EPA access arrangements and reasonable adjustments

Guidance on evidence requirements

Version 1.2
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For external use

Document revision history

Version	Summary of change	Approval date
1.2	More detail added on evidence requirements New section: 5 Making applications	14 April 2025
1.1	Added link to the JCQ access arrangement page	04 December 2024
1.0	Document created	15 July 2024

Contents

1. Introduction

Access arrangements allow people to show what they know and can do without changing the demands of the assessment. For example, through the use of readers, scribes and extra time for an assessment.

Access arrangements are agreed before an assessment. They allow apprentices with special educational needs, disabilities or temporary injuries to access the assessment.

The Equality Act 2010 requires City & Guilds to make reasonable adjustments where a learner, who is disabled within the meaning of the Act, would be at a substantial disadvantage in comparison to someone who is not disabled. Access arrangements is a wider term, which includes adjustments made for learners who are not disabled.

This document describes the evidence required to apply for access arrangements for apprenticeship end-point assessments. It should be used in conjunction with the following documents:
- Individual end-point assessment packs,
- Reasonable adjustments – EPA Pro guide,
- JCQ Access Arrangements and Reasonable Adjustments.

Providers should consider the following points when determining suitable access arrangements:
- what arrangements are suitable for the assessment,
- the apprentice's normal way of working (eg support normally given on-programme or in the workplace),
- the details of how specific access arrangements would work in an assessment.

This document does not cover all possible arrangements. If an apprentice needs an access arrangement not mentioned in this document, the provider should discuss it with City & Guilds. Access arrangements will be permitted by City & Guilds if they are appropriate for the assessment and for the apprentice.

1.1. Compliance with assessment plans

No access arrangement can be permitted where it conflicts with the specific requirements of the assessment plan. For example, if an assessment plan states an assessment must take place in person, we could not permit remote assessment even as an access arrangement.

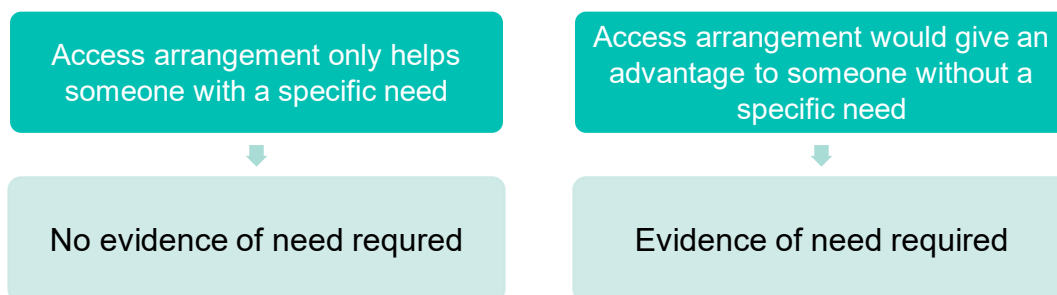# 2. Overview of evidence to support access arrangements

Providers must keep evidence on file for access arrangements for a minimum of three years after the assessment date. City & Guilds may ask to see copies of the evidence held for specific apprentices. Providers must keep copies of access arrangements confirmations from City & Guilds on file (including those from the Walled Garden and email correspondence).

The apprentice **must** be consulted by the provider before an access arrangement an application is submitted to City & Guilds.

There are two different types of evidence as described in the sections below:

2.1. Evidence of need

This is required where an access arrangement could give an unfair advantage to someone without a genuine need. For example, extra time might help someone without a disability to spend more time on their answers, whereas a Communication Professional would only help apprentices who uses sign language.

Access arrangement only helps someone with a specific need	Access arrangement would give an advantage to someone without a specific need
↓	↓
No evidence of need required	Evidence of need required

Examples of documents that could be used to provide evidence of need include:
- Education, Health and Care Plan (EHCP), or the equivalent for Wales / Northern Ireland,
- a letter from a hospital consultant or a psychiatrist,
- a letter from a Speech and Language Therapist,
- Educational Psychologist's report,
- JCQ Form 8.

All evidence **must**:
- be dated,
- be from when the apprentice was at least 12 years old,
- include details of the author (eg name, position),
- be relevant (for example, if a provider is applying for a reader and no other arrangements, there would be no reason to include the results of a spelling test),
- specify the apprentice's disability/diagnosis.
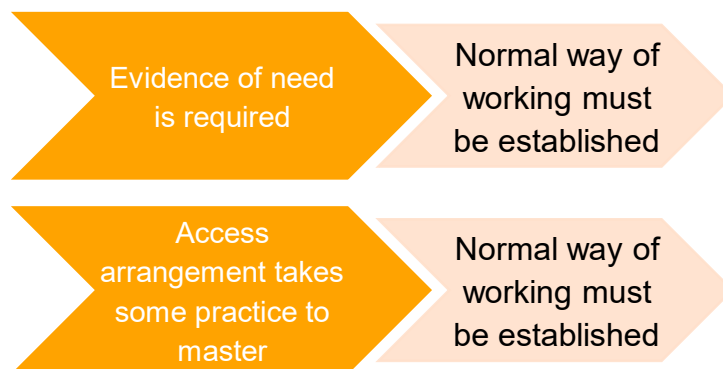
2.2. Normal way of working

The arrangement(s) put in place for the EPA must reflect the support given to the apprentice when preparing for their EPA, for example:

- for any on-programme qualifications or Functional Skills,
- during any teaching or preparation for their EPA,
- when putting together any portfolios or other work for their EPA,
- in the workplace,
- during any mock or practice tests.

This is referred to as 'normal way of working'. The evidence must be put together by a member of staff at the provider. It should 'paint a holistic picture of need', including:

- support given to the apprentice when preparing for their EPA (as described above),
- if known, arrangements made at school (for example for GCSEs),
- comments and observations from teaching staff and support staff who have noted the apprentice's difficulties,
- intervention strategies (e.g. individual education/learning plans),
- screening test results,
- the apprentice's self-reported difficulties.

Normal way of working evidence is designed to show how the apprentice will benefit from the access arrangement, for example, that they know how to work with a reader or scribe, as it does take some practice.

Evidence of need is required → Normal way of working must be established

Access arrangement takes some practice to master → Normal way of working must be established

Normal way of working evidence can be in the form of a note written by the provider on headed paper. It must be signed[1] and dated. Alternatively, the JCQ forms can be used.

Normal way of working evidence is not required for access arrangements where it is put in place due to a temporary injury or impairment where it would not be possible to establish normal way of working.

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[1] Electronic signatures can be used.

3.   Access arrangements in the drop down

3.1.   25% extra time

Evidence required	Description	Guidance
Yes	• Extra time to complete the assessment. • If there is flexibility in the duration, extra time should be added to this, as well as the standard assessment time.	• Not permitted where the apprentice is being assessed on how quickly they complete tasks.

Evidence required:

Evidence of need	Yes	Normal way of working	Yes

3.1.1.   Evidence of need

Examples of suitable evidence are given below:

Learning difficulties (including dyslexia)	Evidence required (one of the following)	Requirement
	• Education, Health and Care Plan	Current or final
	• Fully completed JCQ Form 8 with an assessment (Part 2 of Form 8) carried out. • Educational Psychologist report • Diagnostic report, carried out by an assessor confirming a learning difficulty, and detailing any difficulties with reading, writing and/or cognitive processing	• 1 below average standardised score (84 or less), from the following: - speed of reading, or - cognitive processing/fluency. or • 2 low average standardised score (85-89), from the following: - speed of reading and speed of writing - speed of reading and cognitive processing/fluency - speed of writing and cognitive processing/fluency, or - two different areas of cognitive processing/fluency

Autistic Spectrum Disorder (ASD)	Evidence required
Autistic Spectrum Disorder (ASD) **Sensory and/or physical needs (HI, MSI, PD, VI)** **Social, emotional and mental health needs (e.g. ADHD)** **Speech, Language and Communication Needs (SLCN)**	One of the following: • Education, Health and Care Plan (or equivalent for Wales / Northern Ireland) • A letter/report from mental health services, a psychologist, a medical consultant, a psychiatrist or a Speech and Language Therapist (SaLT) • A letter/report from the Local Authority Specialist Service, Local Authority Sensory Impairment Service or Occupational Health Service

The evidence of need must confirm the diagnosis/disability and reflect the apprentice's current needs.

3.1.2. Normal way of working

One of the following	Covering the following:
Form 8 (Part 1)	• confirmation that 25% extra time is the apprentice's normal way of working,
Form 9	• any persistent and significant difficulties, and how these substantially impact on teaching and learning,
A note by the centre	• details of support and adjustments that are in place in the classroom, tests and examinations, or in the workplace

3.1.3. Additional evidence for over 25% extra time

In addition to the evidence listed under 3.1:

Learning difficulties	Percentage	Requirement
	Up to 50% extra time	• 1 very substantially below average standardised score (69 or less), from the following: - speed of reading, or - cognitive processing/fluency. Dated either: • within the last two years, or • when the apprentice was aged 16 or above Plus, normal way of working evidence, as listed in 3.1.2

Medical condition	Percentage	Requirement
Physical disability Sensory impairment (hearing, vision or multi-sensory impairment)	Up to 50% extra time	Evidence (or a statement from centre) must give examples of how the apprentice's disability very substantially hinders their speed of working
	Over 50% extra time	Only approved in exceptional circumstances. City & Guilds will provide more information if the application is rejected.

3.2. Scribe

Evidence required	Description	Guidance
Yes	• Writes an apprentice's dictated answers. • Speech recognition software or a word processor with the spelling and grammar check switched on	• Only for assessments with written responses. • For spoken assessments, a scribe is not needed.

Evidence required:

Evidence of need	Yes	Normal way of working	Yes

3.2.1. Evidence of need

The evidence of need must confirm the diagnosis/disability and reflect the apprentice's current needs. Examples of suitable evidence are given below:

Learning difficulties (including dyslexia)	One of the following:	Requirement
	• Education, Health and Care Plan	• Current or final
	• JCQ Form 8 (part 2)	One of the following:
	• Educational Psychologist report	• a standardised score of 84 or less for spelling,
	• Diagnostic report	• a standardised score of 84 or less for writing speed, or
		• the candidate's writing is illegible or grammatically incomprehensible but improves significantly when a scribe is used.

Autistic Spectrum Disorder (ASD) Sensory and/or physical needs (HI, MSI, PD, VI) Social, emotional and mental health needs (e.g. ADHD) Speech, Language and Communication Needs (SLCN)	Evidence required
	One of the following: • Education, Health and Care Plan (or equivalent for Wales / Northern Ireland) • A letter/report from mental health services, a psychologist, a medical consultant, a psychiatrist or a Speech and Language Therapist (SaLT) • A letter/report from the Local Authority Specialist Service, Local Authority Sensory Impairment Service or Occupational Health Service

3.2.2. Normal way of working

One of the following	Covering the following:
Form 8 (Part 1)	• confirms that a scribe is the apprentice's normal way of working within the provider or workplace,
Form 9	• provides evidence that the apprentice has persistent and significant difficulties, and how these substantially impact on teaching and learning,
A note by the centre	• confirms if the apprentice cannot write, type independently, or at sufficient speed to record their answers (even with extra time allowed), • confirms if the apprentice cannot use a word processor with the spelling and grammar check or predictive text facility switched off.

3.3. Reader

Evidence required	Description	Guidance
Yes	• Reads written instructions and the questions. • A computer reader is software which accurately reads out text, but does not decode or interpret	• Only needed for assessments with written questions or instructions. • For spoken assessments, a reader is not needed.

Evidence required:

Evidence of need	No	Normal way of working	Yes

3.3.1. Normal way of working

One of the following	Covering the following:
Form 8 (Part 1)	• the nature of the apprentice's impairment,
Form 9	• confirming that the use of a reader/computer reader reflects the apprentice's normal and current way of working with the provider or in the workplace.
A note by the centre	

3.4. Practical assistant

Evidence required	Description	Guidance
Yes	• A practical assistant carries out practical tasks at the instruction of the apprentice. • A practical assistant will not normally be permitted in practical assessment components.	• Not allowed to carry out tasks where which are part of the assessment objectives.

Evidence required:

Evidence of need	No	Normal way of working	No

3.4.1. Other details required

We need a list of the tasks which the practical assistant would perform. This will allow us to ensure that the assessment objectives are not compromised.

3.5. Coloured/ enlarged paper

Evidence required	Description	Guidance
No	Copying/printing assessment materials: • to enlarge from A4 to A3, and/or • onto coloured paper.	• Enlarging assessment materials may affect questions relating to scale.

3.6. Bilingual dictionary and 10% extra time

Evidence required	Description	Guidance
Yes	• This is a rare and exceptional arrangement for apprentices who entered the UK less than three years ago, with no prior knowledge of the English Language.	• No application (or evidence) is required for a bilingual dictionary without extra time

Evidence required:

Evidence of need	No	Normal way of working	Yes

3.6.1. Normal way of working

A note by the centre covering the following:

- that the apprentice's first language is not English, Irish or Welsh,
- confirming that the apprentice entered the United Kingdom within three years of the examination(s) with no prior knowledge of the English language,
- English is not one of the languages spoken in the family home,
- prior to their arrival in the United Kingdom the apprentice was not:
  - educated in an international school where some or the entire curriculum was delivered in English,
  - prepared for or entered for IGCSE qualifications where the question papers were set in English,
  - prepared in English for other qualifications, e.g. IELTS qualifications, Preliminary English Tests,
- the apprentice has to refer to the bilingual translation dictionary so often that examination time is used for this purpose, delaying the answering of questions,
- the provision of extra time reflects the apprentice's normal way of working with the dictionary.

4.   Other access arrangements

To use an arrangement that is not listed in the drop down, select "other" in the list and add a description, as shown below:

Examples of possible access arrangements are listed in the sections below, the fact that it is not listed does not mean it is not permitted. City & Guilds makes every effort to provide detailed information to providers, but it is not possible to list every possible access arrangement an apprentice may need.

4.1.   Supervised rest breaks

Evidence required	Description	Guidance
No	• A break from the assessment • The timing of the assessment is paused and re-started when the apprentice is ready to continue.	• This is different to extra time. Rest breaks do not come out of the assessment time. • The apprentice must be accompanied if they need to leave the room

4.2.   Prompter

Evidence required	Description	Guidance
No	• Designed for if the apprentice has persistent distractibility or significant difficulty in concentrating	• A prompter can help to keep the apprentice focused.

4.3. Communication Professional

Evidence required	Description	Guidance
No	For apprentices using Sign Language	They must not: • change the meaning, • provide any additional information, or • provide an explanation as to what the question requires of the apprentice.

4.4. Face to face assessment

Evidence required	Description	Guidance
No	• For assessments that are usually remote	• If the apprentice cannot access a remote assessment, due to their disability, it may be possible to make alternative arrangements.

4.5. Remote assessment

Evidence required	Description	Guidance
No	• For assessments that are usually face to face	• If the apprentice cannot access a face to face assessment, due to their disability, it may be possible to make alternative arrangements.

4.6. Scrap paper to write notes

Evidence required	Description	Guidance
No	• Blank scrap paper to write notes within an assessment	• The notes should be destroyed after the assessment.

4.7. Written questions in spoken assessments

Evidence required	Description	Guidance
No	• This will usually be provided as subtitles in a remote assessment	• The questions can only be provided during the assessment, not in advance.

4.8. Pre-recorded presentation

Evidence required	Description	Guidance
Yes	• Where the presentation is recorded in advance of the assessment and the recording played for the IEPA	• This can be permitted if the apprentice would be at significant disadvantage without this arrangement and that this is due to a disability.

Evidence required:

Evidence of need	Yes	Normal way of working	Yes

4.8.1. Evidence of need

Examples of suitable evidence are given below:

Autistic Spectrum Disorder (ASD) Social, emotional and mental health needs (e.g. ADHD) Speech, Language and Communication Needs (SLCN)	Evidence required, one of the following: • Education, Health and Care Plan (or equivalent for Wales / Northern Ireland) • A letter/report from mental health services, a psychologist, a medical consultant, a psychiatrist or a Speech and Language Therapist (SaLT)

The evidence of need must confirm the diagnosis/disability and reflect the apprentice's current needs.

4.8.2.   Normal way of working

One of the following	Covering the following:
Form 8 (Part 1)	• confirmation that a recorded presentation is the apprentice's normal way of working,
Form 9	• details of persistent and significant difficulties, and how these impact on teaching and learning,
A note by the centre	• details of how a recorded presentation mitigates these difficulties • details of support and adjustments that are in place for learning, tests or in the workplace.

4.9.   Written answers in spoken assessments

Evidence required	Description	Guidance
Yes	• For remote assessments, this would be where answers are given in the chat	• This can be used providing the IEPA can be confident the responses are the apprentice's own

Evidence required:

Evidence of need	No	Normal way of working	Yes

4.9.1.   Normal way of working

One of the following	Covering the following:
A note by the centre	• the nature of the apprentice's impairment,
Education, Health and Care Plan	• confirming that the communicating in writing reflects the apprentice's normal and current way of working for learning and/or in the workplace

5.   Making applications

For instructions on how to use epaPro, please refer to the Reasonable Adjustments epaPRO – Centre Guide.
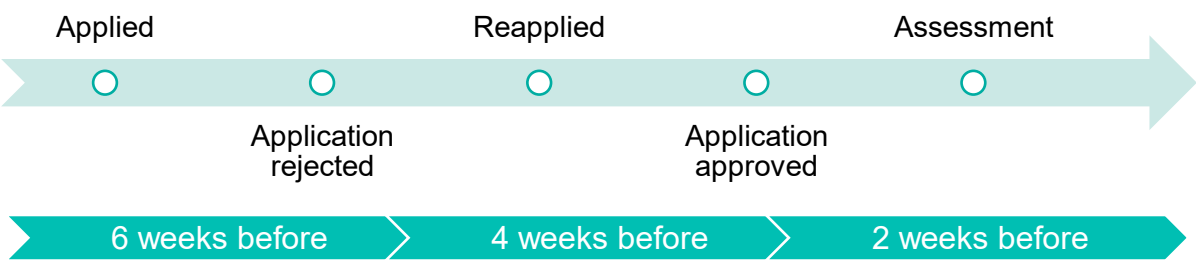
5.1. Deadlines for applications

5.1.1. Long term access arrangements

Please use "reasonable adjustment" to apply for long term access arrangements.

Applications **must** be made at least one month before the assessment.

We recommend all applications are made pre-Gateway and can be made at any time after registration. If an application if rejected, a new application is required and this could take another two weeks to be reviewed:

Applied		Reapplied		Assessment
○	○	○	○	○
	Application rejected		Application approved	

6 weeks before	4 weeks before	2 weeks before

For this reason, we recommend early applications as the best way to ensure the apprentice receives the access arrangements they need.

If applications are made less than one month before the assessment, even in the case of reapplying after a rejection, we cannot guarantee it can be reviewed before the assessment date. If an access arrangement has **not** been approved, the apprentice will need to complete the assessment **without** it.
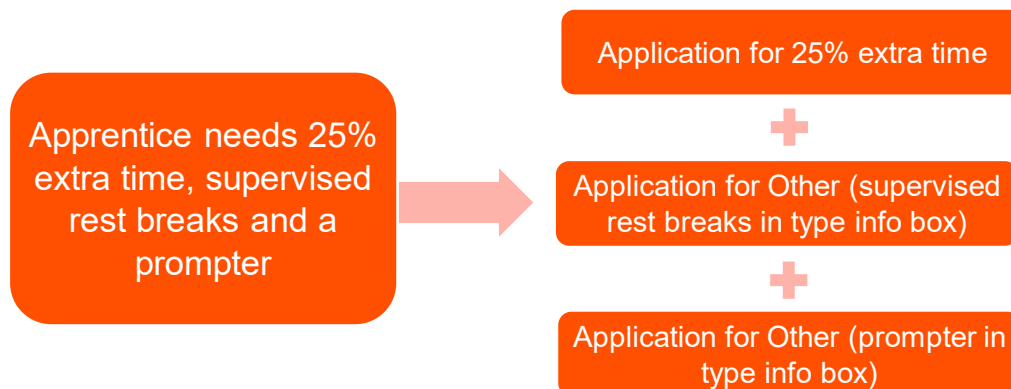
5.1.2. Temporary access arrangements

Please use "Special consideration – short term/ temporary due to injury" to apply for temporary access arrangements. For example, this can be used where an apprentice has broken their arm and needs a scribe. However, apprentices should not attempt an assessment unless they are well enough to do so.

Applications for temporary access arrangements should be made as early as possible. However. providers may also want to consider rescheduling the assessment in the case of a temporary injury.

5.2. Applying for multiple access arrangements

A separate application must be made for each access arrangement. For example, if the apprentice needs 25% extra time, supervised rest breaks and a prompter, then three applications are required:

```mermaid
Apprentice needs 25% extra time, supervised rest breaks and a prompter →
  Application for 25% extra time
  +
  Application for Other (supervised rest breaks in type info box)
  +
  Application for Other (prompter in type info box)
```

Please **do not** add additional access arrangements to the "type info" or "additional information" box, as these may be missed and not put in place for the assessment.

5.3. Making applications for specific assessment components

An application can either be made for:

- all assessment components, or
- a specific assessment component.

5.3.1. Determining when access arrangements are needed

If an application is made for all assessments, it may still be that the apprentice only *needs* the access arrangement for certain types of assessment. For example:

- A reader would not be needed for a professional discussion, where there is no written material to read.
- Extra time may be needed in a practical assessment, for an apprentice with a physical disability or a sensory impairment which has a substantial and adverse effect on their manual dexterity or their physical coordination. However, extra time may not be required in a practical assessment for an apprentice with learning difficulties.
- Extra time is not required where the assessment is not timed, for example, for a project which must be completed within 12 weeks. The 12 weeks is **not** the duration of the assessment, as the apprentice is not completing it continuously during the 12 weeks. More time can be given to the apprentice, within those 12 weeks, without approval.

5.3.2. Risks to consider when applying extra time

It's possible for extra time to be counter-productive in terms of fatigue. This may be a risk

- where an apprentice has over 50% extra time, or
- when applying extra time to very long assessments (eg 6 hours or more).

Other access arrangements may be more helpful to the apprentice in this case, and you may want to consider rest breaks as an alternative.

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About City & Guilds

Since 1878 we have worked with people, organisations and economies to help them identify and develop the skills they need to thrive. We understand the life changing link between skills development, social mobility, prosperity and success. Everything we do is focused on developing and delivering high-quality training, qualifications, assessments and credentials that lead to jobs and meet the changing needs of industry.

We work with governments, organisations and industry stakeholders to help shape future skills needs across industries. We are known for setting industry-wide standards for technical, behavioural and commercial skills to improve performance and productivity. We train teams, assure learning, assess cohorts and certify with digital credentials. Our solutions help to build skilled and compliant workforces.