



ACCESS TO FAIR ASSESSMENT POLICY

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1. OVERVIEW

1.1 Scope of the policy

This policy is aimed at learners taking part in any of the courses provided by PRO Phlebotomy Training, who have identified a need for reasonable adjustments and special considerations to be put in place, in order to enable them to take part in the course without any disadvantage.

1.2 Purpose of the policy

The purpose of this policy is to establish the ways in which we make our assessments fair and accessible to all learners, through the implementation of reasonable adjustments and special considerations.

1.3 Location of the policy

This policy can be downloaded from our website:

www.PROPhlebotomyTraining.co.uk/AccessToFairAssessment.pdf or copies can be requested from the PRO Phlebotomy Training Centre on 01332 380 777 or by emailing info@PROPhlebotomyTraining.co.uk.

This policy is also signposted from our course application form.

1.4 Communication of the policy

All Assessors, Internal Moderators and other Training Centre staff have been made aware of this policy as part of their induction.

Learners are made aware of the policy during the application process. Assessors are also encouraged to remind learners about the policy at the start of the course.

1.5 Review of the policy

This policy will be reviewed annually, and will be revised in response to changes in our practices, actions from the regulatory authorities, accrediting bodies or external agencies, or changes in national legislation. We reserve the right to amend the policy as and when necessary.

Our review of the policy will ensure that our procedures continue to be consistent with the regulatory criteria and are applied properly and fairly in arriving at judgments.

Issues and feedback raised by learners and other stakeholders, with respect to reasonable adjustments and special considerations, will be considered in the on-going development of this policy, and all our products and services.



2. DEFINING REASONABLE ADJUSTMENTS AND SPECIAL CONSIDERATIONS

2.1 Overview

We seek to uphold human rights relating to race relations, disability discrimination and the special educational needs of our learners and to provide equal reasonable adjustments and special considerations for all learners registered on our courses.

PRO Phlebotomy Training strongly believe that assessment should be a fair test of learners' knowledge and what they are able to do, however, we recognise that, for some learners, the usual format of assessment may not be suitable. We ensure that the ways in which our courses are assessed, do not bar candidates from taking the courses.

We recognise that reasonable adjustments or special considerations may be required at the time of assessment where:

- learners have a permanent disability or specific learning needs ;
- learners have a temporary disability, medical condition or learning needs;
- learners are indisposed at the time of the assessment.

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

There are 2 ways in which we maintain access to fair assessment: ^[L]_[SEP]

- through reasonable adjustments; and ^[L]_[SEP]
- through special considerations. ^[L]_[SEP]

2.2 Reasonable adjustments

A reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty that places the candidate at a substantial disadvantage in the assessment situation. Reasonable adjustments must not affect the integrity of what needs to be assessed, but may involve:

- changing standard assessment arrangements, for example allowing learners extra time to complete the assessment activity;
- adapting assessment materials, such as providing materials in Braille, on a different coloured paper or in large print;
- providing access facilitators during assessment, such as a sign language interpreter or a reader
- re-organising the assessment room, such as removing visual stimuli for an autistic learner, or ensuring a room is accessible for a physically disabled learner.



Reasonable adjustments are approved or set in place before the assessment activity takes place; they constitute an arrangement to give the candidate access to the assessment activity. The use of a reasonable adjustment will not be taken into consideration during the assessment of a learner's work.

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

2.3 Special considerations

Special considerations can be applied after an assessment if there was a reason the learner may have been disadvantaged during the assessment. Reasons for special consideration could be temporary illness, injury or adverse circumstances at the time of the assessment.

Candidates cannot enter a plea for special considerations for assessment solely on the grounds of disability or learning difficulty. Learners must declare their needs prior to the assessment period and all necessary reasonable adjustments arrangements must have been implemented before the time of the assessment.

Special consideration should not give the learner an unfair advantage. The learner's result must reflect their achievement in the assessment and not necessarily their potential ability.

Special consideration may result in a small post-assessment adjustment to the mark of the candidate. The size of the adjustment will depend on the circumstances during the assessment and will reflect the difficulty faced by the candidate, but will always be a minor adjustment as to do more may jeopardise the standard.

Where an assessment requires a competence, criterion or standard to be met fully, or in the case of qualifications that confer a Licence to Practise, it may not be possible to apply special consideration. In some circumstances it may be more appropriate to offer the learner an opportunity to retake the assessment at a later date or to extend the registration period so that the learner has more time to complete the assessment activity.

2.4 Making reasonable adjustments

When considering whether an adjustment to assessment is appropriate, Training Centres need to bear in mind the following:

- **Learners should potentially be able to achieve the assessment requirements.** Adjustments to assessment should not compensate the learner for lack of knowledge and skills. The learner must be able to cope with the content of the assessment and be able to work at the level required for the assessment ☐



- **Any adjustment to assessment must not invalidate the assessment requirements of the course** or the requirements of the assessment strategy. Competence standards should not be altered. While we will take all reasonable steps to ensure that learners with a disability or difficulty are not placed at a substantial disadvantage in terms of access to assessment, there is no duty to make any adjustment to a provision, criterion or practice which is defined as a competence standard. All learners' performance will be assessed against set standards. These standards cannot be altered, but it may be possible to change the delivery or process of assessment so that each candidate has an equal opportunity to demonstrate what they know and can do. [2]
- **Any adjustment to the assessment must not give the candidate an unfair advantage** nor should it disadvantage the candidate. The qualification of a candidate who has had an adjustment to assessment must have the same credibility as that of any other candidate. As our courses may lead to employment, completion of the course must give a realistic indication to the potential employer of what the learner can do in the working environment. [2]
- **Any adjustment to assessment must be based on the individual need of the learner.** Decisions about adjustments to assessment should be taken after careful consideration of the assessment needs of each individual learner, the assessment requirements of the qualification and the nature and extent of the support given as part of normal teaching practice. We should not assume that the same adjustment will be required for all assessments. Different courses and different methods of assessments can make different demands on the learner. Learners will be consulted throughout the process. [2]
- **Any adjustment to assessment should reflect the candidate's normal way of working** providing this does not affect what is being assessed in any way. The candidate should have experience of and practice in the use of the adjustment.

These principles should be followed when making decisions about a learner's need for adjustments to assessment. [1][SEP] We have a responsibility to ensure that the process of assessment is robust and fair and allows the candidate to show what they know and can do without compromising the assessment criteria. [1][SEP]



3. OUR RESPONSIBILITIES

3.1 Internal assessment

Arrangements for reasonable adjustments for the internal assessment must ensure that the resulting learner's evidence:

- meets the performance criteria [2]
- is assessable [2]
- is capable of internal moderation and external moderation.

When arrangements have been made for reasonable adjustments for a learner to complete a course, details of the adjustments will be made available to our External Moderators, External Verifiers and Quality Advisors. [L] [SEP]

3.2 External assessment

For learners completing external assessments, we will record the details of these arrangements on the Invigilator's Register and return it to the accrediting body with the [2] external assessment papers.

3.3 Arrangements for internal and external assessments

The following arrangements may be implemented by PRO Phlebotomy Training, for both the internal and [2] external assessment components of our courses, without prior application to the accrediting body.

When arrangements are implemented for the internal assessment we will ensure they are clearly referenced so the External Moderator, External Verifier and Quality Advisor can see this.

3.3.1 Arrangements for learners who have a learning difficulty e.g. dyslexia

- Use of a reader [2]
- Use of a scribe [2]
- Use of audio-cassettes [2]
- Use of a speech synthesiser [2]
- Use of word-processing or transcription packages/typewriters (except where [L] [SEP] hand writing is an assessment objective) [L] [SEP]
- Use of coloured overlays

3.3.2 Arrangements for learners who have a hearing impairment

- Use of a communicator/interpreter [2]
- Use of mechanical/electronic aids [2]
- Use of any other suitable aids (recommended by a teacher of the hearing [L] [SEP] impaired)

3.3.3 Arrangements for learners who have a visual impairment

- Use of a reader [2]
- Use of a scribe [2]
- Use of mechanical/electronic aids (e.g. audiotape, speech synthesiser) [2]



- Use of coloured overlays

3.3.4 Arrangements for learners who have a permanent physical impairment

- Use of a reader ☐
- Use of a scribe and/or interpreter ☐
- Use of mechanical/electronic aids ☐
- Use of an assistant in practical tasks

3.3.5 Arrangements for learners who have a medical condition or temporary injury

- Use of a reader and/or scribe and/or interpreter ☐
- Use of mechanical/electronic aids ☐
- Use of an assistant in practical tasks ☐

3.3.6 Arrangements for learners whose first language is not English, Gaelic or Welsh

- Use of a bilingual dictionary (book form only; not electronic dictionaries)

3.3.7 Change in the organisation of the assessment room

Minor changes to the organisation of the assessment room may benefit some candidates with autistic spectrum disorder, with visual or hearing impairment or with physical difficulties. For example:

- visually impaired candidates may benefit from sitting near a window so that they have good lighting
- hearing impaired candidates may benefit from being seated near the front of the room ☐
- removing visual/noise stimuli, such as a ticking clock, from the room. ☐

3.3.8 Arrangements for learners who require extra time and/or rest breaks

Except where performance within a specific timescale is an assessment objective, we are able to grant additional time up to a maximum of 25% of external assessment time, and/or rest breaks, to learners with particular requirements and with appropriate evidence of need.

We do not need to notify the accrediting body beforehand although these arrangements do need to be noted on the Invigilator's Register which will be returned to the accrediting body.

If the learner requires more than 25% extra time we will need to inform the accrediting body before the assessment.

3.3.9 Arrangements for learners who require separate supervision or invigilation

We may make arrangements for the separate supervision of any learner at our discretion. Any invigilation arrangements for such learners should not advantage or disadvantage these learners over other learners.



Please note anyone who assists in implementing reasonable adjustments during an assessment, such as a reader, scribe or interpreter, can be employed by the centre but should not be involved in the course delivery.

3.4 Applications to the accrediting body

If PRO Phlebotomy Training need to put any reasonable adjustments arrangements in place, which are above and beyond what is described above, we will need the approval of the accrediting body, by filling in a 'Request for Reasonable Adjustments'.

Each request should indicate the:

- nature of the candidate's disability/learning need
- special assessment arrangements requested
- supporting evidence or a copy of the evidence.

We must submit this request each time the learner is going to sit an external assessment or needs internal assessment materials modified, regardless of any previous requests we have made for the same learner.

3.4.1. Notification timescales

We must complete the 'Request for Reasonable Adjustments' form and send it to the accrediting body at least 10 working days before the learner needs the Candidate Learning Log, workbook, supporting materials or sits either an online or paper based external assessment.

For some requests, more time is required:

- at least 15 working days' notice for the Candidate Learning Log, workbook, supporting materials or external assessment paper to be produced in simplified language, enlarged font, or printed on coloured paper.
- at least 30 working days' notice for the Candidate Learning Log, workbook, supporting materials or external assessment paper to be translated into Braille.

The learner is encouraged to inform us of any arrangements they require as soon as they book onto the course, in order to give us as much notice as possible.

3.5 The role and responsibilities of the accrediting body

When the accrediting body receive the completed form, they will aim to complete their review within 2 working days. They will keep in touch along the way to keep us updated, and phone us with the outcome of the review.

If they are unable to agree to the request, they will try to suggest a suitable alternative reasonable adjustment.

3.6 Evidence requirements

If the learner requires arrangements for reasonable adjustments they should provide the PRO Phlebotomy Training Centre with evidence of their learning needs or medical condition. We must ensure that suitably qualified personnel check that the evidence is



current and relevant to the learner. Examples of evidence could be a relevant diagnostic report or statement of learning needs or medical condition from appropriately qualified personnel.

We will retain the evidence and make it available to any of the accrediting body's authorised representatives who visit our centre, this includes External Moderators, External Verifiers, Quality Advisors and spot checkers.

In case of an appeal, we must ensure that evidence to support a reasonable adjustment or special consideration is retained for 3 months after we have been issued with the results of an assessment.



4. SPECIAL CONSIDERATIONS FOR BOTH INTERNAL AND EXTERNAL ASSESSMENT

The accrediting body will review the circumstances surrounding each request for special consideration to ensure that the decision made maintains the equity, validity and reliability of the assessment for the learner and does not give the learner an unfair advantage.

Learners need to submit evidence to the PRO Phlebotomy Training Centre in support of the special consideration. This may include medical evidence or a statement from the invigilator or any other appropriate information.

4.1 Internal assessment

The only special consideration allowed is an extended time period/registration period for the completion of the assessment. We will retain evidence of this special consideration and make it available to our External Moderators, External Verifiers and Quality Advisors.

4.2 External assessment

All learners, regardless of their special consideration, must still meet the minimum requirement for the course. Where a learner completes the external assessment under special considerations, and sufficient supporting evidence is available, then an exceptional circumstances award may be made where learners have achieved the internal assessment component providing at least 50% of the external assessment has been achieved. (This is also known as an aegrotat award).

For learners completing external assessments, we will record the details of these arrangements on the Invigilator's Register and return it to the accrediting body with the external assessment papers.

A learner who is fully prepared for an external assessment may be eligible for special consideration if:

- performance in an external assessment is affected by circumstances beyond the control of the learner, eg 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.

4.3 Applying for special considerations

When PRO Phlebotomy Training apply to the accrediting body for special considerations, the following information must be included:

- centre number and name;



- learner name;
- learner number (where available);
- programme and/or unit number/code ;
- programme title and level;
- date of the assessment session (month and year);
- summary of adverse circumstances affecting the learner's performance in the assessment;
- list of other units of the qualification already achieved and details of the assessor's and/or internal moderator's/verifier's records of their decisions about the learner's achievement;
- estimated result for the learner;
- copy of any evidence submitted to us by the learner in support of their request.

We must submit the application as soon as possible after the assessment and no later than 7 working days after the assessment.

Requests for special consideration can only be accepted after the results of the assessment have been released in the following circumstances:

- the application has been overlooked by the PRO Phlebotomy Training Centre, and this oversight is confirmed by the Head of Centre;
- medical evidence comes to light about a learner's condition, which demonstrates that the learner must have been affected by the condition at the time of the assessment, even though the problem revealed itself only after the assessment.

4.4 The role and responsibilities of the accrediting body

When an application is sent to the awarding body, it will be reviewed and we will be informed of the decision within 48 hours. If the review is going to take longer, we will be informed. If the application for special consideration is successful, the learner's performance will be reviewed in the light of available evidence.

Please note that a successful application of special consideration would not necessarily change a learner's result.



5. GENERAL INFORMATION

5.1 Confidentiality

PRO Phlebotomy Training, and the accrediting body, will treat all records of reasonable adjustments and special consideration arrangements in confidence.

5.2 Other arrangements not covered by this policy

Circumstances for both internal and external assessment not covered in this policy should be discussed with the PRO Phlebotomy Training Centre before assessment takes place. Please contact us on 01332 380 777 or by emailing info@PROPhlebotomyTraining.co.uk.

5.3 Appeals

If the learner wishes to appeal against any decision to decline requests for reasonable adjustments or special consideration arrangements, please refer to our Appeals Policy, available to download from our website:

www.PROPhlebotomyTraining.co.uk/Appeals.pdf or requested from the PRO

Phlebotomy Training Centre on 01332 380 777 or by emailing

info@PROPhlebotomyTraining.co.uk.

5.4 Recording

PP-004A-FAF - Track and review reasonable adjustments and special considerations for individual candidates.

6. REVIEWING THIS POLICY

6.1 Contacts

If there are any queries about the contents of the policy, please contact the PRO Phlebotomy Training Centre on 01332 380 777 or by emailing info@PROPhlebotomyTraining.co.uk.

6.2 Reviews

The Senior Management Team reviews this policy at least annually during the bi-annual Service Review Meetings.

Last updated: 1st November 2025

6.3 Declaration

This policy has been reviewed and approved by the Senior Management Team:

SIGNED:		DATE:	01/11/2025
NAME:	Kim Cockerham	POSITION:	Training Centre Manager