

# **Specifications in Relation to the Reasonable Adjustment of General Qualifications**

Report on Consultation Responses



December 2011

Ofqual/11/5110

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## **Introduction**

The Office of Qualifications and Examinations Regulation (Ofqual), as the regulator of qualifications, examinations and assessments in England, has been given a new power through Section 96 of the *Equality Act 2010* (The Act) to make specifications about where reasonable adjustments to general qualifications should not be made. Reasonable adjustments to qualifications are steps that can be taken to reduce or remove the effects of a disadvantage to a learner with disabilities. As the regulator, we have an interest in ensuring that reasonable adjustments are appropriate and fair to the learner, and that any adjustments do not undermine the value of a qualification and how it is used to show what a candidate can and cannot do. In making specifications under Section 96(7) the regulator is specifically required to balance:

1. The need to minimise the extent to which disabled persons are disadvantaged in attaining the qualification because of their disabilities
2. The need to secure that the qualification gives a reliable indication of the knowledge, skills and understanding of a person upon whom it is conferred
3. The need to maintain public confidence in the qualification.

The Act also requires the regulator to:

- Consult with such persons as it thinks appropriate
- Publish specifications, and a timetable indicating when they will come into effect, on its website.

We undertook a public consultation, setting out how we propose to exercise our new power under Section 96, in order to seek views on our plans. The consultation was open from 25th May until 15th August 2011. Vocational qualifications and National Curriculum assessments were not covered in the consultation as this new power relates only to general qualifications.

The public and stakeholders were invited to study the consultation document and provide comments on the proposals via web-based, email and paper responses.

This report provides a summary of the responses received. The structure of the report is as follows:

**Section 1: Consultation summary** summarises the key messages from the consultation responses.

**Section 2: Consultation approach** provides an explanation of how the consultation was undertaken and information about how and from where responses were received.

**Section 3: Response analysis** provides a summary and analysis of the responses provided for each of the consultation proposals.

### **Next steps**

We will publish this report by 31st December 2011, at the same time as the publication of the final specifications that will be made under Section 96(7).

## **Section 1: Consultation summary**

This section summarises the consultation responses for each of the proposals made in the consultation document.

The table on the following page provides a brief summary of the overall consultation responses together with an outline of our decision on each of the consultation proposals.



*Specifications in Relation to the Reasonable Adjustment of General Qualifications: Report on Consultation Responses*

<p>Alternatively would you agree with a lower limit of 30 per cent as the maximum percentage of a qualification that can be exempted?</p> <p>Respondents were invited to state their view as to the level at which the lower limit should be set.</p>	<p>agreement</p>		
<p>C. An exemption to part of a component should not be used as a reasonable adjustment. Exemptions should only be provided for whole components where a candidate cannot access any part of that component.</p>	<p>Some agreement</p>	<p>There was a majority in favour of exempting only whole components, while some respondents favoured part-component exemption in order to allow candidates to demonstrate their skills. Concerns were expressed from awarding organisations about the feasibility of administering exemptions for parts of a component in terms of the complexity of the process needed to manage fair and consistent delivery and to standardise assessment.</p>	<p>This proposal should become a specification. Exemption of only whole components is the current situation and, in view of the responses, it would seem appropriate to maintain the status quo for the time being.</p>
<p>D. Awarding organisations should not make reasonable adjustments for disabled candidates in relation to grade boundaries and pass</p>	<p>Agreement</p>	<p>There was strong agreement that grade boundaries and pass marks should be the same for disabled and non-disabled candidates. There was concern expressed that introducing</p>	<p>This proposal should become a specification. This fits with the idea that reasonable adjustments are intended to try to create a level playing field for candidates with disabilities, so that they compete on an equal</p>

<p>marks, also known as 'cut scores'.</p>		<p>different 'cut scores' for disabled candidates could add further challenge to the grading system and might result in a two-tier system, which could impact post-course progression to employment and/or continuing education.</p>	<p>basis with their peers and gain the qualification on merit. Therefore, where a candidate is not subject to an exemption, grade boundaries must be applied in a consistent fashion.</p>
<p>E. Human readers should not be used as a reasonable adjustment where a candidate's reading ability is being assessed.</p>	<p>Some agreement</p>	<p>The majority of respondents agreed with this specification and welcomed the possibility of enabling independence of candidates in an examination. Concerns about the availability of computer readers in centres were mentioned by a few respondents.</p> <p>The importance of having a clear definition of 'reading' in terms of what is being assessed (i.e. decoding words from a page or comprehension) was mentioned by several respondents.</p>	<p>This proposal should become a specification. The proposal relates to human readers only, thus representing a relaxation of the current practice in which computer readers are also typically disallowed when a candidate's reading ability is being assessed. The use of assistive technologies provides the possibility of enabling independence of candidates in an examination without adding any nuance or meaning that the vocal interpretation of a human reader might provide. It will be for awarding organisations to decide whether the use of such technologies would be a reasonable adjustment in any particular set of circumstances.</p> <p>Regarding concerns about the availability of computer readers in centres, it would be inappropriate for us to prohibit access to a suitable reasonable adjustment on the basis of a possibility that not all candidates who might wish to use the adjustment would have</p>

			access to it.
F. Scribes and voice recognition systems should not be used as a reasonable adjustment to demonstrate written skills where those written skills form part of the qualification's assessment objectives.	Respondents' views are divided	Just over half the respondents agreed with the proposal, with some indicating that scribes should be used only as a last resort, with greater use of technology such as word processors with the spell-check facility disabled. It is likely that the proposal was not explained clearly enough in the consultation, as several of those who disagreed with the proposal had not understood that scribes and voice recognition systems would be allowed under this specification provided the marks for spelling, punctuation and grammar were not available to the candidate, or unless a candidate using a scribe spelt out the individual words. This is current practice and would still be the case under the specification. Concerns about the current assessment inconsistencies between GCSE English and Functional Skills English were also mentioned.	This proposal does not represent a change to existing practice and should become a specification. This specification would not preclude the use of scribes and voice-activated software altogether. It would mean that, where such aids are used, any marks allocated to spelling, punctuation and grammar would not be available to the candidate, apart from the situation in which a candidate working with a scribe spells out the letters of each word. Similarly, marks for spelling, punctuation and grammar would not be available to those using computers for writing unless the spell-check facility had been turned off.
G. British Sign Language (BSL) should not be used as a reasonable adjustment	Agreement	There was general agreement that BSL should not be used as a reasonable adjustment in such	This proposal does not represent a change to existing practice and should become a specification.

<p>where candidates are required to demonstrate their ability to speak or listen in English or a modern foreign language (MFL).</p>		<p>circumstances. Reasons for this included:</p> <ul style="list-style-type: none"> <li>▪ BSL is recognised as a language in its own right</li> <li>▪ Current GCSE subject criteria in English and MFLs specifically reference the ability to speak and listen, but do not refer to non-written communication in the wider sense and so do not include assessment objectives appropriate for the assessment of BSL.</li> </ul> <p>There were concerns expressed that current GCSE English and Functional Skills English specifications do not have similar approaches to the use of BSL.</p>	<p>It is acknowledged that BSL is a language in its own right.</p> <p>While the current subject criteria for GCSE English and MFLs are still operational, the use of BSL would risk undermining the reliability of such qualifications to indicate the knowledge, skills and understanding of the candidate.</p>
<p>H. Practical assistants should not be used as a reasonable adjustment to carry out physical tasks or demonstrate physical abilities where those physical tasks or abilities form part of the qualification's assessment objectives.</p>	<p>Agreement</p>	<p>The majority of respondents were in agreement that it was appropriate to use a practical assistant to perform tasks that are not part of an assessment objective, e.g. turning pages in a written examination, but not to allow a practical assistant to demonstrate physical skills that form part of the assessment objectives,</p>	<p>This proposal reflects the current situation and should become a specification.</p> <p>Allowing the support of a practical assistant for physical tasks that are being assessed would not provide a clear indication of the candidate's skills and could undermine the credibility of the final qualification award.</p>

<p>I. Do you agree that there should be no specification on oral language modifiers (OLMs)?</p>	<p>Respondents' views are divided</p>	<p>such as playing a musical instrument.</p> <p>Concerns were expressed regarding the extent and quality of current modifications to examination papers, and also about the quality of the modifications that some OLMs provide.</p> <p>The responses were fairly evenly divided about the use of OLMs, with an overall polarisation of views between the awarding organisations (generally raised concerns regarding the use of OLMs) and disability groups (generally in favour of the use of OLMs).</p>	<p>In the light of the divided responses, there is currently insufficient available evidence about the use of OLMs to make a reasoned judgement about their use. Therefore, no specification should be made on OLMs. This means that OLMs can continue to be used to support candidates by helping them with carrier language, but not with technical language.</p> <p>There is a need to undertake further investigation into the use of OLMs and modified examination papers upon which to base a future review of the need for a specification on OLMs.</p>
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## **Section 2: Consultation approach**

Our aim was to gather views from a wide range of people and organisations; from those who design and deliver qualifications, to those who study them or who support learners in education. To ensure the consultation was accessible, and clearly targeted, we identified stakeholders with an interest and/or influence in the subject matter. Stakeholders were broadly grouped for communication purposes:

1. Fellow regulators and the Department for Education (DfE)
2. Equality and Human Rights Commission (EHRC), groups representing disabled learners (including our consultative bodies the Access Consultation Forum and the External Advisory Group on Equality and Inclusion), Joint Council for Qualifications (JCQ) awarding organisations and the JCQ itself
3. Wider interested parties, including those working within schools/centres (e.g. examinations officers, specialist teachers, learners and their carers)
4. Wider public.

Forms of engagement included:

- Informal engagement with stakeholders
- Email to tier 1, 2 and 3 stakeholders at the start of the consultation
- High profile half-day events to inform stakeholders and encourage their response
- Reminder emails prior to the consultation close.

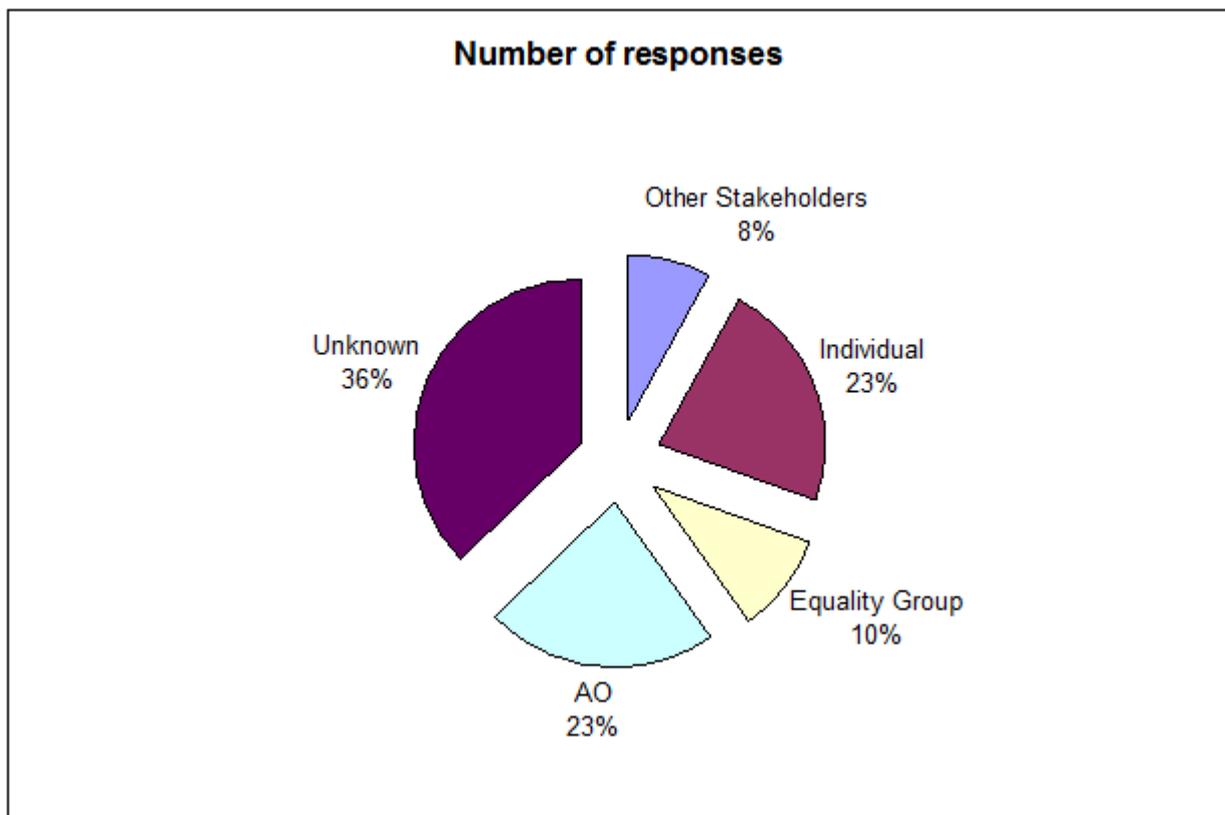
The two half-day consultation events held on 5th July were well attended (around 70 delegates) and included representation from disability organisations, awarding organisations, examinations officers, teachers, special educational needs co-ordinators and a small number of disabled students.

Individuals and organisations from the various stakeholder groups were invited to respond, and an open consultation notice was put on our website. A set of open and closed questions was developed to provide a structured method of responding to the proposals.

In total, 62 responses were received from a diverse range of stakeholders. These stakeholders included representatives from England, Wales and Scotland. The public were invited to comment as they wished. The results show that some responded partly, while others answered all the questions. For the analysis, stakeholders were grouped into the following groups:

- Awarding organisations (suppliers of qualifications, assessments and examinations)
- Equality groups
- Stakeholders (this includes responses from government departments to education centres)
- Unknown (we received a number of anonymous responses)
- Individuals (this includes learners and parents, i.e. members of the public).

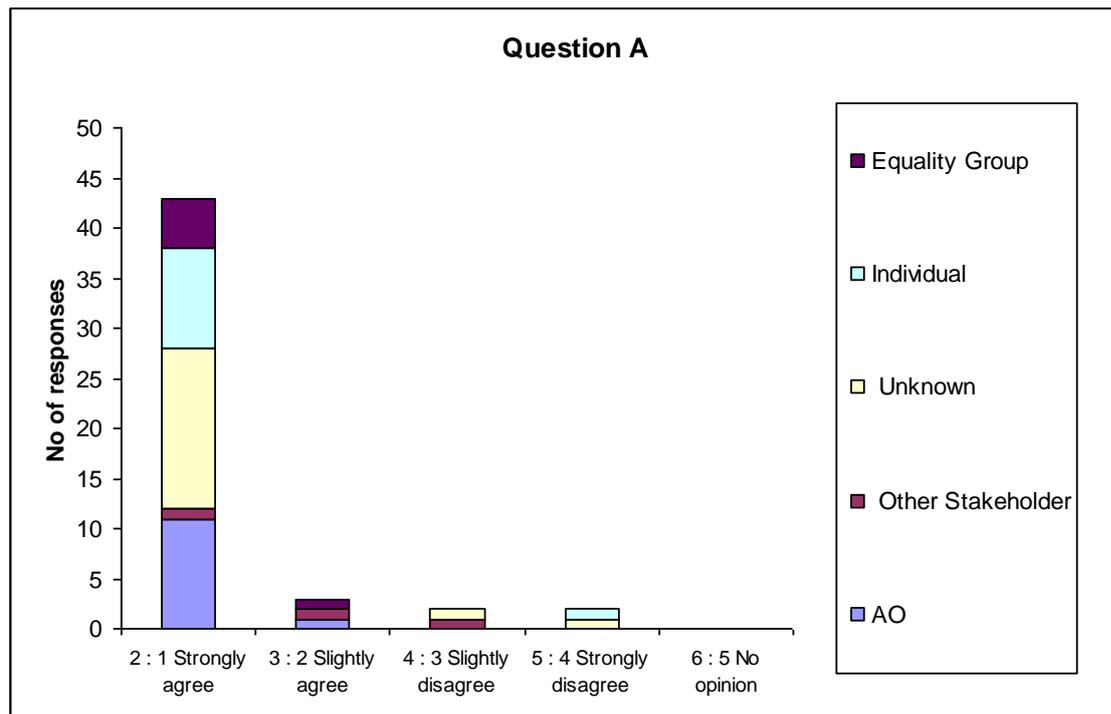
**Table 1: Response by stakeholder group**



## Section 3: Response analysis

This section of the report provides analysis of the responses to each of the proposals in the consultation document.

### 3.1. A. An exemption must not be used as a reasonable adjustment, except where no other reasonable adjustment is available to the candidate. Do you agree with this specific proposal?



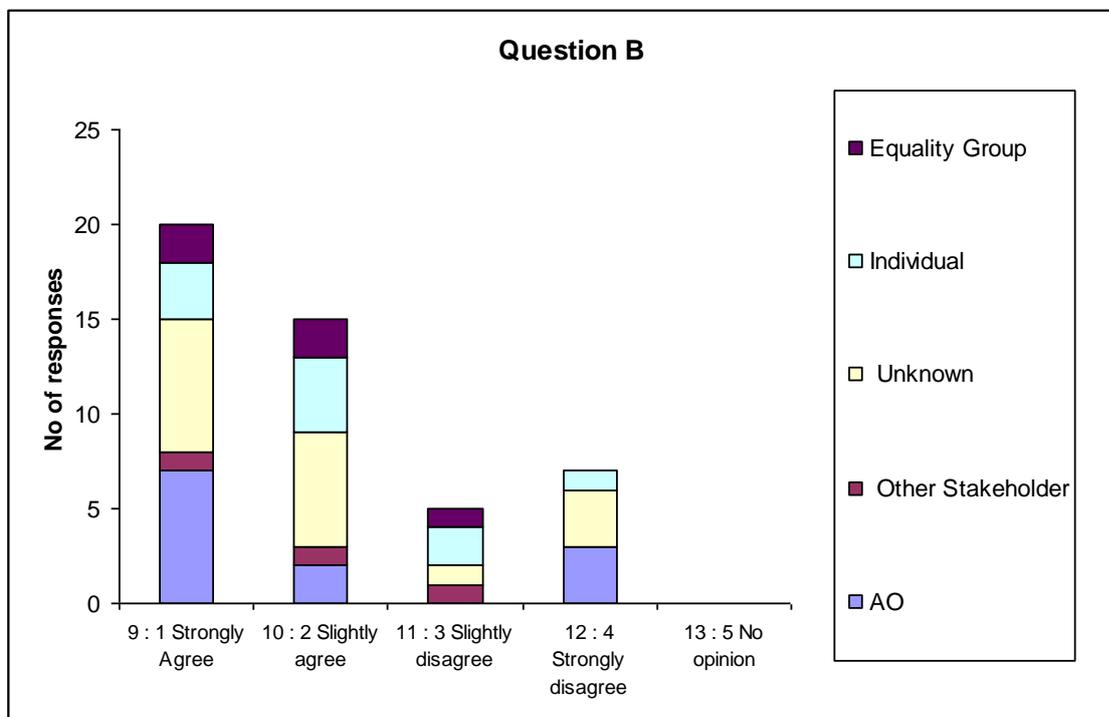
Of the 50 responses to this question, 46 agreed with this proposal. Of those who agreed, 43 strongly agreed.

Key messages are:

- In the majority of cases the respondents agreed that exemptions should only be used as a last resort, and only when all other reasonable adjustment arrangements have been considered and exhausted.
- Most awarding organisations were of the view that, where possible, reasonable adjustment should be made to maintain public confidence in the qualification and for the benefit of candidates. Attempts should always be made to enable candidates to access and be assessed on all the components within a specification.
- A minority of stakeholders stated that exemptions give the disabled candidates an unfair advantage, and should be avoided as a number of other reasonable adjustment options are available.

- Equality groups tended to agree that exemptions need to remain as a reasonable adjustment, but should only be used as a last resort. Members of this group also stated that it would be better if the design of qualifications was such that an exemption was not necessary. One group suggested that exemptions should only remain until “such time as inclusive design is properly implemented... However, it is clear that linking future provision to a past arrangement, which was drawn up in a different legislative context, cannot be helpful in the longer term, and we would like this anomaly resolved”.
- Equality groups pointed out that, in considering reasonable adjustment alternatives, there is a need to ensure that candidates are not disadvantaged, and that it is still possible to assess the required skills and knowledge for that subject.
- There was general support for the practice of certificate indication as a method of showing that the candidate has not accessed all the assessment objectives. The respondents, however, wanted it to be clear on the certificate that this is due to not all the assessment objectives being accessible.

**3.2. B. An exemption must not be used as a reasonable adjustment where it would form more than 50 per cent of the available (weighted) marks of a qualification. At A level, at least one A2 unit should be completed. For Principal Learning, 50 per cent of the qualification should be taken to mean 50 per cent of the guided learning hours. Do you agree with this specific proposal?**

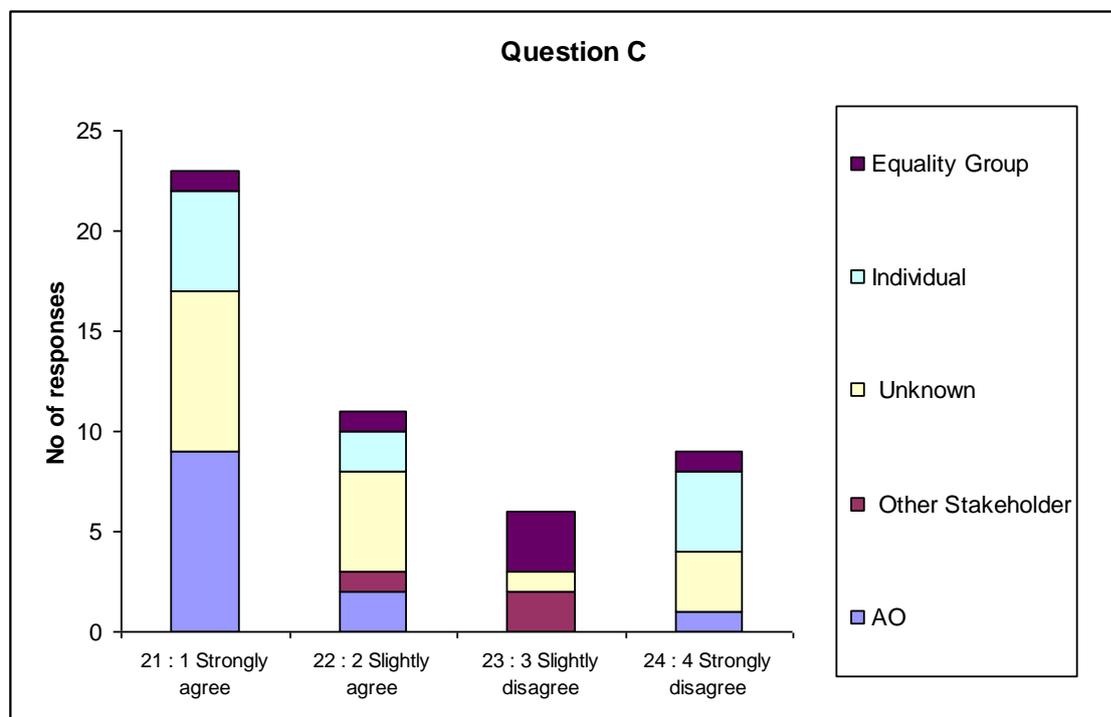


Of the 47 responses to this question, 35 agreed with this proposal and 11 disagreed. Of those who agreed, 20 strongly agreed.

Key messages are:

- Awarding organisations tended to agree with the proposal that, to maintain the validity of qualifications and public confidence, exemptions should not amount to more than 50 per cent of the total mark, or at least one A2 unit should be completed. However, the awarding organisations that responded to the consultation suggested that a lower limit of 40 per cent would be more feasible than 50 or 30 per cent.
- Stakeholders and equality groups agreed, but tended to state that any exemption of more than 50 per cent would undermine public confidence and would not accurately or reliably indicate the knowledge, skills and understanding of the candidate for the subject.
- Twenty six respondents did not agree with the lower limit of 30 per cent as the maximum percentage of a qualification that can be exempt, compared with 17 respondents who preferred this option. The reasons given by those who disagreed with 30 per cent were that it is too low and would not work for a number of A levels and GCSEs, where 30 per cent would be less than a whole component.
- Some stakeholders were concerned that the 30 per cent limit might exclude the candidate from an entire subject area, if the component was worth more than 30 per cent of the final mark.
- There was also a suggestion that it might be better to have a flexible approach, dependant on a candidate's needs, rather than a fixed limit. The stated rationale was that applying a fixed limit was not helpful as a broad strategy for all candidate types.

**3.3 C. An exemption to part of a component should not be used as a reasonable adjustment. Exemptions should only be provided for whole components where a candidate cannot access any part of that component.**



Of the 49 responses to this question, 34 agreed with this proposal. Of those who agreed, 23 strongly agreed. Fifteen disagreed or strongly disagreed.

The key messages are:

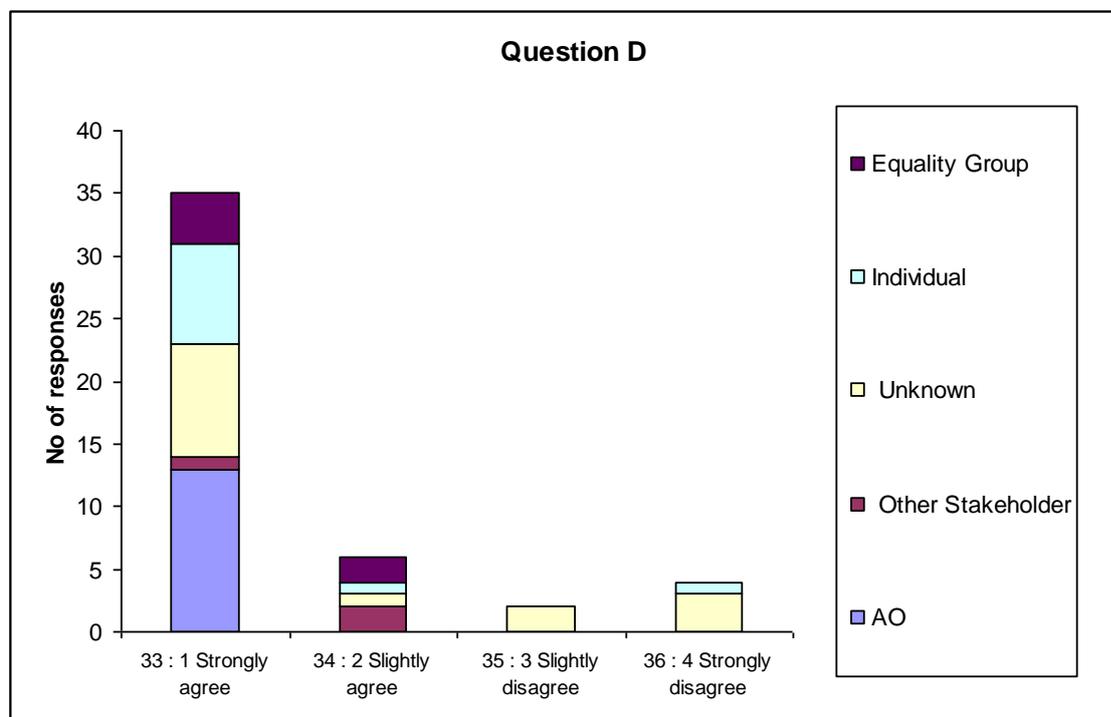
- Awarding organisations were in agreement that exemptions should be for the whole component, and this should only be the case where another reasonable adjustment is absolutely not possible.
- Awarding organisations expressed concerns about administering parts of a component, stating this would be difficult to do in a fair and consistent manner. It may impact the manageability of delivery of the qualifications, and quality control and standardisation of awarding would be at risk as the process would become too complex to co-ordinate. In addition, a part-component exemption strategy may be open to abuse as alternative access arrangements may not be pursued, the full teaching programme may not be delivered to candidates, and other options which would allow candidates to fully demonstrate their knowledge and skills may not be considered.
- However, other stakeholders and equality groups felt that part-component exemption is better for the candidates, as it would allow them to demonstrate their skills. These respondents appreciated that manageability and feasibility

would be difficult with part-component exemption, but outlined that for some qualifications this may be possible and, where it is, candidates should only be exempt from the parts of the components they are unable to do. Equality groups suggested that, where possible, if a reasonable adjustment can be made to assist the candidate to answer the question, but also ensure that the required skill is tested, this would be preferable to a whole-component exemption.

- In addition to the above core question, respondents were asked “Would you agree with a lower limit of 30 per cent as the maximum percentage of a qualification that can be exempted?” Of the 48 responses to this question, 22 disagreed with the statement. Very few reasons were provided as to why the respondents did not agree; some responses were that it should be 40 or 50 per cent, and it is also dependent on the qualification and the candidate’s requirements.

In response to: “If you would like to see exemptions granted for part of a component of a general qualification, it would be helpful if you could describe a situation in which this should/could be done (i.e. where there would not be other reasonable adjustments that could be put in place) and also how part of a component could be assessed.” In total, 11 of the respondents described situations where they felt part-component exemptions might work. The general view expressed by these respondents was to allow candidates to be exempt only from specific elements they are unable to do.

### 3.4 D. Awarding organisations should not make reasonable adjustments for disabled candidates in relation to grade boundaries and pass marks, also known as 'cut scores'.



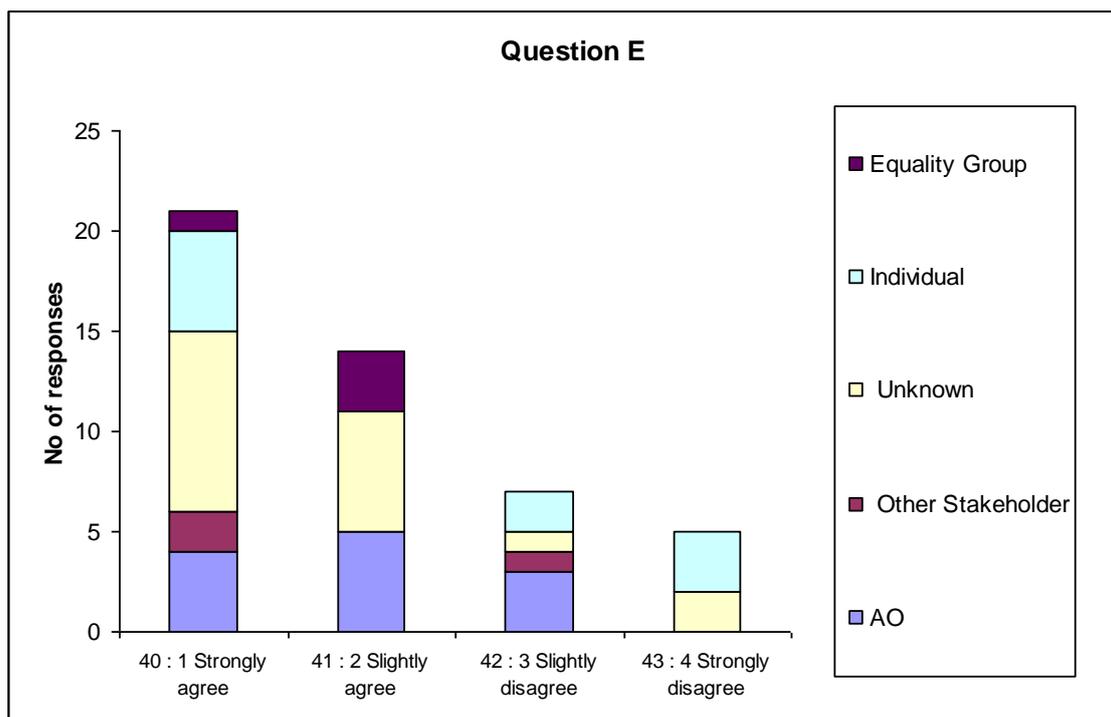
Of the 47 responses to this question, 41 agreed with this proposal. Of those who agreed, 35 strongly agreed.

Key messages are:

- Grade boundaries and pass marks should be the same for disabled and non-disabled candidates.
- All the respondents who agreed with the above statement were in agreement as to why grade boundaries should not be adjusted. The main reason given was to maintain public confidence and integrity in the examination system.
- Further to this, the respondents outlined that the aim of reasonable adjustments is to create a level playing field for candidates with disabilities, so that they compete on an equal basis with their peers and gain the qualification on merit. Therefore, where a candidate is not subject to an exemption, grade boundaries must be applied in a consistent fashion.
- Respondents stated that adjusting grade boundaries would not be a 'reasonable adjustment', but rather it would effectively set expectations disappointingly low for disabled candidates. Respondents wanted disabled candidates to achieve qualifications of the same value as others.

- Respondents believed that introducing different ‘cut scores’ for disabled candidates would add further challenge to the grading system and may result in a two-tier system. This would mean that disabled people’s qualifications may be valued differently by employers and universities, making progression difficult for disabled learners.

**3.5 E.1. Human readers should not be used as a reasonable adjustment where a candidate’s reading ability is being assessed.**



Of the 47 responses to this question, 35 agreed with this proposal.

Key messages are:

- The majority of the respondents agreed with the statement that human readers should not be used as a reasonable adjustment where a candidate’s reading ability is being assessed. The respondents welcomed suggestions that, in examinations, alternative reasonable adjustments such as the use of computer/ screen readers or reading pens should be used, since these allow for independence during an examination. Some awarding organisations slightly disagreed; they suggested that human readers should remain until suitable alternatives are in place as, at present, the substitutes are not in place.
- Although awarding organisations agreed with the statement, they stated that current JCQ regulation does not permit the use of reading pens or electronic readers. This is because there are no guidelines on how to monitor these multi-functional devices to ensure that their use is fair. Some awarding organisations

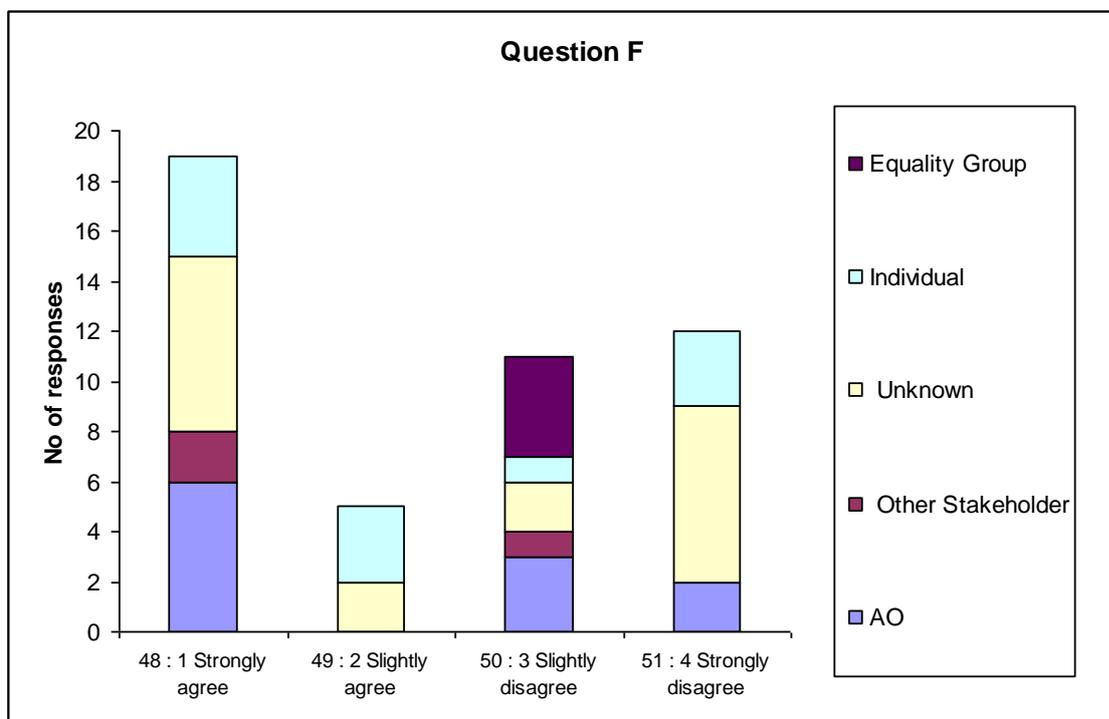
would like a clearer definition of 'reading ability', as this would allow for appropriate reasonable adjustments on what is being tested.

- Some respondents said that the use of computer/screen readers in GCSE English and GCSE English Language specifications, GCSE and GCE MFL specifications, and GCSE and GCE MFL specifications where reading is being assessed can only be considered and reviewed following the conclusions of the current National Curriculum Review. In addition, the regulator must set out whether computer/screen readers or reading pens can be used.
- Some respondents felt that alternatives to human readers would benefit the learner as they would allow candidates to be independent and participate in the assessment. The use of software is more reflective of workplace practices. Software is acceptable as it allows readers to comprehend what is read, whereas human readers may interpret text.
- Some respondents stated that there are resource implications for centres wanting to purchase this technology, and awarding organisations would need to modify assessment papers to ensure they are suitable for use with such technologies.

**3.5 E.2. Are there any circumstances in which it would be appropriate to allow the use of a human reader where reading ability is being assessed?**

Seventeen respondents felt that human readers are needed in certain situations, but this is not linked to where reading ability is being assessed. Suggestions as to some circumstances where readers may be required included the following: where some candidates do not know how to use electronic equipment, or have access to it; where it is not feasible, for example a candidate who has a temporary visual impairment; or where graphic description and multiple-choice questions are difficult to illustrate and navigate in Braille and large print.

**3.7 F. Scribes and voice recognition systems should not be used as a reasonable adjustment to demonstrate written skills where those written skills form part of the qualification’s assessment objectives.**



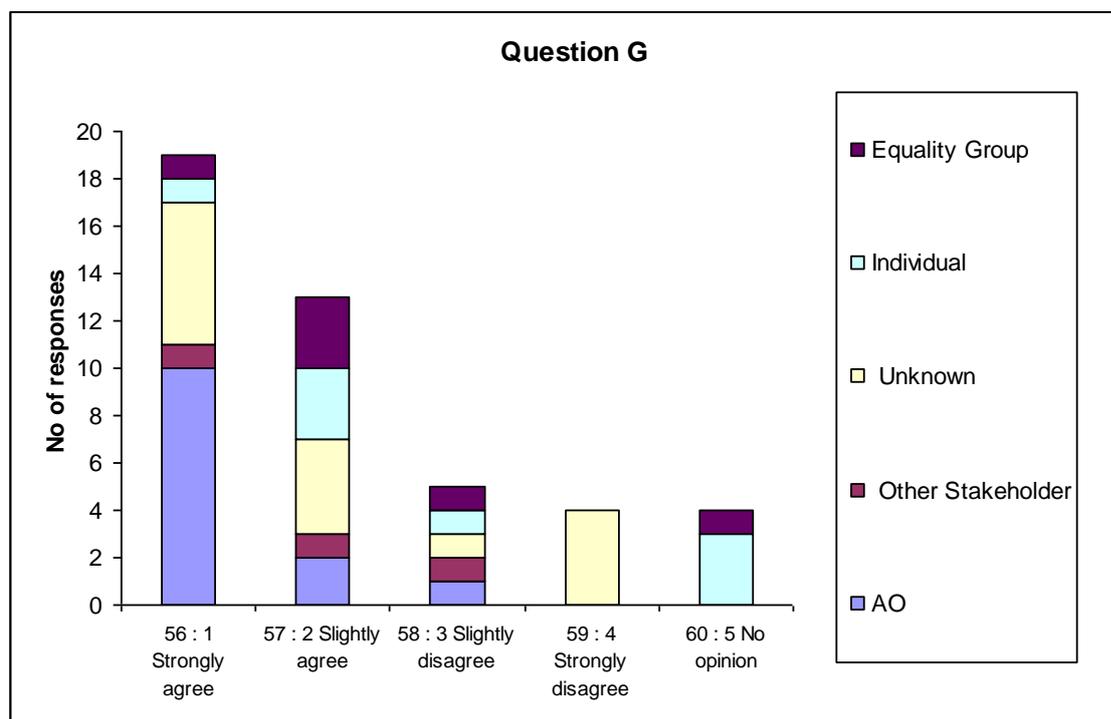
Forty eight public responses were received for this question; this is one of the two proposals where the respondents’ views were split. Twenty four agreed with this proposal, 22 disagreed and one gave no opinion. The table above illustrates this division.

Key messages are:

- Awarding organisations, to an extent, agreed that scribes and voice recognition systems should not be used as a reasonable adjustment to demonstrate written skills. They stated that scribes should only be used as a last resort. Greater use should be made of word processors with the spell-check facility disabled, transcription word processors with the spell check enabled and voice-activated software.
- Equality groups slightly disagreed with this proposal. Their reasons included that as tests do not assess handwriting, voice recognition systems and scribes should be allowed. Some stakeholders pointed to the higher education model where scribes are used with an invigilator to ensure that reasonable adjustments are appropriate. As they are supervised, the use of scribes should not undermine public confidence in the qualification. Therefore, if handwriting is not the skill being assessed, scribes could be seen as a suitable form of reasonable adjustment, but only if they are used properly.

- Some respondents stated that it should be possible for scribes to be used, and where spelling, punctuation and grammar are being tested, the candidates should spell out the words.
- Some respondents were concerned about the current inconsistencies between GCSE English and Functional Skills (FS) English, stating that this should be resolved at the earliest opportunity.

### **3.8 G. BSL should not be used as a reasonable adjustment where candidates are required to demonstrate their ability to speak or listen in English or a Modern Foreign Language (MFL).**



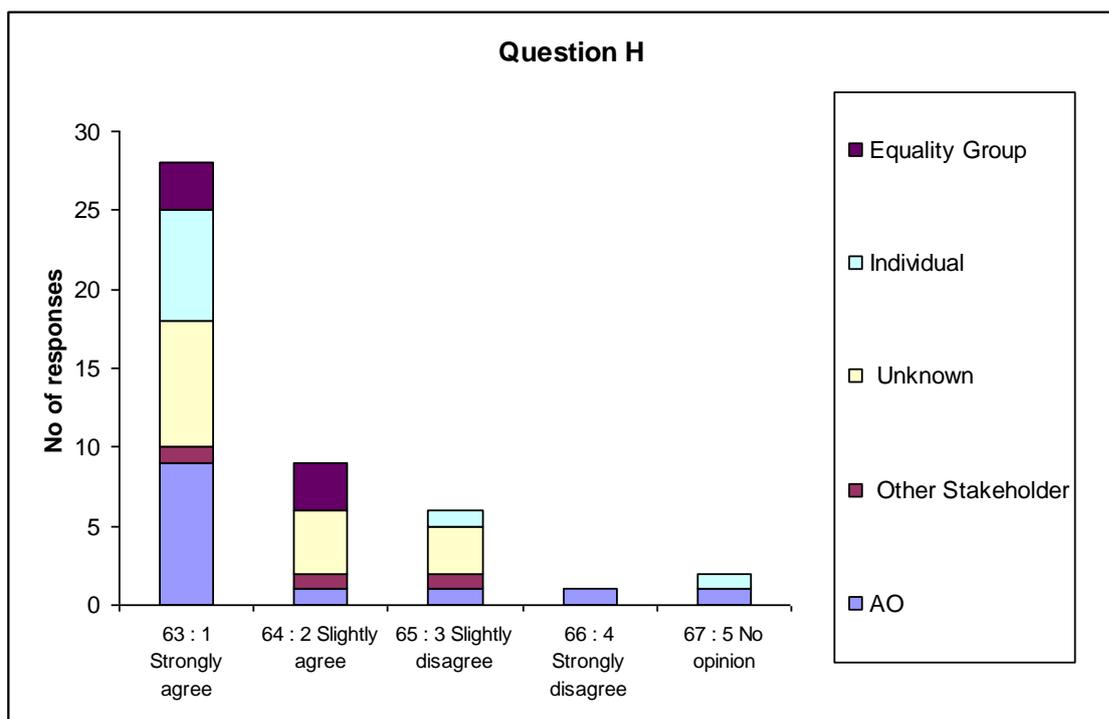
Of the 45 responses to this question, 32 agreed with this proposal and 4 expressed no opinion.

Key messages are:

- Respondents felt that BSL is a recognised language and requires a specific level of understanding. Therefore, to include it would risk undermining the reliability of English and MFL qualifications in assessing knowledge, skills and understanding, as the person using BSL would not be demonstrating verbal and aural abilities in the particular language.
- Inconsistencies between GCSE English and Functional Skills English were highlighted.

- However, a handful of respondents felt that BSL should be allowed for deaf candidates, for listening elements. One respondent raised the issue of inconsistencies between Scotland and England, where deaf candidates are able to respond to assessments and examinations via a BSL interpreter. A few respondents felt this area needed further exploration with experts from the BSL field.
- Some of the respondents suggested alternatives. These included Sign Supported English, using cued speech interpreters for some English and MFL examinations, adjusting the subject criteria, and broadening the speaking and listening components to include non-written forms of communication so BSL could be included as one of the ways to demonstrate ability, as has been done for FS.

**3.9 H. Practical assistants should not be used as a reasonable adjustment to carry out physical tasks or demonstrate physical abilities where those physical tasks or abilities form part of the qualification’s assessment objectives.**

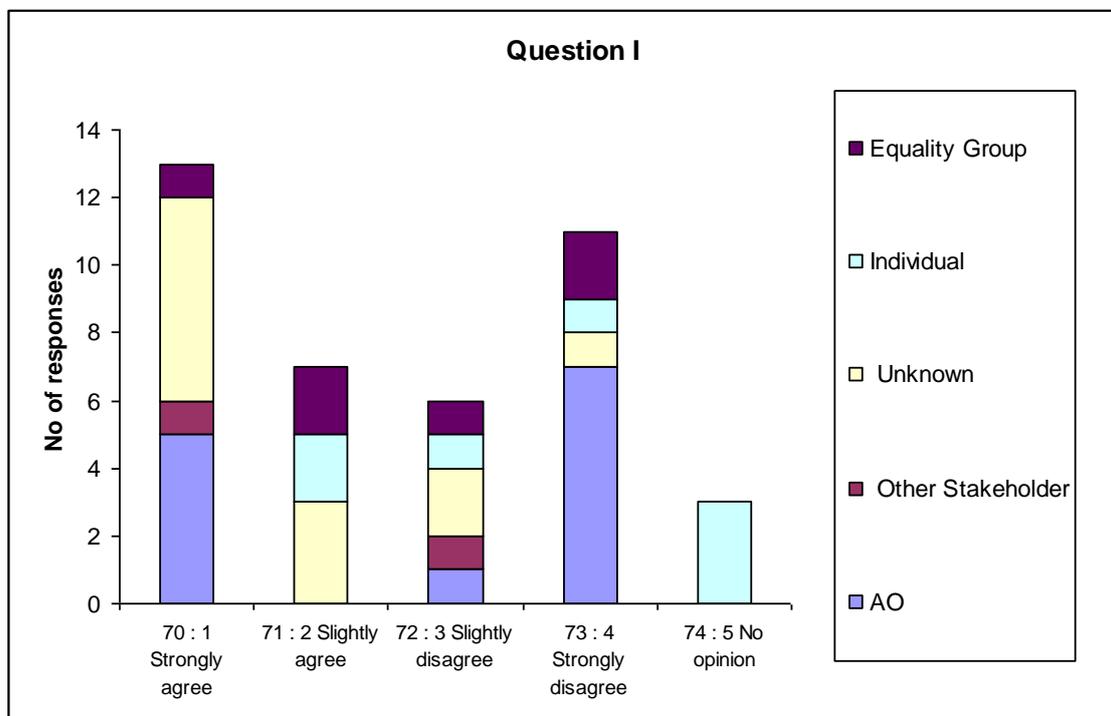


Of the 46 responses to this question, 37 agreed with this proposal. Of those who agreed, 28 strongly agreed.

- All respondents agreed that if a qualification’s assessment objectives require a candidate to carry out physical tasks or demonstrate physical abilities, a practical assistant should not be used.

- Respondents stated that allowing such support would mean that the qualification would not provide a clear indication of the candidate's skills. This would lead to a loss of public confidence in the qualification and undermine the credibility of the final qualification award.
- Some respondents, in particular equality groups, were concerned about the way the proposal was worded. They felt it would be too prescriptive and inflexible, as in some instances, such as design and technology and catering for health and safety issues, a practical assistant is needed to assist, but not demonstrate, practical skills on behalf of the candidate.
- Also, equality groups stated that science candidates with physical disabilities would need an assistant to perform practical experiments. In this case the candidate would direct the assistant on how to conduct the experiment. Or a blind candidate could use a practical assistant to confirm whether identified information is correct.
- Respondents would like the level of practical assistance to be clearly outlined in inclusion sheets.

### 3.10 I. Do you agree that there should be no specification on oral language modifiers (OLMs)?

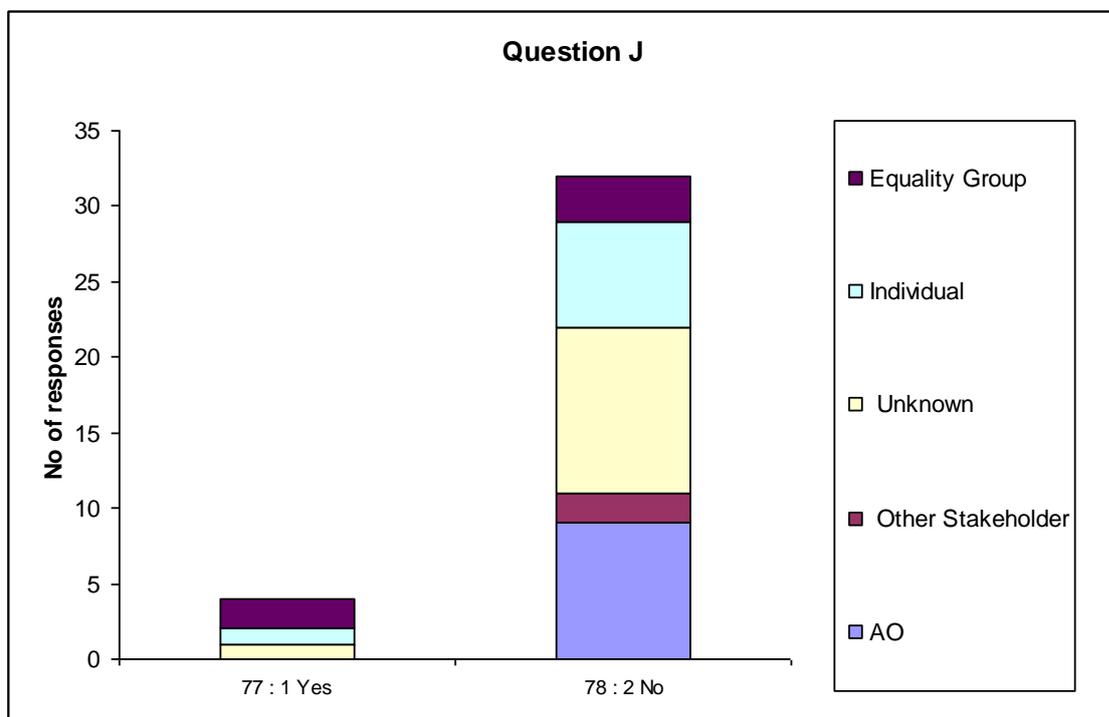


40 public responses were received for this question; this is one of the two proposals where the respondents' views were split. 20 agreed with this proposal, 17 disagreed and three gave no opinion. The view of awarding organisations and disability groups tended to differ. The table above illustrates this division.

Key messages are:

- Due to the concerns outlined in the consultation document regarding the use of OLMs, some respondents would like us to establish clearer OLM guidelines to maintain and enforce consistent standards.
- Some respondents, in particular awarding organisations, argued that modified papers should be of sufficient quality to avoid the need for OLMs.
- Equality groups were generally in favour of OLMs' use and believe it is needed in some cases. But, as highlighted by the other respondents, training and clarification are required on the application of OLM modifications and when they are needed.
- A number of awarding organisations supported the notion that a specification should be made in relation to OLMs. These respondents stated that OLMs were originally a three-year pilot, which ended in 2010, but the arrangement has continued; it has now reached a point where awarding organisations are concerned that OLMs may be advantaging or disadvantaging candidates.
- As a result, JCQ awarding organisations strongly believed that a specification which removes OLMs as an access arrangement should be effective from 1st September 2013. The JCQ awarding organisations stated that over the past four years they have had serious concerns, "These are wide-ranging concerns, principally: no real idea as to what is taking place in the examination room; where BSL is used by an OLM is a technical term/subject-specific term being signed?; concerns over those performing the role of an OLM who have often received inadequate and insufficient training; considerable potential for malpractice; significant concern over candidates either being advantaged or disadvantaged through the practices of an OLM". In addition, awarding organisations highlighted that they do not offer training and have limited control over how OLMs make modifications.
- All respondents agreed that better training is needed for examiners, modifiers and OLMs in relation to this issue. There was agreement that papers should be modified in advance to ensure that all candidates are given the same opportunities, and that candidates need to be better prepared and aware of how to utilise OLMs.
- Awarding organisations would like to see an evaluation conducted on OLMs, in order to review their future role. Overall, all the respondents felt a better understanding and monitoring of the situation is needed, in order to assess whether or not OLMs are advantaging or disadvantaging candidates, and whether they are required in the future.

### 3.11 J. Are there any specifications about reasonable adjustments that should not be made in relation to general qualifications that have not been listed in this document?



36 responded to this question, of which 32 felt no other reasonable adjustment to the specification should be made in relation to general qualifications. Four respondents provided an answer to this question, but none of the responses outlined any further specifications about reasonable adjustments that **should not be made** in relation to general qualifications.

The responses provided examples of what the respondents felt **should be** happening:

- Early opening – to allow more time to modify papers
- The process should not dictate the range of arrangements that are available
- Better use of e-assessment
- Modifications should be made at the design stage of the qualification
- A review of extra time
- It is important that candidates are assessed in ways that are familiar to them, i.e. what they use in the classroom.

## **Concluding remarks**

Overall, most of the respondents agreed with the proposals we outlined in the consultation. The respondents were asked for reasons for their answers, and these generated some interesting and valid matters for us to consider. Three of the proposals (B, F and I) generated some divided views among the respondents:

- B. (Relating to the maximum amount of a qualification that would be appropriate for exemption) Alternatively would you agree with a lower limit of 30 per cent as the maximum percentage of a qualification that can be exempted?
- F. Scribes and voice recognition systems should not be used as a reasonable adjustment to demonstrate written skills where those written skills form part of the qualification's assessment objectives.
- I. Do you agree that there should be no specification on oral language modifiers (OLMs)?

The views expressed have been taken into consideration as part of our decision-making process. Our decisions relating to each of the consultation proposals are shown in the table in section 1 of this report.

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