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***Office of the Immigration Services  
Commissioner***

**Equality Scheme  
2011 - 2016**

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## FOREWORD

Welcome to the OISC's Equality Scheme for 2011-16.

This Scheme is the end product of our wide ranging internal and external consultation.

For those of you that have helped us so far with this project, thank you for your input and assistance. For those of you we have not yet encountered, we trust that the objectives of our scheme will help us meet your expectations if, and when, we encounter you in the future.



A handwritten signature in black ink that reads "Suzanne McCarthy". The signature is written in a cursive style.

**Suzanne McCarthy**  
**Immigration Services Commissioner**

## The role of the Office of the Immigration Services Commissioner (OISC)

The OISC was established by the Immigration and Asylum Act 1999 (the Act) as an independent Non-Departmental Public Body (NDPB). The organisation's primary aim is to protect those who seek, or may seek, immigration advice and/or services by ensuring that OISC regulated advisers are fit and competent.

The Immigration Services Commissioner has regulatory, ombudsman and prosecutorial responsibilities. The latter two functions are closely allied to, and are directly supportive of, her regulatory functions. Her main roles are to operate both a regulatory scheme and a complaints scheme, to prosecute those operating illegally and to promote best practice within the immigration advice sector. The OISC actively works to ensure that high standards of professionalism are maintained in the immigration advice industry. As of 31 March 2011 1851 organisations and 3346 advisers and were directly regulated by the OISC.

The OISC's core business is to:

- Make sure that those who give immigration advice and/or services are fit and competent;
- Work towards encouraging advisers who should be within its regulatory scheme to apply for admission to the scheme or are prosecuted;
- Promote good practice within the sector, so far as reasonably practicable; and
- Discharge the Commissioner's responsibilities in respect of the Designated Professional Bodies under her oversight.

The OISC regulates in a proportionate, targeted and transparent manner. Using a risk based approach the OISC focuses its resources on those areas where clients may be most vulnerable. In line with this, the key elements of the OISC's integrated audit process are the review of an adviser organisation's main business systems and structures, scrutiny of client files and the assessment of adviser competence.

The OISC assists and supports the Home Office in the delivery of two particular objectives in its Business Plan 2011-2015 – the minimisation of abuse of migration routes and asylum applications being processed more quickly.

## The Equality Duty

### **The general equality duty**

The general equality duty requires public authorities to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation;
- Advance equality of opportunity between people who share a characteristic and those who do not; and
- Foster good relations between people who share a characteristic and those who do not.

This is very similar to the previous 'general duties' for race, disability and gender equality. It entails giving appropriate weight and priority to the need to:

- Remove or minimise disadvantages;
- Take steps to meet the needs of people with protected characteristics; and
- Encourage people with protected characteristics to participate in public life.

Public authorities are also encouraged to take steps to take account of people's disabilities (for example, by making reasonable adjustments). Fostering good relations includes looking at how to tackle prejudice and promote understanding.

Compliance with the general equality duty means that in some circumstances it is lawful to treat some people more favourably than others, when this is allowed by the Equality Act 2010.

### **Specific duties**

The specific duties require public bodies to set specific, measurable equality objectives and to publish information about their performance on equality so that the public can hold them to account. All information must be published in a way which makes it easy for people to access it.

### **Protected characteristics**

The protected characteristics under the Equality Act 2010 are:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;

Religion or belief;  
Sex; and  
Sexual orientation.

## How we developed our Scheme

This Scheme describes how the OISC will meet its obligation to put equality at the heart of our business. The Scheme was initially for the period 1 August 2011 to 31 July 2014. In 2013, a biennial review was undertaken and the findings were that the Scheme was working successfully. It was agreed therefore to hold a triennial review next in July 2016. The Scheme now covers the period 2011-2016.

The OISC views equality as something that affects us all regardless of background, and we are committed to working closely with everyone who is affected by, or interested in, our commitment to this. We see this as an ongoing process.

In developing our Scheme we proactively consulted with stakeholders (The questionnaire is attached at Annex 1.)

The consultation document was sent to 35 equality organisations, of which 5 are OISC stakeholders. The responses to the consultation are at Annex 3.

## OISC Equality and Diversity Policy Statement

The OISC is committed to equality of opportunity in the selection and development of its staff, in the provision of a work environment free from discrimination and the way in which it deals with external stakeholders. Our aim is for our staff to put into practice the principles of equality and diversity.

The OISC will not tolerate discrimination in any form against anyone possessing a protected characteristic as defined by the Equality Act 2010. Those characteristics are:

- Age;
- Race;
- Sex;
- Gender Reassignment;
- Disability;
- Sexual Orientation;
- Religion or Belief;
- Pregnancy or Maternity; or
- Civil Partnership or Marriage.

Nor will we discriminate because of working patterns or trade union membership, and we will not tolerate harassment or bullying on these or any other grounds.

We are fully committed to, and undertaking action on, the duties placed upon us as a public body under the Equality Act 2010 and other legislation that combat discrimination and promote equality and diversity. We will ensure that everyone in the OISC is respected and can give of their best, irrespective of who they are or what job they do. We will work hard to ensure that our services are accessible to the diverse customers we serve.



## General Equality Duty – what the OISC currently has in place

Although the action plan contained within this document outlines what additional things we want to put in place to comply with the general Equality Duty, the OISC already does many things which meet the general duty as listed below.

### **Non-statutory initiatives**

- Leaflets/publications available in Braille on special request;
- OISC Website content in line with Web Content Accessibility Guidelines (prior to technical problems temporarily closing full access);
- Guaranteed Interview Scheme at recruitment stage for applicants with disabilities who meet essential criteria;
- Equality & Diversity questionnaire issued to all new staff joining the OISC;
- Induction training includes explaining to new staff the OISC Equality & Diversity policy;
- HR policies include Equality & Diversity and Dignity at Work;
- Equality Impact Assessments carried out on all new/amended HR policies;
- Camden Primary Care Trust engaged as Occupational Health provider, including advice on disability related illnesses and adjustments required;
- Workstation assessments carried out and adjustments made/items purchased, where applicable;
- Staff Welfare service available via Home Office, including advice/guidance on disability;
- 24 hour telephone counselling service available in cases where Welfare service not considered appropriate;
- Workstations accessible for wheelchair users;
- Flexible working policies in place;
- Special leave available with pay for employees with HIV, cancer and other long-term medical conditions;
- Staff with caring responsibilities including family with disabilities, given high priority for Homeworking;
- Staff with caring responsibilities including family with disabilities, given high priority for Career breaks;
- Wheelchair access via Lift to OISC's offices on 5<sup>th</sup> floor, ramp access from lift to door;
- Intercom designed for use by wheelchair users;
- Disabled toilet available;
- OISC premises on one floor, no stairs to negotiate;
- Special evacuation procedures in place for physically disabled;
- OISC fully Trained First Aiders in place with knowledge of staff with certain disabilities e.g. epilepsy; and

- Floor Wardens trained in search/evacuation procedures including special needs of disabled.

In addition, the OISC aims to comply fully with health and safety and employment law requirements.

## Consultation

### **Our approach to the development of this Scheme**

This Scheme has been developed in partnership with external stakeholders and OISC staff.

When developing this scheme we wanted to hear about:

- Ease of access to OISC services;
- Ease of access to the OISC's office by telephone; and
- Improvements we could make in service provision;

The questionnaire is attached at Annex 1.

### **Involving people in public consultation**

The consultation document was sent to 27 disability organisations. A further five key OISC stakeholders were also consulted. These are listed at Annex 2. The responses to the consultation are at Annex 3.

## Equality Analysis

Equality Analysis is a valuable tool in helping organisations to look at their policies and practices to make sure they do not discriminate or disadvantage people. They are not an end in themselves but are a way of ensuring that due regard has been paid to the general duties. They also help to promote equality. Equality Analysis helps the OISC to measure whether it is meeting its obligations under the general duties.

## Developing our action plan for 2011 – 2014 (extended through to 2016 following review in 2013)

### **Updating the Equality Scheme**

We will review the Scheme after one year of operation to determine how it's working and if changes are needed. Thereafter we will review it every three years.

As part of this we will be monitoring progress, and, if we identify any changes that need to be made prior to the review period, these will be implemented.

As a small NDPB employing fewer than 70 staff and with an annual budget of just under £4 million, there are constraints we face both in terms of time and resources that affected the production and will affect what we can do in implementing it.

## Contact information

Your comments on this Scheme are welcome; please contact us as follows:

**Larry Rush**  
**Head of Human Resources & Facilities**  
**Office of the Immigration Services Commissioner**  
**5<sup>th</sup> Floor**  
**21 Bloomsbury Street**  
**London WC1B 3HF**  
**Tel. No: 020 7211 1535**  
**Fax: 020 7211 1532**  
**E-mail: [larry.rush@oisc.gov.uk](mailto:larry.rush@oisc.gov.uk)**

## Annex 1: Equality questionnaire

### Ease of access to OISC services

Q 1. The three questions in this section are about ease of access to OISC information and help/assistance given by OISC staff. You may have accessed our services already, in which case we would like to know about your experience and what improvements we might make. Alternatively, if you have not yet accessed these services, we would like to know what you consider would be a positive experience if you did.

a) Ease of access to information on the OISC website:

Your Comments:

b) Ease of accessing the OISC by telephone

Your Comments:

c) Given your individual needs, did our staff fully assist you?

Your Comments:

### Ease of access to the OISC's office

Q 2. When visiting us at our premises at Counting House in Southwark, how did you find the following?

a) Ease of access to the building

Your Comments:

b) Once inside our 5th floor office, did you find the environment generally user friendly? If not, please tell us which aspects could be improved.

Your Comments:

### Improvements in service provision

Q.3 We would like your comments on how you think we can improve the service we provide to disabled people?

Your Comment:

## General

Q.4 Please use the space below for any additional comments you may wish to make. In particular, is there anything you would like to tell us which is not covered by the questions above?

Your Comment:

Thank you for taking time to give us your views. Your input is vital to ensuring that the OISC Single Equality Scheme reflects the needs of its stakeholders.

Please tell us if you would like to be involved in the design and delivery of our services for those with protected characteristics. If so, please provide us with your contact details below.

Contact details:

If you would like a copy of the published OISC Equality Scheme sent to you, please tick this box [ ].

## **Annex 2: List of organisations consulted**

### **OISC Equality Stakeholder Consultation Groups**

- 1. List of key OISC Adviser stakeholder organisations invited to respond to consultation:**

**ARIA**  
**ILPA**

- 1. List of other OISC Adviser organisations invited to respond to consultation:**

**RLC**  
**IAS**  
**DisabledGo**  
*(Recommended for inclusion by ARIA during Disability Equality Scheme consultation)*  
**Discrimination Law Association**  
*(Recommended for inclusion by ILPA)*

- 4 List of Equality Groups included invited to respond to consultation (issued on 22 March 2011):**

**United Kingdom's Disabled People's Council (UKDPC)**  
**MIND (Southwark)**  
**RNID (Royal National Institute for Deaf People)**  
**RNIB (Royal National Institute of Blind People)**  
**Southwark Disability Association**  
**Khald Sofi – Muslim Council of Great Britain**  
**RADAR (Royal Association for Disability and Rehabilitation)**  
**Disability Alliance**  
*(Recommended for inclusion by ILPA)*  
**Disability Employment Adviser – Southwark Job Centre**  
**Diabetes UK**  
**Terrence Higgins Trust**  
**Spectrum**  
**Macmillan Cancer Support**  
**MENCAP (National Association for Mental Health)**  
**Stonewall**  
**Discrimination Law Association**  
**Disabled Go**  
**Equality & Diversity Forum**  
**The Multiple Sclerosis Society**  
**National Autistic Society**  
**Inter Faith Network**  
**Equality Network - Scotland**  
**Black Training & Enterprise Group**  
**British Dyslexia Society**  
**Voice4change**



***Race on the Agenda  
League of British Muslims  
Churches Together  
Inderjit Bhogal - Faiths***



### Annex 3: Comments received from consultation and OISC response

External Organisations	Summary of Comments received	OISC Response
ILPA	<p><b>1 Ease of access to OISC website</b>            All information is in English which disadvantages those who do not speak English            There is no page on the website on Accessibility detailing how those using it can adapt it to their special needs            Pale grey text should be changed as difficult to read            Smallest font size is not suitable for those with eyesight problems (comments apply equally to CPD website)</p>	<p>1. The OISC does have Complaints and General Information documents in 15 languages on its website. We did not perceive a need beyond those documents or the languages that we have translated the documents into. Should the need arise the OISC will consider translating other documents upon request. We will look at the other points taking into account implications of introducing any that are considered beneficial. The OISC is also looking at the feasibility of introducing Easy Read for our Statutory documents</p>

External Organisations	Summary of Comments received	OISC Response
	<p><b>2 Ease of access to OISC by telephone</b>  Contact page on website does not provide details of text phone and text relay services and is unclear whether these are available  Consideration of Language Line for those that don't speak English</p> <p><b>3 Ease of access to the building</b>  Building easy to miss even on repeat visit. Map of its precise location and a picture on the website would be helpful especially to those with disabilities where difficult to wander up and down  Heavy doors may present challenges to some  Within the OISC office consideration should be given to Induction loops, crystal listening devices, a list of staff able to speak non-English languages available to receptionists and staff trained as lip speakers and British Sign Language interpreters</p> <p><b>4 Improvements in service provision</b>  Accessible complaints procedure  OISC should monitor matters related to those with protected</p>	<p>2. This will be taken into account when reviewing the website</p> <p>3. This will also be taken into account when reviewing the website. Maps are available on request and are currently provided where required. It is not feasible given our resources and the fact we will relocate in 2013 to change the existing doors. Staff provide assistance for those that find the doors heavy to open/negotiate</p> <p>4. The OISC is looking at Easy Read which would make the complaints procedure more accessible.</p>

External Organisations	Summary of Comments received	OISC Response
	<p>characteristics to identify those who may be underrepresented and to think about ways to protect them against bad advice</p> <p>OISC website confusing in stating timescales which OISC can/cannot help with (example quoted but not reprinted here)</p> <p>Provide telephone number and email address on complaints form so that this reassures complainants they can speak to someone</p> <p>Look at having good relations with migrant and refugee community organisations plus women's groups to keep channels of communication open which would help inform the OISC about the quality of immigration advice being provided (same principle applies to advisers that OISC regulates)</p> <p>Information on website about becoming immigration adviser too factual. Encourage those with protected characteristics to apply by stating the protected characteristics are not a bar to becoming an adviser</p> <p>Extent to which OISC regulation is perceived as a quality mark will determine whether it offers advisers protection from guilt by association and thus the extent to which it helps those at risk of discrimination because of protected characteristics</p> <p>In accepting organisations into the OISC scheme organisational structures should be demanded as well as the competence of individual advisers (example cited of storage and access to files when organisations regulated by OISC close down). To this end OISC could publish on its website and in its publications examples of those that provide good practice in promoting equality e.g. those with flexible working arrangements or excellent maternity arrangements</p>	<p>Monitoring matters related to protected characteristics requires asking advisers to complete/declare whether they have a protected characteristic. Whilst the OISC will consider this we are mindful that advisers might be reluctant to provide the information. The OISC does providing a telephone number on the complaints form both in the main body of the form and at the end. Regarding storage/access to files when adviser organisations shut down, we do not currently have the powers or resources to resolve that issue. Publishing examples of immigration advisers with good practice is referred to in our model documents</p>

External Organisations	Summary of Comments received	OISC Response
	<p><b>5 Additional comments</b>  Hard copy publications should be produced in matt rather than glossy finish to make them easier to read  Consideration should be given to producing audio versions  OISC monitoring of matters relating to protected characteristics could be helpful for those making complaints  Scope for OISC to do joint work to better understand discrimination on the basis of protected characteristics  ILPA would be interested in research looking at those working as OISC regulated advisers who would be qualified and entitled to practise as solicitors or barristers and why they have elected to work as immigration advisers. This could be useful to others e.g. the Bar Council and the Solicitors Regulation Authority in considering their own work on equality</p>	<p><b>5.</b> Only the OISC Annual Report is now printed, all material including the Annual Report is available electronically. There is a resource implication in producing audio versions. The protected characteristic issue has already been touched on at point 4.</p>
<p><b>OISC staff Equality Working Group</b></p>	<ol style="list-style-type: none"> <li><b>1.</b> Scheme currently only publishes information about complaint in English with no large print (online information)</li> <li><b>2.</b> Consider requesting protected characteristics from advisers/complainants</li> <li><b>3.</b> Annual report/OISC News/Internal news/Guidance &amp; Practice notes <ul style="list-style-type: none"> <li>• Produce report in a Word (read only) document</li> <li>• Produce Easy Read versions</li> </ul> </li> </ol>	<p><b>1 - 11.</b> Will be considered alongside external organisation recommendations</p>

External Organisations	Summary of Comments received	OISC Response
	<ul style="list-style-type: none"> <li>• Consider availability in different languages</li> <li>• Make allowances for colour blindness</li> </ul> <p><b>4</b> Conference</p> <ul style="list-style-type: none"> <li>• Do not hold conference on a Friday</li> </ul> <p><b>5.</b> Library</p> <ul style="list-style-type: none"> <li>• Make a magnifier available if requested</li> </ul> <p><b>6.</b> Roundtables</p> <ul style="list-style-type: none"> <li>• Do not hold on Fridays</li> <li>• Make prayer room available</li> <li>• Do not have facilities to assist hard of hearing</li> </ul> <p><b>7.</b> Website</p> <ul style="list-style-type: none"> <li>• Font size may be an issue</li> <li>• CPD site may be an issue</li> <li>• Only available in English</li> <li>• simpler website search abilities</li> </ul> <p><b>8.</b> Publications</p> <ul style="list-style-type: none"> <li>• Produce report in a Word (read only) document</li> <li>• Produce Easy Read versions especially for the Complaints Scheme and Complaints Form</li> <li>• Consider availability in different languages</li> <li>• Make allowances for colour blindness</li> </ul>	

External Organisations	Summary of Comments received	OISC Response
	<ul style="list-style-type: none"> <li>•</li> <li>9. Consider mini-coms, induction loops, Braille</li> <li>10., Consider maternity issues when inviting advisers to assessment</li> <li>11. Consider issues that may arise from someone undergoing Gender reassignment</li> </ul>	



## Annex 4 – Action plan for implementing OISC Equality Scheme

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility	Met/Not met
<b>Consultation comments</b>	Consider all areas felt to be both feasible and affordable	<ul style="list-style-type: none"> <li>Consider elements over a 2 year period</li> </ul>	31 July 2013	Head of HR	<p>Ongoing</p> <p><b>Review 3/7/13 Met</b></p>
<b>Equality Analysis</b>	Carrying out Equality Analysis	<ul style="list-style-type: none"> <li>All new business proposals, consultation documents, project plans, business and corporate plans/strategy to be Equality assessed during their development alongside Regulatory Impact Assessments</li> </ul>	Ongoing	Authors of the policy, document etc.	<p><b>Review 3/7/13 Met</b></p> <p>Consultation on amending the Code of Standards and Complaints Scheme held in 2012. HO agreed in Nov. 2012 that the OISC did not need to undertake either</p>

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility	Met/Not met
		<ul style="list-style-type: none"> <li>• Equality Analysis will be carried out at the renewal stage of existing policies. This is normally on a three year programme but may be sooner e.g. changes in the law</li> <li>• All OISC policies with dates for review are listed on a schedule that is reviewed annually by the Senior Management Team (SMT)</li> </ul>	<p>As and when</p> <p>December of each year</p>	<p>Authors of the policy, document etc.</p> <p>Authors of the policy</p> <p>SMT</p>	<p>a Regulatory or Equality Assessment as there were no monetised impacts. The new documents were implemented on 1 January 2013.</p> <p><b>Review 3/7/13</b> <b>Met iro HR policies</b></p> <p><b>Review 3/7/13</b> N/K for non-OISC policies</p>

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility	Met/Not met
<b>Progress Reporting</b>	Half yearly reports to Senior Management Team (SMT) on initial action plan progress	<ul style="list-style-type: none"> <li>• Include in SMT schedule as part of HR Corporate data set reporting</li> </ul>	Bi-annually	Head of HR	<b>Review 3/7/13</b>
	Annually publish action plan progress on OISC website	<ul style="list-style-type: none"> <li>• Place annual update on OISC website each year</li> </ul>	December of each year (Recommend changing to align with Review periods i.e. July)	Head of HR	<b>Review 3/7/13</b> Aim to publish by 31 July 2013
	Review of Scheme	<ul style="list-style-type: none"> <li>• Initial Review after first year</li> </ul>	July 2012	Head of HR	Met
		<ul style="list-style-type: none"> <li>• Review after 2 years</li> </ul>	July 2013	Head of HR	<b>Review 3/7/13</b> <b>Met</b>
	<ul style="list-style-type: none"> <li>• Triennial review thereafter</li> </ul>	July 2016	Head of HR	<b>Future date</b>	

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility	Met/Not met
<b>Communication</b>	Publication of Equality Scheme	<ul style="list-style-type: none"> <li>• Scheme published after following SMT approval</li> <li>• Scheme to be made available in accessible formats on request</li> <li>• Scheme to be published on website</li> <li>• Copy of Scheme to be made available to all staff</li> <li>• Copy of Scheme mailed to all those consulted on the Scheme who requested a copy, and to others on request</li> <li>• Article in OISC Newsletter informing of the publication of the Equality Scheme</li> </ul>	31 July 2011	Head of HR	Met
			1 December 2011 onwards	Head of HR/Head of Comms.	Met
	Dissemination to key stakeholders		31 July 2011	Head of IT	Met
			31 July 2011	Head of HR	Met
			By 31 August 2011	Head of HR	Met
			Autumn 2011	Head of Comms.	Met
<b>Complaints</b>	Complaints procedure	<ul style="list-style-type: none"> <li>• To respond to any complaints in accordance with the published timescales in the OISC internal Complaints</li> </ul>	Ongoing	Head of HR	Met

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility	Met/Not met
		Procedure <ul style="list-style-type: none"> <li>To provide SMT with details of complaints made relating to disability and action taken as per existing reporting system</li> </ul>	Bi-annually	Head of HR	Met

<b>July 2013 Review - Achievements</b>	<ol style="list-style-type: none"> <li>1. Consultation on amending the Code of Standards and Complaints Scheme held in 2012. HO agreed in Nov. 2012 that the OISC did not need to undertake either a Regulatory or Equality Assessment as there were no monetised impacts. The new documents were implemented on 1 January 2013</li> <li>2. We have designed the new competence assessment process to be more stringent, secure and transparent but we have also taken into account at various stages the impact on different sectors of those that are affected including those with the protected characteristics.</li> </ol> <p>Examples are:</p> <ul style="list-style-type: none"> <li>• The invitation to tender specification contained a specific requirement that the supplier has an equality policy,</li> <li>• The timings of the assessment centres are designed to reduce the likelihood of any person having to stay overnight,</li> <li>• Most of the scheduled assessment centres are on Thursdays so that no routine religious days are affected,</li> <li>• The assessment centres are all completely accessible for the disabled,</li> </ul>
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	<ul style="list-style-type: none"><li>• The invitation to assessment letter makes clear that special arrangements can be made for those that might require them at the assessment centres</li><li>• The process also allows for those that are able to evidentially demonstrate they are unable to take the formal examination. In such cases, the applicant will continue to be expected to demonstrate their competence (that is a legal requirement in the 1999 Act) at the level and in the category they have applied for but can do so through demonstrating sufficient experience, qualifications and training.</li></ul> <p>3. CPD - The CPD website provides on-line training courses free of charge to advisers. These courses are available in an accessible version for those who are visually impaired and can be used with screen-readers. The CPD scheme allows for advisers to obtain their training in various ways to take into account those who are unable to travel and those who are visually or aurally impaired.</p> <p>4. Adjustments for advisers with specific needs:</p> <ul style="list-style-type: none"><li>• Dyslexic adviser given higher level competence assessment on yellow paper as they informed us that this makes it easier for them to read the text;</li><li>• Adviser with impaired sight requested written correspondence to be sent in size 14 font; and</li><li>• Adviser with health conditions given extra time to complete the written competence assessment.</li></ul>
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