

## **GBS Special Considerations and Reasonable Adjustments Policy**

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<b>Related policies</b>
<ul style="list-style-type: none"> <li>GBS Equality and Diversity Policy</li> <li>GBS Academic Appeals Policy</li> <li>GBS Student Complaints Policy and Procedure</li> </ul>
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## **1. Purpose and Scope**

- 1.1. GBS HE Malta Limited aims to facilitate open access to all qualifications for learners who are eligible for reasonable adjustment and/or special consideration in teaching and assessments, without compromising the assessment of the skills, knowledge, understanding, or competence being measured. This will be achieved through:
- **Reasonable Adjustment.** This is agreed at the pre-assessment planning stage and any action that helps to reduce the effect of a disability or difficulty, which places the learner at a substantial disadvantage in the assessment situation. Reasonable adjustments must not, however, affect the reliability or validity of assessment outcomes nor must they give the learner an assessment advantage over other learners undertaking the same or similar assessments.
  - **Special Consideration.** This is a post-assessment allowance to reflect temporary illness, injury or indisposition that occurred at the time of assessment. Any special consideration granted cannot remove the difficulty the learner faced at the time of assessment and can only be a relatively small adjustment to ensure that the integrity of the assessment is not compromised. Special consideration cannot apply to *license to practice units* within a qualification, or to *license to practice* qualifications.

## **2. Guidance on Reasonable Adjustment and Special Considerations**

- 2.1. Reasonable Adjustment
- 2.2. A reasonable adjustment helps to reduce the effect of a disability or learning need that places the learner at a substantial disadvantage in the assessment situation. Reasonable adjustments must not affect the validity or reliability of assessment outcomes, but may involve:
- Changing usual assessment arrangements
  - Adapting assessment materials
  - Providing assistance during assessment
  - Re-organising the assessment physical environment.
  - Changing or adapting the assessment method
  - Using Assistive Technology (including AI)
- 2.3. GBS understands that reasonable adjustments must be approved (internally or externally) and set in place prior to an assessment commencing. It is an arrangement to give a learner access to a qualification. The work produced following a reasonable adjustment must be assessed in the same way as the work from other learners. It is important to note that not all adjustments will be reasonable, permissible, or practical in particular situations. The learner may not need, nor be allowed the same adjustment for all assessments.
- 2.4. Reasonable adjustments permitted by GBS Malta may fall into one or more of the following categories:

- Changes to assessment conditions
  - The use of mechanical and electronic aids
  - Modification to the presentation of assessment material
  - Alternative ways of presenting responses
  - Use of Access facilitators
- 2.5. A reasonable adjustment must never affect the validity or reliability of assessment, influence the outcome of assessment, or give the learner(s) in question an unfair assessment advantage.
- 2.6. Examples of reasonable adjustments as defined by the above categories, are listed below.
- Allowing extra time, for example, assignment deadline extension
  - Using different assessment location
  - Use of coloured overlays, low vision aids, etc.
  - Use of assistive software.
  - Assessment material in large format or braille
  - Use of readers and/or scribes.
  - Practical assistants
  - Assessment Material

### **3. Recruitment Process**

- 3.1. GBS Malta takes measures to ensure that learners have the correct information and advice on their chosen programme of study and that the qualification will meet their needs. The recruitment process includes GBS Malta assessing each potential learner and making justifiable and professional judgments about the learner's potential to successfully complete the programme of study and associated assessments and achieve the qualification.
- 3.2. Such assessment must identify, where appropriate, the support that will be made available to the learner to facilitate access to the assessment. Where the recruitment process identifies that the learner may not be able to demonstrate attainment and thus gain achievement in all parts of assessment for the selected qualification, this must be communicated clearly to the learner. A learner may still decide to proceed with studying a particular qualification and not be entered for all or part of the assessment.
- 3.3. GBS will ensure that learners are aware of:
- The range of options available, including any reasonable adjustments that may be necessary, to enable the demonstration of attainment across all required assessment.
  - Any restriction on progression routes to the learner as a result of not achieving certain outcomes.

### **4. Applying Reasonable Adjustment**

- 4.1. Reasonable adjustments are approved before an assessment and are intended to allow attainment to be demonstrated. A learner does not have to be disabled to qualify for reasonable adjustment, nor will every learner who is disabled be entitled to reasonable adjustment.
- 4.2. Allowing reasonable adjustment is dependent upon how it will facilitate access for the learner. A reasonable adjustment is intended to allow access to assessment but can only be granted where the adjustment does not:
- Affect the validity or reliability of the assessment.
  - Give the learner (s) in question an unfair advantage over other.
  - Learners taking the same or similar assessment.
  - Influence the final outcome of the assessment decision.
- 4.3. GBS applies reasonable adjustment in a transparent and unbiased manner. All reasonable adjustments made must be recorded using the GBS Malta Reasonable Adjustment Form, please refer to Annex 1. Once completed, these would be held by GBS in the learner's file and shall be available for scrutiny by the awarding body, if so requested. All reasonable adjustments implemented by GBS Malta are subject to meeting the requirements of the appropriate assessment strategy and assessment criteria for each qualification and awarding body. It is the responsibility of the Programme Leader to ensure that any access arrangement implemented by GBS on behalf of the learner is based on firm evidence of a barrier to assessment.
- 4.4. Where further clarification is required in relation to the application of reasonable adjustment, GBS Malta would contact the applicant by e-mail. For all qualifications that are internally assessed, GBS Malta will apply to the awarding body to request to implement a reasonable adjustment, but it must:
- Only make reasonable adjustments that are in line with this policy.
  - Record all reasonable adjustments made on the appropriate forms.
  - Keep all forms on the appropriate learner's record.
  - Make forms available to the awarding body as required.

## **5. Assessing Achievement**

- 5.1. GBS Malta will ensure that for all internal assessment, achievement is given only for the skills demonstrated by the learner and that reasonable adjustments do not compromise the outcomes of assessment.

## **6. Special Educational Needs**

- 6.1. GBS Malta should note that a Statement of Special Educational Needs (SEN) does not automatically qualify the learner for reasonable adjustment to assessment. This may be the case when, for example, the SEN statement may not contain a recent assessment of the needs or the reasonable adjustment may compromise the assessment.

## **7. Inappropriate use of Reasonable Adjustment**

- 7.1. GBS Malta understands that if the reasonable adjustment policy is misused, then GBS Malta in consultation with the awarding body will take appropriate action. Such action will range from advice and action for the centre through to the implementation of steps to manage assessment malpractice. This could ultimately lead to the recall of certificates, removal of qualification approval or removal of awarding body approval.

## **8. Special Considerations**

- 8.1. A special consideration is consideration given following a period of assessment for a learner who:
- Was prepared for and present at an assessment but who may have been disadvantaged by temporary illness, injury or adverse circumstances that have arisen at or near to the time of assessment.
  - Misses part of the assessment due to circumstances outside their control
- 8.2. It is important to note that it may not be possible to apply special consideration in instances where:
- Assessment requires the demonstration of practical competence.
  - Criteria have to be met fully.
  - Units/qualifications confer license to practice.
- 8.3. Where assessment is in the form of on demand assessment, such as electronic tests set and marked by computer, then may often be more appropriate to offer the learner an opportunity to take the assessment at a later date.
- 8.4. A special consideration cannot give the learner an unfair advantage, nor must its use cause the user of a certificate to be misled regarding a learner's achievement. The learner's results must reflect real achievement in assessment and not potential ability. To this end, special considerations can only be a small post-assessment adjustment to the mark or outcome.
- 8.5. The awarding body's decision will be based on various factors, which may vary from learner to learner, and from one subject to another. These factors may include the severity of the circumstances, the date of the assessment, the nature of the assessment (e.g., practical, oral presentation, etc.). A Learner who is fully prepared and present for a scheduled assessment may be eligible for special consideration if:
- Performance in an assessment is affected by circumstances beyond the control of the learner, for example, recent personal illness, accident, bereavement, serious disturbance during the assessment.
  - Alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate.
  - Part of an assessment has been missed due to circumstances beyond the control of the learner.
- 8.6. A learner will not be eligible for special consideration if:
- No evidence is supplied that the learner has been affected at the time of the assessment by a particular condition.

- Any part of the assessment is missed due to personal arrangements including holidays or unauthorised absence.
- Reparation for an assessment component is affected by difficulties during the course, for example, disturbance through building work, lack of proper facilities, changes in or shortages of staff, or industrial disputes.

8.7. The following are examples of circumstances which might be eligible for special consideration (this list is not exhaustive):

- Terminal illness of the learner
- Terminal illness of a parent
- Recent bereavement of a member of the immediate family
- Serious and distributive domestic crises leading to acute anxiety.
- Incapacitating illness of the learner
- Severe car accident
- Recent traumatic experience such as death of a close friend or distant relative
- Flare-up of severe congenital conditions such as epilepsy, diabetes, severe asthmatic attack
- Recent domestic crises
- Recent physical assault trauma
- Broken limb on the mend

8.8. Unlike reasonable adjustment, there are no circumstances whereby a school can apply its own special consideration. Applications must be made to the awarding body.

## **9. Applying for Special Consideration**

9.1. GBS Malta will put arrangements in place to enable a learner, in extenuating circumstances, to complete an assessment(s) and thus achieve the qualification. Only when this is unsuccessful should an application for special consideration be made.

9.2. All applications for special consideration can only be made on a case-by-case basis and thus separate applications must be made by the individual learner. The only exception to this is where a group of learners has been affected by a similar circumstance such as a fire alarm during an assessment; in this case a group application is permissible. In this situation, however, a list of learners affected should be attached to the application.

9.3. Applications for special consideration should be submitted to GBS Malta accompanied by:

- Completed Special Considerations Form
- The learner's transcript of record of achievement whilst at GBS
- Evidence to support the application such as a medical certificate, a doctor's letter, a statement from the invigilator (if relevant), or any other appropriate independent evidence.

9.4. The appropriate Programme Leader in consultation with the Associate Dean and/or Dean shall authorise all applications for special consideration. Applications must be submitted to GBS Malta within seven days of the assessment having taken place.

- 9.5. Following receipt, GBS Malta will usually give a decision within a further ten working days. During the processing of an application, it is important to note that special consideration applications will not be considered where learner achievement has been claimed and certificated.

## **10. Lost or Damaged Work**

- 10.1. When a learner's work has been lost or damaged, GBS Malta, in consultation with the awarding body, may consider accepting a grade for which there is no available evidence. In all cases, GBS Malta will verify that the work was done and that it was monitored whilst it was in progress.

## **11. Complying with Policy**

- 11.1. Following receipt, GBS Malta will usually give a decision within a further ten working days. During the processing of an application, it is important to note that special consideration applications will not be considered where learner achievement has been claimed and certificated.
- 11.2. GBS Malta understands that failure to comply with the requirements contained within this policy document could lead to assessment malpractice, which may impact on the learner's result. Failure to comply is defined as any or all the following:
- Where applicable, putting in place arrangements without GBS Malta approval.
  - Exceeding the allowance agreed by GBS Malta.
  - Agreeing delegated adjustments that are not supported by evidence.
  - Failing to maintain records.
  - Failing to report delegated adjustments when requested to do so by awarding body
  - Implementing delegated adjustments that affect the validity and reliability of assessment compromises the outcomes of assessment or gives the learner in questions an unfair assessment advantage over other learners undertaking the same or similar assessment.

## **12. Monitoring and Review**

- 12.1. This policy may be amended by GBS Malta at any time.

## **13. Alternative Format**

- 13.1. This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:
- **Name:** Student Welfare Management Team
  - **Position:** Student Welfare Officer/Manager



## Annex 1 – GBS Malta Reasonable Adjustment Form

Student Details			
Student Name:		Student ID:	
Date:			
Tel:		Email:	

<i>What is the nature of your disability? (Please tick or complete as appropriate)</i>
<input type="radio"/> Cognitive impairment e.g., Dyslexia <input type="radio"/> Motor difficulties e.g., hand-eye co-ordination <input type="radio"/> Hearing impairment <input type="radio"/> Visual impairment <input type="radio"/> Physical impairment e.g., cerebral palsy religious grounds <input type="radio"/> Other (please specify in details section)
<i>What reasonable adjustments do you require? (Tick and provide details below)</i>
<input type="radio"/> Reader / Scribe <input type="radio"/> BSL / English interpreter <input type="radio"/> Rest period / Comfort break Own software <input type="radio"/> Extra time <input type="radio"/> Larger font Coloured paper (pink/blue/green/yellow) <input type="radio"/> Lip speaker <input type="radio"/> Own hardware <input type="radio"/> Other (please specify in details section)
<i>Please provide further details of requirement:</i>

<p><b>Extra time required for the disability.</b></p> <p><i>Your Health Professional must make a recommendation for how much time is required if more than 25% is requested</i></p>	
<p><b>Requested additional time in minutes:</b></p>	
<p><b>Please indicate the form of evidence that supports your request and return a copy of the report with this form:</b></p>	<p><input type="radio"/> The original Health Professional report with specified allowance request clearly detailed</p> <p><input type="radio"/> A letter from another Awarding Body approving reasonable adjustments.</p> <p><input type="radio"/> A written statement signed by an appropriate religious authority (only applicable on religious grounds)</p> <p><input type="radio"/> Other (please give details below)</p> <p><input type="radio"/> Tick the box to confirm that relevant evidence has been attached</p>

<p><b>Student Declaration:</b></p> <p><i>I confirm that the information on this form is true and accurate and I agree with GBS processing my data.</i></p> <p><b>The General Data Protection Regulation (EU) 2016/679 (GDPR):</b></p> <p><i>By signing this form, you express your free consent to the processing of your personal data according to and within the data processing purposes stated in this privacy and consent notice.</i></p> <p><i>You agree that you understand your rights to withdraw consent at any time, totally or partially, without affecting the lawfulness of processing based on your consent before its withdrawal.</i></p> <p><i>You acknowledge that if you wish to partially withdraw your consent, you can do that by revisiting this privacy and consent notice to state your objections to processing your personal data.</i></p>
<p><b>Student Signature .....</b>      <b>Date: .....</b></p>

<p><b>GBS Malta Staff Approval:</b></p>	
<p><b>GBS Malta Staff Signature .....</b></p>	<p><b>Date: .....</b></p>