

Ofqual consultation on designing and developing accessible assessments

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to this consultation.

B. General points

3. ASCL welcomes this important consultation and is pleased that the regulator is being proactive in making assessments more accessible for more learners.
4. We agree strongly with much of the proposed guidance, and would advocate its implementation with immediate effect, as suggested.
5. We do not think the proposed guidance would affect the workload or planning of school and college leaders and teachers; nor would it disadvantage any learners currently preparing for national assessments.
6. However, we believe that the omission of a specified reading age for qualifications is wrong. A revised reading age should be included in the guidance.
7. The current statutory reading age of GCSE and other level 1 and 2 qualifications is 16. This makes exam papers and other assessments inaccessible to almost a quarter of students. A recent study ([Fernandes & Gallacher, 2020](#)) found that 25% of 15-year-olds have a reading age of 12 or below.
8. The first principle of the proposed guidance is that an assessment task should only measure what it intended to measure. It is ASCL's view that not addressing the issue of reading ages undermines this principle, as it could result in an assessment construct assessing a quarter of learners on their literacy rather than the knowledge and skills being measured.
9. ASCL believes that Ofqual should consult on the specified reading age of general and other qualification assessments; and adapt the guidance accordingly with immediate effect.

C. In response to your specific questions

To what extent do you agree or disagree that the content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

10. Strongly agree.

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

11. Strongly agree.

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

12. Strongly agree.

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

13. Strongly agree.

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

14. As mentioned in our general points above, we believe that the section on 'Language' should reflect recent findings that a quarter of fifteen-year-olds, including many with SEND, have reading ages of 12 or below. The proposed guidance uses the phrase: '*General Condition G3 requires the language used in assessments to be "appropriate", taking into account the age of the Learners likely to take the assessment*'. ASCL thinks this should be revised to read '*... taking into account the average reading age of the Learners*'. This would make assessments more accessible.

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

15. Agree.

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

16. As above, guidance should be given on appropriate reading ages of learners, and should not assume the chronological age of learners is the same as their reading age.

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

17. No.

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

18. N/A.

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

19. N/A.

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

20. N/A.

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

21. ASCL believes that, if accepted, the proposed guidance should be issued with immediate effect.

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

22. Any associated costs of redesigning assessment items or whole assessments to comply with the guidance should be funded by the government or absorbed by awarding bodies, rather than passed onto centres through increased exam fees in future years.

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

23. No.

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

24. ASCL believes that, if accepted, the proposed guidance should be issued with immediate effect.

D. Conclusion

25. We are very pleased that Ofqual is consulting on this important topic, and believe that the proposed changes to the regulatory framework will have a positive impact on disadvantaged, including disabled, learners.

26. We hope that this response is of value to the consultation process. ASCL is willing to be further consulted and to assist in any way that it can.

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