

# Access Arrangements and Reasonable Adjustments Policy and Procedure for Examination Candidates

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## 1. Introduction

1.1 This policy sets out the Executive’s (“the Executive”) commitment to providing reasonable adjustments and access arrangements and explains the process for ensuring that no candidate is unfairly disadvantaged in examinations because of an impairment, disability or specific learning difficulty.

1.2 This policy and procedure uses the terms reasonable adjustments and access arrangements to describe different types of support that may be put in place to support candidates in accessing examinations.

1.2.1 Reasonable adjustments are changes made to assessment arrangements for candidates who meet the definition of disability under the Equality Act 2010 and who would otherwise be placed at a substantial disadvantage in comparison with candidates who are not disabled.

1.2.2 Access arrangements are practical or administrative arrangements that support equitable access to examinations where required due to a candidate's personal circumstances but may not meet the legal threshold for a reasonable adjustment under the Equality Act 2010.

1.3 Both reasonable adjustments and access arrangements are designed to support fair participation in examinations without compromising the competence or professional standards of the examination or the assessment outcomes being assessed. All requests will be considered on an individual basis, taking account of supporting evidence, the format of the examination, and the need to maintain examination integrity, validity, and patient safety.

## 2. Scope

2.1 This policy applies to all candidates undertaking examinations delivered by, or on behalf of, the Executive. It applies to all parts of the examination process where reasonable adjustments and access arrangements may be required, including application to exams, communication with the Executive, and all assessment activities.

## 3. Principles

3.1 The Executive will:

- 3.1.1 Promote fair and accessible participation in examinations for candidates with a disability, impairment, or specific learning difficulty.
- 3.1.2 Consider requests for reasonable adjustments on an individual basis, taking account of the candidate's needs and appropriate supporting evidence.
- 3.1.3 Ensure that decisions are made fairly, consistently and sensitively.
- 3.1.4 Implement reasonable adjustments where these are necessary and reasonable, without compromising the competency standards being assessed.
- 3.1.5 Communicate clearly with candidates about the process, evidence requirements and outcomes of requests.

3.1.6 Keep this policy and its arrangements under review to support inclusive practice and continuous improvement.

## 4. Policy Framework

4.1 The Equality Act 2010 requires the Executive to make reasonable adjustments where a disabled candidate would otherwise be placed at a substantial disadvantage in comparison with a candidate who is not disabled. The Executive must take reasonable steps to avoid or reduce that disadvantage. In line with this duty, the Executive is committed to providing fair and accessible examination arrangements for all candidates, including those with disabilities. This commitment reflects both equality legislation and relevant anti-discrimination guidance.

4.2 It is recognised that, in some circumstances, candidates may experience acute personal difficulties that affect their ability to engage fully with standard examination procedures but do not meet the threshold for reasonable adjustments under this policy. In such cases, candidates are encouraged to contact the Executive at the earliest opportunity to discuss their circumstances and any support that may be available. Each request will be considered sensitively, openly and on its individual merits, although not all requests can be accommodated.

4.3 The Executive recognises that disabled candidates are not a homogeneous group and may have a wide range of individual needs. Disability may include physical or sensory impairments, mental health conditions, specific learning difficulties, and chronic, long-term or fluctuating conditions. Requests for reasonable adjustments will therefore be considered on a case-by-case basis, taking account of the candidate's individual circumstances and supporting evidence.

4.4 This policy and procedure set out the Executive's approach to reasonable adjustments and access arrangements and the process for candidates who wish to apply for them.

## 5. Definitions and Legal Context

### 5.1 Reasonable Adjustment

5.1.1 Reasonable adjustments are designed to reduce the adverse impact of long-term conditions and/or disability that puts a candidate at a disadvantage in an examination situation.

5.1.2 A reasonable adjustment is specific to the individual candidate and their circumstances. What is reasonable will depend on a range of factors, including the

candidate's needs, the format of the examination, and the competence or standard being assessed. An adjustment may not be considered reasonable if it would involve disproportionate cost or time, or if it would compromise the security, integrity or validity of the examination.

5.1.3 The format of the examination will affect whether a requested reasonable adjustment is possible and permissible.

5.1.4 The Executive reserves the right to seek independent professional advice to ensure that any adjustments and arrangements are appropriate and are in accordance with any applicable legislation and regulatory requirements.

5.1.5 The Executive will take the following into account when assessing what is reasonable:

- a. The effect of the disability or specific learning need on the individual candidate,
- b. The effectiveness of the proposed adjustment in removing or overcoming the relevant disadvantage,
- c. The relevant interests of other people, e.g. whether an adjustment would result in a significant disadvantage for other candidates,
- d. The practicality of the changes,
- e. Any potential health and safety issues, and
- f. The resources available.

5.1.6 Reasonable adjustments must not compromise the competence standard, professional standard, rigour or patient safety requirements being assessed in any examination. The Equality Act 2010 does not require adjustments to be made to competence standards. Accordingly, a reasonable adjustment cannot alter the level of competence or safe professional practice being assessed.

5.1.7 Reasonable adjustments may include, for example, changes to examination arrangements, adaptations to examination materials, the provision of a reader or scribe, or adjustments to the assessment environment. These examples are illustrative only and are not exhaustive.

## **5.2 The Equality Act 2010**

5.2.1 The Equality Act 2010 defines a disability in the following way:

*A person has a disability ‘if they have a physical or mental impairment, and the impairment has a substantial and long term (more than 12 months) adverse effect on their ability to carry out normal day-to-day activities’. Whether a person is disabled is determined by the effect the physical or mental impairment has on the ability to carry out normal day-to-day activities.*

5.2.2 Whether a person is disabled for the purposes of the Act depends on the effect of the impairment on their ability to carry out normal day-to-day activities.

5.2.3 In applying this definition, consideration is usually given to:

- a. whether there is a physical or mental impairment,
- b. whether the impairment has an adverse effect,
- c. whether that adverse effect is substantial,
- d. whether that substantial adverse effect is long-term,
- e. the impact of the impairment on normal day-to-day activities.
- f. what the impact of the impairment would be in the absence of medication, treatment or coping strategies, where relevant.

5.2.4 For the purposes of the Act, substantial means more than minor or trivial and goes beyond the normal differences in ability which may exist between people.

5.2.5 “Long-term” generally means that the impairment has lasted, or is likely to last, for at least 12 months. Some temporary conditions will not meet this threshold. For example, restricted mobility arising from a broken leg that is expected to heal within 12 months would not usually meet the definition. However, candidates are encouraged to contact the Executive to discuss any circumstances affecting their ability to participate in the examination, even where these may not meet the legal definition of disability.

5.2.6 Normal day-to-day activities may include but are not limited to mobility, physical coordination, speech, hearing, eyesight, and memory or ability to communicate.

5.2.7 The legal definition of disability in the Equality Act 2010 is broad. Some conditions are treated as disabilities from the point of diagnosis, including cancer, HIV infection and multiple sclerosis. A person who is certified as blind, severely sight impaired, sight impaired or partially sighted is also protected under the Act.

5.2.8 There is no requirement under the Act for an individual to have a medically diagnosed cause for impairment. What is important is the impact and duration of the impairment.

5.2.9 While the Act uses the medical model of disability and refers to ‘impairment’ and as such, this terminology is utilised throughout this policy, we recognise that candidates may not use this language. This does not in any way preclude candidates from applying for reasonable adjustments.

### 5.3 Access Arrangement

5.3.1 An access arrangement refers to a practical or administrative adjustment put in place to support a candidate’s ability to access and participate in an examination fairly where their circumstances may not meet the legal definition of disability under the Equality Act 2010.

5.3.2 Access arrangements are intended to reduce disadvantage arising from temporary conditions, short-term impairments, or individual circumstances that may affect a candidate’s performance or ability to engage with standard examination arrangements.

5.3.3 Access arrangements are considered on an individual basis and may be implemented where they are reasonable, proportionate, and practicable, and where they do not compromise the competence standards, professional standards, or examination integrity or validity.

5.3.4 The provision of an access arrangement does not imply that a candidate meets the legal decision of disability and therefore reasonable adjustments under the Equality Act 2010.

## 6. Applying for a Reasonable Adjustment or Access Arrangement

6.1 Candidates who wish to apply for a reasonable adjustment or access arrangement must notify the Executive at the point of application where possible. Where need for an alternative arrangement emerges post-application, candidates should email the Executive at the earliest opportunity to indicate this.

6.2 When they apply for an examination, candidates will be asked if they wish to request reasonable adjustments.

6.3 If they answer yes, candidates will be asked a series of questions related to their request. This includes a request for a brief description of the impairment(s), what adjustments or access arrangements may be required, and a request for supporting evidence.

6.4 Requests may be based on adjustments that have been implemented in previous examination activities for a candidate.

6.5 All requests must be accompanied by supporting documentation that has been independently and professionally produced and verified. Evidence is not required to include a medical diagnosis but should provide relevant information related to the nature of the impairment, the expected duration of the impairment, and confirmation of the impact on day-to-day activities.

6.6 Candidates may upload supporting evidence with their application or submit it to the Executive by email within two weeks of submitting their application.

6.7 The Executive may not be able to accommodate a reasonable adjustment request if the request or supporting documentation is not received by the application closing date.

6.8 Upon receipt of the supporting documentation, the Executive may request additional evidence or information if deemed necessary.

6.9 Where required, the Executive may contact the candidate to discuss their request in more detail.

6.10 Following receipt of a request for an adjustment or access arrangement, the Executive will contact the candidate at least six weeks prior to the examination date to confirm all access arrangements. Candidates must review these to ensure accuracy.

6.11 All agreed adjustments or access arrangements will be confirmed in writing in a candidate's Exam Confirmation Letter which will be received at least four weeks prior to the examination date. It is not possible for changes to agreed reasonable adjustments or access arrangements to be made after this date unless in exceptional circumstances. Changes at this point cannot be guaranteed.

## 7. Evidence Requirements

7.1 Appropriate supporting evidence of the candidate's impairment must be provided to the Executive.

7.2 Supporting evidence does not need to include a medical diagnosis. However, to assist the Executive in reviewing requests, the evidence should provide relevant information about the nature and extent of the impairment, its expected duration, and its impact on normal day-to-day activities.

7.3 Evidence of impairment will normally include at least one of the following:

- a. Letter, report or medical summary from GP/doctor,

- b. Consultant or specialist assessor report (e.g. psychiatrist, educational psychologist, psychologist),
- c. Medication history or treatment plan,
- d. Letter or report from occupational therapist/physiotherapist,
- e. Letter or report from speech and language therapist,
- f. Letter or report from audiologist,
- g. Letter or report from ophthalmologist.

7.4 Where a diagnostic report for dyslexia is provided, the Executive will normally expect evidence that reflects the candidate's current functional impact, for example a post-16 assessment. Reports completed before the age of 16 will still be considered on a case-by-case basis and will not be rejected solely because the assessment was completed before the age of 16.

7.5 All supporting evidence must be submitted in English. Documents originally issued in another language must be accompanied by a professionally translated English version from a verifiable source. The Executive may request evidence of the translator's professional status or other confirmation of authenticity.

## 8. Responsibilities

### 8.1 Candidates are responsible for:

- a. Disclosing an impairment, disability or specific learning need at the earliest opportunity for each examination diet.
- b. Providing evidence to support the impairment, disability or specific learning needs in line with section 7.
- c. Communicating with the Executive to discuss reasonable adjustments and/or access needs.
- d. Informing the Executive of any changes in circumstances or needs, including any worsening of an impairment, which may require new or revised reasonable adjustments.
- e. Notifying the Executive promptly of any issues that arise, including any difficulties with the implementation of agreed adjustments.

### 8.2 The Executive is responsible for:

- a. Following the reasonable adjustment policy and procedure as detailed in this document.
- b. Notifying candidates of the agreed reasonable adjustments that will be implemented for each examination.
- c. Notifying candidates where a request for a reasonable adjustment is not approved, including the reason/s for that decision.
- d. Contacting candidates to discuss any variation to agreed reasonable adjustments or alternative proposals regarding reasonable adjustment requests.
- e. Maintaining records of requests for reasonable adjustments.
- f. Maintaining records of decisions relating to reasonable adjustments.
- g. Ensuring that agreed reasonable adjustments are put in place.
- h. Ensuring that relevant examination personnel, including Executive staff, Royal College staff, examiners, and assessors are aware as necessary of any reasonable adjustments or access arrangements.
- i. Reviewing the effectiveness of reasonable adjustments following each examination diet, where appropriate, in conjunction with the candidate.
- j. Ensuring, with the explicit consent of the candidate, that any external agencies or organisations, including external venues, are informed of and able to implement the reasonable adjustments required to support the candidate during the examination process.

## 9. Common Reasonable Adjustments and Access Arrangements

9.1 As set out in section 5, reasonable adjustments will vary from candidate to candidate. What is considered reasonable will depend on a range of factors, including the nature and impact of the impairment, the format of the examination, the competence being assessed, and the need to maintain patient safety, examination security, integrity and validity.

9.2 The examples below are non-exhaustive and are provided for guidance only. They do not apply automatically to all candidates with a particular disability, medical condition or specific learning difficulty. Each request will be considered on an individual basis.

### 9.3 General access arrangements

These are examples of common arrangements that may be appropriate for some candidates and should be read in conjunction with section 9.4.:

- a. Additional time to complete the examination.
- b. Supervised rest breaks during or between examination activities.
- c. Use of assistive technology, for example screen-reading software, speech-to-text software, or specialist software.
- d. Use of specialist or adapted computer equipment, for example screen filters or ergonomic accessories.
- e. Examination papers and materials in alternative formats, such as Braille, enlarged print, or coloured paper.
- f. Use of a separate room or smaller examination room.
- g. Support from another person, where appropriate, such as a practical assistant, prompter, scribe (amanuensis), or reader.

#### **9.4 Impairment-specific adjustments**

These are examples of arrangements that may be appropriate for candidates with impairments and should be read alongside section 9.3. This list is non-exhaustive. It should not be taken to mean that these are the only impairments that may be considered under this policy, nor that any listed adjustment will automatically be approved for a candidate with a particular impairment.

##### *9.4.1 Autism and learning disabilities*

- a. The opportunity to visit the examination location in advance of the examination.
- b. Access to a quiet, private rest space during breaks.
- c. Provision of key information in more than one format, for example both verbally and in writing.

##### *9.4.2 Blindness or visual impairment*

- a. Implementation of a Personal Emergency Evacuation Plan or guidance on evacuation routes and protocols.
- b. Use of a sighted guide during examination activities.
- c. Use of a reader to read examination materials and questions.
- d. Audio descriptions of visual props used in examinations.
- e. Large print or Braille examination materials.
- f. Use of modified or adapted equipment to allow participation in practical examination activities, e.g. talking thermometers, handheld illuminated magnifiers.

- g. Good lighting, adequate signage, and good colour contrasts in examination locations.

#### 9.4.3 *Deafness or hearing impairment*

- a. Support from a communication professional, for example a sign language interpreter or lip-speaker.
- b. Visual access to time warnings.
- c. Visual or sensory access to emergency alarms, for example fire alarms.
- d. Implementation of a Personal Emergency Evacuation Plan, or provision of guidance on evacuation routes and procedures.
- e. Subtitles or captions for video materials, where used in the examination.

#### 9.4.4 *Specific learning difficulties, including dyslexia, dyspraxia, and dyscalculia*

- a. The use of different coloured pens, pencils or overlays, where appropriate.
- b. Examination materials in an accessible format.
- c. Assistive software or other appropriate technological support.
- d. Additional time or rest breaks, where appropriate and supported by evidence.

#### 9.4.5 *Medical conditions*

- a. Arrangements to meet specific medical or medication requirements, for example, access to a refrigerator.
- b. Access to a private space for any treatment or medication requirements.
- c. Access to regular toilet breaks.
- d. Ability to access snacks or drinks during examinations.
- e. Access to ergonomic or adapted furniture.

#### 9.4.6 *Mental health conditions*

- a. Access to wellbeing or support arrangements during rest breaks, where appropriate.
- b. Access to a quiet, private rest space during breaks.
- c. Clear written and verbal information about examination arrangements.

#### 9.4.7 *Physical impairments*

- a. Physically accessible examination venues, including examination rooms, rest spaces, and toilet facilities.
- b. Access to ergonomic or adapted seating.
- c. Implementation of a Personal Emergency Evacuation Plan or guidance on evacuation routes and protocols.

- d. Additional time to move between examination stations.

#### 9.4.8 *Speech, language and communication impairments*

- a. Physically accessible examination venues, including examination rooms, rest spaces, and Use of a communication aid or interpreter.
- b. Use of a communication board, speech synthesiser, or other assistive communication device.

## 10. Appeals

10.1 Candidates who are dissatisfied with a decision regarding a reasonable adjustment or access arrangement request may appeal that decision.

10.2 Appeals must be submitted in writing to the Executive within 10 working days of the date on which the decision was communicated to the candidate.

10.3 An appeal must clearly state the basis on which the decision is being appealed. Appeals will normally only be considered where one or more of the following apply:

- a. Relevant information or supporting documentation regarding the request was not available at the time of the original decision.
- b. There is evidence that the policy or procedure was not correctly applied.
- c. The decision is believed to be inconsistent with the evidence provided.

10.4 Appeals will be reviewed by the Quality Assurance team in the Dental Examinations Executive. This team sits separately to the Delivery team who are responsible for the initial review and decision regarding all requests.

10.5 The outcome of the appeal will be communicated in writing within 10 working days of receipt of the appeal. The decision of the appeal reviewer will be final.

## 11. Confidentiality and Data Protection

11.1 The Executive recognises that information related to a candidate's impairment, disability, medical condition, or specific learning difficulty is sensitive and personal in nature, and for the need to handle such information with care, respect, and confidentiality at all times.

11.2 Personal data provided in connection with requests for reasonable adjustments or access arrangements will be handled lawfully, fairly and transparently at all times.

11.3 All personal data will be processed in line with the Dental Examinations Executive's Privacy Statement which is underpinned by the UK Data Protection Act (2018).

11.4 Information provided by candidates in relation to this policy and procedure may constitute special category personal data and as such will only be collected and processed where it is necessary for the purpose of assessing and/or implementing reasonable adjustments or access arrangements.

11.5 Where implementation of an agreed reasonable adjustment or access arrangement requires involvement of third parties (such as exam venue invigilators and staff), only the minimum information necessary to support the arrangement will be provided.

11.6 All information and documentation relating to reasonable adjustments and access arrangements will be stored securely and retained only for as long as necessary.