

# MRCGP Examination Reasonable Adjustments Policy, Procedure and Guidance for disability assessors

MRCGP Reasonable Adjustments Policy, Procedure and Guidance for AKT and SCA v1.0 August 2023

#### **Revision History**

Version	Date	Author	Comments
1.0	August	Head of	New policy
	2023	<b>Examinations</b>	

**Review date** August 2024 and then annually thereafter.

### **Relevant Policies, Templates and Forms**

The following policies, procedures and guidance should be used or referred to when necessary alongside this policy. All policies and templates are available on the RCGP website.

Name	Version	Date
MRCGP Regulations for medical practitioners	3.0	August 2023
training for a CCT in General Practice		

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### Introduction

- 1. The Royal College of General Practitioners (RCGP) is committed to equality of opportunity and to promoting diversity in all its practices, including the MRCGP examination.
- 2. The Equality Act 2010 requires the RCGP to make reasonable adjustments to the provision of an examination where a trainee, who is disabled within the meaning of the Equality Act 2010, would be at a substantial disadvantage in comparison to someone who is not disabled. The RCGP is committed to take reasonable steps to overcome that disadvantage. This policy sets out the process for making an application for a reasonable adjustment.
- 3. This policy applies to all examination components of the MRCGP that are set and marked by the RCGP:
  - Applied Knowledge Test (AKT)
  - Simulated Consultation Assessment (SCA).
- 4. Trainees should refer to the RCGP webpage on Reasonable Adjustments for information about Reasonable Adjustments for Workplace Based Assessment (WPBA). Read the Reasonable Adjustments webpage.
- 5. Where a reasonable adjustment is required to enable the trainee to perform a consultation in the workplace it is not the responsibility of the RCGP to make such an adjustment. Trainees should liaise with the GP training practice or their employer regarding such adjustments.
- 6. Trainees who feel they need a reasonable adjustment, ie trainees with a disability should declare this and request reasonable adjustments in line with the timelines set out within this policy. Trainees must also confirm they have approved reasonable adjustments when making an online application for their examination. It is the trainee's responsibility to provide the necessary information to the RCGP so that an accurate assessment of needs can be made.
- 7. Once approved most reasonable adjustments will apply to all subsequent sittings of the component. It is the responsibility of the trainee to notify the RCGP of changes to these requirements. Trainees are required to confirm at the point of booking their examination that there are no changes to their reasonable adjustment requirements. Requests to change reasonable adjustments will be considered through the process for new requests, inclusive of all timelines.

- 8. RCGP is committed to making reasonable adjustments to any aspect of the delivery of the examination that places the trainee at a disadvantage compared to a non-disabled trainee, provided this does not affect the competence standard(s) being assessed.
- 9. Reasonable adjustments are component specific. Approved reasonable adjustments for a component within the MRCGP examination cannot be transferred to an alternative component within the MRCGP examination. Separate reasonable adjustment requests must be made for each examination.

### **Definitions**

### The Equality Act 2010 - Definition of Disability

- 10. The Equality Act 2010 provides the below definition:
  - A person (P) has a disability if—
  - (a) P has a physical or mental impairment, and
  - (b) the impairment has a substantial and long-term adverse effect on P's ability to carry out normal day-to-day activities.

### **Reasonable Adjustments**

- 11. A reasonable adjustment to examination arrangements will only be provided to trainees who have an evidenced disability as defined by the Equality Act 2010, as reproduced in paragraph 10 above.
- 12. A reasonable adjustment to examination arrangements is provided to trainees with a disability in order to reduce the potential disadvantage they face compared to a non-disabled trainees. It is not designed to give any type of advantage to disabled trainees in the receiving of additional examination accommodations. Reasonable adjustments must not affect the reliability or validity of the examination and does not apply to the application of a competence standard.
- 13. A reasonable adjustment for a particular person may be unique to that individual. How reasonable the adjustment is will depend on a number of factors, including the needs of the disabled trainee. An adjustment may not be considered reasonable if it involves unreasonable costs or timeframes, or if it affects the security or integrity of the examination.
- 14. The needs and circumstances of each trainee are different. The RCGP will consider any request for a reasonable adjustment on a case-by-case basis.
- 15. The format of the examination will also have a bearing on whether a requested reasonable adjustment is permissible. The competence level of the examination cannot be altered.
- 16. The RCGP reserves the right to seek independent advice to ensure any adjustment(s) and arrangements are appropriate and are in accordance with any applicable legislation.

### Process to request a reasonable adjustment

- 17. Reasonable adjustments must be requested separately for the AKT and SCA. Each request must be submitted on a separate online reasonable adjustment request form.
- 18. Trainees who wish to request reasonable adjustments for the AKT or SCA can submit their request to the RCGP at any point upon entering training. The last date for submission of the reasonable adjustment request form for each examination day or diet will be published on the website and will be not less than 15 working days before the examination booking window opens.
- 19. Once approved reasonable adjustments will apply to all subsequent sittings of the applicable component, unless there is a change to trainee requirements.
- 20. It is the responsibility of the trainee to notify the RCGP of any changes to these requirements. Trainees are required to confirm at the point of booking their examination that there are no changes to their reasonable adjustment requirements. Requests to change reasonable adjustments must be submitted as a new request and will be considered through this process and timelines.
- 21. Requests for reasonable adjustments must be made via the online form. Requests submitted via email or hard copy will not be accepted.
- 22. Trainees must ensure the reasonable adjustments are specific to their requirements. Requests for RA must:
  - a. detail the diagnosis
  - b. explain how this diagnosis would potentially impact on performance on the examination
  - c. detail what adjustments are being requested that might overcome that disadvantage.
- 23. The request for reasonable adjustments form must be accompanied by supporting evidence. Where possible this should be submitted at the same time as the relevant request for reasonable adjustment form. Specific details of evidence required can be found in paragraphs 28 36 of this policy. Supporting evidence must be emailed to the examinations team:

  <u>exams.accoms@rcgp.org.uk</u>. Hard copies sent by post will not be accepted.

- 24. Applications for an adjustment must be submitted according to dates published on the RCGP website, which will be not less than 15 working days before the examination booking window opens. Trainees waiting for an assessment or supporting evidence must indicate this on their form. Any new requests for reasonable adjustment made after this date will not be processed as we would not be able to guarantee implementation in time for the examination sitting.
- 25. The RCGP will make best endeavors to accommodate trainees who have a disability diagnosed in the period between the reasonable adjustment request deadline and sitting the examination. However, trainees may need to defer examinations in such circumstances.
- 26. It is the trainee's responsibility to provide the necessary information to the RCGP so that an accurate assessment of their requirements can be made. The RCGP will notify trainees of the reasonable adjustments that have been agreed. Trainees will be notified in writing (by email) within 10 working days of the date of receipt of supporting evidence.
- 27. Complex reasonable adjustment requests may take up to 28 days to process. Trainees whose reasonable adjustments are deemed complex will be notified within 10 working days.
- 28. Appeals against decisions made in relation to reasonable adjustments should be addressed to the Chief Examiner and sent to <a href="mailto:exams.accoms@rcgp.org.uk">exams.accoms@rcgp.org.uk</a>.

### Reasonable adjustment request timeline

Deadline for submission of Request for	15 working days before the opening of the applicable component booking window.
Reasonable Adjustment form (RA1 or RA2)	Request for reasonable adjustments can be submitted at any point upon entering training, and early applications are encouraged.
Deadline for evidence to support Request for reasonable adjustments	15 working days before the opening of the applicable component booking window.
Written Outcome of reasonable adjustment request	Within 10 working days of the date of receipt of supporting evidence.
Written Outcome for complex reasonable adjustments requests	Within 28 working days of the date of receipt of supporting evidence.

### **Evidence**

- 29. It is the trainee's responsibility to ensure that any supporting evidence, including professional assessments, is completed sufficiently far in advance of the examination. The latest date by which supporting evidence can be submitted for each examination day or diet will be published on the website and will be not less than 15 working days before the examination booking window opens. Supporting evidence received after this date will not allow sufficient time for any reasonable adjustments to be implemented. Supporting evidence must be emailed to the examinations team: <a href="mailto:exams.accoms@rcgp.org.uk">exams.accoms@rcgp.org.uk</a>. Hard copies sent by post will not be accepted.
- 30. Trainees should share the Annex appropriate for the examination they are requesting the reasonable adjustment for with the person undertaking their disability assessment before the report is produced.
- 31. Fees for professional assessments are the trainee's responsibility. In some areas the Deanery funds dyslexia assessments for trainees, but this is not universal.
- 32. Trainees who declare that they have existing reasonable adjustments in the workplace, maybe asked to provide specific confirmatory evidence of these from their educational supervisor.
- 33. For trainees with specific learning difficulties (SpLD) such as dyslexia, dyspraxia and dyscalculia a suitable diagnostic assessment report, conducted post-16 years of age, by a chartered or educational psychologist or a specialist teacher assessor with a current practising certificate (PATOSS) must be provided. Please see the Annexes at the end of this document for more information.
- 34. For trainees with conditions such as attention deficit hyperactivity disorder (ADHD) and autism spectrum disorder (ASD) an assessment by a psychologist or Psychiatrist confirming the diagnosis or a letter from the GP must be provided. A screening test which indicates such conditions is not sufficient evidence.
- 35. For trainees with other disabilities a letter or report will normally be required from their GP/consultant or other qualified specialist as approved by the RCGP. This should include a description of how the trainee's ability to perform the AKT or SCA examination is likely to be affected and details of any special arrangements that have been made to accommodate them in their current and/or past work environment.
- 36. For trainees requesting reasonable adjustments related to pregnancy and breastfeeding, sufficient evidence will normally be a MatB1 form or a letter from a midwife, a GP or hospital.

37.	All evidence must be submitted electronically. Hard copies sent by post will not be accepted.

### Reasonable Adjustments for the AKT

- 38. The type of reasonable adjustments that the RCGP is able to provide are included in the Annex A Guidance for disability assessors AKT '
- 39. If the adjustment required is additional time, trainees must book an afternoon session with Pearson VUE additional time cannot be accommodated in morning sittings.
- 40. All Pearson VUE test centre sites have different layouts and so a trainee may be required to schedule the examination at a different test centre from their preferred location. Trainees should ensure they apply as early as is permitted and within the guidelines set out above.

# Information for pregnant trainees sitting the Applied Knowledge Test

- 41. The RCGP is not under a legal obligation to make reasonable adjustments for pregnant trainees. However, pregnant trainees who need drinks or snacks during the examination, and/or more frequent access to toilet facilities can apply for a rest break. The application process is identical to all other reasonable adjustment applications and supporting evidence will be required. Typically this evidence will be a MATB1 form, or an independent doctor's name for those trainees who have not yet received a MATB1 form.
- 42. Additional time is not granted as standard and is instead considered on a caseby-case basis. Decisions will vary according to the exact nature of the request.
- 43. The RCGP is unable to support breastfeeding during the AKT examination. In fairness to other trainees, children are not permitted to enter Pearson VUE test centre premises and, due to the nature of the AKT being a high-stakes licensing examination, the RCGP does not permit trainees to leave the building while under examination conditions.
- 44. Breastfeeding trainees wishing to express/pump breast milk during the examination can apply for a rest break and suitable space to do so during the examination. The application process is identical to all other reasonable adjustment applications and supporting evidence will be required.

### Reasonable Adjustments for the SCA

- 46. The type of reasonable adjustments that the RCGP and the Osler examination platform are able to provide are included in <u>Annex B Guidance for disability</u> assessors SCA.
- 47. The standard duration of each SCA consultation is up to 12 minutes.
- 48. Extensions to the 12-minute consultation time for common SpLD such as dyslexia alone are not usually granted as a reasonable adjustment. Each trainee is able to submit a reasonable adjustment request for additional reading time prior to the consultation time. RCGP may, on rare occasions, grant an extension to examination time if the trainee has significant speech, hearing or communication difficulties.
- 49. The SCA examination takes place in the workplace. It is not the responsibility of the RCGP to make reasonable adjustments for other disabilities affecting trainees in their workplace. Trainees should liaise with the GP training practice or their employers about any other adjustments.

### Information for pregnant and breastfeeding trainees sitting the SCA

- 50. The RCGP is not under a legal obligation to make reasonable adjustments for pregnant women. However, pregnant trainees who need drinks or snacks during the examination, and/or more frequent access to toilet facilities can apply for additional and/or extended rest breaks. The application process is identical to all other reasonable adjustment applications and supporting evidence will be required.
- 51. Additional rest breaks are not granted as standard and is instead considered on a case-by-case basis. Decisions will vary according to the exact nature of the request.
- 52. Breastfeeding trainees wishing to express/pump breast milk during the examination can apply for additional and/or extended rest breaks. The application process is identical to all other reasonable adjustment applications and supporting evidence will be required.

### Unsuccessful attempts and late diagnosis

- Trainees who are unsuccessful at the AKT or SCA and are subsequently diagnosed with a disability (such as neurodiversity) will be entitled to reasonable adjustments for any future attempts. However, unsuccessful attempt(s) will still stand, and RCGP cannot discount or void previous attempts or accept challenges to the outcome of an examination based on performance.
- 54. Trainees who are unsuccessful in an examination and feel that their performance may have been impaired by an underlying and previously undiagnosed disability, are strongly advised to seek further medical assessment rather than waiting until they have been unsuccessful at the examination a further time. The RCGP is unable to grant additional attempts at an examination (above the standard maximum number of attempts) where there is a late disability diagnosis.

### Data

- 55. Information and evidence about a trainee's disability and requirement for reasonable adjustments will be treated as sensitive personal information. It will be kept confidential and only passed to those who need to know. In some cases, this may include the decision makers (in the case of an appeal) and examiners.
- Approved reasonable adjustments, will be shared with Pearson VUE for the purposes of delivering AKT examinations, or PRP for the purposes of delivering SCA examinations. Trainees will be asked to indicate their consent for sharing this information on the application form. If consent is not given the RCGP cannot guarantee that a reasonable adjustment request will be granted.
- 57. The assessment of reasonable adjustments requests may need to involve, with trainee consent, information from their workplace Educational Supervisor or training organisation. If trainees do not consent to their Educational Supervisor being contacted the RCGP cannot guarantee that a reasonable adjustment request will be granted.

# ANNEX A - Guidance for disability assessors - AKT

The MRCGP is an integrated examination system, success in which confirms that a doctor has satisfactorily completed specialty training for general practice and is competent to enter independent practice in the United Kingdom without further supervision. Satisfactory completion of the MRCGP is a pre-requisite for the issue of a certificate of completion of training (CCT) by the General Medical Council and full Membership of the RCGP.

The MRCGP examination consists of a tripos of assessments. There are two externally examined components: the new Simulated Consultation Assessment (SCA) which replaces the Recorded Consultation Assessment (RCA) and the Applied Knowledge Test (AKT). It is for these two components that trainees often seek reasonable adjustments for an underlying disability. In order for you to be able to tailor your recommendations to the demands of the examinations we would appreciate it if you could take the time to read this short guide, which will hopefully increase your understanding of what they involve.

The AKT is a multiple-choice examination that tests the trainee's application of knowledge and is normally taken prior to the Simulated Consultation Assessment (SCA). It is computer-delivered in Pearson VUE test centres across the four nations. The examination contains 200 questions and the standard time allocation is 3 hours and 10 minutes.

There are a number of different formats to the questions:

- Single Best Answer (SBA)
- Extended Matching Questions (EMQ)
- Picture/Table/Chart Format
- Data interpretation
- Free text.

You can find examples of these on the trainee AKT presentation (PDF file, 1.6 MB).

Some of the questions will involve interpreting information that will be displayed in a similar format to that seen regularly in common medical journals. Some may also require simple arithmetical calculations.

### **Examples of common reasonable adjustments:**

Reasonable adjustments that require prior approval.

- Additional rest breaks for trainees. Please note that the clock cannot be stopped in the examination so trainees need to plan their breaks.
- Adjustable workstation.
- Changing the font size and colour contrasts for trainees with visual
  impairments or neurodiversity (although this may result in the trainee having
  to scroll through screens to access information). Please note that if a larger
  computer terminal is needed to prevent scrolling of some screen displays,
  this may occasionally result in the trainee having to accept a different
  Pearson VUE test centre to their geographical first choice.
- Overlay these must be supplied by the trainee and will be visually inspected by staff during the test centre check-in process. Overlays should lie flat against the screen (kept in place by static) or in a frame that sits on the top of the monitor. Monitors in most UK test centres are 24" flat screen. It is recommended to take a non-damaging adhesive, such as 'Blu-tack' in case you do not have the appropriate size overlay.
- Providing extra time for trainees with specific learning difficulties (SpLD).

Reasonable adjustments that do not require prior approval:

- Access to medical items or medically necessary food/approved drinks bottle
  at your workstation are listed on the Pearson VUE Comfort Aid List. You will
  need to submit an application form if any item you need access to, is not
  mentioned on the Comfort Aid list.
- Headphones/Earplugs only headphones/earplugs supplied by the test centre are permitted for use.
- Separate rooms are available. Please note that these are not soundproofed.

# Some questions that are commonly raised with regard to reasonable adjustments:

#### Provision of a paper version of the test

Reasonable adjustments have to be proportionate and the routine provision of paper tests is challenging, particularly as some question formats are specifically designed for computer-based delivery and marking. It should also be remembered that GPs are required to use computer-based medical records on a daily basis and so a trainee who requests a paper version would need to be able to demonstrate what adjustments had been made for them in the workplace to accommodate this.

Decisions are made on a case-by-case basis and, in exceptional circumstances, a paper version of the AKT may be provided and sat at the RCGP, 30 Euston Square, London.

#### Provision of more than 25% additional time

For specific learning differences, such as dyslexia, the RCGP, in line with current national practice, routinely offers an additional 25% time. This is almost always justified by the supporting professional evidence and adequate to ensure a level playing field with other trainees. The RCGP has a responsibility to ensure that trainees with a specific learning difficulty are supported and are not disadvantaged due to their disability, however it also has the responsibility of making sure that such a trainee does not receive any unfair advantage over other trainees. The standards expected of a high stakes national licensing examination such as the AKT cannot be compromised for reasons of patient safety.

In order to consider more than 25% additional time, the RCGP would need to see more supporting evidence. The RCGP must be able to clarify what impact the learning difficulty is having on day-to-day functioning and what adjustments are in place to support the trainee within their usual workplace.

We would only accept more than 25% additional time under exceptional circumstances where significant workplace adjustments have been made to accommodate the learning difficulty. Such significant additional time can make examinations last more than five hours, which some trainees could then find very tiring.

It is worth remembering that trainees often find other adjustments helpful, such as screen overlays, background colour changes and font size changes etc. These, along with the 25% additional time, are more than sufficient for the vast majority of applicants.

#### Provision of extra time for trainees for whom English is an additional language

This section is relevant when considering English for Speakers of other languages (ESOL). Trainees with a specific learning difficulty are entitled to additional time in the examination, provided that they submit a report from an educational/chartered psychologist or an appropriately qualified specialist teacher (PATOSS) which endorses this. This assessment needs to be in English and be undertaken post-16 years of age. If it involves a trainee for whom English is an additional language then you, as the assessor, need to include details of your experience in assessing individuals with this characteristic. If one of your recommendations is for additional time, then it needs to be clear that this is due to the trainee's underlying disability (as defined by the Equality Act 2010) rather than the fact that English is an additional language.

#### Use of text-to-speech software or a Reader

The RCGP is not able to offer the use of text-to-speech software as an adjustment. This is due to practical reasons, including the use of pictures and graphs, the use of medical terminology and the security considerations of Pearson VUE centres in allowing additional software to be added to their computer systems. In exceptional circumstances the use of a reader may be available. However, this would require the trainee to demonstrate a genuine need and in this regard we would expect that they could demonstrate the regular use of an adjustment of this kind, or a comparable adaptation, within their workplace.

# ANNEX B - Guidance for disability assessors - SCA

The MRCGP is an integrated examination system, success in which confirms that a doctor has satisfactorily completed specialty training for general practice and is competent to enter independent practice in the United Kingdom without further supervision. Satisfactory completion of the MRCGP is a pre-requisite for the issue of a certificate of completion of training (CCT) by the General Medical Council and full Membership of the RCGP.

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The SCA is a remote OSCE style examination that tests the trainee's ability to apply clinical, professional and communication skills appropriate for General Practice. It is taken once the trainee is in ST3, typically after the Applied Knowledge Test (AKT). It is delivered on an online assessment platform, Osler. The trainee is located in a GP practice and will be connected to professional role players to simulate consultations via the platform. The marking of the examination is asynchronous.

There will be twelve consultations with simulated patients, each lasting twelve minutes. There will be reading time of three minutes prior to each consultation. The cases are performed by professional role-players who are trained, calibrated and standardised so that although the case appears the same for every trainee, it responds to the approach of each individual doctor, as in real life.

The cases may be patients (most commonly), or their carer/parent or other health or social care workers. The cases are based on telephone consultations. In the majority of these trainees will be able to see the simulated patient. Others will be audio only.

Reasonable adjustments in the form of additional consultation time will be extremely rare during the SCA and will usually be restricted to trainees who have significant speech, hearing or communication difficulties.

Trainees will sit this assessment within their current working environment, hence it would be expected that any reasonable adjustments required to enable their day-to-day work (such as special seating, aids, IT equipment and software etc.) would already be in place.

### **Examples of common reasonable adjustments:**

Reasonable adjustments that require prior approval:

- Additional consultation time
- Additional reading time for trainees with SpLD
- Additional rest breaks for trainees.

Accessibility features of the Osler examination platform that do not require prior approval:

- Colour contrast
- Enlargement/zooming of instructions
- Keyboard navigation.