

REASONABLE ADJUSTMENTS & SPECIAL CONSIDERATIONS INCLUDING FAIR ACCESS TO ASSESSMENT

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Summary of Changes

Ser	Issue	Date	Summary of changes
1	6	18/12/2023	Addition of this changes summary table
2	7	06/01/2025	Definitions section linked to Equality Act. Added process flow for Enterprise / Commercial training (annex B) Merged 'Fair Access to Assessment' policy within this policy. Additional process and guidance added, including Annex C on reasonable adjustment strategies for trainers.
3	8	09/01/2026	Removed reference to 'Enterprise' training delivery.

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1. Our Commitment - Fair Access to Assessment

- 1.1. MKC Training is committed to pursuing a policy of Diversity, Wellbeing, Inclusion and Access to Learning & Assessment for all applicants, learners and staff.
- 1.2. This policy, process and guidance is applicable to learners (and those involved in the delivery or support of training) on MKC Training delivered training.
- 1.3. Through this, and associated policies, MKC Training will anticipate and implement **Reasonable Adjustments** for learners with a disability in line with the Equality Act (2010).
- 1.4. MKC Training takes its legal responsibilities very seriously. However, our commitment goes beyond the definitions of the Equality Act (2010) and we are committed to providing an inclusive curriculum and supportive environment to ensure the best possible outcomes for all learners.

2. Definitions

- 2.1. **Reasonable Adjustments** can be defined as; *any action that helps to reduce the effect of a disability or difficulty that places an individual at a substantial disadvantage in working or learning (assessment) situation.*
- 2.2. **Learners with a disability** are defined by the Equality Act (2010) as someone with, 'A physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.'
 - Normal day-to-day activities include mobility, manual dexterity, physical co-ordination, speech, hearing, eyesight, memory, ability to concentrate, learn or understand and perception of risk or physical danger.
 - Long term means likely to last for 12 months or more.
- 2.3. The definition includes (but is not limited to):
 - Mobility differences such as wheelchair uses or musculoskeletal conditions.

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- Sensory differences such as learners certified as blind, partially sighted, m/deaf.
- Long term health conditions such as arthritis, cancer, diabetes, HIV or auto immune conditions.
- Long term mental health conditions such as depression, eating disorders, schizophrenia.
- Specific learning differences (SpLD) such as dyslexia or dyspraxia.
- Neurodiversity such as Autistic Spectrum Condition (ASC) or ADHD.
- Progressive conditions such as motor neurone disease, dystrophy or forms of dementia. These are covered from the point of diagnosis, regardless of the symptoms.
- Any terminal condition is included regardless of the timeframes involved.
- Conditions that are intermittent or that fluctuate will entitle the person protection under the Equality act at all times (provided the condition is likely to recur) even if, at a particular point in time, the condition is in remission.

2.4. The Equality act places an obligation on education providers to take active steps to reduce discrimination of individuals protected by the act and to make reasonable adjustments to learning, teaching/training and assessment. There is no duty to adjust a 'competence standard' to make allowance for a disability.

2.5. **Special Considerations** may arise following a scheduled assessment of a learner:

- Who is present for the assessment but who may have been disadvantaged by temporary illness, injury or adverse circumstances which arose at or near the time of assessment
- Who misses part of the assessment due to circumstances outside their control

Special Considerations will be applied in line with Awarding Organisation, or other relevant guidance where appropriate (see 8.2)

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3. Reasonable Adjustments

What is reasonable?

- 3.1. Adjustments only need to be made if it is reasonable to do so. This is dependent upon the context and individual situation.
- 3.2. Factors that will help to decide whether an adjustment is reasonable at MKC Training include the following:
 - The extent to which the adjustment is practicable.
 - The extent to which an adjustment would overcome the learner's disadvantage.
 - The nature of MKC Training's activities and size.
 - The financial and other resources available to MKC Training.
 - The cost of making the adjustment and the extent to which the adjustment would disrupt MKC Training's activity.
 - External financial or other assistance available to MKC Training.

Examples of reasonable adjustments

- 3.3. See Appendix C for a more detailed list of possible reasonable adjustments.
- 3.4. Examples of reasonable adjustments for learners with evidence of a disability or Specific Learning Difficulty (SpLD) include, but are by no means limited to:
 - **Physical adjustments:** for example, moving the course to an accessible room or providing an online option, allocating parking spaces, access to safe/quiet space, lighting, temperature, reduced noise levels, location within classroom.
 - **Special study arrangements:** for example, modifying course materials and curriculum resources, making handouts available electronically in advance, providing multi-sensory presentations, enabling learners to make a personal recording of the training.
 - **Additional examination recommendations:** for example, allowing the use of a word processor, providing examination scripts on coloured paper, using a different method of assessment or allowing a learner extra time to complete their exam, where feasible.
- 3.5. Adjustments to assessments:
 - Should not invalidate the assessment requirements of the qualification
 - Should not give the learner an unfair advantage over others

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- Should be consistent with the learner's usual way of working
- Should be based on the learner's individual needs
- Must be supported by sufficient, valid and reliable evidence

4. Responsibilities & Process

- 4.1. MKC Training operates in both Defence and Commercial training environments. Whilst the general principles of reasonable adjustments and special considerations are shared, specific process flows for Defence / RSME (Annex A) and Commercial (Annex B) training environments are detailed.
- 4.2. Recommendations for reasonable adjustments are communicated to staff on a need-to-know basis. Depending on the reasonable adjustments required, staff could include trainers, learning specialists, administrative staff, learning support tutors, assessors, IT, and Health and Safety officers.
- 4.3. Programme Managers / Leads
 - Support their teams to ensure familiarity and compliance with this policy and processes.
 - Communicate reasonable adjustment and special consideration arrangements to learners during their induction / onboarding and throughout the course where the need arises.
 - Identify, through the initial assessment process, any learners that may have difficulty in accessing assessment. Collaborate with the Learning Support Coordinator, or other relevant people / agencies to plan and implement appropriate adjustments.
 - Monitor the success of adjustments through assessment outcomes and learner feedback.
 - Maintain records of all reasonable adjustments or special considerations for assurance purposes.
- 4.4. Learning Support Coordinator
 - In some cases (see Reasonable adjustments flowcharts Annex A & B), reasonable adjustments will be facilitated by the Learning Support Coordinator; however, it is everyone's responsibility to put them in place and to make anticipatory reasonable adjustments through inclusive approaches to teaching and learning.

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4.5. Exam officers (or designated role)

- If additional exam access arrangements are required, exam officers will contact the awarding organisation (AO) for approval.
- They are responsible for maintaining records of (AO) approvals for reasonable adjustments or special considerations for assurance purposes.

5. Guidance for Learners

5.1. We encourage you to disclose your support needs to MKC Training at the earliest opportunity so we can implement reasonable adjustments in a timely manner. For short courses, in particular, it is vital that you let us know on application so that we can put in place the support that you need as soon as possible.

5.2. MKC Training recognises that each learner is different and their needs will be specific to them. We will endeavour not to make assumptions that a specific condition will have a pre-identified set of needs. It is key to the process described below that you should be involved in discussions about any adjustment.

- When you fill in the course application form, you will be asked to disclose if you have a disability, specific learning difference, or long term physical or mental health condition that may impact your learning. You will also be asked about other additional support that you may need, for example, if English is not your first language and you think this will impact on your learning.
- You will then be invited to fill in a support questionnaire. This can be filled in through a discussion with a member of staff from MKC Training if required. Please see Appendix B for details of the questions asked.

5.3. This support questionnaire may also be filled in when you are on course if you, your trainer, teacher, or other curriculum staff identify that you require additional support.

- In some cases, you will need to provide medical/non-medical specialist evidence to make sure your adjustments align with the Equality Act (2010) and JCQ Access Arrangements and Reasonable Adjustments

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Regulations. An example of this would be for additional exam access arrangements.

- The learning support team can support and advise some learners with recommendations for reasonable adjustments which can then be agreed with curriculum staff.
- The learning support team may be able to provide 1 to 1 support, for example, with English, maths, study skills, strategies for memory and concentration.

6. Guidance for Staff

- 6.1. The Health and Safety Officer will be able to give advice if the applicant needs a personal risk assessment (PRA) and/or Personal Emergency Evacuation Plan (PEEP).
- 6.2. As defined by the Equality Act (2010), some learners may be able to apply for exam access arrangements. The exam officer will be responsible for applying for exam access arrangements and should be contacted as early as possible in the process.
- 6.3. During the process of agreeing reasonable adjustments, the learning support team are able to
 - give specialist advice / support learners with learning differences
 - give advice to support neurodiverse learners
 - advise on the evidence and paperwork requirements for exam access arrangements.
- 6.4. The learning support team can also
 - support learners who do not have English as a first language with drawing up recommendations for support
 - provide 1 to 1 support, for example, with English, maths, study skills, strategies for memory and concentration.
 - discuss, advise and support curriculum staff on strategies to support learners.
- 6.5. The list of reasonable adjustments in Annex C gives suggestions of possible reasonable adjustments but it is not a definitive list. It is designed to support the process for both learners and staff.

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7. Personal data and Special category personal (sensitive) data

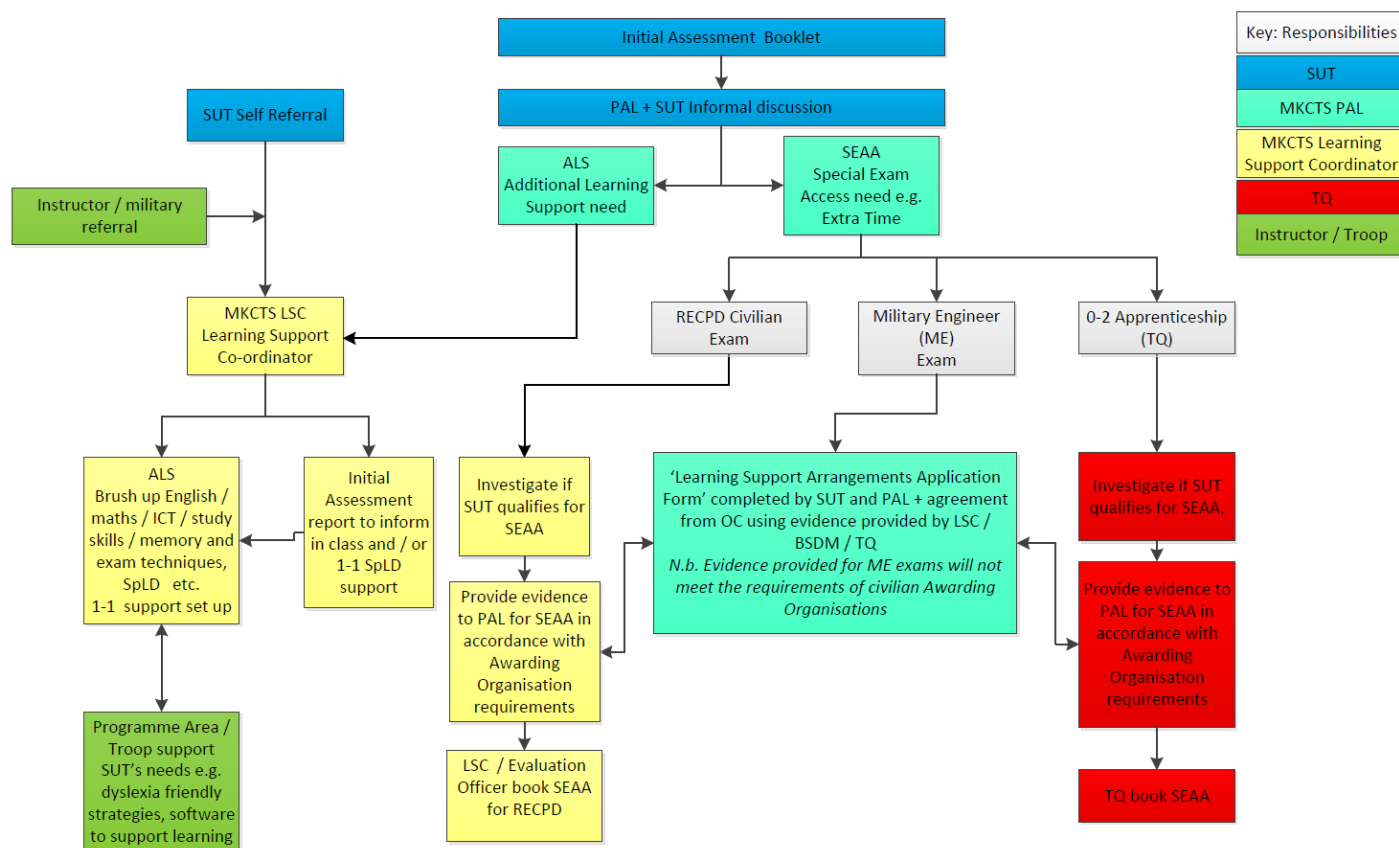
- 7.1. **Personal data** - A list of the agreed recommendations and reasonable adjustments will be kept securely and access given to staff where there is a justifiable need.
- 7.2. **Special category personal (sensitive) data** – information on the nature of an individual's disability, for example, specific learning difference, medical condition; the need for a particular reasonable adjustment and any evidence that a learner has supplied will only be accessed on a 'need to know' basis by members of staff who are responsible for approving learner support.
- 7.3. MKC Training will ask for consent to store this information. Learners can withdraw their consent at any time at which point this information will be removed from our system.

8. Associated policies

- 8.1. This policy should be read alongside our policies and procedures on:
- Equality, Diversity and Inclusion
 - Data Protection
 - Safeguarding
 - Health and Safety
 - Complaints, Compliments and Appeals
 - Examination Process
 - IQA Process
- 8.2. External references include:
- JCQ - [Access Arrangements, Reasonable Adjustments and Special Consideration - JCQ Joint Council for Qualifications](#)
 - RSME Training Quality 'Wiki'
 - JSP 822 Defence Systems Approach to Training - [Defence direction and guidance for training and education \(JSP 822\) - GOV.UK](#)
 - Awarding Organisation policies and requirements

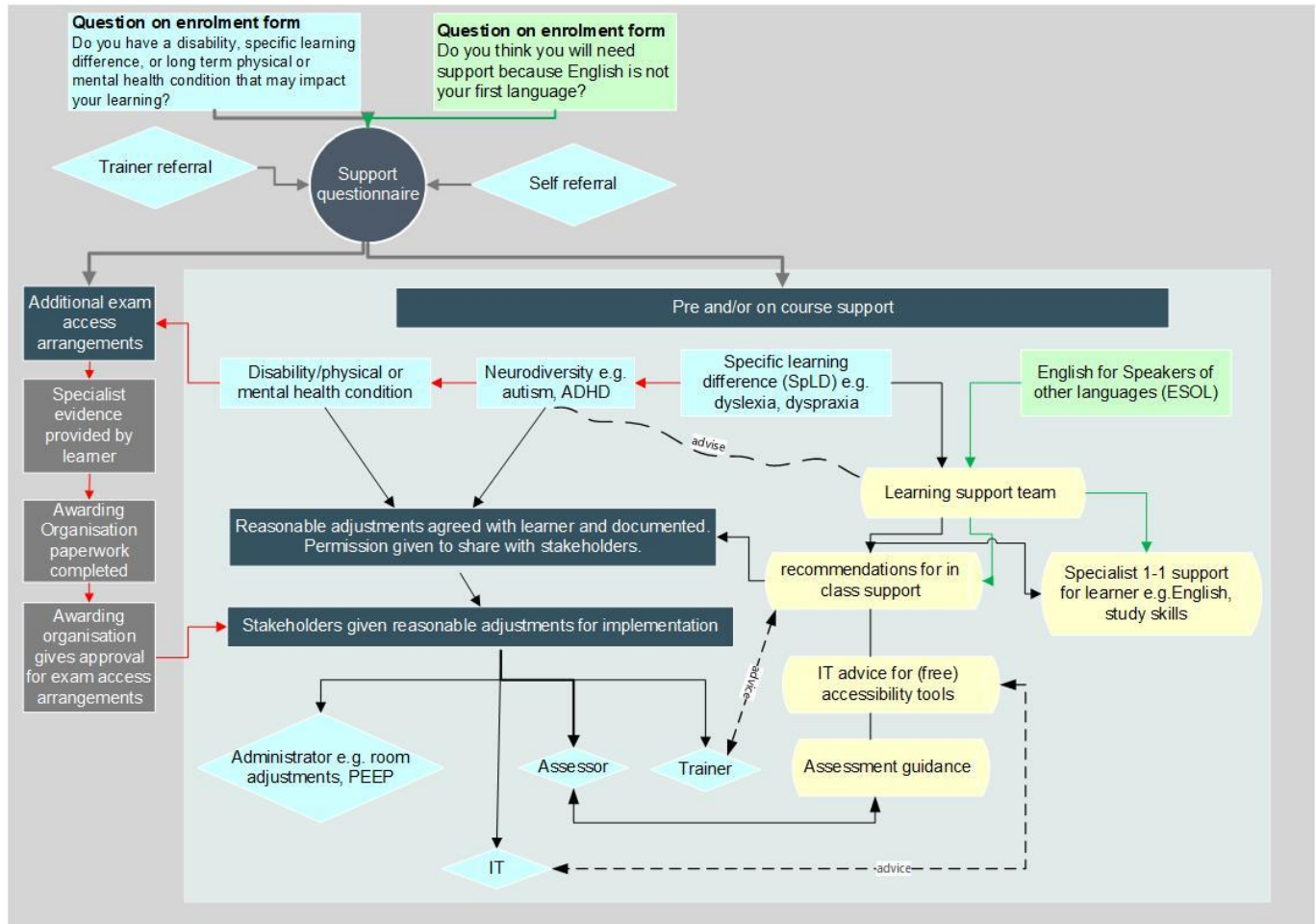
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Annex A – Reasonable Adjustments – Defence / RSME training



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Annex B – Reasonable Adjustments – Commercial training



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Annex C – Guidance for trainers on Reasonable Adjustments

Environment

Accessibility: ensure that the venue is accessible. Consider room changes, ramps, lifts, accessible parking and accessible seating arrangements.

Assistive Technology: provide tools and resources or demonstrations in the use of assistive technology, particularly features built into own devices, which learners may not already be aware of, such as screen readers, magnification, screen tinting and dictation.

Physical environment: ensure learning area is well-lit and ventilated. Some learners can be sensitive to certain lighting such as fluorescent bulbs - offer alternative working areas to those affected. Avoid standing in front of a window or light, which would make it more difficult to lip-read.

Consider seating arrangements – for example, a horseshoe configuration is useful for learners who are lipreading, some learners may need to sit somewhere where they can discretely take breaks, some learners may need a quiet place where they can work independently at times.

Alternatives to seating: evidence is emerging that alternatives such as standing whilst working, rather than sitting for long periods, may have some physical and mental health benefits longer term.

Offer differentiated assessment: flexible assessment options such as project-based assessments or alternative formats such as spoken over written assignments allow learners to demonstrate their understanding and skills in ways that align with their strengths.

Health and Safety - create a personal risk assessment (PRA) and/or Personal Emergency Evacuation Plan (PEEP).

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Writing difficulties

Assistive technology: encourage the use of word processing software with spell and grammar checks and promote dictation as an alternative to getting thoughts on the page. There are built-in options in iOS and Windows which allow dictation. Learners might also use voice recorders as an alternative to written assignments.

Break down longer writing tasks into smaller, more manageable segments and allow learners to work at their own pace.

Scaffold writing by providing structure, headings, templates and examples.

Allow extra time to complete written assignments and exams to accommodate learners who may require additional time to generate ideas effectively or have slow handwriting or typing.

Allow alternative forms of expression for learners to demonstrate their understanding and knowledge, such as oral presentations, multimedia projects, concept maps or visual posters.

Avoid asking learners to take notes from a board/PowerPoint presentation.

Mark for subject content rather than spelling, grammar and punctuation.

Offer 1-1 lessons to support writing.

Individualised support: offer extra sessions or peer tutoring and monitor progress regularly to adjust strategies to address specific needs

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Reading difficulties

Provide accessible texts: offer a variety of reading materials at different levels and formats, including large print, audio or graphic texts.

Note:

- Large print copies for visually impaired learners should be at least 16-18 point and in a sans serif font although this should be checked with the learner as needs and solutions vary.
- Allow sufficient space between paragraphs, together with wide margins and headings. Bullet points or numbers rather than continuous prose can be helpful. Left hand justified text makes print easier to read.
- Bold is easier to read than italics or underlining which can make the words run together.
- Use a clear font of at least 11 points.

Use simplified texts, summaries and adapted versions of complex texts to support comprehension for learners with reading difficulties. Be aware of alternative texts which are less complex or academic but contain the same information.

Break down longer texts into smaller, more manageable chunks. Use clear language and short paragraphs.

Provide PowerPoints and handouts in advance so the learner can understand and read the material at their own pace.

Assistive Technology: make learners aware of the range of screen reading software available online and built-in to their devices. Screen readers have the potential to help a range of learners, not just those with reading difficulties but those with vision problems, sensitivity or fatigue when reading off screen, concentration and memory difficulties.

Visual Disturbance: some learners (not just with reading difficulties) can experience visual disturbance when reading and find that wearing tinted glasses, tinting their device's screen or using overlays can greatly improve readability. Tinted glasses and coloured overlays can be borrowed from MKC Training.

Pre-teach vocabulary and concepts to help build background knowledge and recognise vocabulary to aid understanding of text.

A glossary of key terms, especially if visual/pictorial with an option for auditory, will be useful for some learners.

Encourage active reading: encourage learners to seek out reading material which reflect their personal interests, promoting engagement with the process of reading and improving skills.

Be aware of differing reading speeds: avoid whole class silent reading followed by questioning. Those who cannot finish the text will not be able to contribute.

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Be aware of putting learners on the spot: ask for volunteer readers rather than picking on learners randomly, putting learners with reading difficulties on the spot can be stressful or awkward.

Offer 1-1 lessons to support reading.

Individualised support: offer extra sessions or peer tutoring, and monitor progress regularly to adjust strategies to address specific needs

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Communication

Use concrete language: avoid abstract concepts and ambiguous language that can have multiple meanings.

Avoid colloquialisms – this can be distracting and difficult for learners who do not have English as a first language.

Be specific with instructions and break down information into manageable chunks.

Try to face any learners who are lip reading; if turning to write on a white board, stop speaking so that those lip reading do not miss what is said.

Use clear speech, making sure that the mouth is not covered.

Write unfamiliar vocabulary on a board: this can help learners who lip read, learners who struggle with spelling and learners who do not have English as a first language.

Do not put learners on the spot: give additional time to process information and formulate responses; encourage pair/group responses or ask for volunteers.

Provide alternative means of participation: written responses, drawings, role-playing, group discussions and activities.

Help learners anticipate change: provide clear timetables and prior warning of changes to help learners anticipate and prepare for transition and changes in routine.

Visual aids: provide pictures, symbols, charts to support understanding.

Say a learner's name so they know you are talking to them.

Consider class interaction - be aware that some learners will prefer not to socialise.

Consider body language – be aware that not all learners will read this in the same way. There are cultural differences with, for example, eye contact and some learners will also find this uncomfortable.

Create a supportive and inclusive classroom environment where learners feel valued, respected and encouraged to participate.