Contact Us

If you have any queries about the contents of the policy, please contact our Awarding Body Team via email at [epa.absupport@managers.org.uk](mailto:epa.absupport@managers.org.uk) or via post to:



## Annex 1 - Application For Reasonable Adjustment Form

This form must be completed by the Training Provider when requesting any Reasonable Adjustment at EPA to CMI.

<b>APPRENTICE NAME:</b>	
<b>ULN:</b>	
<b>APPRENTICESHIP STANDARD TITLE:</b>	
<b>TRAINING PROVIDER NAME:</b>	
<b>CONTACT NAME:</b>	
<b>CONTACT ADDRESS:</b>	
<b>CONTACT NUMBER:</b>	
<b>CONTACT EMAIL:</b>	
<b>IS THE APPRENTICE ALSO COMPLETING A CMI QUALIFICATION IF SO, PLEASE ADVISE QUALIFICATION TITLE AND LEVEL:</b>	
<b>WHAT REASONABLE ADJUSTMENTS HAVE BEEN MADE DURING THE APPRENTICE'S ON-PROGRAMME ACTIVITIES:</b>	
<b><i>THE BELOW SECTION IS TO BE COMPLETED BY CMI</i></b>	
<b><i>DATE RECEIVED BY CMI</i></b>	
<b><i>PROPOSED GATEWAY AND/OR LIVE ASSESSMENT DATE(S):</i></b>	
<b><i>REASONABLE ADJUSTMENTS AGREED:</i></b>	
<b><i>ADVISED TO TRAINING PROVIDER:</i></b>	

**Training/ Employer Providers** - Please ensure that all supporting documents/evidence is attached when submitting the application.

Please upload this form to the apprentice's record in Skillsure, using the ALN Upload button, 3 months prior to submitting the Gateway documentation.

## Annex 2 - Application For Special Consideration Form

This form must be completed by the Training Provider when making any requests to CMI for special consideration, following the conclusion of an apprentice's End Point Assessment.

<b>APPRENTICE NAME:</b>	
<b>ULN:</b>	
<b>APPRENTICESHIP STANDARD TITLE:</b>	
<b>TRAINING PROVIDER NAME:</b>	
<b>CONTACT NAME:</b>	
<b>CONTACT ADDRESS:</b>	
<b>CONTACT NUMBER:</b>	
<b>CONTACT EMAIL:</b>	
<b>PLEASE ADVISE THE CIRCUMSTANCES AND REASON FOR THE REQUEST FOR SPECIAL CONSIDERATION:</b>	
<b><i>THE BELOW SECTION WILL BE COMPLETED BY CMI</i></b>	
<b><i>DATE RECEIVED BY CMI</i></b>	
<b><i>LIVE ASSESSMENT DATE:</i></b>	
<b><i>SPECIAL CONSIDERATION AGREED:</i></b>	
<b><i>ADVISED TO TRAINING PROVIDER:</i></b>	

**Training/ Employer Providers** - Please ensure that all supporting documents/evidence is attached when submitting the application.

Please submit to: [epa@managers.org.uk](mailto:epa@managers.org.uk)

Every effort has been made to ensure that the information contained within this policy is true and correct at the time of publication. However, CMI products and services are subject to continuous development and improvement and the right is reserved to change products and services from time to time. CMI cannot accept responsibility for any loss or damage arising from the use of the information in this policy.

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