

## Updated advice on Bluetooth hearing devices and examinations

Deaf candidates increasingly use hearing aids, cochlear implant processors, and bone conduction hearing devices that incorporate Bluetooth and other wireless technologies. Examination centres must balance compliance with Joint Council for Qualifications (JCQ)/Qualification Scotland regulations on communication devices with their duty to ensure equitable access for deaf candidates. This guidance sets out a practical approach that supports both examination integrity and candidate access.

The information is supported by National Deaf Children's Society – a charity that offers deaf specific examination access arrangements advice.



### Key messages

- Deaf candidates should not be required to remove hearing aids, cochlear implant processors, or bone conduction hearing devices.
- Bluetooth functionality should normally be disabled using flight mode.
- Flight mode should be part of the candidate's normal way of working.
- Alternative arrangements may be considered where flight mode creates significant functional disadvantage\*.
- Arrangements must be agreed and documented before examinations.
- Routine hearing-aid adjustment is not malpractice.

*\*A significant functional disadvantage is a demonstrable and material reduction in a candidate's ability to access auditory information or participate in examinations in their normal way of working. The disadvantage must be supported by evidence and be greater than a minor change in listening experience, sound quality, or personal preference.*

In 2023, BATOD's statutory assessment and examination access arrangements working group was made aware *that deaf students had been advised to remove their hearing aids in exams*. BATOD provided guidance to BATOD members, other members of the deaf education community, JCQ, Qualifications Scotland, and Ofqual's Access Consultation Forum.

This updated guidance sets out the procedures for managing Bluetooth-enabled hearing aids, cochlear implant processors, or bone conduction hearing devices and assistive listening technology (ALT) in GCSE/Nationals, AS and A level/Advanced Highers examinations, ensuring compliance with JCQ/Qualification Scotland regulations while supporting equitable access for deaf candidates.

This policy applies to:

- all candidates using hearing aids, cochlear implant processors, bone conduction hearing devices, or ALTs
- examination centres and invigilation staff
- Qualified Teachers of Deaf Children and Young People (QToDs), Educational Audiologists, clinical audiologists, exam officers, invigilators, and others with access arrangements responsibilities.
- all Bluetooth protocols (visit the [Bluetooth SIG website](#) for detailed information on Bluetooth protocols).

### **Regulatory context**

Under JCQ regulations, candidates **must not have access to unauthorised communication technology** in the exam room.

The JCQ regulations **5.23.3** state 'The centre **must** ensure that the candidate uses a device which cannot be connected to the internet and is not Bluetooth enabled.'

This includes any device capable of wireless communication (e.g. Bluetooth).

- Devices must **not be connected to the internet or to external devices**.

- Possession of unauthorised connectivity (even if unused) may be treated as malpractice.

Failure to comply may result in:

- loss of marks
- disqualification from the component or qualification.

### **BATOD/ALTWG/BAEA recommendation**

For deaf candidates, *it would be advised that before the examination, the candidate unpairs any Bluetooth connection they have with their device and that they set their hearing aids/cochlear implant processors/bone conduction hearing devices to 'flight mode'.*

Flight mode is recommended because it:

- disables Bluetooth and wireless connections
- maintains the programmed amplification settings
- is a simple and consistent method for centres to apply.

Flight mode **does not affect basic amplification.**

### **Key principles**

- Examination integrity must be maintained at all times.
- Bluetooth and wireless communication must not be active during examinations.
- Candidates must not be placed at a substantial disadvantage as a result of compliance measures.
- Adjustments must align with JCQ access arrangements processes and evidence requirements.

### **Qualification Scotland**

Centres in Scotland are advised to ensure that the requirements in the Qualification Scotland ICT Security Checklist are followed. It is available to centres from their secure website.

“ICT devices must be secure and must not allow connection to:

- internet/intranet (beyond enabling the basic operation of the device (such as Chromebook and Apple devices)
- network drives
- documents or other data not allowed in the exam.”

BATOD/ALTWG/BAEA support Qualification Scotland’s recommendations for deaf candidates: the invigilator should make sure they are within clear view of all candidates to allow them to lip read (or within 1.5 metres distance to allow them to hear) any spoken instructions. Deaf candidates must not be asked to remove hearing aids or cochlear implant speech processors for an exam.

### **Avoiding discriminatory practice**

Deaf candidates should not be asked to remove their hearing aids/cochlear implant processors/bone conduction hearing devices during any exam/assessment.

Removing hearing aids/cochlear implant processors/bone conduction hearing devices would alter the candidate's normal auditory access, increase cognitive load, potentially compromise safety, and may place the candidate at a substantial disadvantage.

JCQ note “should this happen in future it might be that the candidate is eligible for special consideration depending on the circumstances and the nature of any disruption caused – the school or college would need to make an application to the relevant exam board” (more information on JCQ’s [website](#)).

### **Normal way of working**

As part of their normal way of working, during school/college assessments and mock exams/prelims, all deaf children and young people must have experience and confidence of using their approved access arrangements, including managing Bluetooth devices.

If flight mode is going to be enabled as the normal way of working, establishing that normal way of working is essential so that the learner feels confident about how to enable flight mode on their device as well as knowing how to switch back to normal settings.

Some deaf children and young people may access an acoustically suitable space due to other access arrangements such as read out loud, use of a sign language professional, and/or use of a language modifier.

*See specific note below about music examinations.*

### **Flight mode**

JCQ requires communication functions to be unavailable.

Flight mode is BATOD's preferred method. The "phone switched off and stored away" approach is an alternative recommendation where flight mode causes significant functional disadvantage.

However, flight mode **may disable binaural processing** in some hearing aids devices. Some models rely on binaural wireless communication for real-time processing between the left and right aids. For most of those users, disabling this link may result in only a minimal change to sound perception. Contralateral routing of sound (CROS) hearing aids systems may lose functionality when in flight mode.

Some candidates, particularly those with asymmetrical hearing profiles, auditory processing challenges, reliance on binaural features eg CROS systems, or heightened sensitivity in stressful environments, may experience:

- reduced sound localisation or clarity
- increased listening effort
- heightened impact due to exam stress.

It is recognised that in an examination setting, even small deviations in expected auditory input can be amplified by anxiety or concentration demands.

Where flight mode would cause a significant functional disadvantage for the student, we recommend the following reasonable adjustment:

- The candidate's mobile phone (or paired transmitting device) is:
  - switched off
  - checked by the invigilator
  - securely stored away from the candidate for the duration of the examination.

This ensures that any potential wireless connection to hearing devices is removed without requiring modifications to the hearing devices themselves. The approach

- removes any external communication pathway
- allows hearing devices to function normally
- maintains exam security.

Children and young people should develop confidence with the arrangements through the normal way of working in internal year exams, mock exams, or prelims in an examination year.

Where flight mode causes a **significant functional disadvantage**, this must be identified by a qualified professional and supported by appropriate evidence.

Evidence should normally be provided by a clinical audiologist, Educational Audiologist, or other appropriately qualified professional and should explain the functional impact of disabling wireless features.

**Significant functional disadvantage** means a demonstrable and material reduction in a candidate's access to auditory information, communication, or examination participation compared with their established normal way of working.

"Significant functional disadvantage" is defined in terms of the practical impact on the candidate's ability to access speech, instructions, or auditory information in an

examination, rather than simply the existence of a technical change when Bluetooth or flight mode is enabled.

Significant functional disadvantage refers to a demonstrable and more-than-minor adverse effect on a candidate's ability to access auditory information, communicate, or perform at their normal level in an examination. The disadvantage should be such that it is likely to materially increase listening effort, reduce access to spoken information, impair sound awareness or localisation, or place the candidate at a meaningful disadvantage compared with their established normal way of working. Evidence should be provided by an appropriately qualified professional and should identify the specific functional consequences of disabling wireless features rather than simply describing the technology used.

Examples that may constitute significant functional disadvantage:

- loss of CROS functionality resulting in substantially reduced access to speech from one side
- loss of binaural processing where this causes marked deterioration in speech understanding
- significant increase in listening effort leading to fatigue or reduced concentration during examinations
- inability to access spoken instructions safely and reliably through the candidate's established normal way of working
- a documented history, supported by audiological evidence, showing that use of flight mode materially affects performance or auditory access.

Examples that would not normally constitute significant functional disadvantage on their own:

- a minor change in sound quality
- candidate preference where no measurable or observed functional impact is evident

- concern that hearing may feel different without evidence of a material effect on access or performance
- general anxiety about changing settings where auditory access remains substantially unchanged.

This approach should only be considered in exceptional circumstances and after discussion with the student and QToD/Educational Audiologist, as the likelihood of significant disturbance from flight mode use remains low for the majority of hearing device users. Nonetheless, having a clear alternative will help support students equitably while maintaining exam security. This approach would stem from long-term established **normal way of working** arrangements through the student's informal and formal assessments in primary, secondary, and post-16 stages.

Flight mode is appropriate for the majority of candidates as it ensures compliance with JCQ requirements by disabling wireless connectivity while preserving core hearing device function. Where evidence demonstrates that flight mode would place the candidate at a significant disadvantage, centres may consider an alternative risk-managed arrangement. This should remove all practical communication pathways while maintaining exam security.

### **How does one know the device is in flight mode?**

Some hearing aids/cochlear implant processors/bone conduction hearing devices/CROS devices do not feature visual light indicators. Without these indicators, there is no quick or clear way for an invigilator to verify if a student is actually in flight mode, or if they have switched it off.

- Verification should rely on:
  - pre-examination checks
  - candidate declaration
  - recorded access arrangements.

To address concerns about lack of indicator lights, it is recommended that:

- verification should be managed through pre-examination checks
- candidates make a declaration before the exam (device set correctly)
- visual checks are made where possible (app or settings screen before entry)
- staff are aware that, where prior arrangements are in place, adjustment or removal of hearing devices during an exam should not be treated as suspicious behaviour/malpractice conduct
- agreed arrangements are recorded in access arrangements documentation.

### **External interference**

In relation to external interference, staff in the exam room should be reassured that the candidate's hearing devices will not auto-connect to the staff's personal devices that have Bluetooth features.

Candidates should already be aware of the existing regulations about location of their mobile devices and phones during exams.

### **Verification and invigilation procedures**

Arrangements must be:

- agreed in advance
- recorded through the centre's access arrangements process
- consistent with JCQ guidance.

### **Pre-examination checks**

Centres must:

- confirm the agreed arrangement prior to the examination
- ensure all external devices are disabled or secured
- brief invigilators on the candidate's approved arrangement.

### During the examination

- Routine adjustment or removal of hearing aids/cochlear implant processors/bone conduction hearing devices **must not be treated as suspicious behaviour** where arrangements are in place.
- Invigilators should not attempt to inspect or interfere with medical devices.

### ALTs

ALTs cannot connect when the hearing devices are in flight mode.

Some students rely on ALTs<sup>‡</sup> to hear the invigilator's instructions at the start of an exam. Where candidates are seated with others, they should be familiar through their normal way of working with alternative methods of receiving instructions if their ALT is unavailable.

Students should be engaged in decision-making regarding practical workarounds

- being seated at the front
- having a second invigilator repeat instructions.

Centres must recognise that ALTs relying on wireless transmission will not function when Bluetooth is disabled. Alternative arrangements should therefore be put in place to ensure the candidate can fully access exam instructions without reliance on wireless streaming.

Listening assessments will have established **normal way of working** arrangements for the individual. Settings can provide a live speaker for examinations with pre-recorded components **if** this is in line with the candidate's preferences.

BATOD would recommend that for any agreed arrangement where the candidate needs to listen to a live voice to support listening, the candidate has access to separate invigilation in a separate room with good acoustics.

### **Music-specific context**

For music assessments, the child/young person's experience of listening through Bluetooth must be taken into account. Although the signal may lose quality when transmitted via Bluetooth to the student's aid, for some deaf children and young people, Bluetooth may enhance frequency resolution, and fine tuning of programmes such as MyMusic may also help the signal quality.

BATOD and BAEA have created a 'Considerations for music lessons and examinations' resource as a practical guide for educators, audiologists, families, exam centres, and awarding bodies to create inclusive, accessible, and fair music learning and assessment environments for deaf children and young people. It is recommended that the head of music, exam officer, QToD/Educational Audiologist, engage with the awarding body regarding the scope of reasonable adjustments, in recognition that Bluetooth may have limitations for young people in relation to accessing music. The discussions should start with the deaf young person and others in Year 8 and 9/S2 and 3, with adjustments confirmed ahead of any option selection for GCSEs/Nationals.

### **Roles and responsibilities**

#### **Examination Centre**

- Ensure compliance with JCQ/Qualification Scotland regulations
- Implement and document access arrangements
- Train invigilators appropriately.

#### **Audiologist**

- Identify if flight mode causes significant functional disadvantage
- Provide supporting evidence where needed.

#### **School/centre**

- Implement JCQ-compliant procedures
- Apply access arrangements where appropriate.

#### **QToD/Educational Audiologist**

- Support the young person to access information to make informed decisions

- Support the young person establish a normal way of working.

### **Candidate (child/young person)**

- Engage in discussion with the QToD to establish how to work in test situations and mock exams/prelims
- Follow agreed setup
- Declare device status if required.

### **Further support**

Candidates who experience difficulties with examination access arrangements can:

- contact the National Deaf Children's Society (NDCS) Freephone Helpline on 0808 800 8880, by emailing [helpline@ndcs.org.uk](mailto:helpline@ndcs.org.uk) or via the live chat service [www.ndcs.org.uk/livechat](http://www.ndcs.org.uk/livechat).
- communicate directly with the awarding body
- send enquiries to Ofqual via [Public.Enquiries@ofqual.gov.uk](mailto:Public.Enquiries@ofqual.gov.uk)
- make a complaint to Ofqual about an awarding organisation – [Complaints to Ofqual – GOV.UK](#) – although the individual would normally complete the awarding organisation's complaints process before complaining to Ofqual.
- Contact [Equality Advisory and Support Service](#). They have a helpline that “advises and assists individuals on issues relating to equality and human rights, across England, Scotland and Wales”.

### **Publications**

- [Ofqual student guide to exams and assessments in 2026 – GOV.UK](#)
- BATOD and BAEA '[Considerations for music lessons and examinations](#)'.

### **Revisions**

Originally created 2023

Last revised July 2026

Next review July 2027 –\* or sooner in response to updates in JCQ/Qualification Scotland guidance, or if new ALTs emerge.



### **About BATOD, ALTWG and BAEA**

British Association of Teachers of Deaf Children and Young People (BATOD) is the only professional association for Qualified Teachers of Deaf Children and Young People (QToDs) in the UK. The Association represents the interests of QToDs and the children and young people they teach with a range of governments and other agencies. The Association supports QToDs and organises continued professional development (CPD) courses and national and regional meetings to provide relevant up-to-date information and to disseminate good practice. Strong links are maintained with UK governments, as well as voluntary bodies, especially the NDCS, to contribute to policy development in this field.

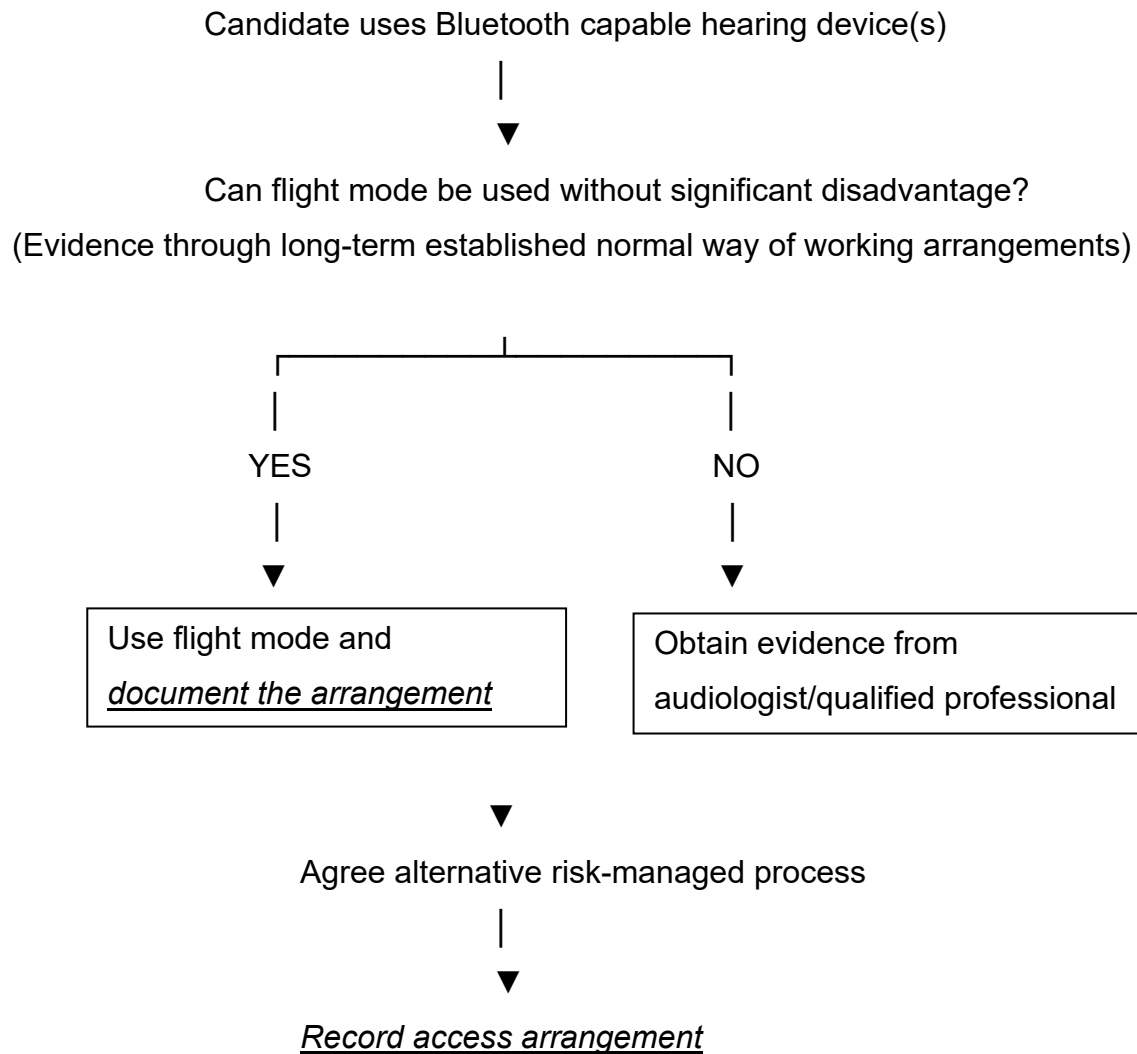
Assistive Listening Technology Working Group (ALTWG) is made up of professionals from academia, charities, education, health, and industry with a specific interest in supporting children and young people who are deaf or have any degree of hearing difficulty. The principal aims of ALTWG are to:

- promote the use of wireless remote microphone systems (WRMS) among deaf children and young people
- promote the knowledge base about ALTs
- influence the policy framework for the provision of ALT
- influence the quality and consistency of ALT provision and practice
- raise awareness of the importance of a positive acoustic environment.

British Association of Educational Audiologists (BAEA) is the only professional association in the UK for Educational Audiologists. Educational Audiologists are typically QToDs who have completed an additional post graduate qualification in educational audiology.

To discuss this publication, contact Teresa Quail, BATOD National Executive Officer, via [exec@batod.org.uk](mailto:exec@batod.org.uk)

## Flowchart



#### ‡List of transmitters

- Phonak Roger Touchscreen
- Phonak Roger On
- Phonak Roger Select
- Phonak Roger Clip-On Mic
- Phonak Roger Table Mic
- Phonak Partner Mic
- Oticon Connect Clip
- Oticon Edumic
- Mini Mic
- Mini Mic 2+
- Audiolink XT

#### Old transmitters that might still be in use:

- Phonak Roger Inspiro
- Phonak Roger Pen
- Genie
- Comfort Audio

This list is not exhaustive.