Guidance for requesting a reasonable adjustment in the registration assessment for sittings in 2017

Introduction

The General Pharmaceutical Council (GPhC) is committed to promoting equality, valuing diversity, being inclusive and ensuring that our equality duties are met. This applies in all our work as a health professions regulator, a public service provider and an employer.

By making sure equality, diversity and inclusion are at the heart of all we do, the resources we invest in services will actually benefit everyone who uses or needs them. This means we will improve our effectiveness and efficiency as a regulator. We will continue to encourage a higher profile for equality and diversity in our role as a regulator, public service provider and employer.

The registration assessment

The GPhC runs a national registration assessment which is undertaken by pre-registration trainee pharmacists who have:

- successfully passed an accredited MPharm degree or overseas pharmacist assessment programme (OSPAP), and
- satisfactorily completed the required period of pre-registration training

To be able to register as a pharmacist, pre-registration trainees must pass the assessment, as well as meeting all the other registration criteria.

The main aim of the assessment is to make sure that pre-registration trainee pharmacists demonstrate an understanding of how to apply knowledge appropriately and in a timely manner when making professional judgements in pharmacy practice contexts. It also makes sure that candidates have the numeracy skills they need to practise as a pharmacist.

Adjustments

The Equality Act effectively makes a distinction between competence standards on the one hand, and the means of assessing them on the other. The normal duty to make reasonable adjustments applies to the process of assessing a competence standard, but not to the question of whether the standard can be applied – that is, to the question of whether or not a person has a particular level of competence or ability.
It is appropriate to grant ‘reasonable adjustments’ to candidates who would be at a disadvantage in sitting the assessment because of health issues, disabilities, specific learning needs or other specific needs. However, it would not be appropriate to grant any adjustment which would affect the nature of the assessment.

**What are reasonable adjustments?**

These are adjustments that cover the nine ‘protected characteristics’, as defined by the Equality Act 2010. The nine characteristics are:

- Age
- Sex
- Disability
- Marriage and civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Gender reassignment
- Sexual orientation

It may be necessary to adapt or change the environment of the assessment sitting for a candidate who has a specific need, whether it is permanent or temporary. The purpose of a reasonable adjustment is to ensure that no candidates are disadvantaged.

**Types of adjustments that can be requested**

Candidates can request additional support that allows them to undertake the assessment in a way that means they are not disadvantaged.

Examples of the adjustments that may be granted are:

- extra time for candidates with dyslexia or another specific learning need
- assessment papers, and answer sheets printed on coloured paper and/or in an enlarged size (A3) for candidates with visual impairment or specific learning needs
- resource packs printed as an enlarged size (A3) booklet for candidates with visual impairment of specific learning need
- special equipment or furniture for physical conditions
- permission to use items, such as tinted reading overlay or magnifying equipment, for candidates who have a specific need
- specific seating arrangements within the assessment centre, such as being positioned near the toilet facilities

This list does not cover everything, and if you have any questions about specific requirements please call the GPhC contact centre for advice.
Important: adjustments must be requested in advance, and not on the day of the assessment. This is because we have to make special arrangements at each of the assessment centres well in advance of the day of the assessment.

Requesting a reasonable adjustment and providing supporting evidence

When requesting an adjustment you must:

- fully complete the form: Request for a reasonable adjustment in the registration assessment, and
- provide supporting evidence from an appropriately qualified professional such as a doctor, another healthcare or educational professional, or another appropriately qualified person

The supporting evidence supplied must refer to the registration assessment specification, and explain which element(s) of it should be adjusted and why.

The appropriately qualified professional must also sign the declaration to confirm that they are aware that the request for an adjustment is related to sitting the registration assessment. There is no need for this signed declaration if a full diagnostic assessment is submitted as evidence of a specific learning need.

If the request is related to specific learning needs, the adjustments panel will only accept as evidence a full diagnostic assessment issued after your 16th birthday.

The diagnostic assessment of specific learning needs must have been carried out by a:

- specialist teacher who holds a current practising certificate in assessing specific learning difficulties, issued by their relevant professional association, or
- psychologist who holds a current practising certificate issued by their relevant professional association

University needs assessment reports are not sufficient as evidence for adjustment requests.

Declaration by an appropriately qualified professional:

The appropriately qualified professional must be a specialist in the condition that you are requesting an adjustment for, and confirm they have read and understood the Registration assessment specification.

The appropriately qualified professional must give details of how your disadvantage would
affect you during the assessment. It is important the evidence relates directly to the reasonable adjustment you are requesting.

**Important:** there should be no potential or actual conflicts of interest that could bring into question the professional judgment of the qualified person – for example, a personal relationship with the candidate.

The adjustments panel is made up of members of the board of assessors, along with an educational disability specialist. This panel is independent of the GPhC and makes decisions based on the information provided by individual candidates.

For the adjustments panel to make fair and consistent decisions about granting reasonable adjustments, they need to have full information available to them. It is the candidate's responsibility to provide all the information required and by the specified deadline. For example, if a candidate was to request 25% more time for dyslexia, without any supporting evidence from a dyslexia specialist, the panel would not have enough information to make an informed decision. This might result in the adjustment not being granted and could put the candidate at a disadvantage when sitting the assessment.

Similarly, if a candidate had a condition that meant they had to frequently visit the toilet, and supplied a doctor's letter that only stated that the candidate was a patient at their surgery, the panel would have difficulty in making an informed decision. Therefore the adjustment might not be granted and again the candidate could be put at a disadvantage during the assessment.

**When to apply for a reasonable adjustment**

It is important to make sure that you apply in plenty of time to meet the deadline for making adjustments. The deadlines for the next assessments are given on the key dates page of our website.

The adjustments panel sits around two months before each registration assessment.

The reason we ask candidates to apply by a specific date is to make sure all requests and their supporting evidence are ready for when the adjustment panel sits and makes its decisions. There are more requests for adjustments every year, so we make sure there is enough time to prepare documentation and for the panel to carefully review each application.

All information about the identity of each candidate is removed before it goes to the panel. This is to make sure that all decisions are fair and consistent, and the process is transparent.

Once the panel has made its decisions, candidates will be notified and the GPhC team
responsible for allocating candidates to a centre will make the arrangements needed to accommodate the adjustments. These arrangements take time, and as we have many candidates sitting the assessment each year we need to make sure that all arrangements are in place so we do not disadvantage anyone.

For more information about how the adjustments panel makes its decisions see the appendix.

**Previous requests for adjustments**

We do not transfer requests for reasonable adjustments from one sitting to the next. This is because some conditions and specific needs are not permanent we ask candidates to request an adjustment for each individual sitting. For example, a candidate may have been pregnant in a previous sitting and requested a particular chair in which to sit the assessment. This may not apply for the next assessment.

If you sit an assessment and are unsuccessful, you must submit another request along with supporting evidence if you want to apply for adjustments for your next attempt at the assessment. This is because we do not keep confidential information about a potential candidate after their request has been evaluated and the assessment has been completed.
Where to send your request

Requests for adjustments may be sent by post or email. You will find details on the Request for a reasonable adjustment in the registration assessment form.

Please make sure you send the completed form and supporting evidence by the deadline for your assessment.

Applications sent by email must be in either Word or .pdf file format.

We do not accept application forms or supporting evidence in .jpeg, .tiff or any other image format.

If you are requesting an adjustment for a sitting in 2017 you must use the application form marked ‘for sittings in 2017’. If you use a previous version of the form your application will be returned.

If you think you may have difficulty sending these documents, filling in the form or providing evidence you must call the GPhC contact centre for advice.

There is also information about making reasonable adjustments in the registration assessment regulations.

Appeals

You may appeal against a decision if your request for a reasonable adjustment is rejected. The registrar will hear the appeal, but you must make sure you appeal by the deadline given. You will find information on making an appeal in the pre-registration manual on our website.
Appendix 1: Guidance for the adjustments panel on granting adjustments in the GPhC’s registration assessment

Introduction

The GPhC runs a national registration assessment which is sat by pre-registration trainee pharmacists. To sit the assessment they must have passed an accredited MPharm degree or OSPAP and have a satisfactory 39-week pre-registration training progress report.

The registration assessment assesses the knowledge, skills and competence of candidates to make sure they will be safe to practise once registered as a pharmacist. To be able to register as a pharmacist, pre-registration trainees must pass the assessment.

Adjustments

As the registration assessment is designed to assess competence, it would not be appropriate to grant any adjustment which would affect the nature of the assessment. However, it is appropriate to grant reasonable adjustments to candidates who would be at a disadvantage due to the process of sitting the assessment – because of health issues, disabilities, specific learning needs or other specific needs.

The law

The Equality Act 2010 says that qualifications bodies must make reasonable adjustments for disabled candidates.

The Equality and Human Rights Commission has not yet produced a revised code of practice. The following link is to codes issued before the introduction of the Equality Act 2010. Please bear in mind that they do not set out clearly and precisely the requirements under the Equality Act 2010, although they may be helpful in giving guidance where the law has not changed substantially.


The Equality Act effectively makes a distinction between competence standards on the one hand, and means of assessing them on the other. The normal duty to make reasonable adjustments applies to the process of assessing a competence standard, but not to the question of whether the standard can be applied – that is, to the question of whether or not a person has a particular level of competence or ability.
## Granting adjustments in the GPhC registration assessment

<table>
<thead>
<tr>
<th>Examples of adjustments that may be granted</th>
<th>Examples of adjustments that cannot be granted</th>
</tr>
</thead>
<tbody>
<tr>
<td>• extra time of 25%</td>
<td>• additional rest breaks</td>
</tr>
<tr>
<td>• special equipment or furniture – for example, a particular style of chair</td>
<td>• doing the assessment in extra sittings – for example, over two days</td>
</tr>
<tr>
<td>• permission to bring items into the assessment other than those specified – for example, a tinted reading overlay</td>
<td>• changes to the nature or content of the assessment – for example, changes to the style of the assessment, or the number of questions</td>
</tr>
<tr>
<td>• assessment papers, and answer sheets printed on coloured paper and/or in an enlarged size (A3) for candidates with visual impairment or specific learning needs</td>
<td>• altering the content of the assessment papers – for example, changing the type size, type colour, type face or line spacing</td>
</tr>
<tr>
<td>• specific seating arrangements within the hall, for example, close to the exit for ease of access to toilet facilities</td>
<td>• resource packs printed on coloured paper</td>
</tr>
<tr>
<td>• other requests that are reasonable within the scope of the assessment</td>
<td>• providing assessment papers in a language other than English</td>
</tr>
</tbody>
</table>
Guidance for requesting a reasonable adjustment in the registration assessment for sittings in 2017
November 2016
Version 1.0

Adjustment decision process

Part 1: Dealing with applications for adjustment

1. Has the candidate met the deadline?
   - Yes
     - Has candidate fully completed a Request for a reasonable adjustment in the registration assessment form?
       - No
         - Refuse the request
       - Yes
         - Contact the candidate to request the missing information
   - No
     - Does the request meet the criteria for being considered after the deadline?
       - No
         - Refuse the request
       - Yes
         - Has candidate provided supporting evidence which meets the criteria set out in section 3 of Guidance for requesting a reasonable adjustment in the registration assessment?
           - No
             - Contact the candidate to request the missing information
           - Yes
             - Submit the request to the adjustments panel for consideration
Part 2: The adjustments panel considers the request

Does the disadvantage relate to competence? (see the assessment regulations for guidance)

Yes → Refuse the request

No → Discuss whether there are sufficient grounds to grant an adjustment, taking the following into account:

Would the adjustment cause any disadvantage to the smooth running of the GPhC assessment processes?

How effective would the adjustment be in preventing disadvantage?

Is the evidence valid and reliable?

Ask for more evidence or guidance if it is needed.

How practical and reasonable is it to make the adjustment?

Would the adjustment have any effect on other candidates?

Would the adjustment result in unacceptable risks to anyone's health and safety, including the candidate's?

Would the adjustment reduce the risk to anyone's health and safety, including the candidate's?

Is the reason for the disadvantage something that only happens now and again?

Yes → Consider whether it would be more appropriate to refuse the request, and advise the candidate to use 'fit to sit' on the day of the assessment.
Part 3: The panel agrees to the request

The panel agrees to the request. The GPhC then investigates the practicality and feasibility of granting the adjustment (if this is necessary).

Part 4: The GPhC tells the candidate the outcome of their request