

Guidance on designing and developing accessible assessments



A response from Natspec

January 2022

Introduction

Introduction

Natspec is the membership association for organisations which offer specialist further education for students with learning difficulties and disabilities. We represent just over 110 colleges and approximately 6,000 students, all with high needs. The majority of our member colleges offer some form of accredited provision; while a small proportion of students take GCSEs and A levels, most of the qualifications taken are vocational or focused on personal, social and/or employability skills or English and maths. Most of the qualifications taken are at level 1 and below although some students are accessing qualifications at levels 2 and/or 3.

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To what extent do you agree or disagree that the content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

Natspec welcomes 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.

However, we are concerned that the scope of the guidance is not wide enough to ensure that it benefits all learners accessing regulated qualifications. The guidance offers little on improving the accessibility of practical, oral, multiple choice, or online assessment. There is also little to guide awarding organisations on best practice in relation to the types of assessment task typically associated with Entry level assessments, for example, matching activities, cloze exercises, circling words or symbols etc.

There is also no guidance on accessibility of internal assessment. As awarding organisations set the requirements for internal assessment, it might be helpful if the guidance offered some advice on doing this in a way that promotes accessibility, for example by encouraging flexibility in evidence type.

Although there is an implicit message about the importance of designing in accessibility from the start, rather than resorting to reasonable adjustments, we would like to see this strengthened. It might be helpful to set out three stages: accessibility-by-design; anticipation of reasonable adjustments; responsiveness to individuals' accessibility requirements. Awarding organisations could then be encouraged to address the vast majority of accessibility issues through the first stage, which would result in a diminishing need for each of the subsequent stages.

Similarly, the guidance could provide stronger encouragement for awarding organisations to take a 'digital-first' approach to enable any reasonable adjustments to be more easily implementable. For example, a well-constructed digital document can easily have a large text style assigned with no editing required and a digital document with alt tags for images can be used electronically or in printed form.

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?

The style and format of the draft of the guidance is, for the most part, clear and helpful. The format in which a principle is first set out, followed by a series of statements on how awarding organisations should design assessments to be consistent with it, is particularly helpful. The section on 'Alternative formats and assistive technology section' would benefit from following this same layout.

Where guidance is being given on use of visuals, the document would benefit from the use of visual examples. Some of the descriptions of good practice in these sections have become rather wordy.

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?

As stated above, learners taking assessments that are not in the form of externally assessed written tasks or who are working at Entry level, are not likely to benefit a great deal from this guidance. As learners with special educational needs or disabilities (SEND) make up a considerable proportion of Entry level and vocational qualification candidates, they will be disproportionately excluded from the benefits likely to result from this 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?

The guidance is relevant to assessments which take the form of externally assessed written tasks at level 1 and above, particularly those used in A levels and GCSEs. The accessibility of qualifications where the assessment model includes practical, oral, multiple choice, or online assessment or tasks typically associated with Entry level assessment will be much less likely to improve as a result of this guidance.

Question 5:

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

The fifth bullet of the 'Assessment instructions' section could include reference to using the second person in instructions, as opposed to, for example, 'Candidates must...'.
The section on 'Language' could include clarification that it is appropriate for vocational qualifications to include more complex technical language where understanding of sector-specific terminology is part of the assessment construct.

In the section on 'Layout', it might be helpful to state directly that justified text should be avoided.

The W3C POUR principles should be embedded in the 'Alternative formats and assistive technology' section, with some examples. Providers may wish to challenge awarding organisations based on the Ofqual guidance; simply sending them to the WCAG guidance may be overwhelming as these are written for web/content designers.

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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?

This would seem to be a sensible approach.

Question 7:

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

As stated above, guidance on accessibility in relation to practical, oral, multiple-choice, online and the setting of internal assessment would be useful. If this broader range of content were to be added, the section on assistive technology would need revisiting, for example, to include information on the use of

assistive technology in supporting practical tasks such as the use of the magnifier or text recognition function on a phone to view part numbers on an engine part.

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?

Natspec would agree that no learner group would be negatively impacted by the guidance. However, as stated above, learners with SEND - and those with lower socioeconomic status - make up a considerable proportion of the candidature for vocational and Entry level qualifications. These learner groups are therefore much less likely to benefit from the anticipated positive impact of the guidance.

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?

Not applicable.

Question 10:

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

See question 13.

Question 11:

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

We recognise that there are associated costs for awarding organisations of complying with this guidance. We anticipate for some that there will be quite considerable up-front costs in developing or refining their infrastructure (for example, assessment platforms) to enable them to comply. However, these should be one-off costs. There should also be savings for awarding organisations where accessibility-by-design reduces the need for reasonable adjustments. It should also be noted that cost cannot be considered a reasonable excuse for not complying with the Equality Act.

Question 12:

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

While we understand the need to minimise the burden on awarding organisations, we would urge Ofsted to focus on *maximising* the regulatory impact of this guidance. Given that there are no changes to the Conditions themselves or on the obligations of awarding organisations under the Equality Act, there is a risk that the guidance may not result in a great deal of change of practice. We would encourage Ofqual when publishing this guidance, to make it clear that they anticipate awarding organisations needing to take significant improvement actions to ensure compliance, and that this is their duty under the Equality Act.

Question 13:

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

There is currently a considerable financial burden on providers related to seeking reasonable adjustments, in terms of exam officer time and paying for professional assessments for learners as evidence of need. This should be reduced if assessments become more accessible-by-design.

Provider confidence and expertise in seeking reasonable adjustments vary considerably, as does learner or parent/carer understanding of the availability of reasonable adjustments and their right to them. This results in an unlevel playing field in which some learners are unfairly disadvantaged. Having assessments that are accessible-by-design should reduce the need for reasonable adjustments and hence create a fairer system.

Question 14:

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

We would encourage Ofqual to consider producing a learner-friendly version of this guidance to support a 'Know your rights' approach. If learners are empowered with the knowledge of what they should be able to expect from an awarding organisation, they – and those supporting them – are more likely to challenge awarding organisations in the face of non-compliance.