

Reasonable Adjustments and Special Considerations Policy

1. General

- 1.1 This policy is for use by Swim England Qualifications (SEQ) and our Approved Training Centres (ATC) to ensure we (SEQ) are dealing with all adjustments and consideration requests in a fair and consistent manner.
- 1.2 Section 53 of the Equality Act 2010 states that awarding bodies must not discriminate, harass or victimise when awarding qualifications, and we have a duty to make reasonable adjustments.
- 1.3 Our aim is to facilitate open access for all Learners who are eligible for reasonable adjustments or special considerations in assessments, whilst ensuring the assessment of understanding, knowledge, skills and competence is not compromised in any way for all of the protected characteristics within the Equality Act 2010. Please also refer to our Equality and Diversity Policy.
- 1.4 Wherever possible, we ensure that through the design and development of our qualifications, assessments remain flexible and mitigate the need for Reasonable Adjustments or Special Considerations. This includes undertaking an Equality Impact Assessment. The majority of our qualifications enable Learners to work at their own pace, and so adjustments and considerations during assessment are unlikely to be needed.
- 1.5 During qualification and assessment development, SEQ applies the principles of universal design to promote accessibility for all learners and to reduce the need for individual adjustments. Each qualification undergoes an Equality Impact Assessment (EIA) to identify and minimise potential barriers to achievement.
- 1.6 SEQ ensures that assessment methods are valid, reliable, and manageable for diverse learner groups, taking into account the varied needs of learners with disabilities, temporary conditions, or other protected characteristics. This proactive design approach supports inclusivity and aligns with Condition D2 (Accessibility of Qualifications) and the Equality Act 2010.
- 1.7 Reasonable Adjustments and Special Considerations can be applied to all of our qualifications. For specific qualification requirements, please refer to the Qualification Specification and/or the Assessment Strategy.
- 1.8 For assessments that are externally led by SEQ, any requests for Reasonable Adjustments or Special Considerations must be submitted by the Approved Training Centre (ATC) to SEQ for approval before the assessment takes place. For assessments that are internally led by the ATC, the ATC is responsible for determining and applying appropriate Reasonable Adjustments or Special Considerations for registered learners, provided these do not conflict with SEQ's published guidance.

1.9 All of our ATCs should adhere to relevant legislation to promote fair access to assessment for all Learners. They must have policies and procedures in place that reflect the principles set out in this policy.

2. Access Arrangements

2.1 Access arrangements are agreed before an assessment and before the learner's registration period has expired. They allow Learners with special educational needs, disabilities, temporary injuries, temporary illness, and/or situations beyond their control to access the assessment and demonstrate what they know. They can do so without changing the assessment's demands. The intention behind an access arrangement is to meet the particular needs of an individual Learner without affecting the integrity of the assessment. Access arrangements are the principal way in which we and our ATCs comply with the duty under the Equality Act 2010 to make 'reasonable adjustments'.

3. Reasonable Adjustments

3.1 The Equality Act 2010 requires both us and our ATCs to make reasonable adjustments where a Learner, who is disabled within the meaning of the Equality Act 2010, would be at a substantial disadvantage in comparison to a Learner who is not disabled. We are all required to take reasonable steps to overcome that disadvantage.

3.2 A Reasonable Adjustment may be unique to the individual Learner and may not be included in the list of Access Arrangements within this policy. Whether an adjustment will be considered reasonable will depend on a number of factors, which will include, but are not limited to:

- The needs of the Learner
- The effectiveness of the adjustment in reducing disadvantage
- The resources available to the ATC and SEQ
- The cost and practicality of the adjustment
- The likely impact of the adjustment upon the Learner and other Learners
- The need to maintain academic or assessment standards

3.3 An adjustment will not be approved if it:

- Involves unreasonable costs to us or the ATC
- Involves unreasonable timeframes
- Effects the integrity of the assessment

This is because the adjustment is not "reasonable". An adjustment will not be approved if its implementation would place an unreasonable burden on resources, require impractical timeframes, or compromise the validity and integrity of the assessment, as this would exceed what is considered reasonable under the Equality Act 2010.

3.4 In most cases, it will not be reasonable for adjustments to be made to assessment criteria within a qualification. To do so would likely undermine the qualification's effectiveness in providing a reliable indication of the Learner's knowledge, skills and understanding.

3.5 There is no duty to make adjustments to competence standards within vocational qualifications. The application by an awarding organisation of a competence standard to

a disabled person is not disability discrimination unless it is discrimination by virtue of section 19 of the Equality Act 2010 (re: indirect discrimination).

3.6 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. Learners should be fully involved in any decisions about adjustments. This will ensure that individual needs are met whilst still bearing in mind the specified assessment criteria for a particular qualification. As the needs and circumstances of each Learner differ, ATCs must consider any request for a reasonable adjustment on a case-by-case basis.

4. Special Considerations

4.1 A Special Consideration is the consideration given to a Learner who has experienced a situation that has had, or is reasonably likely to have had, a material effect on that Learner's ability to take an assessment or demonstrate their level of attainment in an assessment that may not be covered under the Equality Act 2020. We recognise the following Special Considerations categories, whereby the Learner has:

- An illness
- An injury
- A temporary disability, learning need or medical condition
- Experienced some other event outside of their control

4.2 Access Arrangements as described in this policy can be applied to Learners for the following Special Considerations categories, whereby the Learner has:

- An illness
- An injury
- A temporary disability, learning need or medical condition

There may be Learners who require other adjustments not listed in this policy. If that is the case, then the ATC must contact us for advice, guidance and approval.

4.3 The timing of assessments for our qualifications remains flexible for the majority of our qualifications. Particular qualifications do have a set timeframe and / or specific parameters for the assessment takes place, refer to the qualifications specification and / or Assessment strategy for guidance. Learners are able to progress at a rate that is appropriate to their ability, as long as they achieve within the registration period. Therefore, if a Learner is too ill to complete an assessment, alternative timings can be offered by the ATC, without notification to us, unless this is going to be outside of the learner's registration period. In order to support ATCs in providing an alternative assessment opportunity for the Learner at a later date, we will accept requests for reasonable extensions to Learner registrations for any Special Consideration category (subject to any previously set qualification end dates).

4.4 There may be exceptional circumstances whereby we make a Special Consideration decision for a particular qualification and / or cohort of Learners, such as automatic registration extension, whereby there is an extraordinary situation that is outside of the Learner, ATC or our control.

4.5. In some cases, a Learner may experience exceptional circumstances not specifically covered in this policy, where it may be appropriate to consider a Special Consideration. Such considerations may apply after an assessment if the Learner's performance has been, or is likely to have been, affected by mitigating or adverse circumstances beyond their control. In these instances, the ATC must contact us for advice, guidance, and approval before taking any action.

5. ATC Consideration

5.1 Reasonable Adjustments and Special Consideration arrangements are available to ensure all Learners receive recognition of their achievement, provided there is evidence that the equity, validity and reliability of the assessments can be assured. These arrangements should not be used to make assessments easier for Learners or give Learners a head start and should not disadvantage other Learners.

5.2 We will monitor ATCs by ensuring they have applied the following:

- Access Arrangements granted provide Learners with the opportunity to demonstrate their attainment
- The Access Arrangement compensates for any disadvantage imposed by the disability or difficulty, but does not disadvantage other Learners
- The assessments were rigorous and fair
- The assessment activity is valid and is measurable against the assessment criteria
- Assessment results are reliable

5.3 ATCs may reject requests in situations as follows:

- The Access Arrangement would invalidate the assessment requirements set out in the qualification specification
- The content and delivery of the chosen course of study would prevent the Learner from fulfilling a major section of the course, affecting the assessment requirements
- The Learner would be given an unfair advantage compared to other Learners for whom an Access Arrangement has not been granted

6. Applying Reasonable Adjustments to Internal Assessments (Applies to ATCs)

6.1 Internal assessment is whereby the ATC undertakes the assessment and Internally Verifies / Internal Quality Assures (IV), and we undertake External Verification / External Quality Assurance (EV).

6.2 For qualifications which are internally assessed, ATCs do not need to apply to us for Access Arrangement approval for those described in this policy. However, ATCs must make Reasonable Adjustments that are in line with this policy.

6.3 Where the ATC is unsure if the Reasonable Adjustment proposed is in line with this policy, the ATC should contact us for advice and support.

- 6.4 There may be Learners who suffer from particular disabilities who may require other Access Arrangements which are not listed in this policy. Accordingly, the list of Access Arrangements is not exhaustive. For Access Arrangements that are not referenced in this policy, ATCs must contact us for advice, support and approval via our Reasonable Adjustments and / or Special Considerations application form.
- 6.5 ATCs must keep a record of all Access Arrangements applied through Reasonable Adjustments. Evidence of which will be monitored by us via our standard ATC monitoring activities, as described in our ATC Service Level Agreement.
- 6.6 For all other Reasonable Adjustments, the ATC must submit a Reasonable Adjustments and / or Special Considerations application form to us for approval prior to confirming any acceptance with the Learner or assessment. This includes Access Arrangements not defined in this policy, as well as:
- Changing or adapting the assessment method
 - Changing usual assessment arrangements
 - Language modified assessment tasks (excluding BSL)
- 6.7 When internal assessments are delivered through an e-portfolio or other online/digital platforms, Approved Training Centres (ATCs) must ensure that learners have equitable access to the required technology and connectivity. If there is a potential barrier—such as limited access to devices or reliable internet—the ATC is responsible for confirming, at the point of registration, that appropriate support or alternative arrangements can be provided. This may include supplying suitable devices or offering an alternative assessment method where feasible. For further details on assessments delivered electronically, please refer to SEQ’s Assessment Policy (including E-Assessments). More details on online assessments can be found within Section 10.

7. Alignment with Centre Assessment Standards Scrutiny (CASS) and Evidence Monitoring

- 7.1 All evidence supporting Reasonable Adjustments or Special Considerations must be securely retained by the ATC for the regulatory period stated in SEQ’s Retention of Records Policy. SEQ will monitor implementation through the Centre Assessment Standards Scrutiny (CASS) process and standard ATC Monitoring activities. This ensures that all arrangements are applied fairly, consistently, and transparently across centres, maintaining the integrity and comparability of SEQ qualifications.

8. Applying Special Considerations to Internal Assessments

- 8.1 For qualifications which are internally assessed, ATCs do not need to apply to us for Access Arrangement approval for those described in this policy. However, ATCs must include Special Considerations that align with this policy.
- 8.2 Where the ATC is unsure if the Special Consideration proposed is in line with this policy, the ATC should contact us for advice and support.

8.3 There may be Learners who suffer from a particular situation who may require other Access Arrangements which are not listed in this policy. Accordingly, the list of Access Arrangements is not exhaustive. For Access Arrangements that are not referenced in this policy, ATCs must contact us for advice, support and approval via our Reasonable Adjustments and / or Special Considerations application form.

8.4 ATCs must keep a record of all Access Arrangements applied through Special Considerations. Evidence of which will be monitored by us via our standard ATC monitoring activities and as described in our ATC Service Level Agreement.

8.5 Access Arrangements can be applied to Learners for the following Special Considerations categories:

- An illness
- An injury
- A temporary disability, learning need or medical condition

9. Applying Reasonable Adjustments or Special Considerations for External Assessments (Applies to SEQ)

For qualifications whereby the assessment is externally led by SEQ, all reasonable adjustments are required to be submitted to SEQ no more than 14 days in advance of learner registration for approval prior to assessment release. Regarding special considerations this must be submitted prior to confirming with the learner. All requests must be submitted via reasonable adjustments and/or special considerations application form/s. Further details will be contained in either the Qualification Specification and / or Assessment Strategy.

10. Reasonable Adjustments and Special Considerations in Online or E-Assessments

10.1 SEQ recognises that learners undertaking online or e-assessments may require specific arrangements to ensure that assessment accessibility and integrity are maintained. Approved Training Centres (ATCs) must ensure that learners undertaking assessments via digital or remote platforms have equal access to the necessary facilities and support.

10.2 Where a Reasonable Adjustment or Special Consideration relates to an e-assessment, such as the use of assistive technologies, modified digital content, or alternative assessment formats, ATCs must contact SEQ in advance for advice, guidance, and approval.

10.3 Reasonable Adjustments for online or e-assessments may include, but are not limited to:

10.4 Accessible assessment platforms (e.g. screen readers, magnification tools, Coloured Overlays).

- Adjusted time allocations to allow for technology support.
- Alternative methods of verification where remote invigilation or identity checks may disadvantage a learner.

10.5 These arrangements must be implemented without compromising assessment integrity, security, or standardisation and must align with SEQ's Assessment (including E-Assessment) Policy and the conditions set by Ofqual and Qualifications Wales.

11. Timeline for Processing Requests

11.1 ATC submits a completed FRM010 Special Considerations Request form or FRM009 Reasonable Adjustments form to SEQ.

11.2 All requests are recorded on SEQ's QA Register and given an individual reference number.

11.3 SEQ will acknowledge receipt of requests sent to us within 5 working days of receipt.

11.4 SEQ will review the information provided and assess it against the following approval criteria:

- Whether sufficient information and/or relevant evidence has been provided
- Whether additional information and/or evidence is needed from the ATC
- If the request has been made within a live registration period
- Rationale for the request
- If any previous requests have been made for the same individual and the outcome thereof

11.5 Within 10 working days from initial request, SEQ will return the completed form, which will provide an outcome of either 'declined' or 'approved' based on the evidence provided.

11.6 Once approved the learner's online assessment portal will be updated on the day of registration.

12. Approved Access Arrangements

12.1 Vocational Technical Qualifications award competence against the standards and requirements as stated in the qualification specifications, and/or National Standards and/or an approved assessment strategy. Any Access Arrangement must reflect the normal learning or working practice of a Learner in an ATC or working within the occupational area. Learners may, however, use mechanical, electronic, and other aids to demonstrate competence. The aids must either be generally commercially available or available from specialist suppliers and be feasible to use in the ATC or on an employer's premises.

13. Artificial Intelligence and Digital Integrity

13.1 SEQ adheres to Ofqual's guidance on the use of Artificial Intelligence in qualifications and assessments. Artificial Intelligence or automated tools must not be used by learners, ATCs, or staff unless specifically approved as an assistive technology to meet an identified Reasonable Adjustment.

13.2 Where assistive software or technology is approved for use, ATCs must ensure that it:

- Supports the learner's access needs without altering the assessment demands.
- Does not generate or enhance assessment responses; and
- Complies with SEQ's Malpractice and Maladministration Policy.

13.3 SEQ may review and update this section periodically in line with Ofqual or JCQ guidance to ensure continued integrity of digital and online assessment processes.

Table 1: Access Arrangements Approved

The following is a list of Access Arrangements that we approve.

Access Type	Practical Skills	Projects	Knowledge Tasks	Professional Discussions	Online Assessment
Physical Environment	All	All	All	All	All
Personal support worker	1,4,5,6,7,10,11				1.4.5.6.7.10,11
Coloured overlays / low vision aids		1,7,11	1,7,11		7,11
Assessment material in an enlarged format or Braille		1,7,11	1,7,11		7,11
British Sign Language (BSL) Interpreter ^{*/**}	6	6	6	6	6
Reader ^{*/**}		1,6,7,8,11	1,6,7,8,11	1,6,7,8,11	1,6,7,8,11
Assistive software / assistive technology ^{***}		1,5,6,7,10,11	1,5,6,7,10,11	1,5,6,7,10,11	1,5,6,7,10,11
Electronic submissions		All	All	All	All
Dictation software that produces a hard copy		1,5,6,7,10,11	1,5,6,7,10,11	1,5,6,7,10,11	1,5,6,7,10,11
Practical Assistant [*]	3,5,9,10,11				5,10,11
Prompter [*]	1,11				1,11
Scribe [*]		1,5,7,8,10,11	1,5,7,8,10,11	1,5,7,8,10,11	1,5,7,8,10,11
Translator ^{*/**}	8	8	8	8	8
Transcriber ^{*/**}		1,5,7,8,10,11	1,5,7,8,10,11	1,5,7,8,10,11	1,5,7,8,10,11
Extra time	All	All	All	All	All

**They must not be the course tutor, assessor, relative, friend or peer of the Learner.*

*** They must not explain or clarify; they may, if requested, repeat instructions.*

**** Assistive Software/technology software and technology do not include the use of Artificial Intelligence (AI) software, such as ChatGPT.*

Table 2: Codes

1	Cognitive processing such as dyslexia, dyspraxia, visual processing speed, visual perception, literacy, numeracy, verbal reasoning
2	Social communication needs are associated with an autistic spectrum condition.
3	Long-standing illnesses such as epilepsy, IBS, chronic fatigue, or cancer.
4	A mental health condition
5	A physical need, such as arthritis, cerebral palsy, or a wheelchair user
6	Hearing need
7	Visual need
8	English is a Second Language
9	A temporary illness

10	A temporary injury
11	A temporary disability, learning need or medical condition

Table 3: Level and length of permissible registration extension(s)

Example Special Consideration for Learners within Registration Period	Length of Extension Approved (Per Qualification)		
	SAT122	L2TS22 or L2TS26 / L2BT23 / L2OWS	L3AAfH / L3PS22 / L3SCO / L3ET / L3MLSP
<i>If the examples provided relate to, or as a result, require reassessment, refer to the appropriate timescales provided</i>	12 Months Registration Period		24 Months Registration Period
Long-term illness or injury	Up to 12 months		Up to 18 months
Short-term illness or injury	Up to 6 months		
Changes in personal circumstances, i.e. changes in employment, personal situation	Up to 12 months		Up to 18 months
Changes in Maternal / Paternal circumstances, e.g. child care responsibilities	Up to 12 months		Up to 18 months
Changes in course site/booking details, i.e. location change, course availability	Up to 6 months		N/A
Additional administration timeframe required by ATC, including marking (where relevant)*	Up to 2 months	Up to 3 months	
Additional Quality Assurance process, e.g. internal/external quality assurance (where relevant)	Up to 2 months		
Learner's sabbatical, e.g. travelling overseas, holiday	Assessed per case		
Additional learner development time prior to assessment	Up to 3 months		
Extended learner assessment preparation time	Up to 6 months		
Portfolio access, i.e. recovery of evidence (where applicable per Qual, delivery model)	Up to 3 months		
Other	Assessed per case		

* does not apply to L3MLSP25 Version

Please note that repeat requests for registration period extensions for the same individual will not normally be approved; however, we will review/consider these on a case-by-case basis.

14. Queries and Complaints

14.1 If any circumstances arise that are not covered by this policy, you should contact our Quality and Compliance Team to discuss them before any agreement with a Learner and before any assessment takes place.

14.2 Our Complaints Policy is available on our website www.swimenglandqualifications.com via our ATC Secure Site (The Box) or by contacting qualityassurance@swimenglandqualifications.com

15. Appeals

15.1 If you wish to appeal against our decision to decline a request for an Access Arrangement for either Reasonable Adjustments or Special Consideration, please refer to our Enquiries and Appeals Policy that is available on our website www.swimenglandqualifications.com via our ATC Secure Site (The Box) or by contacting qualityassurance@swimenglandqualifications.com

16. Quality Assurance

16.0 This policy supports regulatory conditions;

Related Ofqual General Conditions of Recognition:	C2; D2; E4; E10; G1; G2; G3; G6; G7.
Related Qualifications in Wales Standard Conditions of Recognition:	C2; D2; E4; E10; G1; G2; G3; G6; G7.

16.1 This policy is reviewed biennially, or earlier in line with any changes to the SEQ Strategy or Regulatory requirements to ensure it continues to meet our needs and those of the Regulators (Ofqual / Qualification Wales).

For office Purposes

Document Version Number	Comments on Amendments and/or Additions	Published Date
9	Additional information on EIA and D2 compliance, clarification on approving adjustments for sections 1 and 3. New Section 7, align to CASS New Section 10, RA/SC on E-Assessments (table 1 updated) New Section 13, AI and digital integrity.	November 2025
10	Included reference to updated timeframes required for reasonable adjustments and special considerations. Inclusion of learner adjustment timeframe added.	March 2026