

External Reasonable Adjustments Policy



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VERSION CONTROL

Version number	Summary of change	Date changed
V1	Policy creation	Nov 2024
V2	Separation of policy from Reasonable adjustments and Special considerations to individual policies, new policy template, review and update to process.	June 2025

INTRODUCTION

This policy sets out CTQ's approach to ensuring that learners with permanent or long-term disabilities or conditions are not unfairly disadvantaged in accessing assessments. CTQ is committed to promoting equality, diversity, and inclusion by making reasonable adjustments that enable learners to demonstrate their knowledge, skills, and understanding without altering the demands of the assessment.

Reasonable adjustments are pre-planned changes or arrangements made to remove or reduce disadvantage for learners with specific needs. These adjustments must not undermine the integrity, validity, or reliability of the qualification.

This policy is aligned with the requirements of the Equality Act 2010 and incorporates relevant guidance from the *Reasonable Adjustments and Special Considerations Joint Statement (V1, August 2021)*¹, particularly in relation to first aid qualifications. It also reflects Ofqual General Conditions, ensuring regulatory compliance across all qualifications.

¹ This document has been developed collaboratively with the following organisations: • The First Aid Quality Partnership • The First Aid Awarding Organisation Forum • The Resuscitation Council UK

SCOPE

This policy applies to:

- All qualifications offered by CTQ
- All learners undertaking CTQ qualifications who may require long-term or pre-planned adjustments
- All CTQ-approved centres and their staff involved in the delivery, assessment, and quality assurance of qualifications
- CTQ staff responsible for policy implementation, decision-making, and quality assurance

This policy includes:

- Definitions and procedures for identifying and applying reasonable adjustments
- Responsibilities of centres and CTQ in managing adjustment requests
- Criteria for approving or rejecting applications
- Timescales and documentation requirements
- Escalation and appeals procedures

This policy supports:

- Learners with permanent or long-term disabilities or conditions
- Learners for whom the usual format, setting, or context of assessment is not appropriate due to ongoing needs

All centres must ensure this policy is accessible to staff and learners and that it is followed consistently when supporting reasonable adjustment requests.

ACTIVITY

REASONABLE ADJUSTMENT: ELIGIBILITY

A reasonable adjustment is a planned alteration to assessment arrangements designed to reduce or remove barriers for learners with disabilities or difficulties – ensuring they can demonstrate their knowledge, skills, and understanding without compromising the validity or integrity of the qualification.

To be eligible, a learner must have a permanent or temporary:

- Disability
- Learning difficulty
- Sensory impairment
- Mental health condition
- Other condition that significantly disadvantages them in the assessment process

Adjustments must reflect the learner's normal way of working and must not:

- Compromise the competence standards being assessed
- Affect the reliability or validity of the assessment
- Provide an unfair advantage

Examples include:

- Extra time (e.g. up to or over 25%)
- Adapted materials (e.g. large print, Braille, coloured overlays)
- Assistive technology (e.g. screen readers, voice software)
- Use of a reader, scribe, interpreter or prompter
- Alternative formats (e.g. spoken responses instead of written)
- Adjustments to the assessment environment (e.g. seating or lighting changes)

See **Appendix 1: Permissions Table** for specific adjustment types and approval requirements.

Adjustments must be appropriate, practicable, and proportionate, taking into account the learner's needs, cost, safety, timing, and the integrity of the assessment.

In Licence to Practise qualifications such as first aid, certain adaptations may be allowed if the learner can demonstrate full competence at least once in the intended format (e.g. on the floor).

PROCESS

1. Need is identified – The centre conducts an initial assessment or responds to a learner disclosure, determining whether an adjustment is necessary.
2. Application is prepared – The centre gathers supporting evidence and checks whether the adjustment requires CTQ approval (see Appendix 1).
3. Form is submitted (if required) – For adjustments requiring CTQ approval, the Reasonable Adjustments Application Form must be submitted to CTQ **at least 10 working days** before the scheduled assessment.
4. CTQ reviews – CTQ acknowledges requests within **2 working days** and provides a decision within **2 working days**, unless specialist input is required (in which case, a revised timeline will be confirmed).
5. Adjustment is implemented – The centre makes agreed arrangements and retains documentation for review.
6. EQA reviews – EQAs monitor the use of adjustments during quality assurance visits to ensure consistent and compliant application.

It is important that no learner is denied the chance to attend a first aid training course due to a disability. To assess competence and gain certification in first aid qualifications however, the Learner will need to demonstrate the required practical competences.

As required by Conditions G8.1 and G9.2, CTQ ensures that reasonable adjustments do not compromise assessment security, and that evidence generated under alternative conditions remains valid, authentic, and fit for purpose.

ROLES AND RESPONSIBILITIES

The following RACI matrix outlines the roles and responsibilities for key activities within this policy, ensuring clarity on who is Responsible, Accountable, Consulted, and Informed.

Activity	Responsible	Accountable	Consulted	Informed
Reasonable Adjustments				
Provide information at induction about qualifications and assessment	Centre staff	Head of Centre	Learner	CTQ
Conduct initial learner assessment to identify support needs	Centre staff	Head of Centre	Learner	CTQ
Identify and discuss potential reasonable adjustments with the learner	Centre staff	Head of Centre	Learner	CTQ
Decide on adjustments that can be centre-approved	Centre staff	Head of Centre	Learner	CTQ
Submit Reasonable Adjustment Application to CTQ (if CTQ approval required)	Centre staff	Head of Centre	Learner	CTQ Head of Quality and Operations
Review and decide on CTQ-approved requests	CTQ Head of Quality and Operations	CTQ Leadership Team	External specialists (if needed)	Centre, Learner

Communicate decisions to the centre	CTQ Head of Quality and Operations	CTQ Head of Quality and Operations	-	Centre, Learner, EQA
Record approved centre-level adjustments and send to CTQ as requested	Centre staff	Head of Centre	-	CTQ
Monitor implementation during quality assurance visits	CTQ EQA	CTQ Head of Quality and Operations	-	Centre
Maintain records and evidence	Centre staff	Head of Centre	-	CTQ, EQA
Manage formal appeals if submitted	Centre (initiates)	CTQ Responsible Officer	CTQ Head of Quality and Operations	Learner, Regulator

ESCALATION AND REPORTING

CTQ recognises that decisions around reasonable adjustments can carry significant implications for learners and centres.

ESCALATION

If a centre disagrees with a decision made by CTQ relating to a reasonable adjustment they are encouraged to raise the matter initially with the CTQ Head of Quality and Operations.

Where a satisfactory resolution is not reached, the centre may submit a formal appeal in line with CTQ's Enquiries and Appeals Policy. Appeals will be investigated independently, and outcomes will be shared with the centre, learner (where appropriate), and any involved staff.

Escalation may also be necessary in other scenarios, including:

- Delays in CTQ decision-making beyond published timescales.
- Urgent concerns involving learner safety, assessment integrity, or regulatory compliance.
- Patterns of inconsistent application of policy identified by External Quality Assurers (EQAs) or CTQ staff.

Where a serious risk to regulatory compliance is identified, CTQ will follow its formal reporting procedures, including notifying the appropriate regulator where required.

Safeguarding or health and safety concerns will be prioritised and escalated for immediate review and action.

REPORTING

All reasonable adjustment and special consideration requests received by CTQ are logged systematically and reviewed regularly to identify recurring themes, risks to assessment integrity, and opportunities for continuous improvement. In line with Condition D3.2, we evaluate whether these requests highlight systemic issues, process gaps, or potential adverse effects.

Where appropriate, outcomes may lead to updates in our assessment practices, policies, procedures, or staff training. We are committed to taking proportionate and preventative actions to reduce the likelihood of recurrence and maintain qualification integrity.

Summary data is reported to the Senior Leadership Team and reviewed alongside other quality assurance indicators. Insights from these requests inform internal review processes and strategic planning. Serious or recurring issues may be escalated to the Board for governance oversight.

POLICY REVIEW

This policy is subject to a three-year review cycle, or earlier if feedback or concerns are raised with CTQ, to ensure it remains fit for purpose and its processes and outcomes are deliverable.

It will also be reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements.

REGULATORY CONDITIONS AND REQUIREMENTS

CTQ is committed to meeting the requirements set out by Ofqual's Conditions of Recognition.

CTQ will ensure:

- Policies and procedures align with regulatory conditions.
- All staff understand their obligations in relation to compliance.
- A robust system is in place to identify, manage, and mitigate risks to regulatory compliance.

The table below lists the conditions to which this policy applies.

Condition reference							
D2.1	D3.2	G2.2	G6.1	G6.2	G8.1	G9.2	

APPENDIX 1 – REASONABLE ADJUSTMENTS PERMISSIONS TABLE

This table outlines some possible reasonable adjustments that can be made and who should take the decision. However, centres have a duty to seek advice from CTQ in any case where they are in doubt if an adjustment is needed or how it should be applied.

Reasonable adjustment	Assessments NOT taken under examination conditions	Assessments taken under examination conditions
Extra time up to 25%	CENTRE	CENTRE
Extra time in excess of 25%	CTQ	CTQ
Supervised rest breaks	CENTRE	CTQ
Change in the organisation of assessment room	CENTRE	CTQ
Separate accommodation within the Centre	CENTRE	CTQ
Taking the assessment at an alternative venue	CTQ	CTQ
Use of coloured overlays, low vision aids, tinted spectacles, CCTV and OCR scanners	CTQ	CTQ
Use of assistive software ²	CTQ	CTQ
Use of bilingual and bilingual translation dictionaries ³	CENTRE	CTQ
Assessment material in enlarged format	CENTRE	CTQ
Assessment material in Braille	CTQ	CTQ
Language modified assessment material	CTQ	CTQ
Assessment material in BSL	CTQ	CTQ
Assessment material on coloured paper	CENTRE	CTQ
Assessment material in audio format	CENTRE	CTQ
Use of ICT ⁴	CENTRE	CTQ
Responses using electronic devices	CTQ	CTQ
Responses in BSL	CENTRE	CTQ

² Except where the qualification assessment guidance prohibits the use of ICT

³ Use of dictionaries must not compromise the validity of assessment outcomes

⁴ Except where the qualification assessment guidance prohibits the use of ICT

Responses in Braille	CTQ	CTQ
Reader	CTQ	CTQ
Scribe	CENTRE	CENTRE
BSL/English interpreter	CTQ	CTQ
Prompter	CTQ	CTQ
Practical assistant	CTQ	CTQ
Transcriber	CTQ	CTQ
Other	CTQ	CTQ