



Reasonable Adjustments- Additional Guidance

Contents

Introduction.....	2
1. Changes to Assessment Conditions.....	4
Extra time.....	4
Supervised rest breaks	4
Change in the organisation of the assessment room or assessment environment	5
Separate accommodation for assessment	5
Taking the assessment at an alternative venue.....	5
2. Use of Mechanical, Electronic and Technological Aids	6
Use of coloured overlays, low vision aids, tinted spectacles, CCTV and OCR scanners	6
Use of assistive technology, for example speech/screen reading software and voice activated software	6
Use of bilingual dictionaries or bilingual translation dictionaries (manual or electronic)	7
3. Modifications to the Presentation of the Assessment Material.....	8
Assessment material in enlarged format for paper-based assessments	8
On-screen assessments	8
Assessment material in Braille.....	9
Language modified assessment material	9
Assessment material in BSL (British Sign Language)	10
Assessment material on coloured paper	10
On-screen assessments	10
Assessment material in audio format	10
4. Alternative Ways of Presenting Apprentice/Learner Responses.....	11
Use of ICT to present responses.....	11
Spoken responses using electronic recording devices	12
Responses in BSL	12
Responses in Braille.....	13
5. Use of Access Facilitators.....	14
Reader	14
General guidance for readers in a test environment	15
Use of Access Facilitators as a Reader- use of an automated screen reader- EPA	15

Scribe (sometimes called amanuensis)	16
General guidance for scribes during tests	17
British Sign Language (BSL)/English interpreter	17
General guidance for BSL/English Interpreters during tests	19
General guidance for Prompters during tests	20
Practical Assistant	21
General guidance for Practical Assistants during assessments	21
Personal support worker in attendance	22
General guidance for Personal Support Workers during assessments:	22
Transcriber	23
General guidance for Transcribers	23

Introduction

Professional Assessment Ltd (PAL) has provided this additional guidance for providers, employers, and apprentices in respect of complex reasonable adjustments and their application.

This guidance should be read in conjunction with PAL’s policy, to include the identification of support needs and the information PAL will require to review and process any application.

All reasonable adjustment requests must be supported by evidence which is sufficient, valid, and reliable. Requests may not be accepted without confirmation of the appropriate supporting evidence, which includes how the third party or centre has made the appropriate provisions for the learner/apprentice.

It is the responsibility of all parties to ensure that all applications for reasonable adjustments (RA) are based on the **current** individual needs of the Learner/ Apprentice. It is expected that the Provider will act on behalf of the employer and apprentice in making any such requests regarding EPA.

It is the responsibility of the Centre to ensure that all applications for reasonable adjustments (RA) are based on the learner’s needs.

In all cases a RA request should reflect current needs of the individual learner or apprentice and whilst historical evidence of needs are important evidence, PAL will ask what the contemporary needs of the Learner/Apprentice are to ensure any approved adjustment is valid and relevant for the individual concerned.

The Provider in conjunction with the employer and in consultation with the apprentice/learner should decide which of the following supporting evidence will best assist understanding of the Learner/ Apprentice’s situation:

- An assessment of the Learner /Apprentice’s needs in relation to the relevant assessment, made by the third party and/or Centre by the relevant member of staff with competence and responsibility in this area; staff include learning support staff, trainers, assessors, and other specialist staff
- History of provision during the on-programme delivery of the apprenticeship or qualification
- Written evidence produced by independent, authoritative specialists, that is reflective of the apprentice/ learner current needs and requirements

It is incumbent on the individual or individuals making any request for a reasonable adjustment for an end-point assessment activity or qualification programme that they are familiar with the apprenticeship standard and assessment plan, and/or the relevant qualification requirements the request relates to. Equally PAL recommends that all viable options in respect of reasonable adjustments are looked at, to ensure the most appropriate and beneficial adjustment is chosen. For example, asking to extend a 4-hour practical observation by another hour may not help the apprentice, particularly where the assessment plan, allows the observation to be split over two assessment periods due to the nature of the work. Likewise extending the duration time for a test forming part of a qualification assessment may be counter-productive for some learners.

If the request relates to a time extension for a test, to support cognitive processing and confidence, PAL will ask for evidence that the apprentice has required the extra time in sample/practice test assessments, to ensure the awarding of such an adjustment is equitable and fair to the apprentice concerned and does not provide them with an added advantage over other apprentices taking the assessment in the standard permitted time. Equally in some cases requesting a time extension for an assessment may disadvantage an apprentice who has ADHD.

This guide does note the lead in time we ideally require to consider and apply any reasonable adjustments for end-point assessment, we prefer such requests are made around three months before the planned gateway date, however PAL will always look to support any reasonable request, at whatever point we receive such a request. Late requests i.e., requests made post the gateway meeting or at the assessment planning meeting, may delay or prolong the assessment schedule, to secure the adjustments requested. For Centres offering PAL qualifications we ideally expect such notifications to be made on registration but accept some learner requirements may be identified over the programme duration, in all cases we request the centre provides PAL with notification of such requests, as detailed in this guide.

The list of Reasonable Adjustments (RA) is organised under the following headings:

1. Changes to assessment conditions.
2. Use of mechanical, electronic, and technological aids.
3. Modifications to presentation of assessment material.
4. Alternative ways of presenting responses.
5. Use of access facilitators.

1. Changes to Assessment Conditions

Extra time

Where assessment activities are time constrained, an apprentice/learner may be allowed extra time during an assessment if he/she has a condition which affects the speed of processing. In the case of externally set and externally marked assessments or qualifications PAL will need notification of such a request, ideally three months before the planned gateway for apprentices /test date for qualifications and at the very latest make the request at the gateway meeting and or test booking for qualifications, allowing 7 days' notice and provide the necessary information as directed in PAL's policy and RA application process.

The amount of extra time allowed should accurately reflect the extent to which the completion of the assessment/test will be affected by the apprentice's/learner's difficulty. **'Unlimited' extra time will not be allowed.** It is the responsibility of the applicant (typically the Centre or Third-Party Provider or College) to specify the amount of extra time the apprentice/learner will need, using as a guide the extra time required during practice assessments/tests undertaken as part of the on-programme delivery and support.

Extra time will not be allowed for computer-based assessments testing the time in which a skill is performed, such as keyboarding speed tests. Extra time may, however, be available for those computers-based assessments where the manipulation of software, and not processing speed, is the primary aim of the assessment.

Extra time for online assessments will have to be customised on the testing platform for each apprentice/learner.

Before PAL allows extra time for the Apprentice/learner, PAL requires confirmation that the apprentice /learner can cope with the content of the apprenticeship standard/qualification and that the individual concerned is medically fit to undertake the extended assessment/test.

Extra time will not be allowed in practical activities where the timing is a crucial part of the assessment or in group activities where the learner's performance will be assessed in conjunction with others.

Supervised rest breaks

Where assessment activities are time constrained, an apprentice may, if there is a demonstrated need, be allowed supervised rest breaks during an assessment. A request for breaks must be made in advance and for remote assessments the sign off for any arrangements must be made by the relevant quality manager.

Supervised rest breaks may be taken either in or outside the assessment environment, however the apprentice/learner must be supervised at all times. It is recommended that where supervised breaks are required, remote testing and /or assessment is not ideal and should be avoided wherever possible. If remote assessment is deployed PAL will need to be satisfied that plans for such breaks include how the apprentice/learner will be supervised, and appropriate assessment conditions are maintained.¹ The duration of the breaks will not be deducted from the assessment time. All parties must be aware that, during the supervised rest breaks, the learner/ apprentice is still under assessment conditions and that the usual regulations governing conduct of assessments will apply during this time.

Rest breaks are not applicable where speed or time is a component of what is being assessed, although, if there is a natural break in the assessment, i.e., between tasks, supervised rest breaks can be allowed.

For online test assessments, RA applications will need to confirm with PAL whether the time for rest breaks must be built into the extra time requested for the assessment. This will be necessary if the test runs continuously on the

¹ Rest break requirements should be discussed and approved by PAL

system. The system must also be supervised during the break to ensure that no one else can interfere with the learner's apprentice's test during the break.

Change in the organisation of the assessment room or assessment environment

Minor changes to the organisation of the assessment room may benefit some apprentices/learners with autistic spectrum disorder, with visual or hearing impairment or with physical difficulties. Required changes to the assessment environment must be notified and approved by PAL and they must be made in advance of the planned assessment /testing activity. Failure to notify PAL may result in a non-valid assessment and could invoke sanctions.

Visually impaired apprentices may benefit from sitting near a window so that they have good lighting, in respect of tests, presentations and skills challenges.

Deaf apprentices may find F2F assessments a better option for any oral based assessments.

Autistic learners may benefit from having visual/noise stimuli, such as a ticking clock, removed from the room.

Additionally for sedentary assessments, things to consider and apply for, are to ensure that the Apprentice/learner has access to the appropriate desk and chair and screen and keyboard and mouse options, such equipment, PAL would expect to be provided by the relevant third party or Centre.

Separate accommodation for assessment

It may be necessary to accommodate the learner/apprentice separately if they are using readers, scribes, BSL/English interpreters, or word processing equipment that may disturb other apprentices. In nearly all cases of apprentices undertaking EPA with PAL, the individual nature of each assessment means such an arrangement is not necessary, however if required, PAL requires an application, three months before the planned gateway date. For Centres they should advise PAL prior to the assessment of any such arrangement, PAL reserves the right to review such arrangements as part of our EQA and CASS activities.

Taking the assessment at an alternative venue

In certain circumstances the apprentice/learner may be permitted to take an assessment at an alternative venue, for example at home or in hospital. In the case of end-point assessments, PAL will require three months² notice, prior to the planned gateway date of such assessments for EPA activities. Centres requesting alternative venues need to provide a minimum of 7 days' notice regarding alternative arrangements. The exception would be if an alternative venue is required because the original assessment venue is deemed unsafe, unsuitable, closed down or non-operational for example due to extensive maintenance works. Alternative venues can be deployed for assessments that include professional discussions; tests; presentations; competency-based interviews and oral question and answer sessions.

Requests for an alternative venue for observations that are designed to capture natural performance over an extended time period and covering a range of KSBs in the case of apprenticeship standards or learning outcomes and assessment criteria in the case of qualifications need to specify why an alternative venue is required and how the apprentice/learner can replicate natural performance in an authentic and fair fashion.

It is the responsibility of the provider, Centre and employer where applicable, as well as the apprentice or learner, ensure arrangements are satisfactory and PAL reserves the right to review arrangements and cancel assessments either by our own assessors in the case of EPA, or Centre personnel for qualifications where the arrangements are deemed unsatisfactory and not conducive for safe and valid assessment. It is the responsibility of relevant third party

² Note we recognise such a request could be a result of a recent change of circumstances, and such a request may not always fit neatly into three months in advance time period

or Centre personnel in addition to the individual apprentice/learner to ensure that the apprentice/learner is medically (physically and mentally) fit to take the assessment.

Third parties working with PAL as an EPAO should advise PAL's EPA Support Services Team of any venue changes and Centres should advise the Awarding Organisation Support Services team. This can be done via PAL's freephone the caller must provide the following details:

- Name of organisation and apprentice/learner(s) affected
- Location of original venue
- Contact details of new venue
- Reasons for change

Alternatively, PAL can be contacted via email through provided email addresses for such incidents.

Failure to advise PAL of these changes in a timely manner may result in EPA/EQA cancellations and cancellation charges or the voiding of assessments or results.

2. Use of Mechanical, Electronic and Technological Aids

Use of coloured overlays, low vision aids, tinted spectacles, CCTV and OCR scanners

Third parties and Centres should ensure that the apprentice/learner has had sufficient practice in the use of these aids and that any electronic aids are in good working order.

For assessments taken under examination and synoptic assessment conditions, the apprentice must be assessed and/or invigilated on a 1:1 basis, which is standard practice for PAL. PAL in these circumstances will ensure that the assessor undertaking the invigilation is trained to use such aids, alternatively PAL will allow the support from the Provider/Employer in respect of supporting any assistance, with PAL providing invigilation.

PAL will want to discuss with relevant parties if any new technology will unfairly advantage the apprentice or invalidate the assessment requirements, in advance of the assessment. In the case of end-point assessments, any application for such an adjustment will need to be made to PAL within three months of the planned gateway meeting.

Centres should contact PAL to advise of any such assessment amendments and modification in advance of the planned assessment or examination. PAL's quality team will require confirmation of assessment and invigilation arrangements.

Use of assistive technology, for example speech/screen reading software and voice activated software

Some apprentices or learners may benefit from the use of software that reads the assessment material to them and records their spoken responses. Speech software may not be allowed for qualifications/apprenticeship standards where reading is the competence being assessed. In vocational areas, such software may be used to allow apprentices/learners to have access to assessments that are appropriate for them and enable them to show their proficiency. PAL will consider any such application on an individual basis and will for apprentices review the assessment plan and job role requirements, in respect of what is expected from the occupational sector, in terms of role and business requirements. PAL will need to ensure that the use of assistive technology will not invalidate the assessment requirements or give the apprentice an unfair advantage.

For qualifications PAL will work with the Centre making the request to ensure that the adjustment is in line with the qualification's assessment strategy and specification and does not provide any advantage or disadvantage to the individual learner or other learners who do not require assistive technology to support their assessment.

Due to the rapid development of such technology, it is important that all parties enter into a dialogue with PAL to establish: the basis of the request; its impact on validity and reliability of assessment activities and outcomes; how it fairly secures the desired proficiency outcomes of the apprenticeship standard or qualification and if PAL approves the request we will want a record of the use of the application of specific software and what supervisory arrangements are in place for the duration of the assessment.

It should be noted that the use of such software may introduce a hidden assessment/testing agenda, in that the apprentice or learner has to master the use of the software in addition to undertaking the assessment and this may lead to additional pressure on them and make the assessment more challenging. Centres and/or Third parties when applying for such an adjustment should also consider whether the apprentice or learner will also require extra time to complete the assessment, because of the need to master the additional software application.

In the case of end-point assessments, PAL will expect any such requests for the use of such technology to be lodged with PAL at least three months before the gateway planning meeting, this lead in time is required to ensure all parties can establish and agree the best support arrangements; ensure that the application of any technology is fair and equitable and commensurate with the assessment plan requirements. Centres ideally should provide the same notice to PAL's awarding organisation support services and PAL's quality team may wish to discuss the arrangements directly with the Centre. PAL believes three months' notice for the application of assistive technology is fair, as the Centre should be aware of the learner's needs early on in their programme of learning. For short courses, PAL can work with shorter notice periods, but as a minimum 7 days' notice should be given to PAL.

For some apprentices and learners screen readers can be highly beneficial, however some apprentices or learners may find the use of a screen reader hinders their ability to concentrate and therefore can disadvantage them. PAL expects third parties and Centres to carefully consider all of the implications of deploying or requesting the use of assistive technology for their apprentices or learners.

Use of bilingual dictionaries or bilingual translation dictionaries (manual or electronic)

The use of bilingual dictionaries and bilingual translation dictionaries (including BSL/English dictionaries/glossaries) can be allowed in all vocational assessments unless its use is expressly forbidden by the assessment requirements. In respect of the apprenticeship standards and assessment plans, there is an implicit expectation in respect of role competency that the apprentice is able to effectively communicate in English. The General Conditions of Recognition from Ofqual (G2) provides further guidance that instructs an EPAO in the permissibility of bi-lingual dictionaries.

Any request for the use of such dictionaries needs to ensure that the apprentice is able to meet the full range of KSBs of the standard and is able to use any technical language that is typically attributed to the role they are working in.

For timed assessments, if PAL is satisfied by the evidence provided that the apprentice could cope with the subject content, but the learner's knowledge and comprehension of English, impairs his/her ability to complete the assessment within the normal time allocated, an additional allowance of extra time may be permitted, but as previously stated, there is a requirement that all apprenticeship end-point assessments are conducted in English.

PAL will require, as part of the assessment/invigilation process, a check that the dictionaries used by the apprentice do not contain notes that would give the apprentice an unfair advantage. Where permission is given to use electronic dictionaries, PAL will check that the equipment does not contain additional functionality that will give the apprentice an unfair advantage. If such functionality is present, it must be disabled, or the equipment disallowed. In test invigilation, where such a request has been made and granted for the use of bilingual dictionaries, PAL will act as the invigilator, unless there are such exceptional circumstances, that we need to use or confer centre status on a provider or employer.

PAL will require notification of any request for a bilingual dictionary, ideally will require three months prior to gateway and if this is not possible, such requests must be made available as part of the gateway submission.

Centres should contact PAL's Quality Team and refer to the relevant qualification specification regarding the use of bilingual dictionaries or translations. Centres will need to demonstrate that the learner is capable of using any technical language associated with the qualification and meet the same burden of proof as described for an apprentice undertaking EPA. PAL will require assurance, that the invigilation checks as described above are undertaken by the Centre and as with any application of reasonable adjustments, EQA and CASS activities may request or require the Centre to make available any associated records that supported the need for the specific reasonable adjustments.

3. Modifications to the Presentation of the Assessment Material

Assessment material in enlarged format for paper-based assessments

For paper-based assessments, enlargements of fonts, graphs and diagrams can be requested, examples of permissible requests include:

- Unmodified enlarged papers where the standard paper is photocopied from A4 to A3, thus enlarging the whole paper and retaining the original layout and visual presentation.
- Modified enlarged paper where the paper is modified by simplifying the layout and where necessary reducing the content while still meeting the same objectives as those tested in the original paper.

Where such requests are made to PAL for EPA, PAL expects such requests to be made three months before the planned gateway meeting, or at the gateway meeting at the very latest. PAL will be responsible for the modification of any paper-based assessment. Wherever practicable PAL will undertake the invigilation and deployment of paper-based assessments and thereby ensure security of such materials. Providers and employers are not permitted under any circumstances, to make modifications to assessment materials, however if it is not possible for PAL personnel to act as an invigilator for paper-based assessments, an employer or provider, (subject to centre status approval and invigilation checks and declarations being satisfactory) may invigilate paper-based assessments, assuming responsibility for the papers, while in their possession. Note PAL's preferred option, is for PAL personnel to act as an invigilator.

It must be noted that assessment material containing scale diagrams cannot be enlarged, for EPA or qualification assessment activities.

PAL will require evidence that apprentices during any formative assessment activities, have had to have access to modified paper-based assessments and where this is the case, any application should provide PAL with the types of modifications and how the apprentice responded to such modifications and the difference such modifications made to the on-programme, formative assessment outcome.

Centres wishing to modify the presentation of assessment material should discuss the requirement with the PAL quality team before implementing such modifications. PAL reserves the right to request sight of the modifications and will wish to see documentary evidence that supports the rationale for the modification.

On-screen assessments

If the default font and text size used for an on-screen assessment is not suitable for the apprentice, screen magnification software programmes may provide an option to magnify the text to a suitable size. Advanced screen magnification software programmes provide options to change colours and fonts.

Assessment material in Braille

Assessment material may be provided in Braille for a blind or visually impaired learner. The material will be modified to remove any visual content prior to Braille. Diagrams in the assessment material can be produced as tactile diagrams.

In the case of end-point assessments, PAL would wish to be notified of such requirements at the apprentice's programme commencement³, to ensure all appropriate arrangements organised, are familiar to and suitable for the apprentice concerned. Additionally, PAL will wish to know how the apprentice has been supported on-programme and how they have performed in practice assessments, where such interventions have been deployed.

If Braille assessment material has been ordered, but is no longer required, the Provider on behalf of the apprentice and employer should notify PAL immediately as any costs incurred in producing such material may be passed to the Provider or employer as legitimate, eligible but extra costs, not catered for in the basic end-point assessment fees.

In the case of qualifications, the Centre should advise PAL at learner registration, if braille assessment materials are required and PAL will want to discuss programme delivery and assessment arrangements with the Head of Centre and relevant Centre personnel before ratifying such a request.

Braille is not always an appropriate adjustment for the learner, not all blind people are fluent in Braille.

Language modified assessment material

The carrier language⁴ in assessment material may be modified for a deaf apprentice whose first language is either English or British Sign Language (BSL). In either case, the apprentice's or learner's English may be limited and modified assessment material may be necessary. BSL is a language in its own right and has its own grammar, syntax and vocabulary and written assessment material will have to be modified for most deaf learners for whom BSL is their first language.

Technical language may not be modified. The modified version of the assessment material must contain the same questions/information/descriptions as the standard version and the same answers or task requirements will be expected from the apprentice.

In assessments that involve listening, such as interviews, oral question and answer sessions and professional discussions, a transcript of the test may be provided, which can be read to the apprentice or learner by a live speaker. This will enable the apprentice/learner to lip-read the text.

In the case of end-point assessments, the provider representing the apprentice should request such an adjustment, no later than three months prior to the planned gateway meeting. PAL will need to agree arrangements, regarding the location of assessment and experience and relationship of the speaker to the apprentice. Additionally, PAL will wish to know how the apprentice has been supported on-programme and how they have performed in practice assessments, where such interventions have been deployed.

In the case of qualifications, the Centre should ideally submit their request for this type of modification at the point of learner registration and PAL will want to discuss programme delivery and assessment arrangements with the Head of Centre and relevant Centre personnel before ratifying such a request.

³ The longer lead in time here is requested to ensure all aspects of any adjustments of assessment are appropriate

⁴ The language communication used by the EPAO to set an assessment task or test (which may not be the first/preferred language of the Apprentice)

Assessment material in BSL (British Sign Language)

If it is the situation either in end-point assessment that PAL and or the Provider representing the apprentice cannot access a BSL/English interpreter for the assessment, and in the case of qualifications the Centre is unable to access an interpreter and likewise PAL cannot allocate a suitable interpreter and if language modified assessment material does not provide sufficient assistance, a BSL version of assessment material may be provided as a digital visual recording instead of (or in addition to) the assessment material in written English. This facility may not be permitted for assessments where reading or listening is the competence being assessed or is fundamental to performing the job role the apprentice is undertaking.

In the case of end-point assessments, the provider representing the apprentice should request such an adjustment, no later than three months prior to the planned gateway meeting. PAL will need to agree arrangements, regarding the location of assessment and experience and relationship of the speaker to the apprentice. Additionally, PAL will wish to know how the apprentice has been supported on-programme and how they have performed in practice assessments, where such interventions have been deployed.

In the case of qualifications, the Centre should ideally submit their request for this type of modification at the point of learner registration and PAL will want to discuss programme delivery and assessment arrangements with the Head of Centre and relevant Centre personnel before ratifying such a request.

Assessment material on coloured paper

In the case of end-point assessment, PAL will need to be advised of this request, ideally three months prior to the planned gateway meeting and no later than the gateway meeting. PAL will enquire as to how this adjustment has been used and supported the apprentice during their on-programme training.

PAL personnel in most cases will undertake any 'invigilation' if the adjustment request is related to a paper-based test. If PAL has centre arrangements with a provider and employer and the appropriate declarations and agreements have been set, the invigilation may be undertaken by the provider or employer.

For Centres delivering PAL qualifications the Centre should ideally submit their request for this type of modification ideally within three months before assessment and as a minimum PAL will require 7 days' notice. PAL reserves the right to request records to confirm the need for such an adjustment and access to the assessment materials either prior to the assessment or as part of an EQA field visit.

On-screen assessments

It may be possible to provide a screen background in a colour that is suited to the apprentice's/ learner's needs, as with assessment materials on coloured paper, PAL requires the same timelines for notification. Note this is not the case with many automated screen readers, however the options of selecting voices and moderating the speed of talking, as well as replay functions gives the apprentice a degree of control in the assessment.

Assessment material in audio format

Where there is evidence of need, assessment material may be provided in audio format. PAL will need information regarding precisely what the need is, how such interventions have been used in practice assessments and confirmation that this adjustment does not detract from the apprentice/learner demonstrating the required competence.

This facility cannot be used if reading is the competence being assessed or if the assessment material has visual content that is crucial to the understanding of the questions, such as illustrations, tables, diagrams, or sketches.

In the case of end-point assessments, the provider representing the apprentice should request such an adjustment, no later than three months prior to the planned gateway meeting. For Centres delivering PAL qualifications typically PAL would expect notification of such adjustments at learner registration and no later than three months before the assessment, such adjustments cannot be applied without approval from the PAL Quality team.

4. Alternative Ways of Presenting Apprentice/Learner Responses

An Apprentice or Learner should be provided with the means to present their responses by the method most appropriate and familiar to them, as long as the use of methods will not invalidate the requirements of the assessment for the named apprenticeship or qualification. The use of ICT is generally perceived to have a positive impact on helping learners to access assessments. The guidance given below relates to the use of ICT in written assessments. ICT is typically used for portfolio compilation and project and presentation work. In respect of written work with word counts, the use of other presentation methods such as podcasts for example will need to be discussed with PAL to confirm if such alternatives are congruent to the requirements of the specific assessment plan and standards and in line with industry/sector practices and /or qualification. Third parties can discuss such arrangements with PAL at any stage between registration of the apprentice, to the gateway and in some circumstances, the assessment planning meeting can be used to discuss any additional requests. It is important to note the Independent Assessor is not in a position to approve such adjustments, all requests for reasonable adjustments are reviewed by the EPA PAL Quality team.

Centres should discuss options for alternative ways of presenting assessment with the PAL Quality team prior to implementing any alternatives. As with any request PAL will want to understand the reason and benefits for the request and how the Centre will ensure any evidence meets the threshold of validity, currency, authenticity and reliability and sufficiency. Reasonable adjustment requests and activities will be closely sampled via PAL's CASS and EQA activities.

Use of ICT to present responses

The use of ICT in this context should be taken to include word processors, personal computers (PCs) and other microprocessor-controlled devices producing output in text or other forms such as graphics and diagrams.

For many apprentices and learners with additional support needs, computers provide an effective means of independent communication. Consideration should be given to whether the apprentice can meet the assessment criteria using a computer.

A computer should only be used if it is appropriate to the apprentice's/learner's needs and if the apprentice/learner is confident in its use, can use it effectively and if it reflects his / her normal way of working/learning/studying. ICT skills and the ability to use appropriate technology are increasingly essential life and employability skills so in most cases PAL will encourage all learners and apprentices to have appropriate development of such skills in their programme of learning.

Written work can be hand-written, such as a portfolio or work log such and there is no explicit requirement for the portfolio to be in an electronic format, PAL will accept such submissions.

In the case of using ICT to present written responses to questions in a test environment, where typically the apprentice would be expected to handwrite such responses, a request to use ICT should be made to PAL, three months before the planned gateway date. Centres with similar requests for their learners should make their request to the PAL Quality team for approval, requests for such an amendment ideally should be made three months in advance of the actual planned test and as a minimum 7 days in advance of the test.

When a computer is used, other than as a basic word processor, PAL will need to consider the effect and appropriateness of facilities like spell-checkers, electronic dictionaries, thesauri, calculators, predictive software, AI etc. that are available and check any specific instructions associated with the apprenticeship standard assessment plan in respect of EPA. For qualifications PAL will wish to establish with the Centre that the learner does not have access to any external resources that could unfairly assess them with the assessment.

The use of the computer should not create a misleading impression of the apprentice's or learner's attainment or confer an unfair advantage over other apprentices or learners.

In regard to IT based assistive technology PAL will check in the case of EPA with the Training Provider and Employer to ensure that workstations are adapted for the needs of the apprentice and that enabling technologies, (for example screen reading software, coloured background, adapted keyboard, large tracker ball mouse, sticky keys) are available. Additionally, PAL will wish to establish how any support using such resources have been deployed during the on-programme delivery and how these interventions have assisted the apprentice in meeting the required KSBs.

In respect of qualifications PAL's Quality team will want to check that the Centre can accommodate the above and PAL may also use Centre approval visits and EQA visits to review and monitor such arrangements, to ensure agreed arrangements are being maintained.

Spoken responses using electronic recording devices

Spoken responses digitally recorded, this can include recorded webinars, podcasts, or audio recordings, securely stored and shared with PAL. PAL will need to have evidence of why this form of presenting evidence is required, over the stated assessment methodology described in the relevant apprenticeship standard assessment plan. PAL will also want to confer that deploying such an assessment method is compatible with the apprentice's role requirements and does not prevent any KSBs being achieved.

In the case of end-point assessment, PAL will require notification of such an adjustment request, three months before the planned gateway date. This arrangement will only be available for assessments where there is no requirement for the apprentice to produce visual material.

For Centres wishing to apply and deploy this mode of assessment recording with a PAL qualification, they will need to make the request to the PAL Quality team for approval. Such requests should be made ideally three months before the planned use and as a minimum 7 days before the assessment.

It is important to note that with apprenticeship standards, PAL assessors undertake the assessment, so they are responsible for the correct implementation and their assessment activities are quality assured by PAL's EPA Quality assurance team.

For Centres dependent on the CASS for the qualification and the risk rating assigned to the Centre in addition to providing approval, PAL's Quality team, via the assigned EQA may wish to review assessment approaches and application of reasonable adjustments in situ and typically where Ras have been applied, they will form part of an EQA sample. Centres should not undertake reasonable adjustments without notification and approval from PAL.

Late notification of reasonable adjustment requests or persistent use of the minimum lead in time may be questioned by the PAL Quality team and could result in additional charged EQA visits and Centre scrutiny.

Responses in BSL

Where there is evidence of need, the apprentice/learner may be allowed to sign their responses to questions.

In the case of end-point assessment, PAL will require notification of such an adjustment request, three months before the planned gateway date. For learners undertaking qualifications with PAL, we would expect to receive this

information at learner registration and PAL's Quality Team will wish to discuss what arrangements the Centre has prior to finalising our approval for such an adjustment.

Signing of responses should not be permitted if the ability to write or speak English is being assessed and is intrinsic to job role performance unless specifically allowed by the qualification/apprenticeship standard.

An apprentice or learner can sign full responses in BSL. Where the apprentice is required to show knowledge of an expression / name in their response, this must be finger-spelt. PAL will record the assessment and provide a written transcript based on the signer's communication of the apprentice's responses for apprentices undertaking EPA. For learners undertaking qualifications we will expect the Centre to make similar arrangements and such as assessment will be subject to EQA scrutiny as part of our CASS

PAL will plan for the use of a signer, and PAL will establish the details of the signer in advance of the assessment, such details will include name of signer; relationship/knowledge of the apprentice and subject matter and confirmation of expertise. The signer will be subject to PAL's conflict of interest and confidentiality policies and arrangements. PAL will ensure that the signer is appraised of the assessment requirements and conditions.

If PAL commissions the signer, additional assessment costs will be passed to the provider and /or employer.

Centres will need to provide PAL's Quality team of the same details PAL collects for EPA activities and we expect the signer to be subject to the Centre's conflict of interest and confidentiality policies and arrangements. The Centre must advise PAL of any potential or actual conflict of interest between the signer and learner if they exist, particularly where alternatives to using a signer are limited.

Responses in Braille

Where there is evidence of need, an apprentice or learner may be permitted to present their responses in Braille.

As previously noted, to confirm and make such arrangements, PAL would wish to have such discussions with the Provider, employer and apprentice, early on in the programme. Centres should advise PAL at the point of learner registration where such reasonable adjustments are required.

PAL will expect the provider or employer during the apprentice's programme to have afforded the apprentice the opportunity to use braille as part of their formative assessment activities, to ensure their confidence in using braille and the completeness of any subsequent translations. PAL will check with Centres what arrangements they have made to support the learner throughout their programme, to understand fully how the learner has been supported and how the Centre has prepared the learner for any assessments.

PAL will make the arrangements for a braille translator where EPA is concerned, as we need to check the details of the braille translator in advance of the assessment, such details will include name of person; relationship/knowledge of the apprentice and subject matter and confirmation of expertise. The braille translator will be subject to PAL's conflict of interest and confidentiality policies and arrangements.

If PAL commissions the braille translator, additional assessment costs may be passed to the provider and /or employer. PAL is aware there are software options for braille translations, but a 100% correct braille translation can only be done by a human, as this requires an understanding of the text content. PAL will ensure that the braille translator is appraised of the assessment conditions and requirements.

Centres in addition to providing PAL with programme delivery details will need to provide PAL in advance of any assessment of the details of the braille translator, and confirm they comply with the Centres conflict of interest and confidentiality policies. PAL will want to approve the braille translator prior to the assessment, such assessments will be subject to EQA reviews as part of our CASS.

5. Use of Access Facilitators

Reader

A reader is a person who, when requested, will read to the apprentice or learner all or part of the assessment material.

A screen reader is a piece of software that is capable of reading on-line scripts and it is PAL's preferred option where this reasonable adjustment is requested. Please refer to the section of this guide, headed use of a screen reader.

Where there is evidence of need, a reader may be allowed in all assessments where reading or understanding of the written word is not an assessment requirement or the competence being assessed.

PAL in consultation with the apprentice and provider will wish to establish whether the use of a reader will be an effective arrangement. The apprentice may be more comfortable with:

- The use of speech/screen reading software that reads out the material without decoding or interpreting it.
- Accessing the assessment material in electronic format, in Braille or through sign language.

In the case of end-point assessments, PAL will establish the details and status of the reader, to ensure suitability and ensure they are familiar with the conditions required for assessment. The assessments will be recorded by the assigned PAL assessor, in the same way, they are recorded for a comparable assessment, where a reader is not used. PAL will need to be assured that the apprentice can cover the required KSBs of the apprenticeship standard and perform their job role in line with organisational requirements.

PAL will require an application for such an adjustment three months before the planned gateway date.

The reader should not normally be the learner's own tutor or assessor, except in circumstances where it is necessary to do so. In such cases, PAL should be specifically consulted if such an arrangement is considered. On no account may a relative, friend or peer of the apprentice be used as a reader and where a human reader is used, PAL will have the final decision on who that individual is.

The reader should be able to read accurately and at a reasonable rate and should have sufficient knowledge of the subject to read technical terms accurately.

An apprentice/learner should, wherever possible, have had previous practice in working with a reader and should have used this arrangement during the training programme leading up to the assessment.

A separate invigilator must be present when a reader is used in a test assessment to ensure that the guidance regarding readers is followed. In any other form of assessment, should it be accepted a reader is permissible, the assessor will be present in addition to the reader. As part of the assessment planning process, guidance regarding what the reader is allowed to do, during the assessment will be discussed, as well as to the invigilator.

For an apprentice requiring a reader and a scribe, the same person may act as both subject to PAL's approval. PAL will ensure that the person assigned is competent in acting as both a reader and scribe.

The apprentice using a reader must be accommodated separately so as not to disturb any others who may also be participating in assessment, if it is a case several apprentices are booked to take an assessment on the same day at the same location.

Where an apprentice is not eligible for the use of a reader, it may be helpful for the apprentice to read the questions aloud. In these circumstances the apprentice's assessment must be accommodated in a separate room so that other learners are not disturbed if other apprentices are undertaking an assessment at the same time. Separate invigilation must be arranged in these cases. The invigilator may not correct the reading of the learner.

PAL will expect Centres to apply the same conditions as described above where they have applied for and had approved the use of a reader and/or scribe. Centres must provide PAL as part of the RA application the following details:

- Why the reader/scribe is required
- How the learner has been supported throughout their programme
- Details of the reader/scribe to include name: relationship to learner and experience of acting as a reader or scribe
- Valid confirmation that there's is no known or perceived conflict of interest between the reader and learner
- Valid confirmation the reader is qualified to support the assessment and is bound by the Centre's confidentiality arrangements
- Details of the invigilator
- Location of assessment/test activity

As with the deployment of other reasonable adjustments, PAL must approve the use of the reader/scribe prior to any assessment and the assessment will be subject to EQA scrutiny as part of our CASS arrangements.

General guidance for readers in a test environment

The reader:

- Should read only as requested by the apprentice or learner. The apprentice/learner may choose to read some parts of the assessment/text/questions him/herself.
- Should read accurately. If the reader is working with a deaf or hearing-impaired apprentice, the reader should articulate clearly and ensure the apprentice/learner can see their face.
- Must only read the exact wording (instructions and questions), and not give meanings of words, rephrase, or interpret anything.
- Should repeat instructions and questions on the paper only when specifically requested to do so by the apprentice or learner.
- May consult a dictionary, where this is allowed, at the apprentice's/learner's request and read out entries.
- Should read, as often as requested, and read questions in the order requested by the apprentice or learner.
- Must not advise the apprentice/ learner regarding which questions to do, when to move on to the next question, or the order in which the questions should be answered.
- May enable a visually impaired apprentice/ learner to identify which piece of visual material relates to which question, but must neither give factual help to the apprentice/ learner nor offer any suggestion
- Is permitted to help a visually impaired apprentice/ learner using diagrams, graphs, and tables to obtain the information that the print/amended print copy would give to a sighted learner/ learner
- Should, if requested, give a visually impaired apprentice/ learner the spelling of a word which appears on the paper, but otherwise spellings must not be given.
- Should refer any problems during the assessment/test to the invigilator.
- Both apprentice/learner and the reader should always be in eye and earshot of the invigilator

Use of Access Facilitators as a Reader- use of an automated screen reader- EPA

We offer a Text-to-Speech solution called ReadSpeaker for our onscreen tests which allows digital reasonable adjustments to be provided and accessibility for apprentices with learning and speech disabilities, visual impairments, and low literacy requests. ReadSpeaker ensures assessment items are clear and comprehensible to all

learners. Text-to-speech eases the assessment experience for learners who have challenges such as dyslexia by removing the stress of reading and presenting information in an optimal format. Reading aloud can be done automatically or by manually highlighting text and ReadSpeaker puts the learners in full control of speed, volume, and repetition as required. Learners will be given the opportunity to familiarise themselves with the software in a session with their allocated invigilator ahead of taking a test.

Centres are encouraged to use the same or similar technology and PAL will discuss with Centre personnel what assistive technology both during the Centre recognition approval process and as part of our EQA activities.

Scribe (sometimes called amanuensis)

A scribe is a person who, in an assessment, writes down or word processes an apprentice's/ learner's dictated responses. Where there is evidence of need, a scribe may be allowed in all assessments where writing or keyboarding is not the competence being assessed.

PAL will want to know that the provider and employer, in consultation with the apprentice, has identified and agreed that the use of a scribe is an appropriate adjustment. The effective use of a scribe requires high level communication skills from the apprentice. PAL will ask all parties to consider whether the apprentice would be more comfortable with the use of a computer. The apprentice is also more likely to use a word processor rather than a scribe in the workplace.

In the case of end-point assessment, the request for a scribe will need to be made three months prior to the planned gateway date. For an apprentice requiring a scribe and a reader, the same person may act as both, provided permission has been given for both. Centres ideally should make such applications at learner registration but if this is not possible, then three months before any assessment and no later than 7 days before an assessment.

The use of a scribe should not affect the assessment requirements for the apprenticeship standard being assessed. In some cases, the writing of answers by the learner may be the skill being assessed. In other cases where a test is a multiple-choice test being undertaken on-screen, the request and requirement for a scribe may be deemed unnecessary.

PAL will in normal circumstances, will discuss with the Training Provider and other vested stakeholders provisions for an appropriately qualified scribe, any scribe will be subject to PAL's conflict of interest, confidentiality and invigilation policies and procedures

The scribe is selected on the basis of their ability to work effectively with the apprentice. A scribe should be able to produce an accurate record of the apprentice's responses, write legibly and/or word process at a reasonable speed, and have sufficient knowledge of the subject to be able to record technical terms correctly.

A scribe is not permitted in an assessment requiring word processing.

A scribe should not normally be the apprentice's own trainer/line manager at work or an on-programme trainer/assessor or functional skills tutor or learning support tutor/coach, except when it is necessary to do so, as there are no viable alternatives. In such cases, PAL will in such circumstances carry out independent checks of the scribe's competency and relationship to the apprentice and PAL will decide how any conflicts of interest will be mitigated but these conflicts PAL is confident can be minimised and assessment integrity secured. On no account may a relative, friend or peer of the apprentice be used as a scribe.

An apprentice should, wherever possible, have had previous practice in working with the scribe or a scribe and used this arrangement during their apprenticeship programme.

PAL will confirm with all parties, to include the scribe, what the assessment arrangements are and what the scribe is permitted to do, during the assessment. Where a scribe is used, they cannot invigilate a test, so PAL will ensure an

independent invigilator is in place and the assessment activity will be conducted and recorded in line with the assessment plan requirements and test conditions.

If the apprentice is part of a group or cohort of apprentices, taking the assessment at the same time, the apprentice and scribe, will need to be accommodated separately, with their own invigilator.

PAL will expect Centres to follow the same procedures PAL follows in EPA and the same type of information required of a reader, will be required of a scribe and the use of a scribe must be approved before any assessment takes place using the scribe.

General guidance for scribes during tests

The scribe:

- Should check with the apprentice/learner for which parts of the assessment they wish to have their responses scribed. The apprentice/learner may choose to write some responses him/herself.
- Must neither give factual help to the apprentice/learner nor offer any suggestions.
- Must not advise the apprentice/learner regarding which questions to do, when to move on to the next question or the order in which the questions should be answered.
- Must write down answers exactly as they are dictated. Where spelling accuracy and punctuation is being tested, the scribe must follow explicit instructions from the apprentice/learner. The scribe may not take responsibility for spelling technical words.
- Must write a correction on a typescript or Braille sheet if requested to do so by the apprentice/learner.
- Must not assist the apprentice/learner to produce any diagrammatical or graphical material. If assistance with this is needed, approval should be obtained from PAL in advance of the assessment.
- May, at the apprentice's/ learner's request, read back what has been written but no comment must be made about any part of the apprentice's or learner's response.
- Should immediately refer any problems in communication during the test to the invigilator.

In the event a scribe is required to compile projects, or presentations for EPA, PAL will review the request in line with the apprenticeship standard KSBs, assessment plan and occupational role requirements and viable alternative ways of presenting such evidence that does not confer an advantage or disadvantage to the apprentice, or other apprentices undertaking assessments for the same apprenticeship standard. Authentication of work will be undertaken, as is standard with such assessments.

For Centres where a scribe is required to support the compilation of a learner's project or presentation, the Centre must seek PAL approval, to ascertain acceptable and viable alternatives. PAL will require the centre to demonstrate how the use of a scribe will secure valid, reliable evidence and assessment and that any use of the scribe is equitable and ensures parity of assessment.

As with the deployment of other reasonable adjustments, PAL must approve the use of the scribe prior to any assessment and the assessment will be subject to EQA scrutiny as part of our CASS arrangements.

British Sign Language (BSL)/English interpreter

Although British Sign Language (BSL) is now recognised as an official language of the UK, it is not a statutory language, unlike English, Welsh and Irish (Gaelige).⁵

⁵ The BSL Act 2022 which comes into force on Tuesday 28th June 2022.

The Act will create greater recognition and understanding of BSL, and inclusion and equality for BSL users by:

- Legally recognising BSL as a language for England, Wales, and Scotland.
- Requiring government departments to report on how they are promoting and facilitating the use of BSL.

Where BSL is the primary means of communication for a deaf apprentice or learner, these apprentices/learners may have the support of a BSL/English interpreter to sign the questions (or part questions) where they are undertaking written assessments. For assessments where reading or speaking and listening are the competences being assessed, BSL or any other sign language may only be used for the assessment material instructions.

In assessments such as professional discussions, oral questions and answers or presentations, PAL will review the request in line with the assessment plan and job role requirements. Typically, the selection of the assessment component, is intrinsic to a skill that the apprentice would expect to need or have to perform the role proficiently. The same advice will be provided to Centres for their learners where this RA is asked for, as typically with vocational qualifications, the assessment method selected for specific learning outcomes and assessment criteria tests vocational proficiency and where appropriate develops employability skills.

The apprentice/learner, wherever possible, should have had previous experience of working with a BSL/English interpreter and should have used this arrangement during their apprenticeship training or programme of learning. PAL both as an AO and EPAO will wish to see how the apprentice/learner has been supported throughout their programme, to ensure we have the requisite knowledge to approve RA requests and secure valid assessment outcomes.

In the case of end-point assessment, as previously noted PAL will require a request for such support and adjustments to be made three months before the planning meeting. For learners registered with PAL Centres we would reasonably expect to be informed of such RA requests at registration.

Third parties and Centres can make their own arrangements, and in all cases, PAL must be assured the interpreter has the necessary experience and appropriate qualification in the sign language and a good working knowledge of the content of assessment and assessment conditions and requirements of either the apprenticeship standards or qualifications.

The BSL interpreter regardless if they third party (Provider/College sourced) or provided by the Centre, PAL will expect them to be subject to PAL's conflict of interest, confidentiality, and invigilation policies in the case of EPA. Centres will need to ensure the BSL interpreter is subject to their relevant Centre policies, which will have been checked by PAL, to ensure they are commensurate with PAL's policies and requirements.

PAL will need to ensure that the BSL interpreter has access to the assessment materials in advance of the assessment, to prepare for signing, such arrangements will be discussed and agreed at the assessment planning meeting in the case of EPA and for qualifications, the Centre will discuss arrangements with the PAL Quality team, prior to the qualification assessment.

It is imperative the interpretation does not give the apprentice/learner an unfair advantage and particular care and attention must be taken not to indicate the meaning of technical words, where the apprentice's/learner's understanding of these words is a fundamental knowledge requirement of the apprenticeship standard and their job role or the achievement of the qualification learning outcomes and assessment criteria. The interpreter is not permitted to amplify or clarify questions or terms, and, in some circumstances, it may be preferable to finger spell.

Any words or phrases interpreted for the apprentice/learner because a standard sign is not available or appropriate must be underlined on the assessment material, which, if separate from the mechanism for recording responses, must accompany the apprentice's/learner's answers and any amendments to questions must be available to PAL for quality assurance purposes. For qualifications any assessment using a BSL interpreter will be subject to EQA sampling.

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- Providing guidance to government departments and public bodies on how to meet the needs of people who use BSL as their first or preferred language

Accommodation for such an assessment should be in a suitable assessment environment, and as with arrangements for scribing and reading, the apprentice/learner should be accommodated separately from any other apprentices, where there is more than one apprentice, undertaking assessments at the same time.

General guidance for BSL/English Interpreters during tests

The BSL/English interpreter:

- Should have access to the assessment material in advance of the test to prepare for the signing. PAL will advise how long before the assessment the BSL/English interpreter can have access to the assessment material, on a case-by-case basis and failure by third parties or Centres to follow the specific instructions and timelines will be regarded as malpractice and subject to sanctions
- Must not interpret technical language or give additional explanations.
- May, at the apprentice's/learner's request, sign any labels or text connected with reference material such as maps, diagrams, or graphs. The apprentice/ learner should, however, study the reference material independently.

If a BSL/English interpreter is used assessment arrangements will be discussed and agreed on a case-by-case basis and in all cases the interpreter will not be permitted to provide clarification or amplification to the assessment activities, beyond those already described. In respect of assessments such as a presentation presentation, PAL will seek to use other valid and supporting evidence if the learner/apprentice and their Centre/third party agree this would offer the learner/apprentice a fairer assessment. The interpreter will be expected to interpret and relay the apprentice's commentary accurately, without distortion.

Prompter

An apprentice/learner with severe attention problems may benefit from the use of a prompter in timed assessment situations to draw their attention back to the assessment task.

Prior to making any request for such an adjustment, the provider and employer in consultation with the apprentice must agree that the use of a prompter is justified and will support the equitable and fair assessment of the apprentice. PAL will want to know how prompting has been used during practice assessment activities. PAL will request the same information and evidence from Centres that may such RA requests.

In the case of end-point assessments, PAL should be advised of the request for a prompter, three months before the planned gateway date. For Centres PAL would expect the Centre to advise PAL on identification of such an adjustment, if that is not the case ideally three months' notice should be provided and at the very least 7 days' notice.

PAL will request that if the apprentice's /learner's challenge is one of poor or diverted concentration, consideration should be given to allowing supervised rest breaks rather than a prompter.

Where third parties or Centres arrange for a prompter, this request must be approved by PAL, failure to notify PAL as with any use of an additional support will be regarded as malpractice and will affect assessment outcomes, potentially grades and may illicit sanctions.

A prompter should not normally be the learner's own line manager, trainer, and/ or tutor or on-programme assessor, except when it may be necessary to do so. In such cases PAL should be specifically consulted and approve the arrangements, recognising that having some experience of the apprentice/learner in these circumstances is important.

On no account may a relative, friend or peer of the learner be used as a prompter.

Prompters used for EPA will be subject to PAL's conflict of interest, confidentiality and invigilation policies and will be advised of assessment arrangements and assessment conditions. The prompter cannot act as an invigilator, so a separate person is required, typically a second PAL person will act as the invigilator. The invigilator must be fully informed of the strategies used to regain the learner's attention. For Centres a prompter must adhere to the relevant Centre's policies and procedures, these policies and procedures will be commensurate with PAL's requirements and reviewed as part of the centre recognition process and EQA activities.

Assessments will be subject to the same recording and documentation requirements as is standard procedure.

Prompters should be sufficiently experienced in supporting people with attention deficit or concentration issues to recognise when the apprentice's/learner's attention is no longer on the assessment task and that the apprentice/learner is not, for example, looking away from the test whilst thinking.

Under no circumstances may the prompter draw the attention of the apprentice/learner to specific questions and /or answers, nor should they signpost to the apprentice/learner a particular aspect of the assessment

In an assessment the prompter should sit near enough to be able to observe the apprentice/learner and draw his / her attention back to the task. This should, however, be organised as unobtrusively as possible. The apprentice's /learner's attention may be drawn back to the task using a light tap on the learner's arm or shoulder or, alternatively, on the desk/workstation (though not in a way that may be taken to indicate/signpost the apprentice/learner to a particular aspect of the assessment).

Verbal prompting should not normally be used. The method used by the prompter to bring back the apprentice's attention should be agreed before the assessment. It should be noted that some apprentices/learners with emotional and behavioural sensitivity/vulnerability and/or mental health conditions may not be comfortable with a 'light tap' prompt. A form of verbal prompting should be considered and agreed for these individuals.

In the case of an epileptic apprentice/learner where the problem is one of temporary absenting, the normal procedure to help that apprentice will be allowed.

General guidance for Prompters during tests

The prompter:

- Should draw the apprentice's/learner's attention back to the task in hand.
- Should use the method of prompting agreed with the apprentice/ learner prior to the assessment and approved by PAL; any changes during the assessment must be notified to PAL, with a reason for the change and PAL will decide if special considerations can be applied and/or the assessment remains valid.
- Must not give factual help to the apprentice/learner or offer any suggestions.
- Must not advise the learner/apprentice regarding which questions to do, when to move on to the next question or the order in which the questions should be done, or how to tackle any aspect of any other assessment task.
- Should be prepared for periods of inactivity during the assessment but must remain vigilant.
- Should immediately refer any problems during the assessment to the invigilator.

For other assessments, to include observation of tasks either in a simulated environment or at the workplace, it is imperative that the prompting does not detract from natural performance or prevent the PAL assessor in the case of EPA or the Centre personnel undertaking the learner's assessment from making a judgment of the apprentice's /learner's capabilities and abilities to meet the required standard or qualification criteria.

Practical Assistant

A practical assistant is a person who, during an assessment, carries out practical tasks at the instruction of the apprentice or learner. Examples of the kinds of tasks with which the practical assistant may assist are, turning the pages of the question paper, presenting slides, during a presentation as requested by the apprentice/learner or, guiding a learner using a Braille paper to the correct page they need.

For EPA activities the provider and employer in consultation with the apprentice, decide whether the use of a practical assistant is an appropriate arrangement, before making an application to PAL. A practical assistant will not normally be allowed for those apprenticeship standards and assessment components where the practical skills are the focus of the assessment and are essential to effectively perform the role, in line with industry and organisational expectations. In the case of end-point assessment PAL will require an application for a practical assistant to be made three months before the planned gateway date.

For Centres making such a RA request, PAL would expect this request to be made on registration, if that is not the case, as with other requests ideally a three-month notice period should be given, with the minimum notice period of 7 days. PAL will require a clear rationale for the request and any such request will be subject to EQA scrutiny and must be approved by the PAL Quality team before the adjustment can be used.

Where it is agreed the third party or Centre can provide the use of a practical assistant, PAL will need to have details of the nominated person and assurances they have been appropriately inducted and trained in the role and are familiar with the relevant policies and procedures as previously noted in this guide and are aware of the assessment process.

The practical assistant should not normally be the learner's own teacher/tutor/assessor except when it is necessary to do so, and such deployment will require PAL's approval.

On no account may a relative, friend or peer of the learner be used as a practical assistant.

A practical assistant should be a person who is able to ensure the safety of the apprentice/learner and convey the necessary assessment instructions.

Assessments using a practical assistant for tests/exams will require independent invigilation, for other forms of assessment, the EPA assessor in the case of EPA and the Centre assessor for qualifications leads the assessment. Assessments using a practical assistant will be subject to the same recording and documentation procedures, in line with standard assessment practice.

All parties should note that the practical assistant may not perform tasks for which the apprentice/learner would receive credit and would attribute to an assessment outcome. The use of a practical assistant must not modify the specification requirements. For example, where the manipulation of apparatus or making accurate visual observations may be the skill being assessed, the use of a practical assistant will not be permitted.

In a test situation, the apprentice must be accommodated independently, if it is the case that more than one apprentice is taking the test at the same time.

General guidance for Practical Assistants during assessments

The practical assistant:

- Must follow the instructions issues as approved by PAL and this guide on the level and kind of assistance that can be given to the apprentice/learner. If the apprentice/learner or third party or Centre requires further clarification regarding the use of a practical assistant, they should direct this to the EPA or Qualification PAL quality team
- Must ensure the safety of the apprentice/learner and those around him / her.

- Must not give factual help to the apprentice/learner or offer any suggestions.
- Must not advise the apprentice/learner in a test which questions to do, when to move on to the next question or the order in which the questions should be done. Nor should they instruct the apprentice/learner on how to approach or tackle a particular assessment activity.
- Must carry out instructions exactly as they are given unless to do so would cause a hazard. If the practical assistant does not understand the apprentice's/learner's instructions, he/she may ask for clarification but must not lead the apprentice/ learner in any way or attempt to interpret the learner's/apprentice's wishes; if incorrect or inadequate instructions are given by the learner this must be reflected in the outcome of the assessment.
- Should not expect to assist the learner throughout the entire assessment (there may be parts of the assessment which the apprentice/learner can do without help and thus gain credit for demonstrating the required skills).
- Should immediately refer any problems during an assessment to the invigilator/or PAL or Centre assessor dependent on the nature of the assessment.

Personal support worker in attendance

There are situations where it might be appropriate for a personal worker to be in attendance for scheduled assessments to support the reasonable adjustment requirements of learners/apprentices such as cognitive processing needs, mental health conditions, and social/communication conditions.

The personal worker is recommended to be member of staff from the employing organisation who regularly assists the learner/apprentice with daily work activities, as the key part of the personal worker role in assessment situation is to put the learner/apprentice at their ease and reflect regular working practices. The personal worker will be required to comply with a written declaration to maintain the confidentiality of the assessment materials.

PAL independent assessors are permitted in professional discussion/interview /question and answer assessments to repeat and reword questions to offer clarification and ask for information in smaller chunks from the learner/apprentice where such reasonable adjustments have been approved; therefore, the personal worker is not required to provide these types of adjustments, which could be considered a threat to validity and reliability, and could also be a disadvantage to the learner/apprentice, as the personal worker is not an end-point assessment specialist.

If the personal worker wishes to repeat a question asked by an independent assessor, because that is a routine way of working for the learner/apprentice, then care must be taken to maintain the integrity of the assessment by not prompting and not giving suggestions to the learner/apprentice; again, the independent assessor is entitled to ask follow-up questions, and they will use their assessment expertise to appropriately elicit answers from the learner/apprentice, the independent assessor will also have worked to build a professional affinity with the learner/apprentice during the assessment window.

Where Centres as part of the assessment process have a personal support worker, accompanying the Centre assigned assessor, the same care and attention as described above must be taken by the Centre.

General guidance for Personal Support Workers during assessments:

- Must follow the instructions as issued by PAL in EPA and the Centre for any Centre assessed qualification activities
- Must not re-format, adapt or participate in the actual assessment
- May repeat information if required, but must not add or amend the information as provided by the assessor

Transcriber

This arrangement may be used by an apprentice/ learner in the following circumstances:

- Where the learner's handwriting is illegible, but he or she is unable to use a computer or dictate responses - it may not be allowed where writing by hand is the competence being assessed.
- Where the learner's responses are produced in Braille or in BSL.

The transcriber will produce a transcript to assist the assessment process, they are not involved in making or contributing to the assessment decision. The examiner/assessor will assess the apprentice's/learner's work and will only refer to the transcript if it is impossible to decipher any part of the learner's response(s). (For responses produced in Braille or BSL the examiner/assessor may refer solely to the transcript).

An application for a transcriber in EPA will need to be made ideally three months before the planned gateway date. PAL will provide all parties with instructions regarding the transcriber's role and responsibilities, as well as informing the transcriber of assessment security arrangements.

Centre's ideally should make such a RA request at learner registration; if this is not possible, PAL will expect the Centre to follow the requirements and timelines of three months prior to assessment and no later than 7 days' notice. Such requests will be subject to EQA scrutiny and must be approved by PAL, prior to the assessment.

Centre applications for this adjustment, as with all specialised RA requests must be approved by PAL, and it is important to not that PAL approves such requests on a case-by-case basis, so it should never be assumed that because the use of a transcriber for example was approved for one learner, that this confers some sort of blanket approval.

The transcript should be produced by a transcriber who has demonstrated they can correctly read the apprentice's /learner's handwriting⁶, is fully competent in Braille (where the transcription is for apprentice's/learner's responses produced in Braille), or who has the required skills in BSL (where the transcription is for learner's responses produced in BSL).

Where a transcriber is used to support a learner/apprentice undertaking a test a separate invigilator must be present for the duration of the assessment.

The transcript(s) must be securely shared with PAL, in accordance with PAL's assessment recording and storage requirements. The production of the transcript should not delay any other aspects of assessment, unless one assessment component is reliant on this assessment being completed and assessed first. Transcripts for EPA should be shared with PAL and for qualifications PAL will require access to such transcripts.

Where PAL will makes the provisions for a transcriber this will involve additional costs. Where the Centre or third party is approved by PAL to provide a transcriber, the transcriber will be subject to the relevant policies and procedures as already outlined in previous sections of this guide, to ensure there are no conflicts of interest in using the selected transcriber and the transcriber is aware of the need to maintain confidentiality of the assessment content and the learner/apprentice's responses.

General guidance for Transcribers

The transcriber:

- Must produce the transcript in a separate copy of the question paper/answer booklet or on lined or unlined white paper as appropriate.
- May handwrite or word process the transcript. If handwritten, dark blue or black ink should be used. Pencil must never be used.

⁶ PAL will require at least two samples of the apprentice's/ learner's handwriting for familiarisation purposes and to ensure they can accurately interpret the apprentice's writing

- Must, for tests and where used in any other form of assessments, produce the transcript immediately after the assessment under secure conditions.
- Must not involve the apprentice/learner in the production of the transcript.

Should normally transcribe complete answers. In cases where only occasional words need to be transcribed, these may be written on a copy of the apprentice's/learner's work. **On no account must the apprentice's/learner's original work be marked or annotated in any way.**

Must normally be a word-for-word transcription, i.e., an exact copy of what the learner/apprentice has written. The transcriber may not insert or omit words or alter their order. Any errors, inaccurate or inappropriate use of technical terms and language cannot be changed. The transcriber may correct the spelling of non-technical words. The transcriber must not transcribe diagrammatical material. Assessment of such material will be based on the learner's/apprentice's own work.

Centres and Third parties that do not have access to specialist support such as interpreters or readers should discuss options with PAL, if PAL provides such personnel there will be an additional cost to the Centre/Third Party in addition to the standard registration and certification fees or EPA fees.

If a third party or Centre require PAL to provide the specialist support, then the notice period of at least three months' notice prior to the assessment must be adhered to. For highly specialised support, where the Centre or third party requires PAL to provide such assistance, this should be noted at the point of learner/apprentice registration.

Please contact PAL if you require any further information regarding this guide.