

GEM Partnership Ltd Reasonable Adjustments Policy

1. Introduction

- 1.1. GEM Partnership recognises that it must take reasonable steps in the way that we work with people with a disability to ensure that they have equal access to all of GEM Partnerships recruitment and training services.
- 1.2. This policy aligns with the Equality Act 2010, which requires reasonable adjustments for disabled individuals. The policy is part of GEM Partnerships' broader commitment to equality, diversity, and inclusion, ensuring fair treatment and opportunities for employees, temporary workers, learners and apprentices

2. Reasonable Adjustments Policy Statement

- 2.1. Reasonable adjustments may be required when a disabled person applies for and/or is recruited to a vacancy, training course or apprenticeship, when an employee, temporary worker, learner or apprentice becomes disabled or develops a long-term health condition, when the impact of an impairment or medical condition deteriorates, if there is a change to the workplace, learning environment or employment arrangements, or when there is need for a disabled employee, temporary worker, learner or apprentice to undertake further training.
- 2.2. GEM Partnership recognises that neurodivergent individuals may require reasonable adjustments to remove barriers to recruitment, learning, assessment and employment. Adjustments will be considered individually and may include environmental, communication, technological or organisational support.
- 2.3. GEM Partnership will take reasonable steps to avoid disadvantage being caused to any disabled person in relation to recruitment, training, retention, promotion, development, retirement and dismissal.
- 2.4. GEM Partnership is committed to an environment that promotes equality and embraces diversity in its performance as an employer and training provider. It will adhere to legal and performance requirements and will mainstream equality and diversity principles through its policies, procedures and processes.
- 2.5. GEM Partnership will endeavour to make reasonable adjustments to accommodate any employee, temporary worker, learner and apprentice however there will be occasions where, after consideration, a requested adjustment cannot be accommodated. In such circumstances, the request will not be considered as reasonable by GEM Partnership.

3. Who is entitled to Reasonable Adjustments?

- 3.1. The Equality Act 2010 defines disability as a physical or mental impairment which has substantial and long-term adverse effect on a person's ability to perform normal day to day activities.
- 3.2. There is no definitive list of conditions/impairments which are covered by the Act. Each case must be considered individually, based on the definition given above taking into consideration the effects of the impairment on employees, temporary workers, learners or apprentices. The definition might include, for example, people with the following:
 - 3.2.1. A permanent physical impairment, e.g. cerebral palsy, multiple sclerosis
 - 3.2.2. Behavioural, emotional, social needs, e.g. chronic depression, autism
 - 3.2.3. A sensory impairment, e.g. hearing impairment, visual impairment
 - 3.2.4. Specific cognitive difficulties, e.g. dyslexia, memory loss
 - 3.2.5. Neurodiversity e.g. ADHD, Autism Spectrum Condition (ASC), Dyslexia, Dyscalculia
 - 3.2.6. Motor difficulties, e.g. hand / eye co-ordination, difficulty moving hands / arms
 - 3.2.7. Heart conditions
 - 3.2.8. Musculoskeletal conditions such as back problems
 - 3.2.9. Recurring or fluctuating conditions, such as arthritis or asthma
 - 3.2.10. Mental health problems such as depression
 - 3.2.11. Epilepsy
 - 3.2.12. Diabetes

3.2.13. Severe disfigurements

3.2.14. Learning disabilities

3.3. This list is not exhaustive, and it should be noted that the disability may fall within more than one of the categories set out above.

4. Disclosure and Confidentiality

4.1. Information relating to disability and health conditions is treated as 'Special Category Personal Data' and processed in accordance with the UK GDPR and Data Protection Act 2018. are required by law to process the information 'fairly and lawfully'. We will keep in confidence all correspondence and documentation received in accordance with the Data Protection Act 2018.

4.2. Information on any disabilities will only be made available to those on a 'need to know' basis based on the Equality Act 2010. This may include GEM Partnership staff, our Client (where applicable), the venue being used for training and recruitment activities, Awarding Bodies and any external company used for specific services eg. interpreters

5. Identification of Reasonable Adjustments

5.1. New and existing employees, temporary workers, learners and apprentices may choose not to declare they are disabled or that they have a long-term health condition because:

5.1.1. They feel that they will not get a job, training, development or promotion;

5.1.2. Their impairment is hidden and they feel embarrassed about bringing it up because it may be seen as trivial;

5.1.3. Previous negative experiences in employment or training have left them worried about raising it;

5.1.4. They may not like to ask for help or feel that they can manage and want to fit in and not make a fuss;

5.1.5. They are scared of losing their job;

5.1.6. They think that they will be received unsympathetically or be told to 'just get on with it'.

5.2. GEM Partnership requires employees to take reasonable steps to find out whether reasonable adjustments are needed for temporary workers, learners and apprentices. Such steps might include:

5.2.1. At the recruitment stage, applicants are asked as part of the telescreen process if they require any reasonable adjustments to enable them to attend their interview/training.

5.2.2. Initial assessments are sent through the CRM for applicants attending training and where they are being recruited for vacancies where clients have specific onsite inductions to identify any additional learning support required.

5.2.3. At the interview stage, applicants are asked if they would require any reasonable adjustments in order to complete training or specific client onsite inductions.

5.2.4. On the first day of training/apprenticeship sign up, the enrolment paperwork the learner/apprentice completes asks for information on any disabilities or health issues that might impact on training, as well as the training plan where the learner/apprentice is asked if they have any barriers to learning. The trainer uses this information and completes the learning support section highlighting any additional support or any reasonable adjustments required for the learner to complete their training/apprenticeship.

5.2.5. Apprentices in their first session complete a Pedagogy, functional skills and ICT skills scan to identify any gaps in skills and their individual learning style so the trainer can plan their learning journey appropriately. This is reviewed throughout their whole Apprenticeship as they are asked as part of their 10 weekly review if any additional support is required.

5.2.6. Once a placement has been offered, temporary workers are sent a Health Placement Questionnaire to complete, where any disabilities or health conditions that require adjustments are stated, this information is then shared with the client to action any reasonable adjustments for the temporary worker.

5.3. All Employees on appointment within GEM Partnership are asked if they have any additional needs as a result of an impairment and/or health conditions. A clear explanation of why such reasonable adjustments for Employees information is sought, who else will see or have access to the information, what will be done with the information and how it will be used to trigger follow up

support/adjustments, should be provided. Rather than asking staff to identify if they are disabled, it is more appropriate to ask if a member of staff may need adjustments and what they may be.

- 5.4. All employees complete a workstation risk assessment as part of the onboarding induction as well as on an annual basis to ensure that their workstation is adequate for the work they are carrying out and if any reasonable adjustments are required for employees to complete their role.
- 5.5. All offsite and home workers are also issued with GEM Partnerships Remote and Homeworking Guidance to ensure that their workstation is adequate for the work they are carrying out and if and reasonable adjustments are required for employees to complete their role.

6. What Reasonable Adjustments are considered acceptable?

- 6.1. Applications for reasonable adjustments will be individually considered, and decisions may vary according to the exact nature of everyday needs and usual method of working. The reasonable adjustments offered by GEM Partnership may include:
 - 6.1.1. Phased returns to work after sickness absence
 - 6.1.2. Flexible Working
 - 6.1.3. Quiet workspaces
 - 6.1.4. Dual screens for employees
 - 6.1.5. Extra hardware for laptop use
 - 6.1.6. Overlaps for paperwork or computer screens
 - 6.1.7. Allocation of extra time
 - 6.1.8. Large Print
 - 6.1.9. Alternative fonts
 - 6.1.10. Coloured Paper - blue, green yellow or pink
 - 6.1.11. Support of a personal assistant
 - 6.1.12. Rest / Time Breaks
 - 6.1.13. Support of a Sign Language interpreter
 - 6.1.14. Support of a scribe / amanuensis
 - 6.1.15. Use of assistive technology
 - 6.1.16. Support of a reader
 - 6.1.17. Use of appropriate examination locations.
 - 6.1.18. Re-sits, in the case of temporary illness / injury.
- 6.2. This is not an exhaustive list and other adjustments will be considered on a case by case basis.
- 6.3. GEM Partnership may seek occupational health advice, with the individual's consent where appropriate, to support the identification of suitable reasonable adjustments.
- 6.4. All reasonable adjustments will be reviewed periodically, or sooner where circumstances change, to ensure they remain effective and appropriate.
- 6.5. Individuals may be referred to the Department for Work and Pensions Access to Work scheme where appropriate to obtain support with specialist equipment, travel or workplace support workers.

7. Reasonable Adjustments for Learners and Apprentices

- 7.1. GEM Partnership, recognise that some learners/apprentices require alternative arrangements for their learning journey and for taking examinations. Reasonable adjustments are provided in circumstances which address and help to reduce the effects of a disability or difficulty which would substantially disadvantage a learner during their learning journey, an examination or assessment situation.
- 7.2. This policy ensures all learners/apprentices can access their learning and reach their potential by implementing necessary adjustments to teaching and assessments. These adjustments are considered on a case-by-case basis, recognising that what is reasonable for one learner may not be for another as it's individual to their needs.
- 7.3. Examinations should be a fair test of an individual's knowledge and what they are able to do. If someone has a disability or learning difficulty, the usual format of the examinations may not be suitable. Adjustments may need to be made for them. They allow an individual to show their ability and knowledge without being disadvantaged by the assessment format itself.

- 7.4. This policy provides information on who may be entitled to extra time and how to request it.
- 7.5. The information in this policy can be used by GEM Partnerships Trainers and learners/apprentices for guidance and to ensure that the information is correct for adjustments for learners who have disabilities or difficulties, but it also covers learners who may require adjustments based on religious grounds or learners whose first language is not English.

8. How much extra time is allowed for Examinations

- 8.1. Extra time will be permitted, as appropriate, in line with this document ensuring individuals are not disadvantaged in relation to other learners/apprentices.
- 8.2. The standard time extension for examinations is 25% if the learner/apprentice has a disability/difficulty or are not able to take the exam in their official or native language.
- 8.3. Extra time in excess of 25% needs to be authorised by the awarding body.
- 8.4. All requests for extra time will be considered based on the information supplied; however; in consideration of the amount of extra time requested we must ensure that:
 - 8.4.1. The credibility of the qualification is maintained
 - 8.4.2. The validity, reliability and integrity of the examination is preserved
 - 8.4.3. The learner/apprentice is not given, or does not appear to be given an unfair advantage.

9. What Assistance can be Requested for Examinations

- 9.1. Support of a Personal Assistant – support of a personal assistant can be requested if the learner/apprentice needs someone to help with personal care / assistance during the examination. This help will be designed to maintain the effectiveness of the examination. Personal assistants cannot give factual help or offer any suggestions or advice which could be seen as giving you an unfair advantage.
- 9.2. Rest Breaks – rest breaks can be requested if the learner/apprentice suffers from fatigue, physical or mental disabilities or for religious obligations. The rest break will be part of the extra time request and it can be taken at any time during the examination. Women who are pregnant are also allowed to use the toilet although no extra time is awarded for pregnant women. It is important that you do not discuss the examination with any third party during any break period.
- 9.3. Support of a Sign Language Interpreter – a sign language interpreter can be requested if the learner/apprentice is hard of hearing, to undertake the role of conversing with others on their behalf. The interpreter can say a phrase or word as well as re-phrasing using sign language or by writing it down for the learner/apprentice. They must not give factual help, offer any suggestions or advice which could be seen as giving the learner/apprentice an unfair advantage. GEM Partnership would normally expect the learner to source the interpreter although if this is not possible, GEM Partnership will make reasonable efforts to locate a suitable person.
- 9.4. Support of a scribe – the learner/apprentice can request a scribe if the learner/apprentice has limitations with writing down the answers such as a physical or visual impairment or a specific learning difficulty. The scribe's role will be someone who will write down the learner/apprentices dictated answers to the questions. They must write down the answers exactly as they are dictated. They must not give factual help nor offer any suggestions or advice which could be seen as giving the learner/apprentice an unfair advantage.
- 9.5. Use of laptop and adaptive technology (also known as assistive or access technology) – The learner/apprentice can request the use of adaptive, assistive or access technology which enables the learner/apprentice to access computer systems if they have particular needs. Where possible, GEM Partnership would expect the learner/apprentice to use their own laptop and software. The learner/apprentice will only be able to have access to the relevant program or programs and all equipment will be checked by the invigilator prior to the start of the examination.
- 9.6. Support of a Reader – the learner/apprentice can request a reader if the learner/apprentice has a visual impairment or specific learning difficulties which would benefit from the support of a reader. They will be able to read all or any part of the examination or the answers to the learner/apprentice. They can only read the exact wording and must not give meanings of words, rephrase or interpret anything. They should only repeat instructions and questions on the paper when specifically requested to do so by the learner/apprentice. They cannot advise the

learner/apprentice which questions to do, when to move on to the next question, or the order in which the questions should be answered.

- 9.7. Temporary Illness / Injury - Although a temporary illness or injury or indisposition would not be covered by the Equality Act 2010 (or local equivalent), GEM Partnership may still be able to accommodate learners affected in such a way. The learner/apprentice will need to complete the Reasonable Adjustments Form and provide supporting evidence of the circumstances and GEM Partnership will try to accommodate the learners/apprentices request.
- 9.8. Pregnancy - The learner/apprentice is entitled to go to the toilet if they are pregnant but they are not entitled to extra time unless there is other medical conditions that would allow them to request extra time.
- 9.9. Learners/Apprentices taking an exam that's not in their official or native language - If the examination is taken in a language that is not the learner/apprentices native / official language, then the learner/apprentice is entitled to use their own paper dictionary (whose purpose is translation between the examination language and another national language) during the examination. Unless the awarding body examination dictates otherwise.
 - 9.9.1. If there is not an option for the learner/apprentice to take the examination in their native language the learner/apprentice will be entitled to an extra 25% of time.
 - 9.9.2. If the examination is on-line, then the learner/apprentice must complete and return the Extra Time Request form at least 3 working days before the examination. As GEM Partnership must communicate with a third party to request the extra time. Extra time will not be allowed on the day if the learner/apprentice has not requested this with GEM Partnership prior to the examination date and within the 3 working days.
- 9.10. Stammer / Stutter (Oral Examinations Only) - extra time for an oral examination can be requested if the learner/apprentice has a stammer or stutter (not for a written examination). GEM Partnership will also try to allocate the learner/apprentice the final examination slot of the day so that there are fewer time restrictions on the learner/apprentice and the Invigilators
- 9.11. Religious Obligations - the learner/apprentice can request a break or different time to start the examination if the learner/apprentice needs to do so for religious reasons. GEM Partnership will require a written request for this and the contact details for the appropriate religious authority (e.g. imam, minister, rabbi or priest).
- 9.12. Other Reasonable Adjustments - the reasonable adjustment arrangements listed here are not intended to be comprehensive.
- 9.13. Examination adjustments are subject to the requirements of the relevant awarding organisation and may vary between awarding bodies.

10. Documentary Evidence Requirements

- 10.1. The learner/apprentice. should provide GEM Partnership with documentary evidence which outlines the nature and severity of their disability. It should be from an appropriate independent professional:

Disability	Apply before the exam	Documentary Evidence
Visually Impaired Learner	25% Extra Time • A reader, writer pr interpreter • Suitable mechanical and electrical aids • An alternatively formatted questions paper, enlarged print, or different paper colour	Documented evidence of disability or difficulty and the adjustments required. All requests must be supported with evidence which is valid, sufficient and reliable.

Hearing Impaired Learner	25% Extra Time • A reader, writer pr interpreter • Suitable mechanical and electrical aids • An alternatively formatted questions paper, enlarged print, or different paper colour	Documented evidence of disability or difficulty and the adjustments required. All requests must be supported with evidence which is valid, sufficient and reliable.
Dyslexic Learner	25% Extra Time • A reader, writer pr interpreter • Suitable mechanical and electrical aids • An alternatively formatted questions paper, enlarged print, or different paper colour	Documented evidence of disability or difficulty and the adjustments required. All requests must be supported with evidence which is valid, sufficient and reliable.
Other Medical Conditions	Up to 25% Extra Time • A reader, writer pr interpreter • Suitable mechanical and electrical aids • An alternatively formatted questions paper, enlarged print, or different paper colour	Documented evidence of disability or difficulty and the adjustments required. All requests must be supported with evidence which is valid, sufficient and reliable.

11. Reasonable Adjustments for Functional Skills English

11.1. Speaking, Listening and communication

- 11.1.1. It is recognised that British Sign Language (“BSL”) is not a form of English however; BSL is permitted as an alternative to English for the assessment of this component where BSL is the learner/apprentices’ normal way of communicating in the contexts described by the standards;
- 11.1.2. No other languages are permitted as alternatives to English;
- 11.1.3. Access to augmentative speech equipment is permissible where it reflects the apprentice’s normal way of working;
- 11.1.4. A human reader is allowed to read the instructions only; and
- 11.1.5. As a last resort, learners/apprentices who are disabled under the terms of the Equality Act 2010 and have no accessible means of communication may request and have exemption from this component.
- 11.1.6. Extra time is allowed dependent of needs

11.2. Reading

- 11.2.1. The use of a word processor with the spell check facility switched on is permitted for all apprentices;
- 11.2.2. A human reader cannot be used to demonstrate the requirements of the standards for the reading component as this does not meet the requirement of independence. Apprentices who are classed as disabled under the terms of the Equality Act 2010 and use assistive technology as their normal way of reading can demonstrate they are able to independently meet the requirements of reading standard through the use of technology; and
- 11.2.3. As a last resort, an exemption from the reading requirement can be requested for learners/apprentices with disabilities who cannot use assistive technology tasks only.
- 11.2.4. Extra time is allowed dependent on needs

11.3. Writing

- 11.3.1. The use of a word processor with the spell check facility switched on is permitted for all learners/apprentices;
- 11.3.2. A human reader is allowed to read the instructions to writing in tasks only; and
- 11.3.3. A human scribe cannot be used to demonstrate the requirements for the standards as this does not meet the requirement for independence. Learners/apprentices who are classed as disabled under the terms of the Equality Act 2010 and use assistive technology as their normal was of producing written texts can demonstrate that they are able to independently meet the requirements of the

written standard through the use of a computer and appropriate software. As a last resort, and exemption from the writing requirements can be requested for the learners/apprentices with disabilities who cannot use assistive technology.

11.3.4. Extra time is allowed dependent on needs

11.3.5. Onscreen assessment: Extra time must be selected when scheduling the assessment as this cannot be added once the apprentice has started the assessment.

12. Learner Guidance

12.1. Arrangements for the use of third parties (such as an interpreter or scribe) during the examination will normally be the learner/apprentice's responsibility however GEM Partnership will take reasonable steps to source suitable persons if the learner/apprentice advise they are not able to do so.

12.2. Strict guidelines during the examination must be maintained, for example:

12.2.1. The support of a reader should be solely there to read text and not to advise the learner/apprentice. They cannot offer suggestions or any other support, which could be seen as giving the learner/apprentice an unfair advantage. GEM Partnership would expect the reader to not have a conflict of interest in undertaking this task, however, GEM Partnership acknowledge that it is appropriate to have had previous working experience with the learner/apprentice

12.2.2. Modification to equipment/disability aids and input display devices including adapted keyboard, large monitor and synthesisers must be approved by GEM Partnership in advance of the examination.

12.2.3. Learners/apprentices cannot talk to third parties during Rest/Time Breaks apart from the invigilator.

12.2.4. GEM Partnership will ensure that all public examination facilities comply with the relevant legislation for learners/apprentices with reasonable adjustments.

12.2.5. GEM Partnership will ensure that the invigilator or other authorised third party has prior information of the learners/apprentices requirements.

13. Summary

13.1. Giving employees, temporary workers, learners, apprentices a fair and level platform for achievement is not only a legal requirement but also essential to giving employees, temporary workers, learners, apprentices the best possible chance of success. This policy has been written to cater for all groups requiring Reasonable Adjustments and will be aligned when a risk assessment or an assessment of adjustments is made.

14. Associated Policies

14.1. GEM Partnership Equal and Diversity Policy

14.2. GEM Partnership Fair Access to Assessment Policy

14.3. GEM Partnership Malpractice and Maladministration Policy

14.4. GEM Partnership Data Protection Policy and Procedures

14.5. GEM Partnership Health and Safety Policy

14.6. GEM Partnership External Venue Policy

14.7. GEM Partnership Inclusion and Inclusive Practice Policy

14.8. Gem Partnership Special Education Need and Disabilities (SEND) Policy