

Reasonable Adjustments Policy and Disability Arrangements for Candidates Taking College and Faculty Examinations

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(Supersedes v1.0 – June 2024)

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1 Introduction and Aim of the Policy

The College and its Faculties are committed to ensuring all candidates have an equal opportunity to demonstrate their knowledge, skills and professional behaviours in examinations. Where appropriate, the College will make reasonable adjustments (RAs) to examination arrangements for candidates with a disability or health condition, provided this does not compromise the competence standards being assessed.

This policy sets out the principles, timelines and procedures for requesting RAs, the evidence required, and guidance for assessors. This version also clarifies expectations for clinical-style exam environments, strengthens guidance on evidence quality, and updates the position on late diagnosis.

The reasonable adjustments policy takes into account the guidelines set out by the following statutory organisations:

- a) Academy of Medical Royal Colleges (AoMRC) 'Reasonable Adjustments for Candidates with Disabilities in High Stakes Assessments' document (July 2017), which was produced following collaboration with medical royal colleges. This policy also takes account of the AoMRC document 'Managing access arrangements for candidates requesting adjustments in high stakes assessment (May 2018).
- b) The General Medical Council (GMC) 'Welcome and valued: Supporting disabled learners in medical education and training' document, Chapter 1: 'Health and disability in medicine' and Chapter 3: 'What is expected of medical education organisations and employers?'
- c) The Equality and Human Rights commission (EHRC) technical guidance document to the provisions in the Equality Act 2010 that commenced on 1 October 2010, 'Equality Act 2010. Technical guidance on Further and Higher Education'. For education providers, the document sets out the requirements of the Act and provides an authoritative, comprehensive, and technical guide to the letter of the law (2015).

This policy applies to all examination components. Because components assess different standards, RA approval is component-specific; a separate application is required for each component.

2 Policy statement

The College will make reasonable adjustments for candidates with a disability, neurodivergence or long-term health condition where a provision, criterion or practice places them at a substantial disadvantage, so long as adjustments do not affect assessment validity, integrity or competence standards.

Adjustments mitigate disadvantage; they do not confer advantage. Each request is considered on its merits, taking into account professional evidence, the assessment format and operational feasibility.

3 Definition of Disability

Under the Equality Act 2010, a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities (which include examinations and related activities).

In the Act, a person has a disability if:

- they have a physical or mental impairment.
- the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.

For the purpose of the Act, these words have the following meaning:

- 'substantial' means more than minor or trivial.
- 'long term' means that the effect of the impairment has lasted or is likely to last for at least twelve months.
- 'normal day-to-day activities' include everyday things such as eating, washing, walking, working and examinations.

Persons with certain conditions are deemed to be disabled for the purpose of the Act without having to satisfy the criteria set out above. Those conditions are:

- HIV infection, cancer, and multiple sclerosis
- severe disfigurements (except for unremoved piercings and tattoos)
- blindness, severe sight impairment, sight impairment and partial sightedness (provided this is certified by a consultant ophthalmologist)

4 Definition and Provision of Reasonable Adjustments

4.1 A reasonable adjustment is any action that removes or reduces the effect of a disability that places a candidate at a substantial disadvantage in an examination situation.

4.2 Adjustments must not alter competence standards, change the skills/behaviours being assessed, or undermine the format/validity of the exam.

4.3 The College will make reasonable adjustments for candidates with a disability who undertake College and Faculty examinations, where any provision, criterion, or practice and/or physical feature of the exam environment puts candidates at a disadvantage compared with those who are not disabled.

4.4 The College may provide (or allow) auxiliary aids or altered arrangements where, without them, the candidate would be at a substantial disadvantage (see Section 8).

4.5 The College will consider temporary (such as a broken arm, back pain), on-going or fluctuating medical conditions for the purpose of examination adjustment, where the condition affects a candidate's ability to take a planned sitting of an examination. Competence standards will not be adjusted. See sections 12 and 13 regarding special arrangements for short-term related conditions or pregnancy.

4.5 The College recognises that it is not possible or appropriate to attempt to define a pre-determined set of reasonable adjustments and therefore any decisions will need to be made on a case-by-case basis.

4.6 Candidates are responsible for providing sufficient information to enable accurate assessment of need. Requests must set out: diagnosis; impact on performance in the specified component; the adjustment(s) sought; and the intended sitting.

5 Exam environment in Clinical and Performance-Based Examinations

As assessments continue to evolve towards authentic clinical performance, reasonable adjustments (RAs) will focus on preventing substantial disadvantage while maintaining the validity, fairness, and authenticity of the assessment environment.

Under the Equality Act 2010, reasonable adjustments constitute a framework of supportive measures designed to mitigate disadvantage, not to guarantee perfect conditions in every

aspect of delivery. The purpose is to create equity through proportionate steps that balance candidate needs with the integrity of the examination and practical constraints.

The following principles apply:

- The purpose of the clinical examinations is to test candidates' application of knowledge in real-world clinical situations. In practice, clinicians work in environments where there are ambient sounds, interruptions, and background noise. Given that the examinations are designed to simulate realistic clinical practice conditions, background activity, interruptions, and ambient noise are to be expected.
- It is neither possible nor reasonable to provide candidates with entirely silent rooms.
- Adjustments are intended to minimise unfair disadvantage, not to remove all environmental stimuli.
- Where a quieter or alternative space is approved, it will be provided as far as practicable while maintaining fairness, realism, and logistical feasibility.
- Candidates are reminded that reasonable adjustments relate to the provision of a quiet place to avoid substantial disadvantage, not to a room meeting specific technical or acoustic specifications.

These expectations will be reflected in exam pilots and operational testing, which will include candidates with approved RAs to evaluate both feasibility and fairness of implementation.

6 Application and booking process

6.1 Candidates with a physical or mental disability, neurodivergence, SpLD (e.g. dyslexia, dyspraxia, dyscalculia, dysgraphia, auditory processing disorder, ADHD), or an ongoing/fluctuating medical condition that could affect examination performance may be eligible for RAs.

6.2 Requests must be submitted via the online Reasonable Adjustments Application Form on the College website for each examination component. Applications should clearly state:

- the condition or diagnosis;
- how it impacts performance in the specific exam;
- the adjustment(s) requested; and
- the intended sitting

7 Timeline

7.1 Reasonable adjustments must be requested separately for each component of the relevant written, SOE and/or OSCE exam.

7.2 A candidate may request a reasonable adjustment for a specific component of the examination at any point upon entering training.

7.3 Requests must be received by the RA deadline published in the Examinations Calendar for each component.

7.4 Any late/new requests for reasonable adjustments after the published submission date will not be processed as we cannot guarantee implementation in time for the exam sitting.

7.5 The College will endeavour to accommodate candidates who have a disability diagnosed in the period between the reasonable adjustment request deadline and the desired exam sitting, however, candidates may need to defer examinations to have their requests fully assessed and accommodated.

7.6 Candidates will be notified by email within 14 working days of the reasonable adjustment booking window closing with an offer of adjustments that can be applied to the examination component they wish to book.

7.7 If the request for reasonable adjustments is deemed complex, it may take the College up to 28 days to process. In such a case, the College will notify the candidate in writing within 14 working days that the process may take longer and may not be in time for the intended exam sitting.

7.8 Candidates whose need for reasonable adjustments or special arrangements (see Section 9 of these Regulations) arises after the submission of their application (due to an accident or sudden condition/illness) must contact exams@rcoa.ac.uk (FRCA)/ facultyexams@rcoa.ac.uk (FFICM/ FFPMRCA) as soon as practicable.

7.9 Candidates receive written confirmation of approved adjustments. The College may contact the assessor/clinician for clarification where needed.

7.10 After approval, candidates book their exam and must: indicate their disability/health condition; and, if applicable, tick pregnancy adjustments (see Section 13).

7.11 If a candidate misses the deadline, they may defer to a later sitting or proceed without adjustments.

7.12 Summary of reasonable adjustment request timeline

Deadline for submission of request for reasonable adjustments with supporting evidence	By the deadline stated for reasonable adjustments published in the examinations calendar on the website for the relevant component of the exam. <i>Early submission of requests for reasonable adjustments for a known disability can be made at any point upon entering the training programme and is encouraged.</i>
Outcome of reasonable adjustment request from the College in writing	Within 14 working days of the reasonable adjustment window closing.
Outcome of complex reasonable adjustment request from the College in writing	Within 14 working days of the reasonable adjustment window closing, the College will inform the candidate if a reasonable adjustment is deemed complex and processing may take longer. The outcome of the request will be disclosed within 28 working days of the date of receipt of the supporting evidence.

8 Implementation of Reasonable Adjustments

8.1 Written components: approved adjustments are applied when scheduling. Candidates with time extensions are placed in the earliest onboarding windows (usually

09:00–09:30). The proctoring team is notified of adjustments approximately one week before the exam.

8.2 Clinical/oral components (OSCE, SOE, ACRE, CASE, FCPE, CPEP): adjustments are implemented in person. The exam team is briefed to ensure consistent and discreet delivery.

9 Supporting evidence

9.1 Applications must include current, relevant evidence from an appropriate professional. Evidence must: confirm diagnosis; explain exam-specific impact; and recommend adjustments to mitigate disadvantage.

9.2 Acceptable evidence includes:

For health issues or where candidates receive accommodations at work, a letter from:

- Letter/report from a hospital consultant or GP; or
- Statement from a college tutor/supervising consultant confirming workplace accommodations.

For physical or mental disability, neurodivergence, specific learning difficulty (SpLD) (dyslexia, dyspraxia, dyscalculia, dysgraphia, auditory processing disorder, ADHD), a report/letter from:

- CAMHS (Child and Adolescent Mental Health Services),
- an Educational Psychologist, Clinical Psychologist or appropriately qualified psychologist registered with the Health Care Professions Council or the Psychological Society of Ireland; or
- an appropriately qualified psychiatrist; or
- a Local Authority Educational Psychology Service; or
- the Local Authority Sensory Impairment Service; or
- a Speech and Language Therapist (SaLT)

Reports for SpLDs/neurodivergence must:

- be completed after age 16;
- be authored by an approved assessor* familiar with the professional/clinical nature of FRCA/FFICM/FFPMRCA exams;
- include specific, exam-related recommendations (e.g. “25% additional time for reading/processing in written papers”); and
- demonstrate understanding of the competence standards being assessed.

*Approved assessors include:

- Specialist teachers who hold a practicing certificate, such as **Dyslexia Action, BDA or PATOSS**. Candidates can check if an assessor holds the appropriate qualifications on the **SASC** (SpLD Assessment Standards Committee) website.
- A practicing chartered or educational psychologist who is **registered with the Healthcare Professionals Council**. A candidate can check if an assessor is registered on the HCPC website.

Pregnancy

- MatB1 or a letter from a midwife/GP/hospital confirming expected delivery date and any relevant health issues.

9.3 It is the candidate's responsibility to ensure that the documentary evidence is true and accurate. When assessed by a disability assessor, candidates should ensure that:

- the assessor is familiar with the exam component(s) and guidance provided in sections 10 and 11.
- educational psychologists and experts **understand the professional nature of the examinations** and the **competence standard** being assessed.
- the experts have **access to the appropriate extract of the curriculum** so that they are aware of the knowledge and skills that are tested.
- experts are aware of the **structure of the examination**.
- reports from experts must **confirm that they reviewed the disability assessor guidance documentation** which outlines the competence standards for the relevant exam component.

9.4 The College may seek clarification from the assessor/clinician if rationale or recommendations are unclear.

9.5 Evidence lacking sufficient detail or a clear link between condition and exam impact may delay or prevent approval.

10 Consideration of Reasonable Adjustments

10.1 The College is responsible for evaluating the evidence submitted as evidence for adjustments by individual candidates with a disability, as defined by the Act for each exam application.

10.2 While candidates with similar conditions may receive similar adjustments, decisions remain individualised. Existing precedents may be used as a starting point.

10.3 Good practice in the support of candidates with SpLDs such as dyslexia is applied in offering a provision of extra time for written examinations, although this should be raised as a recommendation in the assessor's report to be used as a starting point for reasonable adjustment considerations.

Extra time accommodations for candidates with SpLDs will also be considered for other exam components where the reading and/or processing of information is required. Additionally, such candidates may have different or further requirements, such as the use of particular fonts, overlays or exam questions printed on coloured paper. Where this is the case, different and/or additional reasonable adjustments will be considered on a case-by-case basis.

10.4 Where the College has no precedent for a complex reasonable adjustment for a particular disability or special need or where the adjustment requested is more significant than any previous adjustment permitted, then the case may be referred to the Examinations Committee or specialist advice sought from, for example, the representative at the Academy of Medical Royal Colleges. If the examination date is before the next meeting of the committee, then the request will be forwarded for their consideration by confidential email, to the Chair of the Examinations Committee, the Director of Education, Training and Examinations, and at least three members of the committee, which will include the chair/deputy chair of the relevant examination and the lay committee representative. The Head of Examinations will coordinate and compile the response and keep the candidate advised throughout the process.

10.5 The OSCE and SOE are regarded as competence tests, assessing understanding, clinical reasoning, clinical application of knowledge and professional behaviours. As such, the method of assessment is a crucial element of these examination components and any adjustments made must maintain the integrity and validity of these assessments and not affect the format of the examinations. The standard of the competence level of the examination cannot be altered.

GMC guidance indicates that while there is a duty to make a reasonable adjustment, in enabling the competency standards in Tomorrow's Doctors to be met, there is no requirement to make adjustments that would alter the standard of competency required.

10.6 An adjustment may be unreasonable if it imposes disproportionate cost or delay, significantly impacts other candidates, or affects exam security or integrity.

10.7 In all cases the College reserves the right to take independent advice to ensure that any proposed adjustments are appropriate and in accordance with any applicable legislation.

10.8 Information on requests for reasonable adjustments, including statistical records will be reported regularly to the Examinations Committee for monitoring and review.

10.9 Where a candidate does not believe that the adjustments they have been granted are reasonable, they should refer to the Complaints and Appeals policy.

9 Late Diagnosis of Specific Learning Disability (SpLD) / Autism

On late diagnosis of a condition that requires reasonable adjustments, any previous attempts at an examination component taken prior to the diagnosis may be discounted or additional attempts added.

Candidates should make a request by emailing:

- **FRCA:** exams@rcoa.ac.uk
- **FFICM / FPMRCA:** facultyexams@rcoa.ac.uk

The request should include the date of diagnosis, a record of examination history, and any relevant extenuating circumstances.

Requests will normally be considered by the Examinations Department in line with agreed criteria. Only exceptional or complex cases will be referred to the relevant Examination Committee for review at their next sitting. The submission will include the candidate's exam history, date of diagnosis, and the report from an approved assessor submitted at the last sitting of the exam. Candidates will be informed of the outcome soon after the committee has sat.

10 Guidance for Disability Assessors - Written Examinations

Competence standards and curriculum extracts are located on the website for each written exam component:

[Primary FRCA MCQ Examination](#)

[Final FRCA Written Examination](#)

[FFICM MCQ Examination](#)

Examples of adjustments (illustrative, not exhaustive):

- Extra reading time or overall exam time (as per assessor report)
- Dyslexia stylesheet / colour contrast in TestReach
- Use of Flex canvas (annotation/zoom/highlighting)
- Up to 3 sheets of additional note paper (where permitted)
- Screen reader or live reader (where appropriate)
- Paper-based exam at the College (where justified)
- Adjusted font size/type or coloured overlays (paper-based only)
- For temporary injury/illness: scribe, rest breaks, additional comfort breaks

All recommendations must be consistent with exam security, validity, and competence standards.

11 Guidance for Disability Assessors - Clinical/Oral Examinations

Competence standards and curriculum extracts are located on the web pages for each clinical oral exam component:

Primary FRCA SOE

Primary FRCA OSCE

Final FRCA SOE

FFICM SOE

FFICM OSCE

Examples of adjustments (illustrative, not exhaustive):

SpLD/Neurodivergence/Visual impairment/AD(H)D/Autism

- Extra reading/responding time in SOE (as per report)
- Station-by-station judgments in OSCE to preserve competence standards
- Additional reading time where text is unusually long
- Adjusted font size or colour contrast for written artefacts
- Hard-copy station information (OSCE)
- Separate room (SOE only)

Hearing impairment/deafness

- Inform relevant examiners; provide induction loop; discuss any required arrangements with the exam department

Speech impairment

- Inform relevant examiners; discuss adjustments with the exam department.

Mobility

- Wheelchair-accessible cubicles; access lifts and ramps; accessible toilets

Temporary illness/injury

- Scribe where appropriate; rest breaks (including for medication)

All adjustments must **preserve the assessment's integrity** and **competence standards**.

12 Temporary Medical Conditions

The College will consider special arrangements in the form of 'reasonable adjustments' for candidates who have a temporary, ongoing, or fluctuating medical condition that does not meet the definition of a disability as set out in the Equality Act 2010 but does affect a candidate's ability to take a planned sitting of an examination. The procedures to follow are set out in this policy.

13 Special Arrangements for Pregnancy

This section applies to candidates whose pregnancy or pregnancy-related illness/condition affects their ability to sit or perform in an examination (as permitted under the Equality Act 2010).

13.1 Candidates should inform the Examinations Department on application, or as soon as possible, if:

- (a) there is a pregnancy-related problem or illness; or
- (b) confinement is due shortly before/around the examination date; or
- (c) the condition is likely to have a detrimental effect on exam performance; or
- (d) pregnancy-related adjustments are requested.

13.2 If a candidate is unable to sit the examination, they can withdraw, and the examination fee will be refunded (subject to a deduction for administrative expenses). In some circumstances, the College may be able to make an adjustment to account for pregnancy-related conditions. Candidates should contact exams@rcoa.ac.uk (FRCA)/ facultyexams@rcoa.ac.uk (FFICM, FPMRCA) to discuss possible reasonable adjustments.

14 Governance, Monitoring and Review

- This policy will be reviewed in October 2026 (or earlier if required).
- RA requests and outcomes will be monitored and reported to the Examinations Committee to support quality assurance and equality duties.
- As clinical performance assessments evolve, the College will pilot RA delivery within those formats and update guidance accordingly.

Appendix A. Summary of key changes (from v1.0 – June 2024)

- **New Section 5:** Clarifies expectations for clinical-style exam environments (ambient noise/realism) and how RAs will be balanced with authenticity.
- **Section 6–7:** Streamlined online application, fixed timelines (14/28 working days), clearer evidence standards and assessor familiarity with competence standards.
- **Section 8:** Clearer boundaries for what is/is not reasonable; strengthened integrity/security language; referral/expedited governance routes.
- **Section 9:** Clarifies discounting/adding attempts for late diagnosis and position on expungement.
- **Section 14:** Governance, monitoring and pilot commitments.
- **Global:** language tightened; duplication removed; consistent headings and cross-references.