

ANALYSIS OF CONSULTATION RESPONSES

Guidance on designing and
developing accessible assessments:
response analysis

ofqual

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Executive summary

We [consulted on proposals to introduce new statutory Guidance on designing and developing accessible assessments](#). The consultation ran for 12 weeks between 1 November 2021 and 24 January 2022.

The consultation questions were available to complete online or via email.

We received 163 responses to the consultation from 162 respondents (one email response supplemented an online response). Of these, 125 were online responses, and 38 were received by email. We are grateful to everyone who participated.

Introduction

This report is a summary of the views expressed by those who responded to the consultation.

The proposed guidance is for awarding organisations when they are designing and developing assessments – particularly, though not exclusively, exams or other written assessments. The guidance concerns the accessibility of assessments for Learners, and applies to all Ofqual-regulated awarding organisations across all qualification types.

We proposed the new guidance would apply to the [General Conditions of Recognition](#) stated within it, covering awarding organisations' obligations relating to accessibility. The new guidance aims to help awarding organisations to understand and comply with their obligations under the following General Conditions:

- Condition C1 – Arrangements with third parties
- Condition D1 – Fitness for purpose of qualifications
- Condition D2 – Accessibility of qualifications
- Condition E4 – Ensuring an assessment is fit for purpose and can be delivered
- Condition G1 – Setting the assessment
- Condition G3 – Use of language and Stimulus Materials
- Condition G6 – Arrangements for Reasonable Adjustments
- Condition G9 – Delivering the assessment

This guidance should also help awarding organisations comply with their obligations under Equalities Law, a requirement of Condition D2.

We proposed that the new guidance would complement the guidance currently associated with Conditions D2, G1, G6 and G9. The new guidance reflects the existing guidance for Condition G3, and so will replace it. There is currently no guidance for Conditions D1 or E4.

The guidance should help awarding organisations to recognise and avoid the unintentional use of irrelevant features in their assessments that could unfairly disadvantage some Learners and prevent them demonstrating the full extent of their knowledge, skills and understanding.

We did not propose any changes to the Conditions, so the obligations that are placed on awarding organisations would be unchanged.

Who responded?

We received 163 responses to our consultation from 162 respondents (one person who responded online and provided a supplementary email response has been counted only once in the data below). 66 of these were from organisations and 97 were personal responses. Table 2 (below) shows the type of the 125 respondents who completed our online survey and 37 respondents who responded by email.

Table 1: Breakdown of responses to the consultation

Response channel	Number of organisational responses	Number of personal responses	Total number of responses
Online consultation	50	75	125
Email	16	22	37 (plus one supplementary response)
Total	66	97	162

Table 2: Breakdown of responses to the online consultation by type

Respondent type	Number of responses
Academy chain	2 (1.6%)
Awarding organisation	16 (12.8%)
Awarding organisation employee	5 (4%)
Consultant	8 (6.4%)
Examiner	1 (0.8%)
Exams officer or manager	2 (1.6%)
Local authority	3 (2.4%)
Other representative or interest group	11 (8.8%)
Parent or carer	24 (19.2%)
School or college	7 (5.6%)
SLT (Senior leadership team)	10 (8.0%)
Student	3 (2.4%)
Teacher (responding in a personal capacity)	16 (12.8)
University or higher education institution	2 (1.6%)
Other	15 (12.0%)

A list of the organisations that responded to the consultation is included in [Annex A](#).

Approach to analysis

The consultation was published on our website. Respondents could choose to respond using an online form, or by email. The consultation included 15 questions relating to the proposed guidance on designing and developing accessible assessments.

The consultation generated views from those who wished to participate, who cannot be considered as a representative sample of the public or of any specific group.

We present the responses to the consultation questions in the order in which they were asked. Respondents could choose to answer all or just some of the questions. Many respondents chose not to answer all the questions asked. This means that the total number responding to each question varies: the details are provided for each question.

For questions 1 to 4 and question 6, respondents could indicate the extent to which they agreed or disagreed with the proposals, using a 5-point scale (strongly agree, agree, neither agree nor disagree, disagree and strongly disagree). These questions, where respondents were asked to indicate their agreement or disagreement, or the extent of their agreement or disagreement, are referred to as 'closed'.

Questions 5 and 7 to 15, in response to which respondents were asked to provide comments, are referred to as 'open'. Some respondents provided open responses to questions 1 to 4 and question 6 by email or as part of their response to the other questions.

Not all respondents provided substantive comments and not all comments were relevant to the question. In some cases, the comment related to a different question or was simply 'no further comment'.

Some email respondents answered the questions in the online survey, and others gave general feedback about the consultation proposals. All feedback received by email has been considered to inform the qualitative analysis.

During the analysis phase we reviewed every response to each question.

We have provided tables of the data from each of the closed questions. Where we have included quotes from the responses, to illustrate the main themes identified, we have edited some for brevity and to preserve anonymity but have been careful not to change their meaning.

For question 5, where respondents were asked to give comments in response to an open question, the responses related to specific sections of the draft guidance, or to certain themes. We summarise the comments under relevant headings.

Respondents were invited to select a respondent type. The number of responses in tables 1 and 2, and appendix A are based on these unverified self-descriptions.

Views expressed: consultation response outcomes

In this section we report the views, in broad terms, of those who responded to the consultation. We have structured this around the questions covered in the consultation document.

We have provided tables of the responses to the closed questions (questions 1-4 and question 6) from the online consultation. Percentages in the tables below represent the views of the 125 respondents who completed the consultation online and include figures for respondents who did not answer the question. Percentages are given to 1 decimal place – no rounding was necessary.

Some respondents who shared their views by email commented on question 1-4 and 6 in an open way. Where respondents provided feedback in this way it is reflected under the relevant question below.

Question 1

To what extent do you agree or disagree that the content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

Response	Number of responses	Percent
Strongly agree	37	29.6%
Agree	74	59.2%
Neither agree nor disagree	3	2.4%
Disagree	7	5.6%
Strongly disagree	1	0.8%
Not answered	3	2.4%

The majority (88.8%) of respondents to the online consultation agreed or strongly agreed that the content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners.

One additional respondent (from an awarding organisation) who commented by email expressed strong agreement with the proposals. Twelve respondents (4 awarding organisations, 6 representative or other interest groups, and 2 other respondents) gave further comments agreeing or strongly agreeing with the proposals.

‘Guidance is clear and concise with good examples on the use of language, images, layout. Strong agreement that it will help awarding organisations to design written assessments that are as accessible as possible for Learners.’

(Other representative or interest group)

‘(We welcome) Ofqual’s drive to improve the accessibility of assessments. The content is clearly well-researched and draws together expert advice from a wide range of sources, reflecting the collaborative approach Ofqual has taken to developing the guidance. It will provide very useful information for awarding organisations developing written examinations at levels 1 and above.’

(Other respondent)

‘The guidance reinforces many of the principles that are currently applied in how (we) design and develop (our) assessments, including modifications to traditional formats.’

(Awarding organisation or exam board)

‘We welcome the draft guidance and think it’s very helpful to list the importance of clear and concise language and to offer advice on making assessments accessible to all.’

(Other respondent)

Two respondents (who supported the proposals) requested further guidance on accessibility of other assessment formats including practical, oral, multiple-choice or online assessment. These respondents also called for additional guidance focused on vocational and technical assessments, including T levels, functional skills qualifications and Entry Level examinations.

Two respondents noted that Learners with special educational needs and disabilities (SEND) make up a significant proportion of Entry Level and vocational qualification candidates. These respondents believed SEND Learners would benefit from guidance on practical assessments, which is not within the scope of the proposed guidance.

‘A higher proportion of deaf young people with SEND take vocational routes at 16 compared to those who are not disabled. Many of the accessibility issues that can arise with deaf students are linked to practical assessments such as those that involve listening or speaking.’

(Other representative or interest group)

Two respondents suggested it would be helpful if the guidance made clear that awarding organisations should seek expertise from specialists on SEND in the design and development of assessments.

One respondent called for examples to exemplify what good practice looks like in accessible assessment design.

Two respondents thought awarding organisations could be more strongly encouraged to take a ‘digital-first’ approach (using digital rather than paper-based assessment) to enable reasonable adjustments to be more easily implementable.

One respondent, who supported the guidance, suggested Ofqual could consider developing a student-friendly version of the guidance, to include information on how

to challenge practice which does not follow guidance, especially regarding the Equality Act 2010 and the use of reasonable adjustments. This respondent also suggested encouraging feedback from Learners and/or centres on assessment accessibility to help awarding organisations to learn and improve.

Some respondents noted the benefits of images to provide useful context to aid question comprehension for many students with SEND. One respondent identified a risk that Learners with SEND may be disadvantaged if awarding organisations were discouraged from using images within exam papers because of the guidance:

'Ofqual should ensure that the guidance on images makes clear that they can be helpful for some students, and that they can be used without disadvantaging others (such as vision impaired students), as long as there is alternative text and messaging to state that viewing the image is not crucial to completing a task.'

(Other respondent)

Question 2

To what extent do you agree or disagree that the style of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

Response	Number of responses	Percent
Strongly agree	30	24.0%
Agree	75	60.0%
Neither agree nor disagree	7	5.6%
Disagree	7	5.6%
Strongly disagree	3	2.4%
Not answered	3	2.4%

The majority (84%) of respondents to the online consultation agreed or strongly agreed that the style of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners.

Two additional respondents who commented by email expressed strong agreement with the proposals.

Nine respondents provided comments supporting the proposals.

'I think the proposed guidance is clearly written and identifies the main issues.'

(Personal response, endorsed by a representative or interest group)

'The style and format of the draft of the guidance is, for the most part, clear and helpful.'

(Other respondent)

However, 3 of these respondents felt that further examples, including visual examples such as an extract of text in double line spacing, would help to clarify some of the principles. Another respondent felt some examples cited within the guidance were contradictory and could cause confusion, particularly the guidance around use of colour.

One respondent considered the draft guidance helpful but requested more guidance and content around assistive and related technology, and online assessment considerations (such as tablets or remote assessment).

Two respondents criticised the style of the draft guidance. One respondent said it was in a 'disengaging format' and 'could benefit from the addition of graphics and more reference to practical examples.' (Other representative or interest group)

The other respondent said the draft guidance was not 'very accessible or user friendly for awarding organisations' and felt it would be more useful to set out the document in a similar way to [Fair Access by Design](#). (Other respondent)

Several respondents suggested drafting and other changes they felt would improve the style of the guidance. Changes requested include:

- clarifying or revising certain words
- labelling bullet points, for example using a), b) or i), ii) to make them easier to identify
- using images to illustrate examples
- making the content less 'text heavy' and reviewing the layout and use of white space
- expanding the categories of Learners more likely to be unfairly disadvantaged by decisions made in assessment design and development
- adding learner testimony
- emphasising that, even when care has been taken in the design and development of assessments, some Learners will still require reasonable adjustments

Question 3

To what extent do you agree or disagree that the draft guidance will have a beneficial impact on all Learners taking regulated assessments?

Response	Number of responses	Percent
Strongly agree	35	28.0%
Agree	57	45.6%
Neither agree nor disagree	17	13.6%
Disagree	9	7.2%
Strongly disagree	4	3.2%
Not answered	3	2.4%

The majority (73.6%) of respondents to the online consultation agreed or strongly agreed that the draft guidance will have a beneficial impact on all Learners taking regulated assessments.

Two additional respondents who commented by email expressed strong agreement with the proposals.

'Strongly agree. The extra detail and examples highlight where consideration needs to be made to encompass the widest range of Learner differences.'

(Other respondent)

Nine respondents provided comments welcoming and agreeing with the proposals.

'Designing papers that are clear and accessible is an important aspect of validity and should benefit all Learners.'

(Personal response, language modifier)

One respondent, who supported the proposals, considered the impact of the guidance on accessibility of assessments for all or particular groups of Learners hard to predict.

'Questions could be challenging for Learners or groups of Learners because of a number of factors or interactions between those factors...While there is considerable research on features of questions that can cause a barrier to Learners...there is limited educational assessment research...that examines

these barriers from the perspective of Learners with specific conditions or who share protected characteristics.’

(Awarding organisation)

Some respondents suggested ways to improve the beneficial impact of the proposals on Learners. These included requests for:

- the guidance to consider Learners who have English as an additional language (Awarding organisation)
- further guidance on assessment methods other than written assessment (Other representative or interest group)
- ‘greater emphasis on providing digital or technology-enhanced assessments; using more flexible modes of demonstrating knowledge; and guidance on assessments in vocational contexts’ (Other representative or interest group)
- Ofqual to set out its plans for evaluating the impact of the guidance on disabled Learners following publication (Other representative or interest group)

One respondent said following common accessibility principles would mean greater consistency across different exam papers. This respondent believed the guidance would benefit deaf Learners taking GCSEs and A levels and could reduce the need for Teachers of the Deaf to modify the language of papers. However, the respondent felt that for many disabled Learners the guidance would have limited impact due to its focus on written exam papers rather than other forms of assessment.

Another respondent said the proposed guidance ‘rightly points out’ that images can aid comprehension for some Learners while creating a barrier for others. The respondent felt the section on ‘Context’ should make an analogous point. The draft on which we consulted covers potential negative impacts of culturally specific contexts. The respondent advised Learners can still face barriers where context of a question is familiar, but contextualisation (like images) can aid comprehension for some Learners.

‘If the impact of the guidance was to discourage use of contextualised problems...this could disadvantage Learners whose mathematical skills have been acquired in vocational or other lived contexts.’

(Other representative or interest group)

One respondent commented on the difficulty of ensuring no Learners are disadvantaged by any assessment and said the aim must be to support most Learners. (Awarding organisation)

Three respondents disagreed that the draft guidance would have a beneficial impact on all Learners taking regulated assessments. One respondent queried what was meant by 'a beneficial impact for all Learners'. Another respondent considered the guidance would benefit most (but not all) Learners taking regulated assessments.

One respondent suggested that additional guidance should be provided on the accessibility of practical and oral assessments to Learners.

One respondent suggested consultation with stakeholders, and ongoing review and monitoring, to determine the impact of the guidance.

Question 4

To what extent do you agree or disagree that the draft guidance will be relevant to assessments across the full range of qualifications that we regulate?

Response	Number of responses	Percent
Strongly agree	25	20.0%
Agree	59	47.2%
Neither agree nor disagree	28	22.4%
Disagree	6	4.8%
Strongly disagree	4	3.2%
Not answered	3	2.4%

The majority (67.2%) of respondents to the online consultation agreed or strongly agreed that the draft guidance will be relevant to assessments across the full range of qualifications Ofqual regulates.

One email respondent strongly agreed. Seven respondents who agreed or strongly agreed provided comments, including:

'We agree the guidance is relevant across (the) range of qualifications including end-point assessment.'

(Awarding organisation)

‘The guidance should be relevant to all qualifications regulated by Ofqual and others too perhaps.’

(Personal response, language modifier)

One respondent called for the reading age of questions to be below the actual age of typical candidates so the questions can assess the skills intended to be tested rather than proficiency in reading, unless the level of reading is part of what is being assessed. (Other representative or interest group)

Two respondents disagreed, and one respondent strongly disagreed, that the draft guidance will be relevant to assessments across the full range of qualifications that Ofqual regulates. These respondents felt it was unclear whether the guidance covered practical and vocational qualifications, given its focus on written assessments. One respondent suggested the guidance:

‘should recognise that awarding bodies will need to vary how they approach accessibility within each assessment because of the different requirements of each specification.’

(Awarding organisation)

Seven respondents expressed views about the guidance focusing on paper-based or written assessments. These respondents suggested either expanding the guidance to cover practical or performance-based assessments, adding separate guidance on practical or performance-based assessment, or explicitly stating the guidance is for paper-based or written assessment only. There was also demand for further guidance on digital assessment, task-based and oral assessments, and more guidance on how to manage overlapping or conflicting requirements.

Another respondent referred to barriers ‘deaf Learners can face’ in completing oral or practical assessments and said the guidance should be relevant to all qualifications rather than developing separate guidance for vocational qualifications. (Other representative or interest group)

One awarding organisation respondent requested clarification on what materials are covered by the guidance, and whether this includes practice tests, sample assessment materials and formative tests.

Question 5

Do you have any specific comments on the draft guidance? Please refer to the relevant section in your response.

There were 94 responses to this part of the question.

Twenty-eight respondents supported the proposed guidance. Some respondents praised the style and layout. Others asked for more focus on practical assessment.

‘(We) welcome statutory guidance for awarding organisations that will enable children and young people with SEND to access assessments and remove barriers for Learners.’

(Parent or carer)

‘The style of the draft guidance with examples of good practice is useful in supporting awarding organisations to design and develop assessments that are as accessible as possible for Learners.’

(Awarding organisation)

‘People on the autism spectrum will be helped. Same with ADHD, dyscalculia, dyslexia and dysgraphia.’

(Student)

‘The guidance will help to further clarify how to design and development accessible assessments for all Learners, especially those with protected characteristics. This, in turn, will ensure that assessments allow Learners to demonstrate the assessment construct (knowledge, skills, understanding or behaviours).’

(Awarding organisation)

‘Consolidated guidance will benefit consistency across Awarding Organisations.’

(Awarding organisation)

'The guidance is very clear; the guidance is pragmatic in allowing awarding organisations to keep a balanced perspective when making decisions about assessment content, for example context. The guidance stresses the importance of having a clear rationale for decisions that may impact on individuals or groups of Learners.'

(Awarding organisation)

'Having accessibility built in will not hinder Learners without additional needs and is likely to be of benefit to those students who may have needs that have not yet been identified.'

(Other representative or interest group)

'The guidance is clear and concise with good examples throughout, can be applied to all qualifications and is flexible enough to be used for best practice in a variety of contexts.'

(Other respondent)

Three organisations said they already follow the principles proposed in the guidance.

One respondent said clear questions may help reduce exam stress, which may in turn improve children's mental health. (Other representative or interest group)

Four respondents supported the inclusion of colour-vision deficiency in the guidance.

'We welcome the specific recognition of the need to accommodate colour blind Learners as a first step towards more accessible assessments.'

(Other representative or interest group)

One respondent called for subject-specific input where elements of a particular area are assessed in different ways, such as listening sections in music or Modern Foreign Languages. (Other respondent)

Scope

Eight respondents noted the emphasis of the guidance on written assessment and requested additional guidance to cover practical or other non-written assessments.

'Many students take some form of practical assessment as part of their qualifications, for example in speaking, listening, performance, etc. There should

be additional specific guidance on how these can be made accessible for all Learners.'

(Other respondent)

'It would be beneficial to include guidance on non-written assessments, such as those that assess affective and psychomotor skills which are prevalent in many VTQs.'

(Personal response)

One respondent suggested expansion of the guidance to include observations, interviews and other methodologies used for apprenticeship end-point assessments which are regulated by Ofqual.

Another respondent felt that while some of the guidance (on source text or materials, context, images and colour) was most relevant to written examinations, it was partly transferable to practical assessments.

One respondent identified challenges in applying some of the guidance and principles to certain regulated qualifications. The respondent gave the example of End-Point Assessments where common requirements, such as the ordering of assessments, do not afford awarding organisations the ability to make alterations that may aid accessibility. (Awarding organisation)

Examples

Eighteen respondents asked for additional examples or case studies to be added to the guidance. They said this would support best practice and help with colours, context, images and layout. One respondent said examples could be particularly useful for practical assessments or non-traditional formats. Other respondents felt it would be helpful to provide disability-specific examples, and for examples to cover a wider range of subject areas, including Art & Design.

'This guidance is too complicated, vague and open to interpretation. It would have been better to give more concrete examples and more specific rules.'

(Teacher, responding in a personal capacity)

Detailed comments on the guidance

Several respondents suggested detailed changes they felt would improve the guidance. Some of these suggestions are summarised below, in the order in which the relevant sections appear in the guidance.

The assessment construct

One respondent suggested expressing more directly that the assessment construct is essentially about validity and how well an assessment measures what it sets out to measure. (Other representative or interest groups)

Assessment structure

Two respondents suggested removing the word 'additional' from the principle:

'The structure of the assessment should not create additional unnecessary barriers for particular Learners' – which suggests there are already barriers.

(Awarding organisation)

Two respondents commented on the sequencing of tasks, saying for autistic Learners it is not so much the order of tasks that presents an accessibility barrier but having to form a judgement on which tasks are more demanding. One respondent noted the challenge of accurately predicting item demand before a paper is sat.

Assessment instructions

Commenting on the example instruction 'you have 2 hours to complete the assessment', 2 respondents suggested also referencing any extra time allowance a learner may have.

One respondent commented that holding information in working memory might be unavoidable for Learners with sight loss, where rubrics may be read by technology or a human reader.

Language

One respondent asked for clarification of the word 'appropriate' in the context of the language used in an assessment task being appropriate for the assessment level and construct and not presenting unnecessary barriers to Learners.

Other respondents asked for the guidance to include references to awarding organisations:

- taking into account Learners' reading age
- avoiding words that are specific to an understanding of particular cultures or socioeconomic backgrounds

- considering providing the full form of a word or phrase each time it is used in extended or complex assessments, unless the assessment specifically requires knowledge of abbreviations

Sentence structures

Some respondents suggested:

- the need for consistent formats for line numbers, paragraph numbers, or section headings across all tasks
- the guidance to be written in the positive
- reviewing the guidance on use of direct quotations rather than reported speech. One awarding organisation said direct speech can be less accessible if it breaks the flow of the context and reading, or makes sentences longer

Source text or materials

Suggestions included:

- clarifying the phrase 'appropriate complexity' in the context of using language that is 'of appropriate complexity' for the assessment construct
- making line numbers, paragraph numbers or section headings accessible regardless of assessment format, so they can be resized and read out to those using screen readers

Context

One respondent noted the challenge of predicting the familiarity of any given context to every group of Learners before they sit an exam.

Images

Four respondents were concerned the guidance could deter awarding organisations from including useful images to provide greater context. Although images can be a barrier to some Learners, this was not thought to be universally the case.

'Images can improve accessibility for some autistic Learners.'

(Other representative or interest group)

'Images or charts can be particularly useful for deaf students to aid understanding of a question being asked or scenario being posed.'

(Other representative or interest group)

'Reducing the number of images that could distract some students with learning difficulties could negatively impact others with learning difficulties that need visuals to support the written word.'

(Senior leadership team, school)

'As a geographer, images and graphs are used quite a lot and their interpretation is an important skill that is often assessed... I would not want to see assessments that do not contain this element because it is too complex to meet this guidance, and therefore other forms of questions are used. It is a matter of balance.'

(Personal response)

Respondents' suggestions for adding more detailed guidance on images included:

- ensuring images do not contain references or visual cues that might be unfamiliar to some Learners (such as regional, religious, or popular cultural references), and do not depict groups of people, gender, race, disability, religion or sexual orientation in an unbalanced, discriminatory or biased way
- not using images containing potentially emotive imagery
- using pictures that will be usable in black and white, or using colour images only if central to the measurement of the assessment construct
- avoiding use of pictures that require inference
- being mindful of placement of images in documents as they can interrupt text to speech software
- providing alt-text for all images to allow access to visually impaired Learners
- consulting Qualified Teacher of Children and Young People with Vision Impairment (QTVI) specialists on the layout and design of images
- stating 'any images used must be able to withstand enlargement, without becoming distorted or pixelated', so that pupils who have enlarged papers are not disadvantaged

Colours

One respondent suggested adding further detail in the guidance on the use of patterns and hatching. The respondent recommended the guidance should say that patterns and hatching should be used with caution and as minimally as possible within the same image.

Other comments were about providing further detail on:

- use of contrast between parts of an image or graphic when used to convey meaning
- not requiring (unless the context requires it) Learners to infer information through use of colour alone

Layout

A few respondents gave detailed comments on layout, with suggestions including:

- referencing increased spacing of lines and words
- providing further guidance or examples of using white space between blocks of text and images
- considering specifying minimum size for text or symbols, and including guidance on font type

Anticipating Reasonable Adjustments

One respondent commented that:

‘in general the detail set out here is right and appropriate’.

(Awarding organisation)

A joint response from 3 representative or interest groups felt the ‘Anticipating Reasonable Adjustments’ section was ‘disproportionately light on content and low in prominence relative to its importance in achieving the purpose of the Guidance’. One respondent recommended including more disability-specific content, such as a summary of frequently encountered needs and reasonable adjustments, sources of authority, and links to further information.

One respondent requested ‘very clear guidance not generic information’ on reasonable adjustments, emphasising that ‘a person with dyslexia will have very different requirements to a person with autism’. (Parent or carer)

Another respondent encouraged reflection as to whether this section of guidance adequately caters for physical disability, such as limb loss.

One respondent asked for additional detail on how reasonable adjustments should be applied to other forms of assessment (such as practical assessment) or within the context of alternative delivery models (such as digital assessment).

Alternative formats and assistive technology

One respondent noted that signposting awarding organisations to the Web Content Accessibility Guidelines (WCAG) may be overwhelming as these are written for web or content designers.

Seven respondents commented on use of digital assessment. Two noted digital assessment was presented in the guidance as an alternative method or reasonable adjustment, rather than integrated throughout the guidance. Another respondent said digital accessibility of assessments should be a priority for awarding organisations.

Respondents identified the following benefits of digital assessments and platforms:

- reducing accessibility barriers by allowing Learners to access material in their preferred way (such as speech recognition, text-to-speech, and the ability to change line spacing and font size)
- assisting Learners with unrecognised or undisclosed support requirements
- reducing reliance on human support (such as readers and scribes)

One respondent said an increase in remote and digital assessment in the higher education sector during the Covid-19 pandemic had been broadly well-received by disabled students as it offered flexibility and physical comfort, and reduced anxiety.

An awarding organisation's processes

One respondent suggested reflecting in the guidance the importance of testing the assessment with assistive technology to avoid accessibility issues.

Another respondent thought awarding organisations should consider the diversity of staff involved with the design and development of assessments.

Referring to the proposed guidance more generally, one respondent said it:

'skips the issue of whether flexibility should be permitted to the method of assessment used to identify whether a learner can demonstrate a skill or competence'.

(Other representative or interest group)

One respondent suggested adding a checklist to the guidance for awarding organisations to refer to when developing or updating new assessments.

Some respondents agreed feedback should be gathered by awarding organisations, and there were some suggestions (including from awarding organisations) that feedback should be also considered by accessibility experts.

Question 6

To what extent do you agree or disagree that, once we introduce our guidance on designing and developing accessible assessments, we should remove the existing guidance to Condition G3?

Response	Number of responses	Percent
Strongly agree	18	14.4%
Agree	55	44.0%
Neither agree nor disagree	34	27.2%
Disagree	13	10.4%
Strongly disagree	2	1.6%
Not answered	3	2.4%

Twenty-two respondents commented on Ofqual's plans for the proposed guidance to replace the existing guidance to Condition G3.

Twelve respondents agreed with the proposal to replace the existing guidance to Condition G3 with the new guidance. One respondent said the new draft guidance was more comprehensive than existing guidance to Condition G3.

One respondent welcomed streamlining the guidance but recommended retaining:

'the sensitivity aspects and level of demand elements of Condition G3 not covered by this guidance'.

(Awarding organisation)

'We agree that if introduced, the existing guidance should be removed because there should only be a single suite of guidance at any point in time. If both are required, they must be merged to provide clarity and a single point of reference).

(Awarding organisation)

'The new guidance is more robust and gives greater detail to support awarding organisations to ensure reliability and validity.'

(Awarding organisation) |

One respondent raised the importance of including in the new guidance points from Condition G3 on special consideration and maintaining confidentiality of assessments. (Senior leadership team, comprehensive or non-selective academy)

One respondent expressed concern about the proposed guidance resulting in 'simplified English' and 'dumbing down' of assessment. (Personal response).

Question 7

Are there any other aspects of design and development on which guidance on accessibility would be useful for awarding organisations?

There were 68 responses to this part of the question.

Scope

Twenty-seven respondents commented on the scope of the guidance, with many calling for more guidance on practical assessments and performances.

While respondents generally welcomed the proposed guidance, they asked for additional guidance on:

- how to maximise accessibility of digital and on screen assessment
- behaviours and skills in practical assessments (such as anticipating the use of practical assistants during competency or other practical assessments)
- approaches that could be considered such as moderation across subjects regarding use of, and difficulty of, language (for example, cross-curricular exemplars to provide consistency)
- accessibility in relation to practical, oral and performance assessments, and on the setting of internal assessment
- listening papers (for example, in music where it is possible to enhance certain frequencies to enable better access for candidates with hearing impairments)
- interactive, digital and remote assessment
- accessibility considerations associated with the setting, design and delivery of other methods of assessment, to help inform qualification design
- inclusive language
- whether it would be reasonable to provide assessments through British Sign Language (BSL) for commonly taken exam papers

One respondent suggested that if the guidance is only for written assessment that should be made clear.

Examples

Eight respondents said additional examples, including best practice examples, would be helpful alongside or within the guidance. Respondents said they would welcome:

- more illustrative examples in a section on Assistive Technology, to include specific examples of using Augmentative and Alternative Communication and the software and functions that can be used
- examples of Reasonable Adjustments for specific needs

One respondent felt the guidance had missed an opportunity to future-plan for assessment design and development given the likely increase in e-assessment. This respondent said it would be helpful to embed the alternative formats and assistive technologies guidance within the main narrative rather than in separate sections.

Web Content Accessibility (WCAG)

Five respondents referenced the WCAG in response to Question 7. These respondents broadly supported use of nationally recognised standards for accessibility, such as WCAG, for web-based assessments.

One respondent commented that:

‘clear stipulated guidance on accessible formatting must be observed by exam boards as standard - such as WCAG/ W3C which provide detail on optimal spacing of letters/ words/ lines/ paragraphs, font type/ size and minimising crowding’.

(Parent or carer)

Other comments

Two respondents called for additional training for those developing assessments on accessibility from specialists, such as Qualified Teachers of Children and Young People with Vision Impairment. Another respondent felt it was important to regularly consider feedback from stakeholders, training providers, employers and apprentices to make sure assessments remain fit for purpose.

Several respondents suggested detailed changes to the proposed guidance to improve accessibility.

The more detailed suggestions included:

- clearly stating when imagined responses would be valid

- clarifying that where communication skills are being assessed this does not just include spoken language skills
- considering the needs of dyslexic students

Disability-specific comments

Nine respondents shared disability-specific comments in response to Question 7.

Three respondents highlighted that colour vision deficiency can affect 1 in 12 boys and 1 in 200 girls and asked for this to be considered when designing exams.

Three respondents noted that Learners with different disabilities learn in different ways and at different speeds:

‘It is therefore very important that the layout, structure and language of the examination is as clear as possible to follow for these candidates.’

(Employer or business representative group)

One respondent asked about the implementation timeline, and whether the guidance will need to be applied retrospectively (for example, to current live assessment material, or to sample assessment materials). Another respondent said it would be helpful to know whether and how the guidance will apply to modified papers.

One parent or carer described the proposed guidance as an excellent start but felt it would only have the desired impact if teachers were trained on the principles from the draft guidance. One respondent would welcome Ofqual sharing, with all awarding organisations, more information, expertise and good practice from our [Access Consultation Forum](#).

Question 8

We have not identified any ways in which the proposed guidance would impact negatively on Learners who share a protected characteristic or socioeconomic status. Are there any potential impacts (positive or negative) we have not identified?

There were 66 responses to this part of the question.

Thirteen respondents said they had not identified any ways in which the proposed guidance would impact negatively on Learners who share a protected characteristic or socioeconomic status.

Two of those respondents identified positive impacts of the proposed guidance on Learners who share a protected characteristic or socioeconomic status.

‘The proposed guidance should improve accessibility and inclusivity.’

(Awarding organisation)

Two other respondents felt that Learners with special educational needs and disabilities, and those with lower socioeconomic status were ‘less likely to benefit from the anticipated positive impact of the new guidance’ because ‘Learners with SEND make up a considerable proportion of the candidature for vocational and Entry level qualifications’. (Other representative or interest group)

Seven respondents identified negative impacts of the proposed guidance on Learners who share a protected characteristic or socioeconomic status. These included:

- potential for deaf Learners to be disadvantaged by the proposed guidance on images if awarding organisations are discouraged from using images within exam papers. (Other representative or interest group)
- a risk that deaf learners may be disadvantaged by the guidance on images, as written, if awarding organisations are discouraged from using images within exam papers – ‘images can provide useful context to aid question comprehension’. ‘Learners from disadvantaged backgrounds are more likely to take vocational qualifications and are therefore disproportionately impacted’. (Other representative or interest group)
- a risk that some aspects of the guidance may allow for misinterpretation, and inadvertently disadvantage Learners. This respondent referred to the indication in the proposed guidance that some Learners on the autism

spectrum may find images an obstacle. The respondent said other autistic Learners may find images helpful, so there is a risk of over-compensation if images are not used at all. (Awarding organisation)

The other respondent (an awarding organisation) advised there is some evidence in research literature on how features could limit accessibility of assessments to Learners of specific socioeconomic status. However, with limited research on how Learners sharing certain protected characteristics (such as sexual orientation) interact with various features of assessment questions, this respondent said it is hard to identify the impact this guidance may have on these groups.

One respondent suggested there should be a general principle that guidance developed with a particular group of Learners in mind should not negatively impact upon another group of Learners with other protected characteristics. The respondent emphasised that groups of Learners who share a protected characteristic do not necessarily share the same accessibility needs, that ‘many protected characteristics such as disability...co-occur and reasonable adjustments may be needed to ensure accessibility for individual Learners.’ (Other representative or interest group)

Two respondents felt the use of non-gendered pronouns should be considered in the guidance.

‘The use of non-gendered pronouns and non-gendered names should be used where possible. I changed all of my teaching resources a couple of years ago with little difficulty.’

(Teacher, responding in a personal capacity)

Three respondents emphasised the challenge of cultural aspects to contexts, and shared some examples of contexts that may not be accessible to all Learners:

‘Not all children understand...contexts such as...paving a patio...whether due to socioeconomic circumstances or having English as an additional language.’

‘Paving part of a school playground avoids the use of the word ‘patio’.’

(Other representative or interest group)

‘There have been autistic pupils that have not known what a ‘return ticket’ was for example, yet this is something that would be taken for granted for the ‘average’ 16-year-old to be aware of.’

(Other representative or interest group)

One awarding organisation supported use of contexts that are equally familiar to all Learners and do not cause disadvantage but noted the challenge of avoiding all

contexts that carry inherent advantage or disadvantage for some Learners. To address any negative impacts of context on Learners, one respondent suggested ongoing review and analysis of the performance of Learners with protected characteristics and socioeconomic status on different questions.

One respondent (a parent or carer) called for guidance on the formatting of papers to stipulate measures for increased line spacing. This respondent believed increased spacing would have a positive impact on dyslexic Learners, those with other specific learning difficulties that impact reading speed, and Learners with sight loss, without negatively impacting other Learners.

Other respondents made the following comments and suggestions in response to Question 8:

- Ensure consistent language terms used within a stem and parts of a question. For example, 'don't refer to 'boys and girls' in the stem and to 'children' in the associated question.' (Consultant)
- With layout, avoid the use of columns to present source material as columns can be difficult for screen readers and may confuse many candidates. (Consultant)
- Using the active voice is good but perhaps there should be a glossary of commands used in the instructions of the paper and of individual questions detailing what the examiner expects the candidate to do. (Other respondent)
- Make the instructions at the start of questions stand out – for example, 'there are 2 marks for this question, so do not spend more than X minutes on it'. (Other respondent)
- The proposed guidance refers to images being distracting to Autistic Learners. 'This is more a reference to those with attention deficit hyperactivity disorder (ADHD) than Autism.' (Other respondent)
- Apply a 'best fit approach' to the guidance where it is not possible to add a heading above an image – such as when using certain technology in onscreen tests. (Awarding organisation)
- How assistive technologies should be used to support Learners is not detailed. (Other respondent)
- Mention Learners with physical disabilities, including users of augmentative and alternative communication

Two respondents asked for mental processing speed and decision-making time to be considered. One respondent (from a representative or interest group) said Learners with a visual impairment may have a developmental delay of approximately 2 years.

The other respondent (a parent or carer) said mental processing time particularly impacts autistic Learners.

Question 9

Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on Learners who share a protected characteristic or socioeconomic status?

There were 57 responses to this part of the question.

One respondent noted that Learners who share protective characteristics may not have identical accessibility needs:

‘Alternative formats, modified papers and other reasonable adjustments may therefore still be required to meet the accessibility needs of individual Learners.’

(Other representative or interest group)

Another respondent emphasised the importance of all involved in designing and developing assessments having current knowledge of protected characteristics and how these impact on learning.

Four respondents suggested training for those producing modified examinations or assessments to help mitigate any negative impact on Learners. One respondent said awarding organisations would need a lot of guidance on making online assessments accessible to meet Learners’ needs.

Liaison with representative or interest groups about how to make assessments accessible was considered another way to mitigate any negative impacts of these proposals on Learners. Five respondents suggested awarding organisations should use QTVIs with specialist subject knowledge to modify exam papers for visually impaired Learners.

Three respondents said all questions and scenarios in an assessment should be ‘politically correct and unoffensive to any group of students’ (Personal response, consultant). However, another respondent advised ‘being careful to avoid being too politically correct’ in case that made questions more difficult to interpret. (Personal response, consultant)

Learner feedback was suggested by 3 respondents as a mitigation:

‘Consider and include the additional needs of AAC users and their specific characteristics.’

(Other respondent)

'It is important to consult and discuss with Learners themselves and/or representative groups to gain feedback on the proposals and review points following implementation.'

(Awarding organisation)

One respondent suggested question by question analysis of students' responses to examinations in past series would offer important insights into which contexts were less accessible. This respondent said question analysis could help identify negative impact on particular groups (for example, Learners with SEND, or Learners with English as an alternative language). The respondent suggested publishing this analysis would help to raise awareness of cultural assumptions.

On familiarity with contexts, one respondent suggested publishing an advance list of names for use by teachers to ensure those vulnerable to being disadvantaged by an unfamiliar name encountered it before their exam.

A joint response from 3 representative or interest groups supported Ofqual's view that designing and developing assessments that are accessible for the widest range of Learners is not always straightforward. These respondents also suggested the guidance should be subject to regular review.

Some respondents suggested Ofqual could take steps to mitigate the impact of the guidance on Learners with a particular disability:

'Include deafblindness/multi-sensory impairment in descriptions of Learners facing barriers.'

(Personal response)

'Be aware of the specific learning profiles of specific groups of Learners (such as specific learning difficulties, Autism Spectrum Condition (ASC), or Down's Syndrome) and make assessments available in a range of formats including alternative formats and assistive technology.'

(Other representative or interest group)

'Check the guidance is suitable for children with complex medical and/or mental health difficulties (for example, children with epilepsy and using online assessments).'

(Other representative or interest group)

'For Learners with dyslexia...insist all papers are printed in a dyslexia-friendly font. This would not disadvantage those without dyslexia'

(Teacher, responding in a personal capacity)

Disabilities

Some respondents asked for the guidance to reference a wide range of disabilities or learner groups:

- Physical difficulties.
- Learners with co-occurring conditions, including – multi-Sensory Impairment and deafblindness – 'many SEND children are co-morbid...Not all SEND issues are regarded as disabilities... a child with (multiple) minor difficulties will also be disadvantaged.' (Other respondent)
- Attention deficit hyperactivity disorder (ADHD) and Attention deficit disorder (ADD) – 'this negatively affects...the ability to get started, concentrate for long periods of time and stay focussed...and...Executive Functioning Skills.' (Parent or carer)
- Developmental Language Disorder – '1 in 14 children in the UK are challenged by it. They have problems with managing multi-step instructions or excessive detail, challenges with sequencing information, and the impact of abstract language, such as 'home'.' (Special school, and other respondent)
- Learners who rely on Augmentative and Alternative Communication (AAC) – 'this is a discrete and specific cohort of students who have unique challenges and needs regarding assessment and exams access.' (Other representative or interest group)
- Learners with 'mental health' problems. (Student)

One respondent suggested Ofqual should signpost to relevant national standards for accessibility that are most relevant. Another respondent felt guidance on procurement of third-party software and systems to ensure that these meet accessibility standards would remove barriers for assistive technology users.

Question 10

Do you have any other comments on the impacts of the proposals on Learners who share a protected characteristic or socioeconomic status?

There were 53 responses to this part of the question.

Some respondents commented positively on the proposed guidance:

'I think these are very positive and clear proposals.'

(Senior leadership team, school)

'I'm really pleased to see this guidance as I think it will have a positive impact on those who might otherwise be disadvantaged.'

(Academy chain)

Twenty-three respondents commented on the impacts of the proposed guidance on Learners who share a protected characteristic or socioeconomic status. Much of the feedback, although related, covered factors beyond the scope of the guidance or outside of Ofqual's remit. For example:

'The guidance is a step in the right direction. However, equality, diversity and inclusive (EDI) assessments start from EDI curricula. In the absence of significant curriculum reform, positive impacts on Learners who share protected characteristics or are of specific socioeconomic status will remain limited.'

(Awarding organisation)

'Ensuring that Learners from lower socioeconomic status who may be practising for these exams in poor home environments and sharing equipment are not disadvantaged.'

(Other representative or interest group)

Four respondents expressed concern about the impact of context and question phrasing on Learners with special educational needs and disabilities, Learners with English as an additional language, and Learners who use specialist software.

Some responses to this question focused on the provision of accessible hard-copy papers, interactive PDFs, and past papers.

Two respondents commented on the importance of Ofqual monitoring how awarding organisations take the guidance into account.

One respondent acknowledged the difficulty of creating engaging assessment materials that are accessible to all Learners and said even the best designed tools will have some functions that do not work for particular Learners and/or with certain assistive technologies. This respondent called for guidance to cover e-assessment and suggested embedding audio and video.

Question 11

Do you have any comments on the estimated costs of awarding organisations, large and small, complying with our proposed guidance?

There were 60 responses to this part of the question.

Thirteen respondents identified that there would be either no costs, or minimal costs, to awarding organisations to comply with our guidance. A member of a school's senior leadership team, and a parent or carer, believed the benefits of implementing these proposals outweighed the costs. Others commented on the benefits of accessible design.

'I do not see any costs being prohibitive.'

(Teacher, responding in a personal capacity)

'We feel that if accessibility is built in from the start, then costs are more manageable.'

(Other regulator)

Two respondents noted that they had not identified any additional costs of implementing the guidance, other than any staff training and continuous professional development that may be required.

Four respondents identified initial additional costs to implement the guidance but described these as mainly 'one-off' costs, with two respondents anticipating that costs may be offset by a reduction in the need for reasonable adjustments.

Three respondents considered the cost of implementing the guidance difficult to quantify, with one commenting that it depended how far awarding organisations had already embedded accessibility principles, and how the landscape changes with the use of digital assessment.

'It is likely that awarding organisations will already be following much of the guidance. However, it is expected that most AOs will conduct a review of their systems, assessments, assessment draft procedure etc to take account of the guidance and make changes accordingly.'

(Awarding organisation)

Six respondents commented on the timeframe to implement the guidance. One respondent welcomed clarification on whether all assessments would need to be reviewed on launch of the new guidance, or whether that could be factored in as part of awarding organisations' standard review cycle.

Another respondent strongly recommended the guidance should not be applied retrospectively to existing or near-final materials due to the cost and risk of introducing errors.

One awarding organisation said meeting the proposal regarding alternative formats and assistive technology would require change to its current assessment design, production, and delivery processes. This respondent said further investigation was needed to estimate costs but anticipated significant costs associated with the proposed 6-month review period.

Ten respondents mentioned increased costs. Three respondents noted the possibility that smaller awarding organisations may be particularly affected by any financial burden and asked for sufficient notice to make changes to assessment materials. One respondent said changes to assessment tools and standards can be very costly for end-point assessment organisations.

One awarding organisation gave a cost estimate of £85,000 in year 1 to ensure compatibility of all its assessments with assistive technology, including the cost of consultancy and staff training. This respondent also estimated an additional £6,000 in fees for specialist modifiers to review assessments and advise on amendments in line with the principles for Learners with protected characteristics, and an annual estimated cost of approximately £75,000 thereafter.

Sixteen respondents commented on training costs. This included training or upskilling staff, employing or contracting accessibility specialists, and collecting feedback from centres on assessment accessibility. Other costs mentioned included reviewing processes, production costs and third-party modification costs.

One respondent estimated a cost of approximately £1,100 per day for technical accessibility testing of assessment delivery platforms if awarding organisations did not have in-house capacity for this.

Two respondents anticipated cost reductions. One respondent said adjustments made at the design stage could reduce the need for costly one-off adjustments required by some students. One respondent commented on the benefits to students of increased accessibility.

'Many of the things done to increase accessibility will be beneficial to all students.'

(Other respondent)

One respondent (from a representative or interest group) suggested Ofqual should make clear to awarding organisations the long-term financial benefits of early investment in digital accessibility, and encourage assessments to be created digitally, to ensure no Learners are disadvantaged by inaccessible design and procurement decisions.

Question 12

Are there any steps we could take to reduce the regulatory impact of our proposals?

There were 52 responses to this part of the question.

Seven respondents, including awarding organisations, said they had not identified any steps Ofqual could take to reduce the regulatory impact of our proposals. One respondent did not consider the proposals to be over burdening, other respondents welcomed this guidance and said it would be beneficial to Learners.

Thirty-one respondents suggested steps Ofqual could take to reduce the regulatory impact of the guidance, including positive messaging around accessibility – especially digital accessibility – providing more examples in the guidance, and training and awareness raising for staff and assessors.

‘Provide clear training to those involved to help them not only understand changes but the people behind the changes that will be benefited by this inclusive practice.’

(Student)

Eight respondents said awarding organisations should follow the guidance as closely as possible, and Ofqual needs efficient regulatory oversight of the implementation of the guidance. One respondent considered the guidance may prompt limited change in practice as it will not impose new obligations on awarding organisations.

Some respondents called for the guidance to be implemented soon, and for it to have immediate effect. Other respondents commented on the timescale for implementing the guidance and asked for enough time to implement any necessary changes.

‘The main step that we would suggest is the allowance of sufficient time for awarding organisations to check and ensure that their assessments meet the new requirements after they are published.’

(Teacher, responding in a personal capacity)

'We typically develop assessments a year in advance, so it would impact us if this were introduced with a short timescale in that we would need to potentially review and review all assessments we have developed for the following year.'

(Awarding organisation)

Two respondents said the regulatory impact of the guidance would depend on expectations after publication.

'We know from experience that late changes to assessments can have unintended consequences and can introduce errors or inconsistencies, unless managed with great care, control and time.'

(Awarding organisation)

'We would ask that the guidance, when introduced, applies to assessment materials commissioned after that date only'

(Awarding organisation)

One respondent queried why we would aim to reduce regulatory impact, stating:

'it should be used as way to be very clear to...boards, schools, and students what they can expect from assessments and provide a more consistent and fair experience for students'

(Parent or carer)

One awarding organisation said that while there would be an impact, they agreed the guidance was necessary to ensure all Learners are catered for.

Question 13

Are there any costs or benefits associated with our proposals which we have not identified?

There were 47 responses to this part of the question.

Four respondents did not identify any other costs or benefits with our proposals, and one respondent felt any other costs or benefits should be minimal.

Two respondents identified cost reductions associated with our proposals, from reduced demand for reasonable adjustments, and reduced associated costs, if assessments become more accessible-by-design.

Two respondents said costs would vary across awarding organisations depending on sector area, the number of assessments, and current approach to accessibility. Other variable costs were thought to include ongoing compliance and quality assurance, and the associated human resource, time, and financial costs.

Four respondents suggested costs would increase. Two respondents (awarding organisations) expected costs might increase significantly if they needed to review and revise previously created exam papers or assessments to comply with the guidance.

Another respondent identified costs in communications to centres and Learners to explain the impact of accessibility changes, additional training costs for those setting assessments and potential additional costs for checking assessments meet the guidance. Possible involvement of external groups representing Learners with specific needs was cited as a further cost, along with any additional checking and validation required for awarding organisations looking to produce accessible on-screen assessments.

Eleven respondents commented on other costs that might be incurred by the introduction of the guidance but did not quantify these costs. Some of these anticipated costs were financial. Others were personal or societal.

One respondent noted there may be costs associated with updated learning materials in addition to the assessments themselves. Another respondent said it was important that no unintended costs were borne by colleges.

Seven respondents identified benefits with the proposed guidance for Learners, and one respondent felt the proposals could reduce burden on schools and colleges by increasing the accessibility of assessments.

'There are benefits to those pupils without a diagnosis who will benefit from the changes.'

(Other representative or interest group)

'The future economic benefits from Learners being able to achieve recognition for what they are capable of will far exceed any small costs associated with applying these additional guidelines.'

(Teacher, responding in a personal capacity)

One respondent said introducing more accessible papers could reduce the need for more costly assistive technology and reduce burden on schools by increasing access for those for whom formatting alone is insufficient to make papers accessible.

Question 14

Do you have any comments on, including any suggestions for improving, the readability and accessibility of the guidance?

There were 58 responses to this part of the question.

Three respondents commended the clarity of the guidance.

Nine respondents called for additional examples to be included in the guidance:

‘Some practical examples showing how ambiguous or confusing language could be altered to be more inclusive and reduce the disadvantages some Learners face.’

(Personal response, parent or carer)

One respondent felt illustrative examples (particularly examples relating to autism) had been provided intermittently and called for a working definition of autism to be provided early or included in a glossary of terms.

Twenty-three respondents suggested ways to improve the readability and accessibility of the guidance, focusing on how the guidance is presented and the formats in which it will be available. There were calls for an accessible version of the guidance to be available, with a read aloud or a high contrast screen option, and the facility for the guidance to be read using assistive technology such as screen readers. One respondent suggested Ofqual’s website should allow the guidance to be read with a pastel background. Another respondent suggested:

‘(Ofqual should) ensure (the guidance) can be downloaded as a document that works with the accessibility tools of all operating systems and products. For example, with the immersive reader tools in MS Word. Or ensure on the website that accessibility tools are available to use with html versions.’

(Other representative or interest group)

Two respondents called for an easy read version of the guidance to be made available, and for it to be produced in languages other than English.

Eight respondents felt that a learner-friendly version of the guidance, or a glossary of terms would be helpful.

‘We would encourage Ofqual to consider producing a learner-friendly version of this guidance...If Learners are empowered with the knowledge of what they

should be able to expect from an awarding organisation, they... are more likely to challenge...non-compliance.'

(Other representative or interest group)

'Ofqual may wish to consider a glossary of terms as an annexe or appendix to the Guidance, with links to further information.'

(Other representative or interest groups)

Other suggestions for improving readability included replacing headings and bullet points with Numerical Legislative Documentation format and adding hyperlinks in the contents page to related sections within the guidance. Conversely, another respondent felt that too many hyperlinks made the guidance difficult to read.

Twelve respondents commented on the language, layout or structure of the guidance. One felt the guidance was too long. Nine felt the language and terminology was not accessible or written in plain English. Shorter sentences and simpler language were suggested. Others considered the language to be accessible, but suggested improvements to the layout and structure of the guidance:

'Incorporating boxes containing further exemplification of principles (i.e., 'principles in action'), would not only further illustrate to boards how each principle could be applied and would also minimise the amounts of block text and increase white space.'

(Awarding organisation)

One awarding organisation respondent suggested it would welcome a review of how the document would meet the WCAG standards when transformed to PDF, and how it would work with screen reader technology.

Question 15

Please provide any comments you may have on when any new guidance should be introduced.

There were 85 responses to this part of the question.

There was a spectrum of opinion on when any new guidance should be introduced, ranging from immediately to 2024.

Ten respondents called for the guidance to be introduced immediately or in time for summer 2022 exams. Twenty-eight respondents felt the guidance was needed as soon as possible. Despite some demand for early introduction of the guidance, some respondents queried how soon it would be possible to implement the guidance, given that awarding organisations produce assessment materials in advance.

Six respondents supported our aim to publish our decisions in spring 2022, with the guidance coming into effect upon publication, and awarding organisations being given 6 months from publication to review their approach.

Twenty respondents called for a period over 6 months before the guidance would be implemented. Some called for a period of 6-12 months before implementation, to allow Awarding Organisations to review and update examination materials. Fourteen respondents suggested the guidance should be implemented in 2023 - with five suggesting implementation from January 2023 and two suggesting implementation from autumn 2023.

Two awarding organisations advised that drafting had started for 2023 assessments and called for implementation of the guidance from 2024.

Five respondents commented on the need to consider the timing of the introduction of the guidance around an academic year, with calls for it to be introduced either at, or before, the start of an academic year to allow teachers and Learners to familiarise themselves with the guidance before exams are sat.

Some respondents asked for the guidance not to be introduced during or just after an exam series, when assessment teams will be focused on marking and grading. One awarding organisation asked for the guidance not to be implemented during the spring term, when much of its awarding and certification takes place.

Other respondents took a more neutral view on the implementation of the guidance, with one stating:

'The timing does not feel particularly critical as the guidance is only providing clarification of principles which awarding organisations should already have adopted.'

(Awarding organisation)

One awarding organisation sought clarification on whether, at the end of the proposed 6-month review period, the guidance would apply only to any new assessments developed after this date. This respondent said:

'If regard to this guidance applies to all existing assessments, six months would not be a reasonable timescale for an Awarding Organisation to complete a new review of all their existing assessments which...would include many hundreds of questions within knowledge test question banks and a large range of written practical tests.'

(Awarding organisation)

Annex A: List of organisational respondents

When completing the consultation questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation.

These are the organisations that submitted a non-confidential response:

- Ambitious About Autism (AAA) – part of a joint response collated by AAA, the Autism Education Trust (AET) and the National Autistic Society (NAS)
- AAC Exam's Access Group
- AAT
- AQA
- Autism Education Trust (AET) – part of a joint response collated by AET, Ambitious About Autism (AAA) and the National Autistic Society (NAS)
- AlphaPlus Consultancy Ltd.
- Ascentis
- ASCL
- ASDAN
- Association of Colleges
- British Association of Teachers of the Deaf (BATOD)
- British Dyslexia Association
- Cambridge Assessment International Education
- Chartered Management Institute (CMI)
- CILEX
- CISI
- Colour Blind Awareness
- Council for Dance, Drama and Musical Theatre
- Council for the Curriculum, Examinations and Assessment (CCEA) Awarding Organisation
- CPCAB
- DLD College London

- Dyslexia Institute UK
- East Norfolk Sixth Form College
- Engineering Construction Industry Training Board
- English Speaking Board (International) Ltd.
- Federation of Awarding Bodies (FAB)
- Gateway Qualifications
- Greater Manchester Learning Provider Network – organisational response (GMLPN)
- Herefordshire Local Authority Additional Needs Service, Visual Impairment Service
- Howard of Effingham School
- Inspiration Trust
- Institute of Commercial Management
- Jisc
- Lantra
- Market Field School
- More House School
- National Association for Hospital Education
- National Association of independent Schools and Non-Maintained Special Schools (NASS)
- National Deaf Children's Society (NDCS)
- National Network of Parent Carer Forums
- National Autistic Society (NAS) – part of a joint response collated by the NAS, Ambitious About Autism (AAA) and the Autism Education Trust (AET)
- Natspec
- NAHT
- Nasen
- NCFE
- North and West Northamptonshire Council Sensory Impairment Service
- OCR
- Open Awards

- Parentkind
- Pearson
- Policy Connect
- Professional Assessment Ltd (PAL)
- RICS
- RNIB
- Royal Mencap Society
- Silverdale School
- Skillsfirst Assess
- Special Educational Consortium (SEC) – the Council for Disabled Children and the National Children’s Bureau (NCB)
- The Cross Association SEND Group of independent schools
- The Independent Schools Association
- The Mathematical Association
- The Sixth Form College Colchester
- Training Qualifications UK
- VIEW
- VISPA (Visual Impairment and Special Needs Advice)
- VTCT
- WJEC



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