FAIR ACCESS BY DESIGN

Guidance for awarding organisations on designing high-quality and inclusive qualifications

CYMWYSTERAU CYMRU
QUALIFICATIONS WALES

CCEA
Regulation

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Fair access by design

This document provides guidance on how good qualification and assessment design can give all learners the fairest possible opportunities to show what they know, understand and can do. It includes examples of how good design can be incorporated. The recommendations in this document are intended to support and complement the best practice of awarding organisations in the design of qualifications and assessment, and provide guidance on complying with regulatory requirements.

This document may be of interest to awarding organisations; disability groups; examiners and assessors; centres entering learners for examinations and others with an interest in inclusive qualifications.

This is not a regulatory document. Awarding organisations are encouraged to use this resource in supporting their work to ensure qualifications are designed to be as accessible as possible.

Enquiries about this guidance should be directed to the relevant qualifications regulator. Details can be found in Annex 9.

Related documents
[Qualifications Wales' Standard Conditions of Recognition](#)
[CCEA Regulation's General Conditions of Recognition](#)
Access Arrangements and Reasonable Adjustments (Joint Council for Qualifications, updated annually, available from the JCQ website at [www.jcq.org.uk)](http://www.jcq.org.uk)
Guide for FAB Members – The Application of Reasonable Adjustments and Special Consideration in Vocational Qualifications (Federation of Awarding Bodies, 2012), available to members only at www.awarding.org.uk

Contents

1. Introduction

This document provides guidance on how qualifications can be designed to give all learners the fairest possible opportunities to show what they know, understand and can do. Consideration of fair access early in the design of a qualification or assessment can help to reduce the need for subsequent modifications or adjustments.

Awarding organisations are required to consider the needs of all learners when developing qualifications. Every effort should be made to enable all learners to participate in the whole assessment, without affecting the integrity of the qualification. Consideration of inclusive design from the start of the qualification development process can reduce the extent to which access arrangements are required.

If any part of a qualification has an adverse impact on learners with disabilities, or other groups, the developers (normally the awarding organisation) need to consider whether that part is justifiable or whether its purpose could be met in another way. If that particular part of the qualification is essential, awarding organisations are required to specify the nature of the barrier it poses, justify its inclusion and give details of how its effect can be mitigated.

This guidance is advisory and is intended to support compliance with regulatory Conditions of Recognition and relevant equality legislation. While we are not creating regulatory rules, we expect awarding bodies to take responsibility for ensuring that assessments are accessible. This guidance can be adapted to suit particular qualifications.

Recommendations in this guidance are intended to support and complement the best practice of awarding organisations in the design of qualifications. The guidance is likely to be most effective when integrated within a wider training and development programme.

This guide includes examples selected to illustrate general principles.

The checklist at Annex 1 draws together the main principles to assist awarding organisations as they develop ways to evaluate specifications, assessment materials and mark schemes.

This document does not give detailed guidance on access arrangements or reasonable adjustments. The Joint Council for Qualifications (JCQ) publish a range of material advising on access arrangements and reasonable adjustments.

2. Fair access

Qualifications Wales and CCEA Regulation have imposed on the awarding organisations they regulate a set of Conditions of Recognition with which they must comply.

These conditions cover many aspects of an awarding organisation's activities. The following conditions are particularly relevant to access to qualifications.

- D1 Fitness for purpose of qualifications (including that they minimise bias).
- D2 Accessibility of qualifications
- G1 Setting the assessment
- G3 Use of language and stimulus materials
- G6 Arrangements for reasonable adjustments.

Condition of Recognition D1 requires an awarding organisation to design qualifications that are fit for purpose, including that they minimise bias. Minimising bias is:

> '...ensuring that an assessment does not produce unreasonably adverse outcomes for learners who share a common attribute. The minimisation of bias is related to fairness to all learners and is closely related to statutory equality duties'.

Condition G3 requires awarding organisations to use appropriate language in assessments and stimulus materials. Any reasonable adjustments must not prejudice the assessment(s) from being valid and fit for purpose.

Fair access needs to be 'built-in, not bolt-on', proactive, not retrospective. Awarding organisations must review their own arrangements, policy and guidance documents on a regular basis to consider how the organisation:

- meets the requirements of the Equality Act 2010 and, relevant, Northern Ireland equality law, in qualification development and operation
- ensures the accessibility of their qualifications and assessments
- ensures equality of opportunity for learners to access all forms of assessment

- ensures fairness in their application of access arrangements
- works with their centres to ensure that they too fulfil their duties
- A review may also include an organisation looking at their procedures for designing qualifications and assessments
- working practices
- staff development programmes
- printing and other publication arrangements
- house style, including language guidance in specifications such as command words and their interpretation, and the use and importance of subject-specific language.

Potential barriers should be considered during qualification and assessment design stages and through equality impact assessment. See 'Annex 1: Example check sheet' points 6 and 7.

3. Legal basis for ensuring fair access

Equality Act 2010

The Equality Act 2010 is the legal basis for fair access in Wales, England and Scotland. The Act seeks to tackle discrimination in respect of 'protected characteristics'. These protected characteristics (in relation to education provision) are:

- age (there are some exceptions regarding education)
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief (there are some education exceptions where there is valid segregation)
- sex (there are some education exceptions where there is valid segregation)
- sexual orientation.

The Equality Act 2010 places a duty on awarding organisations not to discriminate against individuals in conferring qualifications in respect of protected characteristics as set out in the Act. It is important that awarding organisations design their qualifications and examination papers to be inclusive for all of these protected characteristics. Failing to do so could result in indirect discrimination against a learner. Annex 4 contains additional material including an explanation of direct and indirect discrimination.

Note: The protected characteristic of marriage and civil partnership is exempted in respect of general qualifications under Section 96.

Arrangements in Northern Ireland

Separate legislation is in place in Northern Ireland. However, the regulator for Northern Ireland and the awarding organisations operating in Northern Ireland are committed to following the same principles outlined above.

The provisions that make discrimination in the arrangements for awarding general qualifications by awarding organisations unlawful are contained in Part 3, Chapter

3, of the Special Educational Needs and Disability (Northern Ireland) Order 2005 (SENDO).

Section 75 of the Northern Ireland Act 1998 also places statutory duties on public bodies in Northern Ireland relating to the promotion of equality between persons with a disability and persons without.

Section 53 of the Equality Act 2010 refers to qualifications bodies. This section obliges qualifications bodies not to discriminate, harass or victimise a person in relation to the conferment (or withdrawal) of a qualification. Section 54 of the Act provides additional interpretation.

Reasonable adjustments and learners with disabilities

Under the Equality Act 2010 awarding organisations are required to make reasonable adjustments and avoid unfavourable treatment towards learners with disabilities. The duty for an awarding organisation to make a reasonable adjustment will apply where an assessment arrangement would put a disabled person at a substantial disadvantage in comparison to someone who is not disabled.

Section 6 of the Equality Act 2010 defines disability as a '…physical or mental impairment…[which] has a substantial and long-term adverse effect on… [someone's] ability to carry out normal day-to-day activities'. Study and education-related activities are included within the meaning of day-to-day activities.

Section 53 of the Equality Act 2010 covers the duty placed on awarding organisations in relation to vocational qualifications. Awarding organisations offering vocational qualifications are allowed to apply competence standards to a disabled person. Section 54 of the Act provides additional interpretation.

A competence standard is defined as an academic, medical or other standard applied for the purpose of determining whether or not a person has a particular level of competence of ability. The application of a competence standard to a disabled person is not disability discrimination unless it is discrimination by virtue of section 19 of the Equality Act 2010 (regarding indirect discrimination).

Section 96 of the Equality Act 2010 covers the duty placed on awarding organisations in relation to general qualifications. This section also gives the

regulator power to specify where awarding organisations are not under a duty to make reasonable adjustments in relation to general qualifications. In some cases, it will not be reasonable for adjustments to be made to assessment objectives within a qualification. To do so would likely undermine the effectiveness of the qualification in providing indication of the skills, knowledge and understanding of the candidate. The Regulator, under section 96, has the power to specify where reasonable adjustments are not permitted.

Equality law[1] and the Conditions of Recognition

Awarding organisations recognised by the regulators in Wales and Northern Ireland must comply with Conditions of Recognition[2]. These Conditions require awarding organisations to:

- design qualifications that give a reliable indication of learners' skills, knowledge and understanding
- avoid, where possible, features of a qualification that could needlessly make a qualification more difficult for a learner to achieve because they have a protected characteristic and monitor whether any features in their qualifications have this effect and if so, to make reasonable adjustments.

Section 96 of the Learning and Skills Act 2000 states (for Wales):

'42 Equality of opportunity
(1) In exercising its functions the Council[*] must have due regard to the need to promote equality of opportunity-
    (a) between persons of different racial groups,
    (b) between men and women, and
    (c) between persons who are disabled and persons who are not.'

* This role is delegated by the Ministers in Wales to the Department for Education and Skills, Qualifications and Regulation Division.

www.legislation.gov.uk/ukpga/2000/21/section/42

Equalities Law is explicitly referenced in five key places in the Conditions.

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[1] The Equality Act 2010 and current legislation in Northern Ireland with respect to Equalities Law.
[2] Wales and Northern Ireland have separate Conditions; however, both sets of Conditions are for the most part the same with a few minor differences.

- A1.2 - Suitability for continuing recognition
- B1.3 (e) - The role of the responsible officer
- C2.3 (h) - Arrangements with centres
- D2.1 - Accessibility of qualifications
- G6.2 - Arrangements for reasonable adjustments.

Awarding organisations need to ensure that their systems and procedures in all of these areas are in line with the provisions of the Equality Act 2010 and equality law in Northern Ireland.

There are also other Conditions that relate to equality although explicit reference is not made to Equalities Law.

- G2: Language of the assessment
- G3: Use of language and stimulus materials
- I1: Appeals process
- I2: Compliance with regulators' appeals and complaints process.

Providers must ensure that learners are not discriminated against. Direct liability for disability discrimination may also lie with centres. Condition C2.3 (h) requires awarding organisations to make arrangements with its centres to ensure that centres also comply with Equalities Law when undertaking any part of the delivery of a qualification on behalf of the awarding organisation.

In this guidance, in addition to the protected characteristics defined in the Equality Act 2010, the phrases 'all learners' and 'all groups' may include learners:

- at all levels of learning and attainment
- from different socio-economic backgrounds
- from different ethnic and cultural groups
- with physical and sensory disabilities
- with difficulties in aspects of communication, language and literacy
- with emotional or behavioural difficulties
- with long-term illnesses.

The Additional Learning Needs and Education Tribunal Act 2018 (Wales)

The Additional Learning Needs and Education Tribunal Act 2018 introduced a number of changes to educational provision for learners with additional needs in Wales. The Act defines the term Additional Learning Need to replace Special

Educational Need, and also creates statutory duties for local authorities and schools and produce and maintain Individual Development Plans (IDPs) for learners aged 0-25, to be implemented in September 2020.

IDPs will contain reference to both the learners needs and the additional learning provision required to address those needs. In accordance with the Welsh Government's draft ALN Code, the additional learning provision should include reference to access arrangements, though this will form part of non-mandatory content:

> In cases where a child or young person with ALN is likely to be starting a course leading to assessments and qualifications soon or is already doing them, in setting the objectives and determining the additional learning provision, thought should be given to what possible access arrangements should be applied for in light of additional learning provision or the ALN. These are arrangements that are applied for (to the awarding body) before an assessment or examination, ideally at the start of the course, as they can cover the whole course.
>
> Welsh Government, 2018

4. Designing qualifications

Regulators and awarding organisations ensure fair access to assessment by recognising the diverse needs of learners at the design stage of qualifications and assessments.

The following points should be considered by awarding organisations in the design of qualifications. These are consistent with the Conditions of Recognition but focus on the next level of quality assurance.

- Consider the needs of all learners at each stage of developing qualifications, tasks and assessments to help minimise any need to make reasonable adjustments later
- Develop clear specifications, well-designed assessments, source materials and mark schemes to help avoid bias and barriers to the recognition of attainment
- Ensure specifications are uncluttered and clear for all learners
- Link assessment criteria logically to specified content
- Design assessments that use a varied but coherent combination of techniques, where appropriate. If a narrow range of assessments is used this will limit the number of different skill types assessed and may restrict access
- Ensure there are no ambiguities or hidden expectations in the assessment criteria, learning outcomes or schemes of assessment
- Take care to avoid features in qualifications which could disadvantage a group of learners who share a particular characteristic or might create barriers for particular groups. Depending on the qualification purpose, it may be useful to consider how the skills tested by a qualification might be used in the workplace or in subsequent learning
- Working within any published qualifications/subject criteria or principles, keep fair access in mind for the content and assessment scheme
- Remove any disadvantage which is unjustifiable and maintain a record of any disadvantage which it believes to be justifiable, with reasons. Where criteria or standards allow, some parts of the assessment could be made optional or replaced.

The following are examples where alternative approaches could be used.

- A media qualification might require some film or television to be studied. An alternative unit on sound could offer a worthwhile option for many learners, including visually impaired learners

- A subtitled/signed television extract might be a suitable alternative to a radio extract for hearing-impaired learners
- Use of a DVD or live voice rather than audiotape for modern foreign languages (MFL) listening tests would enable learners to lip-read and pick up cues from gesture and presentation style
- In art history, the ability to analyse composition, structure and form is not solely a visual skill. A visually impaired learner would be able to demonstrate their ability to analyse artwork in a variety of ways, e.g. through analysis of written or audio description, or through environmental and tactile experience.

Designing specifications

The following points deal with aspects of the design of qualification specifications.

Awarding organisations should ensure that the titles used for a qualification and, where appropriate, each of its units, denote learning outcomes that are relevant to that subject. Condition of Recognition E2.2 states 'An awarding organisation must... ensure that the title on the Register reflects the knowledge, skills and understanding which will be assessed as part of the qualification'. It can be helpful to write the qualification or unit content first and then write the title. If the qualification or unit is biased in some way, adjust the content and then check and rewrite the title if necessary. For example, gender stereotyping may persist in some curriculum areas such as engineering, manufacturing, health and social care, physics or textiles technology.

Assumptions about the experiences offered by a subject can be countered to some extent by careful balancing and presentation of the titles and range of modules/units.

The range and balance of options available to learners within a qualification can help to minimise bias or stereotyping. For example, in a textiles technology qualification, a unit on industrial textiles might complement a fabric design option.

Awarding organisations should limit recommended prior knowledge and experience to the essentials, especially where such a requirement may present a barrier to access to those with certain protected characteristics. Subject knowledge can be derived outside of a qualification by other means or derived from other associated subjects. For example, plate tectonics and continental drift may be studied within geography, geology or science.

Awarding organisations should avoid the introduction of unintended barriers for those who may use assistive technology or access arrangements to demonstrate skills. For example, specifications written as 'draw diagrams from written instructions' and 'sketch translations and reflections of a given function in maths' could be interpreted as a requirement for the learner to independently draw and sketch. Some learners may be directing an assistant or using technology.

Awarding organisations should ensure that all subject content described as mandatory is essential for the attainment of the qualification, especially where such a requirement may present a barrier to access to those with certain protected characteristics.

Awarding organisations should specify content in terms that make the specification relevant and intelligible to a wide range of groups. It may be helpful to produce a checklist of types of content that may create problems of relevance to a wide range of groups, e.g. UK or regionally specific content, such as Scottish crofts, in a non-geographic qualification.

Awarding organisations should ensure that any optional material is either accessible to all learners or is matched by other equally demanding options that extend access while maintaining the integrity of the qualification.

Awarding organisations should pilot activities: testing or trialling of some sort of the live qualification in advance, including with users of assistive technology, can provide information about comparability.

Monitoring and re-evaluation of content and assessment during the life of the qualification may be appropriate. Data can be useful to look at comparability of demand; real information about comparability and demand can be gauged once evidence is available. For example:

- a design and technology qualification might require learners to design and make products. There may be a CADCAM (computer-aided design/computer aided manufacture) option that will give access to learners who have difficulty with manipulation of tools, equipment and materials
- in drama and performing arts some learners may be restricted in the skills they can apply to communicate via performance. However, learners may meet the assessment objective by taking other equally challenging roles, e.g. choreographer or director to demonstrate production skills
- in art and design, visually impaired learners may choose to use a range of alternative media including 3-D or other tactile media.

Awarding organisations should develop assessment criteria (where these are not defined by the subject criteria or principles) and a scheme of assessment that focuses sharply on the required skills, knowledge and understanding. It should be

assumed that some learners may be using technology or access arrangements to undertake an assessment. For example, checklists or grids could be used to map the coverage of content against all parts of an assessment. Similarly, grids could be used to chart the way the qualification and overall assessment respond to equality law and guidance, to be compliant with the conditions of regulation, and to analyse the accessibility of each part of the assessment for learners with disabilities or other protected characteristics. These could be made available to centres to make them aware of potential barriers to access and where special arrangements may be considered.

Awarding organisations should avoid over-assessment by identifying outcomes that focus clearly on the required skills, knowledge, understanding, scope and range.

Awarding organisations should check that, where appropriate, assessments allow a variety of response modes. Where a particular mode of response would be inaccessible to some learners, alternative assessment methods should be included wherever possible. For example:

- tasks designed to assess speaking and listening may not determine deaf learners' levels of skill, such as in aspects of modern foreign languages or the aural part of music. Consideration should be given to alternative response modes which would permit assessment of these learners. Students with hearing impairment may show perception by interpretation of a music score rather than listening to the music
- a history specification includes internal assessment of research skills. It requires learners to give a short talk which is assessed for its clarity and relevance as well as for evidence that the required research skills have been deployed. This is also assessing learner confidence in giving presentations, which may not be a requirement of the qualification specification. While presentation skills are increasingly required in today's world, the requirement to assess those skills should be explicit in the specification. Making presentations can create barriers for learners who are nervous or shy, regardless of whether they have access issues. Depending on the requirements of the specification, a pre-prepared video or presentation, signing support or the use of an interpreter could provide equally valid alternative response modes.

Awarding organisations should also ensure that where a variety of assessment methods are allowed there is parity of opportunity and rigour of assessment for all learners.

5. Designing assessments

There are common points which should be considered in the design of all assessments.

Assessments should be designed to ensure there are no unnecessary barriers, and the assessments themselves kept under review. Involving access and equality specialists alongside subject experts at an early stage in the development process can reduce the need for later adjustments.

Awarding organisations need to maintain standards and should regularly evaluate feedback on their qualifications from user groups and stakeholders; their feedback can help maintain and improve standards in assessment design and promote fair access (Conditions of Recognition D3).

Some aspects of design, such as competence standards and proportionate means of achieving a legitimate aim, are non-negotiable. Assessments should promote equal opportunities while maintaining the integrity of the qualification. They should:

- be free from gender, ethnic, political, cultural or other discrimination and stereotyping
- use content, resources and assessment materials that recognise the achievements and contributions of different groups
- where appropriate, provide a balance of assessment methods and permit alternative approaches.

The language and presentation of specifications and assessment materials should support fair access. The carrier language should be designed to be, as far as possible, accessible to a range of learners who have difficulty accessing and processing language. Digital versions of exam papers could support fair access with appropriate tagging for navigation and reading order, to support effective independent access.

Appropriate use of new technologies, such as alternative means of communication (where this does not affect the integrity of the qualification), can also help more learners demonstrate their skills and knowledge.

Fine balances have to be struck to ensure that improving access for some learners does not create barriers for others, e.g. when the proportion of verbal to visual

stimuli is adjusted. Equally, improving access for some learners should not put them at an advantage over others.

Stakeholders need to be confident that standards are maintained and consistently applied. The regulators have to ensure that all learners get the results they deserve, and that the qualifications they receive are valued.

Assessment criteria in vocational qualifications are frequently based on National Occupational Standards (NOS). Awarding organisations are advised to check that the standards themselves do not pose unnecessary barriers. Where barriers are identified, awarding organisations should refer back to the Sector Skills Council or body concerned whose responsibility it is to ensure that the NOS do not present unnecessary barriers to access when used in qualifications. Ultimately, awarding organisations must comply with Equalities Law.

Specifications for general qualifications are prepared by awarding organisations and must be accredited for use in each country by the relevant regulator for that country.

Awarding organisations are advised to check that the assessment strategy and methodologies they develop to meet the specification do not pose any unnecessary barriers. Use of equality impact assessment tools at an early stage in the qualification design can help to identify and remove or mitigate potential problems.

The remainder of this section uses the following headings to emphasise particular considerations for:
- Diversity
- Use of language
- Written assessments
- Readability
- Legibility
- Multiple-choice items
- Internal assessments
- Design of internally assessed tasks
- Collecting evidence over time
- Practical, speaking and listening assessments
- Stimulus and source materials
- Mark schemes
- Post-assessment review.

Diversity

The following points illustrate how access can be enhanced when written assessments are designed to recognise the full diversity of the learner population.

Awarding organisations should ensure that the people represented in assessment materials reflect the diversity of society. Narrow cultural referencing should be avoided, for example:

- try to avoid 'UK-centric' references such as St David's Day, St Patrick's Day or Boxing Day
- learners originating from outside the UK, or from some cultural backgrounds, may be unfamiliar with, or confused by, terms that seem relatively familiar within UK lifestyle and culture such as indie music, *XFactor*, Monty Python or pound shops
- avoid colloquialisms unless they are part of a quotation or extract from a text being used as part of the assessment.

Awarding organisations should avoid narrow, negative or stereotypical representations of different groups. For example, in a question on customer service, learners were asked to 'plan a rota for eight part-time women workers manning a 24-hour telephone helpline'; the same question could have been rewritten to avoid gender stereotypes: 'plan a rota for eight part-time workers to staff a 24-hour telephone helpline'.

Awarding organisations should adopt a balanced approach to roles, activities and appearances. For example, the sentence 'The local doctor may be lucky: he keeps much of his social status' is clearly unacceptable, and its evident gender-bias can be avoided by the use of the plural or alternative structures, such as: 'Local doctors are lucky. They keep much of their social status'.

Awarding organisations ensure that people of all cultures, disabilities and societies are presented accurately and with respect. Awarding organisations should use contexts for questions that reflect the experience of all groups in a balanced way. In G3.2 of the Conditions of Recognition, it states that

'Language and stimulus materials are only appropriate if they:
(a) enable learners to demonstrate their level of attainment;
(b) require knowledge, skills and understanding which are required for the qualification;

(c) are clear and unambiguous (unless ambiguity forms part of the assessment), and

(d) are not likely to cause unnecessary offence to learners.'

The use of 'real world' contexts often makes helpful connections for learners. However, the context should not dominate. If learners lose subject focus, they may rely on general knowledge rather than subject knowledge to answer the question.

Perceptions of the 'real world' vary according to learners' ages, experiences, beliefs and circumstances. For example, basing a question on the songs of a particular pop group, radio show, TV or online show may make it more interesting to some learners, but could cause difficulties for others.

Some illustrations (visual or literary) can cause offence to particular groups. Images of clothing styles and references to food items, sports and animals require particular sensitivity.

Weak readers, including some deaf readers, may find that names from other cultures may not be familiar to them or identifiable as names, particularly if the name comes first in the sentence. When using names, it is helpful to use examples from each culture that are more likely to be familiar. The balance of names should be appropriate.

In politically sensitive areas it is important to ensure that there is a balanced representation of sports and musical traditions associated with different groups of people.

Practices and behaviours accepted by some groups may offend others. For example, gambling 'odds' might seem to offer a real-life context for mathematical problems, but learners with certain beliefs could find such a reference distasteful. In addition, learners from particular cultures may be confused by an apparently familiar term such as 'dice', which they may associate with food preparation ('dice the vegetables') rather than with gambling or chance.

References to literary or film characters may not be equally familiar to people of all ages or across different cultures. Even where a reference or character has become a cultural archetype there is a risk of misunderstanding. For example, referring to a 'Mickey Mouse' solution to a problem or a 'Spinal Tap moment' may be misunderstood or misinterpreted in many ways.

Certain contexts can be emotionally disturbing to learners with related experiences such as serious illness, bereavement, violence, abuse, domestic fires and road accidents. Where the subject demands such references the use of affective language should be limited.

Use of language

The language and syntax of questions should express the requirements of the rubric, information and question accurately. The aim of developing written examination or assessment questions is to ensure that questions are written in accessible carrier language. Required technical and subject-specific language must be taught. A language-modified question should require the same subject skills, knowledge and concepts as the original question and enable the learner to meet the same assessment objectives.

Accessible language

Complex concepts and instructions can be communicated in accessible language without compromising standards. Thus, accessible language and syntax should not be thought of as 'making questions easier', but as expressing requirements accurately. Learners should not have to decipher unnecessarily complex language to determine what is being asked. However, they do need to know the technical and subject-specific language and the understanding of these specialist terms are the responsibility of those teaching the subject. The aspects of language that awarding organisations and exam writers should consider include:

- the length and complexity of sentences
- the most frequently used word for the non-technical terms (carrier language)
- e.g. 'make' **not** 'produce', 'use' **not** 'utilise', 'need' **not** 'require'
- avoiding phrasal verbs, e.g. 'carry out', 'put out', 'cut off'
- avoiding idioms, e.g. 'wide of the mark', 'touch alcohol', 'pool results'
- avoiding information and question in the same question or several parts of a question in the same sentence; these should be separated and presented as individual items
- using active sentences when possible
- avoiding two negatives near each other, e.g. 'hardly', 'neither', 'nor', 'not many'
- avoiding non-finite clauses, which can mean that some information is lost

- e.g. instead of writing 'Using information from the graph, calculate the number….' write 'Calculate the number of …. Use information from the graph'
- words or phrases that have specific technical meaning within certain subjects and cannot be changed, e.g. 'settlement' (important in geography, science and business studies), 'plane'/'plain' (important in technology, science, geography, history and ICT; see following examples)
- words or phrases that should be used with care in other subjects to reduce the risk of misunderstanding, e.g. 'plain language', 'came to a settlement (agreement)'
- avoiding subordinate clauses
- avoid words with double meanings, e.g. 'present', 'plane' and 'key' as these words have many meanings which can only be determined through context. The word 'plane' may also be confused with the word 'plain'. Both words have many meanings which can only be determined through context.

Command words

Command words (see 'Annex 5: Glossary') should be used with consistency throughout an awarding organisation's suite of qualifications, as far as is practicable. Consistent use of language makes it easier for learners, teachers and examiners alike to understand the requirements of the assessment.

Language modification

Language modification at source helps ensure that learners can answer and be assessed on the questions using their knowledge rather than on their ability to decipher the language of the question.

Language modification for learners who have difficulty accessing and processing written and spoken language follows after the examination paper is written and reviewed by the subject specialists. Trained language modifiers review the papers in light of the needs of this wide group of learners. These learners include those who are deaf, visually impaired, may have dyslexia, speech, language and communication needs, English as an additional language, and many others.

Written assessments

Assessments should cover subject content at the appropriate level without bias or stereotyping.

The rubric should tell learners clearly what information is required and how that information should be presented. Statements need to be consistent (e.g. use of the term 'booklet' and/or 'insert') and avoid use of colloquialisms, e.g. 'keep an eye on the time' and 'check the time'.

Awarding organisations use specialists to modify prepared assessment materials to meet particular needs. As noted above, involving access and equalities specialists alongside subject experts at an early stage in the development process can reduce the need for later adjustments.

It may be helpful to highlight command words.

Distraction can arise from poor diagrams and inadequate labelling. Colour and contrast should be checked for suitability, especially for use by students with colour deficiency. Useful guidance can be accessed at www.colourblindawareness.org including information on the minimum colour contrast rations between colours which must be used.

The British Association of Teachers of the Deaf (BATOD) publication *Language of Examinations: 2nd edition 2003: updated October 2011* (BATOD, 2011) is a useful source. The booklet is intended for teachers of the deaf (ToD) and those writing or modifying examinations, and offers guidelines to improve accessibility (the principles outlined can be applied to any written examination or to the modification of any text) and can be accessed at https://www.batod.org.uk/information/language-examinations-2nd-edition-2011/

The Royal National Institute of Blind People (RNIB) web page 'Access to exams and tests' has useful resources. See www.rnib.org.uk/services-we-offer-advice-professionals-education-professionals/access-exams-and-tests

The UKAAF guidance on minimum standards and other documentation, which includes advice from the Royal National Institute of Blind People (RNIB) can be found on their website www.ukaaf.org/minimum_standards/

Readability

The following points deal with the readability of questions, and are adapted from

Guidance on the Principles of Language Accessibility in National Curriculum Assessments (Ofqual, 2012). Each point should be considered in its own right, and from an overall perspective. Changes that make sense on their own sometimes do not work well in combination.

Sentence structure

Sentence length and sentence complexity can play a part in the readability of assessment questions. Caution is needed when taking these features into consideration, as:

- Sentence length is not an absolute guide to sentence difficulty
- Sentence complexity can cause misunderstandings in inexperienced readers, and therefore it can be a more useful indicator of sentence difficulty in assessment questions.

Sentence complexity is influenced by the following features within sentences.
- The number of propositions (clauses)
- The number of embeddings
- The order in which major elements appear
- The distance between crucial elements.

Awarding organisations should use sentence structures with accurate punctuation and a logical conceptual flow wherever possible (e.g. in English: subject, verb, object). Avoid subordinate clauses unless absolutely necessary. For example, the following science question is unnecessarily complex.

> '*If a student were provided with three painted metal rods, one of which was known to be made from brass, one from magnetised steel and one from non-magnetised steel, describe how, without scratching the paint, the student could identify each of the rods.'*

The following redraft is simpler. Note that the information is provided first and then the instruction appears as a separate sentence.

> '*A student has three painted metal rods. One is made from brass, one from magnetised steel and one from non-magnetised steel.*

> *Describe how the student could identify each of the rods, without scratching the paint.'*

Even short questions can be difficult to understand. For example:

> *'What kind of cleaning agent will remove the hard water stains left by a dripping tap on a washbasin?'*

The following redraft is simpler. It follows a logical narrative flow. The question has been separated from the information by starting on a new line and using a line space between them.

> *'A dripping tap leaves hard water stains on a washbasin.*
>
> *What kind of cleaning agent will remove them?'*

Awarding organisations should present information in short sentences wherever possible. Divide even relatively short sentences if they contain a lot of condensed information. If long sentences are unavoidable, make them as straightforward as possible.

For example, the following question is made more complex by the use of a long sentence; the punctuation is incorrect, and the sentence is expressed partly in the passive voice.

> *'Identify two faults that have been made in the central heating system (illustrated in figure 3); describing in each case how the fault can be corrected.'*

The following redraft is simpler: it has shorter sentences, the punctuation has been corrected, and an active voice is used.

> *'Identify two faults in the central heating system illustrated in figure 3.*

> *Describe how to correct each fault.'*

Phrasing

Avoid dense text, unnecessary words and metaphors, clumsy phrases and redundant information. For example, the following question contains a sentence that is short but dense.

> *'Four-fifths of a Year 11 class of 35 pupils are going on a field trip.*
>
> *How many pupils will be on the trip?'*

It is easier to grasp what is required if the first sentence is divided.

> *'A Year 11 class has 35 pupils. Four-fifths of them are going on a field trip.*
>
> *How many pupils will be on the trip?'*

Elaborate phrases may seem to add substance to a question, but they often introduce unnecessary complexity. The phrase 'in conjunction with' says no more than the word 'with'. For example, the following question is clumsily expressed.

> *'Given that a stone takes 1.8s to fall through 16m, how long does it take to fall through 25m?'*

The following simpler version is easier to understand. The question now focuses on the mathematical skills required, not language comprehension.

> *'A stone takes 1.8s to fall through 16m.*
>
> *How long does it take to fall through 25m?'*

The instruction below incorporates a number of unnecessary words within some clumsy phrases.

> *'These observations, together with the deductions that you can make from them, must be transposed for the record into the table that is provided for you on the opposite page.'*

It would be sufficient to write the following.

> *'Record your observations and conclusions in the table on the opposite page.'*

Metaphors can mislead as learners may take them literally: *'Why did the government frown on the regime?'* could be rewritten as *'Why was the government opposed to the regime?'* Similarly, *'He had the weight of the world on his shoulders'* could be rewritten as *'He was very worried'*.

The following are examples of words that awarding organisations might want to avoid, with possible alternatives.

Avoid	Alternative
as a consequence of	because
ascertain	find out
commence/start	begin
concerning	about
constitute/make up	form
discontinue/end	stop
endeavour/try	attempt
erroneous	mistaken
facilitate	help

Awarding organisations should also:

- Include jargon or specific technical language only if understanding or using it is a requirement of the assessment.

- Avoid asking more than one question in a single sentence.
- Separate questions from other information.
- Avoid non-finite clauses at the beginning of sentences.

For example, the following text contains two questions.

> *'Name one everyday product that can be recycled, identifying the main material that can be recovered from it.'*

Separating the questions improves clarity.

> *'Name one everyday product that can be recycled.*
>
> *Identify the main material that can be recovered from the product.'*

The following question can be made simpler and fairer by a little reorganisation.

> *'Referring in particular to differences between traditional local weekly newspapers and their newer free competitors, explain how the balances between advertising revenue, costs and cover price operate within the newspaper industry.'*

The question could be rewritten as follows.

> *'Explain the balances between advertising revenue, cost and cover price within the newspaper industry.*
>
> *In your answer, refer to differences between traditional local weekly newspapers and their newer free competitors.'*

The following question is not easy to understand.

> *'What reasons can you suggest for the facts that, of children placed in the lowest teaching set for a subject, 5 per cent were from professional backgrounds and 32 per cent were from unskilled backgrounds?'*

The question is easier to pick out if it is separated from the background material, as follows.

> *'In the lowest teaching set for a subject, 5 per cent of children were from professional backgrounds and 32 per cent were from unskilled backgrounds.*
>
> *Suggest reasons for these facts.'*

Avoid the passive voice wherever appropriate because the active form is easier to understand. The passive voice of a verb says that something is being done rather than someone is doing something, e.g. 'the car was sold by an approved dealer' is passive, while 'an approved dealer sold the car' is active.

The following question uses the passive voice.

> *'Identify two faults that have been made in the design of the experiment shown, describing in each case how the fault can be corrected.'*

Use of the active voice, as follows, gives learners a more direct lead, and the question is further improved by separating the two parts.

> *'Identify two faults in the design of this experiment.*
>
> *Describe how to correct each fault.'*

Vocabulary

Awarding organisations should avoid negative ('not') or partly negative ('only') expressions wherever possible. If a negative is essential, put it in bold type to help

ensure that learners notice it, or phrase the question so that it includes the word 'except'.

Avoid situations where a wrong answer to a question makes it impossible to correctly answer a later question, unless the linkage is the focus of assessment. Unnecessary linkage penalises learners repeatedly for the same error.

Ensure the vocabulary in questions is suitable for the level and context of the assessment. Differentiation should be based on subject content rather than vocabulary. In GCSEs with tiered examinations it is important to maintain consistency in language at all tiers. Using consistent vocabulary across tiers should help ensure learners and tutors are clear about requirements. Learners with problems accessing and processing language could still be able to access higher papers so accessible language is still needed.

Use verbs/adverbs rather than the related abstract nouns. For example, rather than 'What steps can you take to ensure the protection of steel from rust?' use 'How can you protect steel from rusting?'

Avoid words with multiple meanings, unless they are the focus of assessment. Learners may make different, valid decisions about what is meant. For example, 'settlement' can be interpreted as 'village', 'agreement' or 'payment'; 'revolution' can mean 'uprising' or 'rotation'.

The words in bold make the following questions ambiguous.

> *'The **last thing** you should do when serving a soufflé is leave it to settle. Explain why.'*

Put the question in time order:

> *'You have made a soufflé. Would you leave it to settle before serving? Give the reasons for your answer.'*

In the following question, the ambiguity of the word 'sound' and also the use of a metaphorical term are two reasons why the question does not work.

> *'Some walkers see whistling as **a sound way** to keep cheerful on a lonely path. Suggest one reason why.'*

In this example, it would be easy to substitute another word or omit 'overall'.

> *'The decorators' equipment looked modern enough, but their **overall** appearance was shabby.'*

The next question is quite hard to modify.

> '*Discuss how the public image of a company can be affected by the way its employees **look**.'*

Replacing 'look' with 'appear' would substitute one ambiguous word with another. Re-presentation of the question in a different form would work better.

> *'Some companies ask employees to wear smart clothes to work. Why do they do this? In your answer discuss the public image of a company.'*

Use command words consistently and correctly. Different command words should be used to elicit different kinds of responses, not just for the sake of variety.

Where a written assessment or task is offered through the medium of Welsh or Irish, the draft should be checked both by a language specialist and by a subject expert who can ensure the accuracy of technical terms. Papers and tasks need to be both equally accessible and of equivalent demand in each language.

The process of translation may uncover an ambiguity in the original text. If ambiguity is uncovered the question should be amended. Consideration of translation into BSL during the design stage may also be useful to ensure clarity and equivalence in all the official languages.

Legibility

Each of the following points deals with an aspect of legibility.

Awarding organisations should carefully consider the layout of written assessments. Poor presentation can hinder effective communication.

Use an appropriate font of sufficient size:

- The 'point' is the usual unit for measuring the size of fonts

- Regular print is usually 10 or 12 point and may even be slightly smaller than this in some newspapers

- A 12-point font size is frequently used for written assessments as it is generally accessible. Even a slight change in font size, e.g. to 10-point, can impair readability

- As a general principle a sans serif font such as Arial, Calibri, Helvetica or Verdana is easy to read

- Serif fonts should be avoided since they can be harder to read

- Increasing line space to 1.2 – 1.5 lines improves legibility

Adapted from the United Kingdom Association for Accessible Formats (UKAAF) guidance[3] and the British Dyslexia Association (BDA) Dyslexia Style Guide 2018[4].

Awarding organisations should use underlining, bold, italics, boxes, indentation and shading consistently. Do not overuse bold/underlining as it can distract weaker readers.

Awarding organisations should use headings, subheadings, bullet points and numbers to ensure questions are well structured, clear and easily managed. Try to ensure headings are reflected in the semantic structure and tagging of the digital versions of question papers made available to print impaired learners.

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[3] www.ukaaf.org/large-print/
[4] https://www.bdadyslexia.org.uk/employer/dyslexia-style-guide-2018-creating-dyslexia-friendly-content

Use language that makes the question or task clear. A written assessment rubric contains the following statement

> *'In addition to this paper, a 12-page answer book is required.'*

This information is for the invigilator rather than the learner. If the information is needed by the learner, use a simpler statement such as the following.

> *'Check that you have a 12-page answer book.'*

Diagrams

Awarding organisations should include diagrams, pictures or photographs in questions only when there is a clear purpose or benefit to all learners. Any text in diagrams or pictures that must be read by the learner should be provided in an accessible format so that assistive technology can read it.

Where the assessment objectives allow, avoid questions where the correct answer requires learners to distinguish between different colours alone. This could disadvantage colour vision-deficient or blind learners.

When using colour in diagrams, charts, graphs you must distinguish between colours by meeting the minimum colour contrast ratios standards[5].

In particular, text and symbols must be legible against background colours and meet minimum colour contrast ratios (see page 22) – for example black text against a red background is often 'invisible' to people with colour blindness.

If colour contrasts cannot be achieved due to the number of colours needed, you must also provide the information given in colour by some other means[6].

Always ensure boundaries between different colours e.g. of a map or pie chart, are clearly separated by a strongly contrasting colour and the information is also

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[5] www.w3.org/TR/UNDERSTANDING-WCAG20/visual-audio-contrast.html
[6] see Annex C of the Guide to Safety at Sports grounds - https://sgsa.org.uk/worked-examples-and-annexes/

labelled in another way e.g. by text, hatching, patterns, or symbol, always ensuring the minimum colour contrast rations are met between the colour of the text/symbol and the background colour.

Always present different coloured lines online graphs also as different patterns/line formats.

Answer booklets

If answer booklets are being used, provide enough space for learners' responses.

Clearly show the mark allocation for each question or question part.

Ensure cover pages are clearly laid out and include only essential information about the assessment. For example, this first version of a cover page is cluttered and badly organised, and the background is too dark for comfortable reading.

The following version of the cover page is less cluttered and more logically organised. It has better contrast and the essential information is easier to find and understand.

Example:

GCSE GEOGRAPHY
PAPER 2

Foundation Tier: Paper Reference 2010/510/1a
Monday 15 June 2015: 1.30p.m. to 3.30p.m. You have two hours.

Instructions
Use blue or black ink.

> Write your name and the paper number on the answer book in the spaces provided.
>
> Information sources for Question 1 are printed on pages 5 and 6. The pages are perforated. **Tear them out now and use them to help you with your answer.**
>
> Do all rough work in the answer book. **Cross out work that you do not want marked.**
>
> **Information**
> The maximum mark for the paper is 100. The marks for each question are shown in brackets.
>
> Where questions include marks for spelling, punctuation and grammar, these marks are shown separately.

All learners will benefit from a simple and uncluttered design to written assessments. An additional benefit could be a reduction in the need for modified papers.

For example, the first version of the following question contains all the necessary information. However, the signs are not labelled clearly, the three parts of the question are not separated out and the mark allocation is not broken down.

Example

Two of the symbols shown below have one line of symmetry and one has rotational symmetry.

Φ	®	☎	▪

Indicate which of the symbols have one line of symmetry and which has rotational symmetry, specifying the order of the rotational symmetry.

_____
_____   _____
_____
_____   _____
(4 marks)

In the following version of the question, the signs are given specific labels (the numbers). They are also larger. The parts of the question are separated out and the mark allocation for each is indicated.

Example

*Here are **four** symbols. Each is labelled with a number.*

1	2	3	4
	®		
		☎	
Φ			▪

(a) **Two** of the symbols have only one line of symmetry.

Write down the numbers of these two symbols:

_____ and _____ (2 marks)

(b) **One** of the symbols has rotational symmetry.

(i) *Write down the number of this symbol:*

_____ (1 mark)

(ii) *Write down the order of rotational symmetry:*

_____ (1 mark)

The table used in the following question is difficult to interpret; it gets in the way of the main purpose of the task, which is to test the learners' skills of interpretation. There is also not enough spacing, and the shading in a row can cause visual distortion for some learners.

Example

Study the data in the table below then answer the questions that follow.

The figures for vehicle thefts reported in selected cities are set out in Table 1 below.

Table 1			
City	Year		Percentage increase or decrease
	2013	2014	
	Numbers		
England			
Bristol	606	635	+5
Newcastle	856	890	+4
Birmingham	1255	1180	-6
Wales			
Swansea	825	790	-4
Cardiff	740	785	+6

The information is better presented in the following version of the table. It is easier for all learners to find the relevant data, but the key task of interpretation requires the same level of subject understanding. There is more space between the cell boundaries and content. It also has no shading, which can cause visual distortions for some readers. If shading is used, clear boundaries would help.

Example

Study the data in the table carefully and then answer the questions that follow.

Number of vehicle thefts reported in selected cities in Wales and England 2013 to 2014 and percentage change

City	2013	2014	Percentage change
Birmingham	12	11	-6
Bristol	556	806	+5
Cardiff	07	37	+6
Newcastle	48	88	+4
Swansea	58	97	-4

Multiple-choice items

The points made above apply to all forms of written assessment. Where the written assessment includes multiple-choice items, there are additional factors to consider. Multiple-choice questions can be very challenging linguistically and need to be very carefully written. The role of the language modifier is important. In addition, questions should translate into official languages without affecting their meaning.

The key to writing or authoring good multiple-choice items is to ensure that the question:

- directly relates to the subject in question
- focuses on the skill or knowledge being assessed
- is clearly presented
- is free from unnecessary details
- uses straightforward language
- assesses one thing at a time
- uses as few words as possible
- has only **one** correct answer where possible. In certain subjects and questions this may not be possible; in these cases, it can be accommodated in the mark scheme

- avoids using negatives (e.g. 'not', 'none')
- avoids using personal terms (e.g. 'you', 'we')
- should take about a minute to answer
- is pretested
- is reviewed and edited (if needed).

Awarding organisations should:

- ensure that, as with any other form of assessment, any test including multiple-choice items is reliable and valid
- take care that the stem of the question and the options (key and distractors) are clear and unambiguous. This is particularly important for the options where the differences may be subtle
- ensure the stem poses one question/problem only
- where possible, limit the lengths of the distractors and key; including as much information as possible in the stem rather than in each option is generally helpful in developing clear, unambiguous items
- for weak readers, consider having no stem, and using four complete statements instead. A weak reader may not always know to go back to reread the stem, and then move to the completing half of the sentence. This is also true for bulleted lists
- avoid the inclusion of irrelevant detail in an effort to make the correct response less obvious. This can result in reading skills rather than subject knowledge having a significant influence on learners choosing the correct response.

Internal assessments

Awarding organisations use different terms for assessments where evidence is collected over a period of time, often outside of examination conditions. This is particularly true for vocational qualifications. Portfolio, coursework, work-based observations, oral questions, assignments and project assessments should provide opportunities for all groups to demonstrate what they know, understand and can do. This document uses the term 'internal assessment' to cover all centre-based or centre-directed options.

Awarding organisations must provide clear guidance to internal assessors. Condition H1.1 of the Conditions of Recognition requires that awarding organisations:

'...have in place effective arrangements to ensure that, as far as possible, the criteria against which learners' performance will be differentiated are –
(a) understood by assessors and accurately applied, and
(b) applied consistently by assessors, regardless of the identity of the assessor, learner or centre.'

Internal assessment offers scope for centres to promote fair access for all learners. The degree of flexibility used in assessment needs to be controlled in the interest of ensuring validity. Where key points within controlled assessments have a high level of control, opportunities for contextualisation can be used to support accessibility.

Any internally assessed component of a qualification should match the standards of quality and fairness in other parts of the assessment. Where centres are allowed to design their own assessment tasks, awarding organisations should provide enough information for them to do so.

Centres and awarding organisations designing internal assessments and mark schemes need to take into consideration the practical constraints under which centres operate and, for example, whether a practical assistant or signing interpreter may be required.

In some qualifications, internally assessed work may be offered as an alternative to an external component. Where this is so, the level of demand in tasks and associated assessment criteria must be comparable to that of the external option.

Clear presentation, language and expectations are as important for internally assessed tasks as for external assessments.

Where practical performance is the focus, internally assessed work (including controlled assessments) could be assessed using different time constraints to those normally associated with external assessments, subject to awarding organisation guidelines.

Designing internally assessed tasks

Each of the points listed below requires awarding organisations to consider an aspect of the design of internally assessed tasks. Many of the principles considered in earlier sections of this document are equally relevant here.

Awarding organisations should ensure that the purpose of each task is clear. Readability and legibility are as important for internally assessed work as they are for external assessments.

Ensure that tasks address the assessment criteria explicitly without unnecessary prescription. Tasks should allow appropriate alternative modes of information gathering and response provided they can be authenticated. For example, the following business task is well designed.

> *Sample the opinions of employees about a formal training programme.*
>
> *Evaluate their comments and report to the employer on the programme's success.'*

The broad wording of the task means that learners may capture the information and report in a variety of ways. For example, learners with hearing or communication difficulties could complete the task using a written questionnaire, a computer programme or sign language. They could then 'report to the employer' using various means of communication without compromising the validity of the task.

Avoid a requirement for learners to demonstrate skills that are not essential to the subject. (See the section 'Practical, speaking and listening assessments'.)

Require assessment within group settings only if the interpersonal skills needed are essential to the subject.

Ensure internally assessed tasks are accessible and accommodate learners' diverse needs. For example, the following task is narrow as it allows only one mode of response.

> *'Write an account contrasting aspects of working life in Victorian Britain with working life today.'*

This version is more inclusive and simpler.

> *'Contrast aspects of working life in Victorian Britain with working life today. Your account may be handwritten, signed or spoken, or presented using a suitable ICT application.'*

Ensure that tasks can be undertaken using assistive technology and other technology used by the learner to learn and work.

Collecting evidence over time

The following points should be considered by awarding organisations when developing assessments where evidence is collected over a period of time. These are particularly relevant to many vocational qualifications.

- Specify any mandatory requirements for the type, amount and presentation of evidence
- Design tasks with appropriate alternatives for collecting information and communicating responses
- Develop assessment criteria that measure skills, knowledge and understanding rather than the mode of demonstration, unless this is a requirement of the assessment
- Specify any time limits on the use of evidence
- Specify the requirements needed to authenticate evidence
- Provide clear guidance on centre-devised tasks
- Ensure assessments reflect, where possible, current working practices.
- Take account of learners' usual ways of working, including common systems and software platforms.

Practical, speaking and listening assessments

Practical skills are central to many subjects such as dance, music, art and design, design and technology, science and ICT, as well as in many vocational qualifications. However, practical assessments should only be included when they are essential to the qualification.

A qualification might require learners to 'demonstrate' a range of practical techniques. This implies learners must physically manipulate equipment in order to get the marks.

If this is not the focus of the assessment and the requirement can appropriately be changed to 'demonstrate knowledge' of a range of practical techniques, the assessment could then be accessible to learners with physical impairments. For example, a requirement to manipulate specific tools or instruments in a practical examination may disadvantage some learners. Where the focus of assessment is about a concept or problem-solving skill, such a requirement should be avoided.

A reasonable adjustment may be that learners should be able to undertake an assessment of their practical skills with the aid of an assistant. The learner would not be at an unfair advantage as they would need to direct the assistant based on the application of their knowledge. However, where the requirement relates to a competence standard (e.g. playing a musical instrument, or in a motor vehicle maintenance or hair cutting assessment) demonstrating the skill is essential.

Speaking and listening assessment is an important part of languages, music, drama and jobs with a strong customer interface, such as leisure and tourism or social care. Practical speaking and listening assessments bring both advantages and challenges. They give learners (including those who have difficulties with written text) other ways to demonstrate their attainment.

No one form of assessment is equally accessible to all. For example, assessment methods that demand normal hearing or physical dexterity create difficulties for some learners. Where possible, alternative methods should be available, except where the skill is the focus of the assessment.

Facial expression can be an important part of communication. Learners who are unable to demonstrate facial expression may be unable to get maximum marks in an assessment. This requirement should only be included if the assessment cannot be done in any other way.

Designing practical, speaking and listening assessments

The design of practical, speaking and listening assessments requires careful consideration and a balanced approach.

Awarding organisations should be clear about what is to be assessed and design assessments that avoid unnecessary focus on a particular form of assessment.

Check that, where appropriate, each component allows a variety of response modes. Alternative assessment methods should be included wherever possible.

Consider inclusion at an early stage in the design of the assessment. The sample inclusion sheet (see Annex 2) may be a useful tool to show how barriers can be identified within a specification.

Design assessments and materials that do not rely on distinguishing items by colour, except where this is essential or a requirement in competence-based qualifications, such as in electrical wiring or textile production. Where use of colour is unavoidable, guidance on use of labelling and additional formatting should be followed.

In some vocational qualifications (leisure and tourism, business studies, etc.) learners may be required to demonstrate understanding and skills in customer care, such as answering customer queries. Learners could be required to answer a telephone helpline. However, relevant understanding and skills may be demonstrated in a variety of other ways. For example, responses to enquiries could be provided in the form of letters, e-mails or by creating a 'frequently asked questions' (FAQ) web page.

In a further example, a music aural test might require learners to identify a note given immediately after the named tonic. In response learners can:

- give the letter name of the note (D, E, etc.)
- play the note on a musical instrument
- mark or indicate the note on a musical stave.

These three alternatives provide a variety of valid response modes.

Where possible, design speaking, listening and practical tasks so that live evidence can be recorded and authenticated as required.

Where appropriate, select tasks that are likely to be within the experience of all learners. For example, a speaking task requires learners to describe a recent holiday. Some might not relate to this task as regular holidays are not part of their experience. The task can be redesigned to require learners to describe a recent journey. All learners should be able to relate to the revised task.

Practical demonstrations (including those in the workplace), role play, simulations and discussions (including individual interviews, panel interviews, professional discussions and oral questions) should provide opportunities for all learners to demonstrate what they know, understand and can do.

Select tasks that are within the experience of most learners in a balanced way or provide alternative tasks to suit different groups.

Take account of health and safety requirements by carrying out a risk assessment at the design stage.

Consider practical arrangements and resource implications including timings, equipment, staffing, cost-effectiveness and access to buildings.

Specify any acceptable alternative assessment methods and allow a variety of response modes.

Consider how an individual's contribution can be assessed within group work. Develop mark schemes to ensure consistent judgements are made of the standards being demonstrated.

Adopt the relevant design points for presentation, layout and readability in any written material developed for the assessment.

Provide understandable, clear questions.

Avoid the use of multiple questions during oral assessment, where the learner may be confused about which part of the question to answer first.

Avoid the use of closed questions unless a 'yes' or 'no' answer is specifically required. Closed questions can cause learners to 'freeze' or 'block', and this would be more likely under the pressure of examination conditions.

Use open questions with 'why', 'what', 'how', 'where' and 'when' to provide opportunities for all learners to demonstrate attainment.

Stimulus and source materials

Stimulus and source materials are often used to support assessments. Stimulus materials designed or selected by assessors should be developed with fair access

in mind. Most source materials have already been created for another purpose; they rarely originate with the awarding organisation. Whatever their source, they should be relevant and valid in terms of the task set.

Examples of stimulus and source materials include pictures, maps, photographs, film, sound, text, diagrams, charts and graphs. They may be presented electronically or as hard copies.

It is important to ask whether the source or stimulus material adds value to the question. It should only be used where it is an integral part of the assessment as it may create a barrier for some learners.

Many materials cannot be modified and produced effectively in Braille or large print for visually impaired learners and may have to be described in words in the Braille version. Braille and tactile diagrams require particular skills both to create and interpret.

Sound effects and ambient noise or music may help to put an audio stimulus in context. However, people with hearing impairment may not be able to discriminate between the stimulus material and the background. Sometimes the additional background sounds can make a stimulus piece more difficult to comprehend for people with visual disabilities.

In all events, background or contextual sound should never run underneath the stimulus speech (or other material). Any sound that is used should be there to facilitate understanding of context and be recognisable to people from different backgrounds and cultures.

Clear presentation is equally important to stimulus and source materials as it is to the questions themselves. Stimulus and source materials should be separated from the rest of the question. In the example below the source material is shown in a separate box.

Example

Source A lists some important changes in British coal mining.

Source A

1842 Underground work by women and children under 10 years of age forbidden.
1850 Safety rules and government inspectors introduced.
1872 Daily safety inspections for all coal mines required.

Issues can arise with the modification of source materials, since they are normally owned by third parties. Copyright regulations apply where extended extracts or complete works are used.

There are likely to be issues of misrepresentation if materials are altered without permission. It may be necessary to seek the agreement of the authors and publishers and acknowledge the ownership of the original material. For example, where source material is taken directly from information relevant to a vocational area (e.g. an extract from a repair manual in an assessment for a technician's qualification) there should be no requirement to modify the material because the learner would be expected to understand and apply it.

Awarding organisations should be clear about the purpose for including stimulus or source material. Diagrams, pictures or photographs should be included only when there is a clear purpose or benefit to all groups.

Choose material that enhances or at least maintains the readability and legibility of the question or task. If it is unlikely to do so, its purpose should be reviewed, or different material selected. For example, newspapers and popular magazines can offer ideas for clearly written source material, provided that awarding organisations take care over content, the purpose of using the extract and the focus of the assessment.

Some newspapers may sensationalise their reporting. However, they also have a keen sense of audience and may use direct language. Additionally, some newspapers use lots of idioms/colloquialisms. Extracts containing idiomatic language should be avoided unless study of this language is the purpose.

Present text in a familiar format, unless interpretation of novel formats is the focus of assessment. Sharp contrast, clear definition and sufficient resolution help learners to identify important information easily. The layout of text needs to be interpretable by common screen-reading and speech synthesis software. Text arranged in columns can present problems. Diagrams, tables, charts and graphs should be labelled in a way that can be interpreted non-visually, including by digital systems, unless interpretation is part of the assessment objective (e.g. a picture of a lion roaring should have a narrative text label and/or metatext saying 'a picture of a lion roaring in a cage/zoo/circus/open space').

Use diagrams, charts and graphs that lend themselves to being adapted for visually impaired learners. Adaptation does not necessarily mean enlargement. The JCQ, RNIB and UKAAF all offer guidance on adaptations, simplification and production of tactile diagrams that provide a visually impaired learner with the same information as other learners.

Avoid unnecessary information in diagrams, pictures or photographs. Screenshots from computers may contain unnecessary information such as menu bars. Specialist screen-reading software may pick up the information and attempt to read or include it, resulting in a confusion of different information.

Avoid text on images or text as an image. These cannot be read by text-to-speech tools.

Label significant features using a key rather than lines and arrows, where possible. Colours and symbols in the key must be distinct and unambiguous.

Present tables with clearly separated columns. Tables should be clearly labelled so that people using screen-reading software are cued to interpret them.

Avoid handwritten material where possible. If such material is a requirement of the assessment a font that resembles handwriting could be considered.

Present required information close to the relevant question or on a facing page, not overleaf. This will help learners to link related materials.

Ensure the text layout or positioning of images does not degrade if a student needs to reflow and magnify a digital version of an exam paper,

Match the font type and font size to those in associated material, where possible.

Include clear and precise instructions where additional resources are used. For example, state whether or not learners can make notes while watching a video clip.

Where a source shows bias or a stereotypical view of a particular group, check that the associated question draws attention to or seeks comment on this. For example, a source claims superiority for European values and lifestyles; the associated question could appropriately ask learners to consider the stance from which the claims are made and comment on the position taken.

Mark schemes

Assessments designed to maximise fair access need mark schemes that are fit for purpose. Mark schemes that are valid and use clear language will support consistent understanding and application, and accurate marking. See the [good practice guide](#) produced by Qualifications Wales.

Mark schemes should be designed so that they can be easily and consistently applied by all assessors to all standard and modified papers and responses. Teachers and learners may have access to assessed work and the associated mark scheme. It is therefore important that mark schemes show clearly what, where and how marks are awarded.

As part of the development process each mark scheme, along with the assessment papers and tasks, should be evaluated by experts who have had no previous involvement with the materials. Wherever possible, provisional mark schemes should be reviewed by equal opportunities and language specialists, as well as by subject specialists, as part of an equality impact assessment.

Assessments should be designed to reward positive achievement. They should differentiate between learners purely on evidence of skills, subject knowledge and understanding. The degree of flexibility of a mark scheme will reflect the nature of the subject and what is being assessed. Equally valid responses presented in different forms should achieve the same marks.

Mark schemes should credit appropriate responses that reflect the diverse background of learners and the different ways in which they may demonstrate what they know, understand and can do. Some types of task present particular challenges. Synoptic questions, for instance, need to take account of the many

valid ways in which learners may answer the question. For example, a question may ask learners to identify patterns in social behaviour from their knowledge of the way that individuals and groups contributed to national events in different historical periods. Learners may give a chronological overview of a series of events and the role of the main participants before identifying patterns. Alternatively, they may present an analysis of contemporaneous contributions before picking out similar or contrasting behaviour from other periods.

There are other acceptable approaches. The mark scheme should be sufficiently precise to ensure that the relevant skills are appropriately rewarded, and sufficiently open to accommodate alternative approaches. Some multi-part questions may explicitly be designed to test a sequence of logical thought. Generally, however, mark schemes should not allow a wrong answer on one part of a question to make later marks harder or impossible to earn.

Feedback from stakeholders can influence the development of assessments. Live assessments and mark schemes, however, raise the issue of security. In the case of item banks, pre-tests using control groups can inform the development of accessible materials. In other cases, post hoc reviews of questions, mark schemes and the reasonable adjustments allowed will help identify access issues and establish how best to address them for the future.

Each of the following points considers an aspect of the design of mark schemes.

Awarding organisations should consider the following points:

- Ensure that the purpose of each assessment is fully reflected in the associated mark scheme
- Ensure that the mark scheme rewards a variety of appropriate responses
- Design mark schemes that are sufficiently flexible to allow alternative response modes, where these are necessary. Mark schemes for modified papers may need to include extended tolerances where learners are required to make an accurate measurement
- Aim to make mark schemes as clear and legible as the tasks to which they relate
- Ensure that marks awarded reflect fully and consistently the agreed interpretation of command words. For example, the care taken in designing an accessible task would be wasted if the mark scheme were not equally accessible.

If marks are allocated for a task like gathering information from employees, the means by which the learner engages with employees should be as flexible as possible to avoid introducing unnecessary barriers. Similarly, if marks are allocated for a report, the means by which that report is presented should be appropriate for the subject, without introducing any unnecessary barriers.

When learners are asked to describe something, the expectation is that they should set out the characteristics of the item, attribute or event. In this case the mark scheme should fully reward a description. Learners are not asked for an explanation, an analysis or a comparison.

Post-assessment review

The Conditions of Recognition state the following.

> D2.2 An awarding organisation must monitor qualifications which it makes available for any feature which could disadvantage a group of learners who share a particular characteristic.

> D2.3 Where an awarding organisation has identified such a feature, it must:
> (a) remove any disadvantage which is unjustifiable, and
> (b) maintain a record of any disadvantage which it believes to be justifiable, setting out the reasons why in its opinion the disadvantage is justifiable.

Post-assessment review of questions helps to assess whether they were indeed non-discriminatory. Such a review can be part of the feedback loop into the design of future assessments.

The increasing use of item-level marking allows awarding organisations to evaluate the accessibility of individual questions and part questions.

Wherever possible, review of the qualification outcomes analyses the comparative performance of learners entitled to reasonable adjustments, in comparison to the whole cohort.

6. Technology

The increasing use of technology in assessments raises both opportunities and challenges for fair access. Advances in technology have an impact on the design and delivery of qualifications and assessments. This document does not give guidance on issues of security, delivery or accommodation associated with the use of technology in national assessments but concentrates on the implications for fair access.

Qualifications continue to evolve as technology opens up new ways of working. Computer graphics in art and design and electronic systems in music, for example, have affected both the scope and practice of these subjects. Technology also offers new ways of creating and decoding text. Regulators and awarding organisations need to consider carefully how such developments impact on assessments and what implications and potential benefits arise for fair access.

For example, design and technology tasks may require learners to demonstrate 'design and make' skills. Part of the assessment typically focuses on the skills of modelling, sketching and rendering of design proposals. Products are subsequently made by learners using appropriate manufacturing processes and materials.

Familiar terms may need to be reviewed, as technology provides new ways of carrying out practical tasks. For example, the assessment of 'making' in design and technology has traditionally required the activity to be carried out by hand. However, learners with limited motor skills may be able to complete valid 'design and make' tasks by using computer-aided design and computer-aided manufacture (CADCAM) equipment. Appropriate assessment requirements (e.g. selection and use of suitable hardware, software and tolerances in CADCAM projects) could provide appropriate recognition and may be an acceptable alternative to demonstrating a hand skill in some qualifications.

In vocational qualifications, however, if 'make' is a competence standard being assessed, awarding organisations should make clear the extent to which other approaches are acceptable (if at all).

Awarding organisations should consider:

- whether technology offers ways of making mandatory material more widely accessible
- whether technology-based options would extend access to groups who might otherwise be excluded
- introducing a systematic review of the ways in which specifications assessments and source/stimulus materials are presented, checking that technology is being used effectively to enhance quality, opportunity and wider access
- reviewing each assessment scheme to establish whether technology could be used in ways that would enable wider access
- evaluating the comparability of alternative response modes
- evaluating the range of assistive technologies available in everyday practice (word prediction, text to speech, voice recognition, etc.) so that decisions about the appropriateness of these for an examination setting can be communicated to centres in good time.

Exam papers available in an accessible digital format can significantly reduce barriers for learners with print impairments. Basic good practices (outlined in the UKAAF guidance[7]) allow most visually impaired learners to access exam papers using either standard PDF options or third-party assistive technologies.

Using agreed good practice when formatting materials reduces the impact of changes in system specifications for common low visual aids, screen readers and other adaptive technologies.

Digital exam papers for blind learners need additional accessibility checks as outlined by Level 2 requirements of the UKAAF guidance on PDF assessments. In addition, some questions are likely to need modification (e.g. those referencing visual stimulus materials).

Digital exam papers for signers, with videos embedded in the exam paper, will assist some hearing-impaired or deaf people.

The use of technology in assessment (also referred to as e-assessment) has introduced options that can extend access and opportunity to learners who might otherwise be excluded. However, the pace of development is rapid and the access implications of technology enhanced assessment for all learners need to be carefully considered. Awarding organisations have to ensure that new technologies increase rather than reduce opportunity and be mindful that while

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[7] www.ukaaf.org/e-file-formats

any particular use of technology might have a positive impact for one group of learners it might also have a negative impact for another group.

Many of the principles outlined earlier in this document apply equally to the design of assessments, stimulus/source materials and mark schemes in electronic form. However, the flexibility that technology offers raises additional points.

Accessibility is a fundamental consideration for any new technology enhanced assessment development. Properly funded accessibility testing and quality improvement should be planned into project timelines.

E-marking (computer-based marking) and other forms of technology enhanced assessment are well-established practices. One benefit of e-marking is that assessors may be able to respond more quickly and flexibly to learners' work.

Issues inevitably arise as awarding organisations consider the possibilities of technology enhanced assessment. New ways of interacting become possible, and fresh approaches are required to maintain security and consistency. Awarding organisations should ensure that the opinions and assessment needs of learners with disabilities are considered at an early stage and that, as far as possible, on-screen tests accurately reflect these learners' requirements.

To take advantage of the flexibility offered by technology enhanced assessment, awarding organisations should:

- consider providing centres/learners with the opportunity to change the font, font size or colours displayed on-screen. The presentation can then be tailored to individual learners' needs, provided that the security of the assessment is not compromised. The user's operating system may allow them to make other changes, e.g. to the size of the mouse pointer or to the flash rate of the cursor; high contrast mode. Note also that the ability to alter colours may not result in information being accessible to colour blind learners, therefore all software used must meet minimum colours contrast ratios
- include, where possible, text equivalents for graphical elements
- consider providing additional versions of tests, e.g. low graphics versions
- consider availability of versions to support deaf learners, where aural stimuli are included e.g. with sub-titles included
- ensure that, where on-screen content does not lend itself to adjustment, accessible and equivalent alternatives (e.g. pencil and paper tests) are provided and that these make comparable demands of learners

- ensure that navigation (forward and backwards if learners are allowed to review their responses) is straightforward and intuitive for all learners. This is particularly important where on-screen assessment has been provided as a reasonable adjustment to a normally paper-based assessment
- be aware of the importance of accessibility testing of on-screen formats. Users with disabilities may uncover difficulties missed by others. Trialling will help ensure a range of assistive technologies can interact with the test environment
- make sure all navigation and interactivity can be achieved by mouse **or** keyboard
- provide 'practice spaces' or equivalent facilities so that learners can familiarise themselves with the style, user experience and personalisation options of the assessment tool prior to the actual assessment
- check that all content that must be accessed by the learner can be read aloud with text to speech
- be aware of some learners' potential need for use of extra time assistive technology; users must run additional applications alongside the assessment and ensure that security systems allow this when required.

Sources of specialist help

The United Kingdom Association for Accessible Formats (UKAAF) undertake consultations and publish standards, including General and Vocational Examinations for Candidates with Visual Impairment: Best Practice Guidance for Modifiers and Producers
www.ukaaf.org/exams-modification-best-practice

Jisc provides an advisory service on technologies for accessibility and inclusion for disabled staff and students. The Jisc website provides resources and advice for learning and teaching in UK higher education, further education and skills, and independent specialist colleges. www.jisc.ac.uk/

A wide range of guidance is available to maximise the accessibility of online resources and activities. Reference to appropriate standards might include the following.

- Web Accessibility Initiative (see www.w3.org/WAI/) and the Web Accessibility Content Guidelines (WCAG 2.1 / ISO/IEC 40500:2012);
- ISO 9241-20:2009 Accessibility guidelines for information/communication technology (ICT) equipment and services applies to both hardware and

software and aims to improve accessibility for use at work, in the home, and in mobile and public environments

- BS EN ISO 9241-151:2008 Ergonomics of human-system interaction. BS EN ISO 9241-151 is the international standard that provides guidance on the human-centred design of software web user interfaces with the aim of increasing usability
- BS 18477:2010 Inclusive service provision. BS 18477 specifies the critical procedures to ensure inclusive services are available and accessible to all consumers equally, regardless of their personal circumstances
- BS 7000-6:2005 Design management systems. Managing inclusive design. BS 7000 Part 6 is the British Standard that is a part of the BS7000 series on Design Management Systems and this part provides guidance on managing inclusive design at both organisation and project levels, though the inclusive approach ultimately encompasses the whole of business and management
- BS 8878: 2010 Web accessibility code of practice. BS 8878:2010 is the first British standard to outline a framework for web accessibility when designing or commissioning web products. It provides guidance for all sectors on meeting the requirements of the Equality Act 2010 which states that web products must be accessible to all.

From September 2018 some education providers are required by the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 to ensure that online platforms, systems and documents meet web accessibility standards[8] which could include past papers and online e-assessment systems that they make use of.

If online tests are intended to link to other systems, e.g. content delivery platforms or data analytics, then familiarity with IMS Global standards[9] is strongly recommended.

A range of alternative input and output devices can be used for content that is designed to web accessibility guidelines and specifications. International web accessibility standards clearly set out how to make online resources accessible. If the standards are followed, then on-screen test developers need not be experts in the wide range of technologies available for disabled people to access information technology.

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[8] https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps
[9] www.imsglobal.org/

Examples of useful information and case studies that can be found outside the world of education include:

- AbilityNet (www.abilitynet.org.uk), a national charity that helps disabled adults and children use computers and the internet by adapting and adjusting their technology
- the BBC at www.bbc.co.uk/guidelines/futuremedia/accessibility/
- the British Computer Association of the Blind (BCAB) at www.bcab.org.uk/
- the World Wide Web Consortium (W3C) at www.w3.org/
- the Government digital services at https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps.

7. Checklist

This checklist draws the main principles together to assist awarding organisations as they develop qualifications, assessment materials and mark schemes.

In the context of this guide awarding organisations are advised, before submitting any specification, to be sure that:

- all text is free from ambiguity and hidden expectations
- no unnecessary material is included that could present barriers to entry for particular groups of people with protected characteristics
- any assessment criterion that does present an obstacle to a particular group is justified
- the titles, mandatory content, optional content (where available) and assessment scheme are relevant and accessible to learners within the attainment range of the qualification
- the overall qualification is both balanced and coherent from the perspective of learners and other stakeholders.

In the context of this guide, awarding organisations are advised, before signing off any assessment, to be sure that:

- all text is written in plain, clear and consistent language
- the rubric is clear and easily distinguished from the questions
- only essential and relevant source material is included
- all pictorial, tabular and graphic material is presented in a clear, uncluttered and logical way that conforms to best accessibility practices
- all materials associated with a particular task are kept close together and presented in a logical manner
- the scope for each part of the assessment offers to extend fair access has been fully exploited
- each item makes a significant contribution to the balance of the overall qualification
- no offence is caused with respect to any of the protected characteristics of the Equality Act 2010 and Northern Ireland equality law through inappropriate subject matter or language
- the digital file used to create a printed version would ideally be tagged for accessibility and can be used as it is with assistive technology.

Awarding organisations are advised, before signing off any mark scheme or set of assessment criteria, to be sure that:

- all text is readable, legible and valid in relation to the assessment objectives
- the mark scheme is clear and can be easily and consistently understood and applied
- language and equal opportunities specialists have been included alongside subject experts from an early stage in the development process
- the mark scheme has been evaluated by experts who have not been involved in the earlier stages of development
- the mark scheme reflects the diverse ways in which learners can demonstrate attainment and includes an indication of the nature and range of responses likely to be worthy of credit.

The sample check sheet in Annex 1 provides a summary of some of the principles and design points in this guidance. Awarding organisations could use the check sheet during the development of standards, specifications and assessments as part of their quality assurance arrangements.

Annex 1: Example check sheet

A check sheet like this example could be used in conjunction with an equality impact assessment. Equality issues should be addressed at the early draft stages and then later when the qualification can be seen in a more complete state. Before signing off development work or monitoring and evaluation activity, check the following.

Awarding organisation:	Qualification title:			Date checked:
· Check item	Specification development	Sample assessment materials development	Live assessment development	Continuous monitoring and evaluation (inc. data analysis)
The overall qualification is both balanced and coherent from the perspective of learners and other stakeholders.				
1. The titles and mandatory content are relevant to learners within the attainment range of the qualification.				
2. Any requirement for prior knowledge and experience is limited to essentials.				
3. Any optional routes are equally demanding and, as far as possible, accessible to all learners.				
4. All text is written in clear and consistent language.				

5. Text is free from ambiguity, hidden expectations or unnecessary material that could present obstacles to particular groups or people with shared protected characteristics.				
6. Each item makes a significant contribution to the balance of the overall qualification.				
7. The needs of all groups and protected characteristics have been considered.				
8. No offence is caused with respect to any of the protected characteristics of the Equality Act 2010 and Northern Ireland equality law through inappropriate subject matter or language.				
9. Language and equal opportunities specialists have been included alongside subject experts from an early stage in the development process.				
Equality is promoted in the design and review of the assessment.				
10. Text and language used is checked to minimise the possibility of misinterpretation. The source digital file is capable of use by assistive technologies without encountering barriers to navigation, reading order or visual degradation when magnified/reflowed.				
11. All text is readable, legible and valid in relation to the assessment objectives.				
12. The rubric is clear and easily distinguished from the questions.				

13. Only essential and relevant source material is included.			
14. All pictorial, tabular and graphic material is presented in a clear, uncluttered and logical way that conforms to best accessibility practices.			
15. The presentation and layout of assessment materials is checked for compatibility with assistive technology (such as popular screen readers).			
16. All materials associated with a particular task are kept close together and presented in a logical manner.			
17. The scope each part of the assessment offers to extend fair access has been fully exploited.			
18. A variety of response modes have been specified or are shown as acceptable.			
19. Any assessment criteria that may present an obstacle to particular groups or people with shared protected characteristics are justified.			
20. Current working practices are recognised.			
21. The assessment allows learners to demonstrate their skills using assistive technology			
22. The mark scheme is clear and can be easily and consistently understood and applied.			
23. The mark scheme reflects the diverse ways in which learners can demonstrate attainment and includes an indication of the nature and range of responses likely to be worthy of credit.			
24. The mark scheme has been evaluated by experts who have not been involved in the earlier stages of development.			

Ongoing review, monitoring and analysis uses evidence to support changes which promote equality and reduce the need for adjustments.				
25. Evidence of comparative performance has been analysed and used to inform review.				
26. Records of comparative performance are maintained to assess the impact of any changes.				

Annex 2: Sample inclusion sheet

This is provided as an example to show how barriers can be identified within a specification. It should not be regarded as an accurate analysis of a particular specification.

Media studies

Assessment objectives		Weightings
AO1	Recall, select and communicate their knowledge and understanding of media products and the contexts in which they are produced and consumed.	20%
AO2	Analyse and respond to media texts/topics using media key concepts and appropriate terminology.	20%
AO3	Demonstrate research, planning and presentational skills.	30%
AO4	Construct and evaluate their own products using creative and technical skills.	30%

The assessment objectives assess the following abilities of the learners

	AO1	AO2	AO3	AO4
See	No	Yes*	No	No
Speak	No	No	No	No
Hear	No	No*	No	No
Read independently	No	No	No	No
Demonstrate spelling and grammar	No	Yes	Yes	Yes
Hand write	No	No	No	No
Draw/sketch by hand	No	No	No	Yes
Manipulate manually	No	No	No	No*
Perform physically	No	No	No	No
Work in a team	No	No	No	No

* Further guidance can be given once the initial analysis has been carried out.

Do the assessments allow the use of these access arrangements?

Access arrangement	Yes/No	Component
BSL signers	Yes	All written and practical assessments
Extra time	Yes	All written and practical assessments
Live speaker	Yes	All written and practical assessments
Modified question papers	Yes	All written and practical assessments
Read aloud	Yes	All written and practical assessments
Readers	Yes	All written and practical assessments
Reading pens	Yes	All written and practical assessments
Practical assistants	Yes	All written and practical assessments
Scribes	Yes	All written and practical assessments
Speech recognition	Yes	All written and practical assessments
Text to speech	Yes	All written and practical assessments
Transcripts	Yes	All written and practical assessments
Word processors	Yes	All written and practical assessments

(NB:This is not a definitive list of access arrangements.)

Groups for which part of the assessment is a barrier

Some students with visual impairments will encounter a barrier when dealing with print and other visual-based media forms where an appreciation of the visual artefact or effect is required.

Some students with a hearing or physical impairment will be restricted as to which media they may select.

Justification

The GCSE subject criteria for this subject require that students must 'demonstrate knowledge and understanding of a minimum of three different media (including at least one print and one audio-visual based form)'. GCSE specifications for this subject must abide by this requirement.

Mitigation/advice

Although some disabled students may be restricted as to the media they may select, the wide choice of media forms, including web-based media, available to them should allow them access to the assessment. Practical assistants may be used to assist those with a

physical impairment but if the assistant 'constructs' the product (AO4) the student must not be awarded marks for the skill.

Modified question papers, other assistive technologies and careful guidance are required for disabled students to access this qualification.

Annex 3: Learners who require access arrangements

Access arrangements are provided for learners with short- or long-term disabilities or temporary injuries. Access arrangements must:

- be approved before an assessment
- allow access to assessment without giving an unfair advantage
- reflect the learner's normal way of working *
- not compromise the assessment criteria of the specification in question.

Access arrangements are made on the basis of an individual learner's needs. Evidence of learners' needs must be obtained by centres to support an access arrangement. (*Establishing the normal way of working in time for the January deadline can be challenging for centres, if the learner joined in September, so needs to be addressed as soon as possible).

Examples where learners may require access arrangements

The following are examples only. Some learners' needs may fall within more than one category.

Behavioural, emotional and social needs
Learners with some behavioural, emotional, physical or social needs might require supervised rest periods, separate invigilation or alternative accommodation arrangements. Where these learners also have learning difficulties, they may require extra time and, in the case of more severe impairment, readers and/or scribes.

Communication and interaction
Learners with communication and interaction difficulties may have problems with written communication skills. They may need to use a device such as a word processor or in particular circumstances have the assistance of a scribe to write for them. They may need extra time to demonstrate written and oral communication skills.

Cognition and learning
Learners with learning difficulties may require extra time for timed assessments. In appropriate cases, they may also need reading or writing assistance.

Sensory and physical needs

Learners with sensory and physical needs might require extra time, the use of a word processor, a scribe and/or sign language and interpretation. They may require papers that are modified. They may require a practical assistant. They may also require a reader or an Oral Language Modifier.

Annex 4: The Equality Act 2010 and reasonable adjustments

Reasonable adjustments and learners with disabilities

Under the Equality Act 2010 awarding organisations are required to make reasonable adjustments and avoid unfavourable treatment towards learners with disabilities. The duty for awarding organisations to make a reasonable adjustment will apply where an assessment arrangement would put a disabled person at a substantial disadvantage in comparison to someone who is not disabled.

Section 6 of the Equality Act 2010 defines disability as a '…physical or mental impairment… [which] has a substantial and long-term adverse effect on…
[someone's] ability to carry out normal day-to-day activities'. Study and education-related activities are included in definition of day-to-day activities.

Section 53 of the Equality Act 2010 covers the duty placed on awarding organisations in relation to vocational qualifications. Awarding organisations offering vocational qualifications are allowed to apply competence standards to a disabled person. Section 54 of the Act provides additional interpretation.

A competence standard is defined as an academic, medical or other standard applied for the purpose of determining whether or not a person has a particular level of competence of ability. The application of a competence standard to a disabled person is not disability discrimination unless it is discrimination by virtue of section 19 of the Equality Act 2010 (regarding indirect discrimination).

Section 96 of the Equality Act 2010 covers the duty placed on awarding organisations in relation to general qualifications. This section also gives the regulator power to specify where awarding organisations are not under a duty to make reasonable adjustments in relation to general qualifications. In some cases, it will not be reasonable for adjustments to be made to assessment objectives within a qualification. To do so would likely undermine the effectiveness of the qualification in providing indication of the skills, knowledge and understanding of the learner. The Regulator, under section 96, has the power to specify where reasonable adjustments are not permitted.

Discrimination

Discrimination is a key concept of the legislation. Direct and indirect discrimination are defined and recognised by the Act.

Direct discrimination arises where a learner is treated less favourably than another learner because of a protected characteristic. Generally, to bring a case claiming direct discrimination you need to present comparators, e.g. examples of where other learners without the protected characteristics have been treated more favourably. An example of direct discrimination could be where a female is paid less for doing a job than a male colleague in the same or equivalent job role.

Indirect discrimination arises where a provision, criterion or practice is applied in the same way for everyone but has the effect of putting learners with a relevant protected characteristic at a particular disadvantage. The concept of 'legitimate aims' is relevant in considering indirect discrimination. A legitimate aim may be maintaining standards or ensuring health and safety. The maintenance of standards encompasses issues such as examinations.

There may be cases where the application of a provision, criterion or practice can be justified as a proportionate means of achieving a legitimate aim. For example, if someone needs to run as part of an examination (as opposed to move at speed without the assistance of a third party), and this requirement can be justified, then there may be nothing you can do to mitigate the issue that affects the person and their ability to meet the standard. It would probably be difficult to persuade a judge that a subject needed to be examined in another way.

Discrimination arising from disability occurs where a disabled learner is treated unfavourably and where such treatment cannot be shown to be a proportionate means of achieving legitimate aim. In these cases there is no need for comparators. Disability is defined as 'a physical or mental impairment which has a substantial and long-term effect on a person's ability to carry out normal day-to-day activities'. In cases relating to discrimination arising from disability, knowledge is a key component. You must know, or be reasonably expected to know, about the existence of the disability. This only applies to disability and not to the other protected characteristics.

Reasonable adjustments

There is a duty under the Act to make reasonable adjustments. There are three requirements in relation to reasonable adjustments.

1. You must take reasonable steps to avoid a substantial disadvantage to, for example, a disabled person (in comparison to someone who is not disabled) arising from a provision, criterion or practice.
2. You must take reasonable steps to avoid or reduce a substantial disadvantage to, for example, a disabled person (in comparison to someone who is not disabled) arising from a physical feature.
3. You should provide an auxiliary aid, such as assistive technology, to avoid a substantial disadvantage to, for example, a disabled person (in comparison to someone who is not disabled).

Providers are in the 'front-line' of ensuring that learners are not discriminated against. Direct liability for disability discrimination may lie with centres. It is good practice for awarding organisations to ensure centres are aware of the requirements of the Act. Section C2.3 (h) of the Conditions of Recognition requires 'the centre to undertake the delivery of the qualification required by the awarding organisation in accordance with Equalities Law'

www.gov.wales/topics/educationandskills/qualificationsinwales/qualificationregulation/reg publication/regulations/?lang=en

An awarding organisation failing to make its qualifications inclusive for protected characteristics other than disability runs the risk of indirect discrimination. This concept of accommodations is really important in giving a legal underpinning for awarding organisations; they should, for example, avoid sexual stereotyping in exam questions or case studies based on, say, a baptism. This is covered by the proportionality test in the Act.

Annex 5: Glossary

A broad range of terms is used in the assessment of general and vocational qualifications. Each has specific meaning in the context and structure of particular qualifications.

Access arrangements
Arrangements which are agreed before an assessment that allow learners with special educational needs, disabilities or temporary injuries to access the assessment. They allow learners to show what they know and can do without changing the demands of the assessment. An access arrangement that meets the needs of a disabled learner would be a 'reasonable adjustment' for that particular learner.

Accessibility
The quality of being easily reached, entered, or used by people who have a disability. For digital files, e-assessment and online resources, accessibility means that people with disabilities and additional needs can perceive, understand, navigate, and interact with the resources. To achieve this, individuals may make use of assistive technologies, built-in tools or settings within their computer or device.

Accreditation
The process through which the regulators confirm that a qualification and the associated specification conform to the regulatory criteria.

Assessment
The process of making judgements about the extent to which a learner's work meets the assessment criteria for a qualification or unit, or part of a unit. Assessment may also be described as *examination, assessment materials, test*

Assessment criteria
The requirements that learners need to meet in order to achieve success (or a given grade) in a qualification or unit, or part of a unit.

Assessment objective
One of a set of statements in a specification describing the focus of assessment.

Assessor
A chief and principal examiner, examiner, general marker, chief and principal moderator, moderator, internal verifier or external verifier

Assistive technologies
Mechanical or electronic devices that help **individuals** with particular needs to overcome limitations.

Awarding
The process through which learners' results and/or grades are determined on the basis of available evidence.

Awarding organisation
An organisation which awards qualifications. Also known as awarding body, examining body, examinations board

Carrier language
The language used to set an assessment (as opposed to technical language which is being assessed).

Command words
The words used in instructions to learners to elicit a response.

Competence standard
An academic, medical, or other standard applied by or on behalf of a qualifications body for the purpose of determining whether or not a person has a particular level of competence or ability.

Component
A discrete part of a qualification which:
(a) focuses on specific areas of the knowledge, skills and understanding assessed for the qualification, and
(b) has a specific set of criteria against which Learners' performance will be differentiated. A component that can be certified in its own right is referred to as a 'Unit' (see definition below).

Content
The coverage of a qualification, programme, module, unit or other component, expressed as the skills, knowledge, understanding or area of competence that is covered.

Controlled assessment

Assessment undertaken where full examination conditions do not apply. The awarding organisation specifies the controls that apply to how work is set, the conditions under which it is done and how it is assessed.

Coursework
Tasks completed by a learner during the course of study and assessed against criteria made explicit in the specification.

Examination
The totality of assessment that a learner must undertake to gain a qualification. The examination may include several different assessment components.

External assessment
An assessment in the form of an examination paper, question paper or other written assessment, usually taken under examination conditions.

Internal assessment
This document uses the term 'internal assessment' to cover all centre-based or centre-directed options. This includes coursework, practical test, controlled assessment, portfolio, project and non-examined assessments (often taken under a lower level of control than external or written assessments)

Learner
A pupil, student or candidate.

Learning outcomes
What the learner has to be able to do or know in given circumstances.

Mark scheme
Detail of how marks are to be awarded in relation to a particular assessment task. Also known as marking criteria, assessment criteria or performance criteria.

Modified papers
Papers that are adapted to meet the needs of individual learners, e.g. by increasing font size or producing a Braille version.

Portfolio
A collection of evidence submitted for assessment.
Project

An extended piece of work undertaken by a learner for assessment.

Qualification
An award made by an awarding organisation for demonstration of achievement or competence. A qualification as a whole may include modules, components or units that might be awarded separately.

Reasonable adjustment
A reasonable step taken to lessen or remove the effects of a substantial disadvantage to a disabled learner. A reasonable adjustment for a particular person may be unique to that individual.

Regulators
Relevant regulators for the purposes of this document are;
(a)   Council for the Curriculum, Examinations and Assessment (CCEA Regulation) in Northern Ireland
(b)   Qualifications Wales in Wales

Reliability
The extent to which assessment results are an accurate measurement of the learners' demonstration of the abilities specified by the assessment criteria.

Rubric
The (usually) written instructions telling a learner how to approach an assessment. Learners should be told to pay attention to the rubric in all assessments.

Scheme of assessment
The methods and processes (and tasks where appropriate) to be used to assess a qualification or unit.

Special consideration
An adjustment to a learner's mark or grade to reflect temporary illness, injury or other indisposition at the time of the assessment.

Specification
The complete description (including mandatory and optional aspects) of the content, assessment arrangements and performance requirements for a qualification.

Stimulus material

Material generated by assessors and included in a task to encourage learners to demonstrate their subject capabilities.

Source material
Material from external sources that learners are invited to draw on in order to respond to a task.

Unit
The smallest part of a qualification that is capable of certification in its own right.

Validity
The fitness for purpose of an assessment tool or scheme.

Annex 6: Command words

Awarding organisations have prepared various glossaries for the command words used in assessments. The definitions below draw on information found in these glossaries.

The same command words are often used in a wide range of different subjects. However, any common definitions should be used with caution because subjects have their own traditions and expectations.

Use command words consistently and correctly. Avoid words that prompt inadequate, single-word answers. Use different command words to elicit different kinds of responses, not purely for the sake of variety.

Analyse	separate information into components and identify their characteristics
Apply	put into effect in a recognised way
Argue	present a reasoned case
Assess	make an informed judgement
Calculate	work out the value of something
Comment	present an informed opinion
Compare	identify similarities
Complete	finish a task by adding to given information
Consider	review and respond to given information
Contrast	identify differences
Criticise	assess worth against explicit expectations
Debate	present different perspectives on an issue
Deduce	draw conclusions from information provided
Define	specify meaning
Describe	set out characteristics
Develop	take forward or build upon given information
Discuss	present key points
Estimate	assign an approximate value
Evaluate	judge from available evidence
Examine	investigate closely
Explain	set out purposes or reasons
Explore	investigate without preconceptions about the outcome
Give	produce an answer from recall
Identify	name or otherwise characterise
Illustrate	present clarifying examples
Interpret	translate information into recognisable form
Justify	support a case with evidence

Outline	set out main characteristics
Prove	demonstrate validity on the basis of evidence
Relate	demonstrate connections between items
Review	survey information
State	express in clear terms
Suggest	present a possible case
Summarise	present principal points without detail

Annex 7: Promoting good practice

Using equality impact assessment throughout the qualification design process (from the early stages of qualification development, assessment design and in arrangements for assessment in the centre) helps to build-in fairness and reduce the need for post-approval modifications.

Access and barriers should be identified at an initial draft stage for both the qualification structure/content and assessment methodology. Including qualification development specialists and equalities specialists at an early stage of development will help to design qualifications where the need for adjustments can be designed out or reduced to the minimum. Making significant changes is less straightforward once the specification and sample assessments have been produced.

Qualification and assessment design considerations before selection of assessment media

- Consider all the purposes of an assessment.
- Are validity considerations the same for all learners?
- E-assessment may be an access measure or a de facto mechanism, or both.
- If e-assessment is the de facto assessment mechanism, then the access measure may be paper-based or human intervention.

Many e-assessment systems now provide in-built support for access. Good learner-centred design supports access by all learners, and includes:

- clear navigation
- alternative forms of input
- voice-over/audio prompts
- learner-customised look and feel, e.g. font size, font colour and background colour options.

Ideal access is 'usual working practices', and includes:

- 'bring your own device' (BYOD) for security and compatibility
- assistive programmes (e.g. screen readers)
- assistive devices (e.g. tactile screen, Braille reader).

However, learner-centred design may place burdens on the awarding organisation, centre and technology provider, and requires (access to) practice material operating in the same way as the actual assessment.

Awarding organisations need to have confidence that their assessment methodologies are, as far as possible, free of bias (unfair penalisation that does not result from scores that differ due to differences in ability).

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Annex 9: Regulators' contact details

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