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Guidance

# Regulatory report: Access arrangements, including 25% extra time

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## Applies to England

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## Executive summary

Ofqual regulates to ensure that assessments provide a reliable indication of students' knowledge, skills and understanding. It is important that all students can access their assessments to demonstrate what they know, understand, and can do. Awarding organisations and schools, colleges and other exam centres provide

access arrangements so that students with disabilities or temporary access needs can access their assessments. These include reasonable adjustments for disabled students, which are a legal entitlement under equalities law.

Ofqual considers that an effective access arrangements system is one that:

- enables students to receive appropriate arrangements for their needs
- is manageable for schools, colleges and other exam centres
- commands public confidence

Demand for access arrangements has risen in recent years, increasing pressure on awarding organisations and schools, colleges and other exam centres to continue to meet that demand. Ofqual has sought to better understand this trend and the factors driving it, and to identify any associated risks within the access arrangements system.

We reviewed a wide range of evidence, carried out research and analysed data. This report summarises what we found. Our objective was to better understand and determine whether any improvements are needed to help the system meet our regulatory requirements. Our work gave particular focus to 25% extra time as this is the most common exam board-approved access arrangement.

We identified that previously published statistics on access arrangements did not give a sufficiently accurate picture of approved access arrangements in place for the exam cohort in each year. As a result, [we withdrew those official statistics](#) and developed a methodology to improve reporting in the short term. For the longer term, we expect the exam boards to improve the quality of access arrangements data, which we anticipate will need exam board investment.

Extra time is not only used in GCSEs, AS and A levels, but is widely used across educational assessment. Our research identified that the effects of extra time are dependent on several factors, but that extra time is of most benefit where a student would be working with undue time pressure under the standard duration. A student with access needs that affect their speed of working is likely to experience even greater time pressure, and in this case extra time can be an effective access arrangement.

As Ofqual responds to the government's proposals following the [Curriculum and Assessment Review](#), we will work with the Department for Education to make sure that our research on time constraints in assessments is taken into account. We will then set our regulatory requirements around assessment time. We will confirm our regulatory expectations to awarding organisations so they can consider time (and

time pressure) at the outset of qualification design to ensure the standard assessment time does not cause undue time pressure for the vast majority of students, in line with qualification and subject requirements.

We heard a range of views about the current access arrangements system, with support for its core principle that arrangements should meet legal requirements and be based on a student's individual needs. The system is designed to meet this purpose, but we have identified some aspects which could be improved.

We explain in this report the actions we expect exam boards to take to strengthen the current system.

## Introduction

Disabled students are entitled to reasonable adjustments under equalities legislation. Reasonable adjustments are changes made to remove or reduce the substantial disadvantage caused by a person's disability. In the context of exams, a reasonable adjustment aims to allow a disabled student to access the exam, so they can demonstrate their knowledge, skills and understanding. A reasonable adjustment must not change what is being assessed and must not give the student an unfair advantage or disadvantage.

As well as granting reasonable adjustments to disabled students, the exam boards offering GCSEs, AS and A levels allow adjustments for students who are not disabled, but have an accessibility need, such as a student who has a temporary illness or injury. For example, a disabled student may need a scribe to write their answers in an exam because they are unable to write independently; this would be a reasonable adjustment and a legal entitlement for that student. Another student may need a scribe because of a broken arm; the exam boards provide this as an access arrangement, but it is not a legal entitlement.

These 2 categories of adjustments are generally referred to by exam boards as access arrangements. The exam boards administer access arrangements collectively, through their membership organisation the Joint Council for Qualifications (JCQ). Under JCQ's approach, schools and colleges are responsible for identifying the access arrangements that a student requires, based on a picture of need and their normal way of working. For certain access arrangements, such as 25% extra time, JCQ requires the school, college or other exam centre to gather evidence of the student's need and apply to JCQ for the arrangement to be granted.

These arrangements are processed using a joint online application system for all the exam boards, which was designed to reduce workload and duplication for schools, colleges and other exam centres. For other access arrangements, such as supervised rest breaks, the school or college can provide the arrangement without applying to JCQ.

Exam boards, and schools, colleges and other exam centres, have a legal responsibility to make reasonable adjustments for disabled students and must comply with equalities legislation. Ofqual cannot adjudicate on these matters, as they relate to compliance with equalities law rather than Ofqual's rules. Rather, Ofqual's rules require awarding organisations to have clear arrangements for making reasonable adjustments in line with equalities law, and, where they choose to, other access arrangements (provided under Ofqual's rules as a form of special consideration). Awarding organisations must also publish the details of those arrangements.

Ofqual's rules require awarding organisations to have agreements with exam centres confirming that qualifications will be delivered in accordance with equalities law. Ofqual does not prescribe or specify the arrangements awarding organisations make to comply with equalities law, as awarding organisations are themselves accountable under the law for the arrangements they make. However, Ofqual does take an interest in what those arrangements are because they can affect both assessment validity and public confidence in qualifications and assessments. Also, under the Equality Act, Ofqual's [section 96 specifications](#) set out adjustments which an awarding organisation should not make in relation to particular qualifications.

In 2023 Ofqual began work to better understand trends in access arrangements, how the system operates in practice, and any risks in the current approach. We sought to identify opportunities for improvements to the current system to help ensure students receive arrangements appropriate to their needs and to make sure any risks within the current system were appropriately considered and addressed. This work was in response to the apparently increasing volume of exam board-approved access arrangements, as previously reflected in Ofqual's (now withdrawn) official statistics, and to growing stakeholder feedback about the increasing challenges faced by schools, colleges and other exam centres in managing this rising volume. As 25% extra time is the most common exam-board approved access arrangement, this was a particular focus of our work.

We reviewed a range of sources to consider extra time and time in assessment, and access arrangements more generally. These included Ofqual's research, academic studies and awarding organisation research reports, alongside statistical data, stakeholder feedback, and JCQ's annually published documentation on access

arrangements.

## Ofqual research

The most common access arrangement granted by the exam boards is 25% extra time, with the previously published statistics indicating a year-on-year increase in volume of approvals for this arrangement. Ofqual wanted to understand more about the effects of extra time in exams, the time pressure experienced by students in exams, and the extent to which it is appropriate for an exam to assess a student's ability to work under time pressure.

Alongside this regulatory report we are publishing research that:

- [reviews the published literature on the effects of extra time on mitigating time pressure](#)
- [explores the extent to which exams in 6 GCSE subjects are time pressured](#)
- [considers when, and to what extent, an assessment ought to assess a student's ability to work at speed](#)

Some types of qualification might explicitly seek to assess students' ability to work at speed. Where this is the case, it would be appropriate for the assessment duration to be set such that students would have to work at speed.

For GCSEs, AS and A levels, there is no explicit policy intention to assess students' ability to work under time pressure. Rather, the intention is that GCSEs, AS and A levels assess students' subject-specific knowledge, skills and understanding. However, in practice, this is a complex issue. Practicality dictates that exam boards need to set a duration for each exam – it would not be practical in the current system for students to have unlimited time available. Indeed, unlimited time could also have a negative impact on some students. In setting the duration of an exam, the exam board should aim for all (or nearly all) students to have enough time to attempt all tasks without undue time pressure. If a student is unduly time-pressured in an exam, then the exam is effectively testing not only their subject-specific knowledge, skills and understanding, but also their ability to work at speed. In this scenario, the exam is “speeded”.

The extent to which an exam is speeded will depend on the interaction between the tasks in the exam paper, the duration of the exam and the individual student. Where the exam is not designed to test a student's ability to work under time pressure, the

access arrangement of 25% extra time aims to mitigate time pressure a student may experience due to a disability, special educational need or temporary injury.

Most existing research on extra time comes from studies in the United States and focuses on university-level assessments in English and maths. While this limits how directly the findings apply to GCSEs, AS and A levels, the evidence shows that extra time is a widely used arrangement in educational assessment.

As speededness depends on the interaction of specific factors, research shows that the effects of 25% extra time vary according to circumstances. Generally, extra time is helpful to students. However, if the standard duration of an assessment gives a student enough time to attempt all tasks without undue time pressure, then extra time will be less helpful.

Our quantitative research found some limited evidence of time pressure in GCSE exams. There was substantial variation in the apparent degree of speededness across the subjects we analysed, and across different student groups. However, we note that speededness is only one of many factors that could have contributed to the patterns observed in our analysis.

As Ofqual begins the work of qualification reform following the [Curriculum and Assessment Review](#) and the [government's response](#) to it, we will consider our requirements around assessment time for GCSEs, AS and A levels. We will also take this into account in setting our requirements for the proposed new post-16 qualifications, such as V Levels. We will work with the Department for Education to make sure that our research on time constraints in assessments is taken into account for reformed qualifications. In doing so, it will be important to reflect on how the interaction between the tasks in an assessment and the assessment duration can give rise to speededness, and the risks this may present to assessment validity and fairness. In doing so, we recognise there are always trade-offs in assessment design and evidence shows that students' experience of speededness varies depending on how they work and, often, by subject too.

Whether an assessment should require a student to work at speed should be made clear in the Department for Education's policy for GCSE, AS and A level and any other reformed qualifications. Ofqual will consider the nationally-set policy and content requirements for these qualifications as it develops assessment arrangements. Where working at speed is not an intention of the assessment, we will expect awarding organisations to give students appropriate time to complete the tasks in the assessment without undue time pressure. While we do not have evidence of speededness being a significant issue in current assessments, future assessment design will be strengthened by an explicit consideration of whether the

standard duration is sufficient for students to work without undue time pressure.

## Access arrangements data

In response to the rise in approved applications for 25% extra time in recent years, Ofqual sought a deeper understanding of the data underpinning access arrangements statistics. To support this, we requested more detailed data from exam boards, which revealed the nature and extent of the issues within the previously published statistics.

Our analysis of the additional data showed that the previously published statistics did not give an accurate picture of the number of approved access arrangements in place for the exam cohort in each year. Further analysis suggested that the actual proportion of students receiving access arrangements was broadly in line with the proportion of students with special educational needs in the school population. As a result, we [withdrew the published statistics](#) and began work on revised statistics based on the available data.

Our analysis found that the issue with the previous data was due to how the data was recorded and reported. For example, the reporting included students with valid arrangements but who did not sit exams in the given year, and duplicate applications for the same student were not filtered out. Validation was difficult as the reporting was based on data not linked to individual student exam entry records. Access arrangements data is derived from Access Arrangements Online, JCQ's centralised system used by schools, colleges and other exam centres. This system was designed to streamline the application process for access arrangements, rather than to produce official statistics on the number of students with access arrangements. Our analysis did not reveal systemic evidence of misuse or failure – this was a technical issue with data reporting, rather than how the system had been used.

Alongside this report we are publishing [revised statistics](#) for the period from 2015 to 2016 to 2024 to 2025. For these new statistics, designated as “official statistics in development”, we developed a methodology that focuses only on those access arrangements granted to students who were assessed in the given year. We have done this by matching students in the access arrangements data to those in our exam results data, and by more reliably removing duplicate records from the data. While this new methodology is not perfect, it gives a more accurate picture of exam board-approved access arrangements as they relate to a specific exam cohort than the previously published official statistics.

The previously published statistics indicated a high proportion of GCSE, AS and A level students with an approval for 25% extra time, with this proportion increasing over time. The statistics also indicated that the proportion of students in independent centres with an approval for 25% extra time appeared to be considerably higher than in secondary non-selective, non-independent centres.

Ofqual's revised statistics suggest that the actual proportion of exam students with an approval for 25% extra time is lower than previous data suggested, and broadly in line with the rate of special educational needs (SEN) in the student population (as reported by the [Department for Education](#)). For 2024 to 2025, between 16.6% and 25.5% of exam students had an approval for 25% extra time (although the upper value of the ranges in our access arrangements data will decrease when these figures are updated next year as new data becomes available.) DfE's statistics show a similar picture, with a 21.0% rate of SEN in centre types where GCSEs, AS and A levels may be taken – although we note that DfE's statistics do not include further education establishments. Both data sets show a rise over recent years.

Our new statistics for 2024 to 2025 show a higher proportion of students in independent centres with an approval for 25% extra time (between 22.4% and 32.1%) than in state-funded secondary centres (between 14.6% and 22.0%). DfE's statistics show an SEN rate of 24.1% in independent schools, compared with 16.5% in state-funded secondaries. However, DfE's "independent" category includes independent special schools, whereas Ofqual's statistics treat independent special schools as a separate category. Again, the upper value of the ranges for 2024 to 2025 in our access arrangements data will decrease when these figures are updated next year, as further data becomes available.

Given the differences between Ofqual's access arrangements statistics and DfE's SEN statistics, any comparisons between the two should be made with caution. However, we expect the exam boards to reflect on both the access arrangements statistics and DfE's SEN data as appropriate, as they strengthen their risk-based methodology for identifying centres for access arrangements inspections

The figures in the report are presented as a range of plausible values, rather than absolute values, to reflect the complexity of the data. The lower bound of the range reflects the access arrangements that we are sure were for students being assessed in the given year. The upper bound includes the arrangements where we cannot be sure whether they were for students being assessed in the given year or are duplicate records, because the data from exam boards is not clear enough.

We have consulted with the Office for Statistics Regulation in preparing this release in line with the [Code of Practice for Statistics](#).



We will continue to develop our methodology so that we can report with greater certainty using the data we currently collect. We will explore different methods of matching the access arrangements data with our exam results data, with a view to more accurate linkage for future releases.

For the longer term, we expect the exam boards to improve the quality of the data. We anticipate this will involve investment in their systems. Improved data will support transparency and help exam boards to better monitor access arrangements approvals, which in turn will strengthen confidence in the system. Improved data can also allow exam boards to better understand the needs of students taking their assessments, which can inform accessible assessment design, in line with Ofqual's [guidance on designing and developing accessible assessments](#). It will also allow Ofqual to continue improving its official statistics. We recognise the need to balance the benefits of improved access arrangements data against the costs – in particular, the importance of minimising burden on schools, colleges and other exam centres.

It is important to note that even after these longer-term improvements are made, there will still be limitations to the access arrangements data. In reporting on exam board approvals for access arrangements, the data will not include access arrangements where exam board approval is not required, such as supervised rest breaks. Importantly, the data will also not provide information on the extent to which students actually use the access arrangements that they are granted.

While the focus of Ofqual's work has been on the access arrangements data for GCSE, AS and A level, as this is the data we have historically collected and reported, we recognise that exam boards also use the same systems to administer access arrangements applications for a range of other qualifications including key stage 4 technical awards and applied generals (such as BTECs and Cambridge Technicals). We anticipate that this investment in their systems would improve the quality of data for these qualifications too. As part of the proposed post-16 reforms arising from the Curriculum and Assessment Review, we will consider whether to begin collecting and publishing equivalent data for other qualifications taken alongside GCSEs, AS and A levels, including T Levels and the proposed new V Levels.

## Considering the wider access arrangements system

We have considered the wider access arrangements system in line with our responsibilities as the independent regulator of qualifications and assessments in England. As set out in detail above, this includes requiring that the awarding organisations provide reasonable adjustments as required by equalities law and that they publish clear arrangements. We considered how effectively the system enables students to access appropriate arrangements, the administrative burden on schools, colleges and other exam centres, and potential risks to fairness and public confidence.

The exam boards, through JCQ, set specific requirements for schools, colleges and other exam centres when applying for access arrangements. JCQ sets detailed criteria for evidence of need, based on the student's individual need and the access arrangements requested, to support an online application. JCQ also provides guidance to help schools, colleges and other exam centres meet these requirements and determine appropriate arrangements for individual students. Exam boards use JCQ's Centre Inspection Service to monitor schools, colleges and other exam centres in implementing access arrangements, through focused access arrangements inspections.

Schools, colleges and other exam centres, along with their representatives, have raised concerns regarding the challenges associated with meeting increased demand for access arrangements. These challenges include the additional workload and cost implications of identifying appropriate arrangements, evidencing student need, and administering arrangements.

We recognise that rising demand for access arrangements – and the differing level of resource across schools, colleges and other exam centres to meet this demand – is a sector-wide issue. However, it is important that the exam boards consider their approach to access arrangements within this context, with a view to balancing the safeguards in the system with workload for schools, colleges and other exam centres. Ofqual has been clear with the exam boards that we expect the system to enable students to receive appropriate arrangements for their needs, in line with legal requirements.

We acknowledge that the exam boards have made some improvements, for example the format of the main JCQ access arrangements document and the introduction of additional guidance documents. We recognise the exam boards' efforts to respond to specific issues and feedback raised with them by Ofqual and others in their annual updates to their requirements. It is important that any such changes are made carefully and are well understood by schools, colleges and other exam centres.

Our work has identified that there remain opportunities for further improvements. These should be evidence based and support the core purpose of the system: to enable students to receive appropriate arrangements for their needs, in line with legal requirements. There is scope to improve the clarity and readability of the JCQ access arrangements and reasonable adjustments documentation and the way information about processes and requirements is made available to SENDCos and other centre staff. Ofqual considers that clearer information for students and parents about the purpose, principles and process for access arrangements would support wider understanding. This would also support schools, colleges and other exam centres in their discussions with parents and carers. Improving information about access arrangements aligns with Ofqual's requirements that awarding organisations provide effective guidance to centres and ensure that arrangements do not impose unnecessary burden on them. We also identified that the current methodology for inspecting centres could be strengthened.

We expect the exam boards to consider the findings of our work and, where appropriate, make improvements to strengthen their current arrangements. We will monitor how exam boards implement this through our regulatory approach.

In light of the findings of our work and the improvement opportunities identified, we expect exam boards to review their current arrangements for approving and monitoring access arrangements. They should improve the clarity, accessibility and effectiveness of the access arrangements system, considering manageability for schools, colleges and other exam centres. Exam boards should also strengthen inspection practices by using improved data to apply a clearly defined, risk-based approach to selecting centres for access arrangements inspections. In addition, they should consider how best to provide information to a wider audience – including students and parents – to improve clarity and understanding of the system.

Under Ofqual's General Condition G6, awarding organisations must have clear arrangements in place for making reasonable adjustments in line with equalities law, and under General Condition G7 they must have in place clear arrangements for any other access arrangements that they may make. General Condition C1 requires awarding organisations to take all reasonable steps to ensure that they do not impose unnecessary or unduly burdensome requirements on third parties, such as schools, colleges and other exam centres. It also requires awarding organisations to monitor and enforce their centre arrangements to ensure that they can comply with the Conditions.

Delivering the improvements outlined above is part of the exam boards' responsibility to comply with Ofqual's Conditions. We expect the exam boards to complete a review of their current arrangements and report to Ofqual on the

outcomes. This should detail the changes they intend to make and explain how the findings from our review have informed those changes.

## Conclusions

Based on the findings of our work, and consistent with their responsibilities, we expect exam boards to take the following actions:

First, in relation to their overall approach to access arrangements, to:

- review the effectiveness, clarity and manageability of their requirements
- strengthen access arrangements inspections
- consider the information they provide about access arrangements to support wider understanding

We will monitor the exam boards' progress in these areas as part of our normal regulatory approach.

Secondly, to improve data quality. This will allow them to more effectively monitor access arrangements approvals, ensuring that schools, colleges and other exam centres are meeting requirements and helping to strengthen confidence in the access arrangements system. It will also increase transparency and enable Ofqual to continue to improve its official statistics.

Thirdly, to take account of potential unintended speededness during assessment design and consider the risks that this would present to assessment validity.

GCSEs, AS and A levels are not explicitly designed to assess students' ability to work under time pressure. If this remains the Department for Education's intention, the exam boards should ensure that the standard duration of a GCSE, AS or A level assessment allows the majority of students sufficient time to attempt all items in the assessment without undue time pressure.

Our research found that, in practice, this is complex. The interaction between tasks in the assessment, the duration of the assessment and the individual student can mean that an assessment can become "speeded" for some students, although it may not be intended to be so. For some students, the experience of speededness may arise from a disability, special educational need or temporary injury, which the extra time access arrangement seeks to address. However, where working at speed

is not intended to form part of the assessment, the standard assessment duration should be sufficient to allow the vast majority of students to attempt all tasks without undue time pressure.

Ofqual will work with the Department for Education to make sure that our research on time constraints in assessments is taken into account for reformed qualifications, alongside the separate consideration to reduce overall examination time following the Curriculum and Assessment Review. We will then set our regulatory requirements around assessment time. We will confirm our regulatory expectations to awarding organisations so they can consider time (and time pressure) at the outset of qualification design to ensure the standard assessment time does not cause undue time pressure for most students, in line with qualification and subject requirements.

We expect exam boards to provide better quality data through improved systems, as outlined above. This will then enable Ofqual to publish statistics that command public confidence and address the important questions the public has on these issues.

The actions we expect exam boards to take – based on our findings – together with assessment design considerations as part of qualification reform, will make the system more effective and transparent, in line with our regulatory expectations. These measures will help ensure that all students can access their assessments to demonstrate their knowledge, skills and understanding. In turn, this will strengthen the reliability of qualification results and reinforce public confidence in both the access arrangements system and in qualification outcomes.

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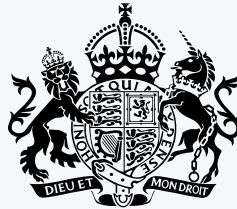
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