

CONSULTATION DECISIONS

# Guidance on designing and developing accessible assessments: decisions

**ofqual**

# Contents

<b>Introduction .....</b>	<b>4</b>
<b>Background .....</b>	<b>6</b>
<b>Summary of decisions.....</b>	<b>8</b>
<b>Details.....</b>	<b>9</b>
The introduction of the new guidance .....	9
The scope of the new guidance.....	9
Examples.....	10
Drafting changes.....	10
Design and development.....	10
Readability and accessibility.....	11
Implementation .....	12
Evaluation .....	13
<b>Content of the new guidance.....</b>	<b>14</b>
Introduction.....	14
The assessment construct.....	14
<b>Assessment structure.....</b>	<b>14</b>
<b>Assessment instructions.....</b>	<b>15</b>
Language.....	15
Sentence structures .....	16
<b>Source text or materials, context, images and colour.....</b>	<b>16</b>
<b>Source text or materials .....</b>	<b>17</b>
Context.....	17
Images.....	18
Layout.....	18

*Guidance on designing and developing accessible assessments: decisions*

Alternative formats and assistive technology .....	19
An awarding organisation's processes.....	19
<b>Equalities impact assessment.....</b>	<b>20</b>
<b>Regulatory impact assessment.....</b>	<b>21</b>

# Introduction

Qualifications must give a reliable indication of what Learners know, understand and can do.

Learners must be able to show what they know, understand and can do in their assessments without having to overcome unnecessary obstacles. It would not be fair if an assessment had been designed and developed in a way that prevents some Learners from fully demonstrating their knowledge, skills and understanding – in other words if the assessment is not as accessible to some Learners as it is to others. We are introducing new guidance for awarding organisations to help them avoid building such obstacles into their assessments.

Avoiding unnecessary obstacles does not mean that an assessment will be less rigorous. Quite the opposite – it means that the assessment will be stronger, as it will be a more valid measurement of a student's knowledge, skills and understanding. It also means that the assessment will be fairer, as it will give Learners a true opportunity to demonstrate their ability.

Avoiding unnecessary obstacles is not the same as making things easy for Learners. An assessment which is designed to test Learners' command of high-level and complex language must test this. However, if this is not part of what the assessment is designed to assess, such language may be an unnecessary barrier – which would make the assessment less valid and less fair for Learners.

Ofqual's [General Conditions of Recognition](#) require awarding organisations to deliver valid, accessible assessments. We identified that additional guidance could help awarding organisations to understand and comply with their accessibility obligations under Conditions C1, D1, D2, E4, G1, G3, G6 and G9 (set out fully in the background section below).

We are now publishing the new guidance on designing and developing accessible assessments, following public consultation. The guidance should help awarding organisations recognise and avoid irrelevant features in their assessments that could unfairly disadvantage Learners and/ or prevent Learners from demonstrating their knowledge, skills and understanding.

We did not propose any changes to the Conditions, so the obligations on awarding organisations are unchanged, although they will be required to have regard to the guidance.

We engaged with regulated awarding organisations during the consultation process:

We delivered a seminar on the draft guidance at the Federation of Awarding Bodies' conference in November 2021. In January 2022 we hosted a Knowledge Base webinar for all awarding organisations on designing and developing accessible

assessments. We presented updates on the consultation to members of Ofqual's [Access Consultation Forum](#), the Department for Education's Assistive Technology engagement group and our Vocational and Technical Qualifications Awarding Organisations Equalities Forum in November 2021 and to our Stakeholder Equalities Forum in January 2022.

# Background

All awarding organisations must meet Ofqual's regulatory requirements relevant to the qualifications they offer – these are the rules we set to make sure qualifications are valid and fit for purpose. One such set of requirements is the [General Conditions of Recognition](#) (the Conditions of Recognition). All awarding organisations we recognise must comply with these.

We publish statutory guidance to help awarding organisations understand how to comply with the Conditions of Recognition. Awarding organisations that award regulated qualifications must have regard to such guidance. This means that they must review the guidance and take seriously what it says.

Guidance is not a further set of rules, and the approaches set out within it are not the only way to comply. However, if an awarding organisation chooses to take a different approach, it needs to be able to explain why it has done so.

We have had guidance on accessibility that applies to the following Conditions:

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

We reviewed our Conditions and existing statutory guidance and found the Conditions on accessibility were fit for purpose, but that additional guidance may be helpful. We received feedback that awarding organisations and stakeholder organisations would welcome more guidance in this area.

We [consulted on proposals to introduce new statutory guidance on designing and developing accessible assessments](#) between 1 November 2021 and 24 January 2022.

We proposed the new guidance would complement the guidance currently associated with Conditions D2, G1, G6 and G9. The guidance would also help awarding organisations comply with their obligations under Equalities Law, a requirement of Condition D2.

The new guidance reflects the existing guidance for Condition G3, and so will replace it. There is currently no guidance for Conditions D1 or E4.

The proposed guidance was informed by a desk-based literature review of accessibility guidance and best practice, and engagement with awarding organisations and other representative and interest groups.

We set out in this document the decisions we have taken following the consultation and explain how we have taken account of respondents' feedback. Alongside this document, we have published an analysis of consultation responses and the guidance itself.

## Summary of decisions

In summary, we have decided to implement the proposed guidance, largely as set out in the consultation. This will replace the current guidance to Condition G3.

In response to feedback, we have amended the draft guidance on which we consulted to explicitly refer to validity, and to make the wording and some of the examples clearer in places.

We proposed to publish our final guidance in spring 2022, and to give awarding organisations 6 months within which to review their approach in line with the Guidance.

The guidance will take effect on publication and awarding organisations will be expected to have regard to the guidance when producing new assessment materials. There will be no requirement for awarding organisations to change assessments that have already been finalised when the guidance is published.



## Details

In this decisions document, and the accompanying analysis of responses, we have not discussed every point made by those who responded to our consultation. We did, however, consider all points made as we finalised the guidance.

### The introduction of the new guidance

A majority of respondents to the online consultation agreed or strongly agreed that the:

- content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners (88.8%)
- style of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners (84.0%)
- draft guidance will have a beneficial impact on all Learners taking regulated assessments (73.6%)

A majority of respondents to the online consultation (54.4%) agreed or strongly agreed with the proposal for the new guidance to replace existing guidance to Condition G3. Around a quarter (27.2%) of responses neither agreed nor disagreed with this proposal and 2.4% did not answer this question. A minority of respondents (12.0%) did not support removal of the existing guidance to Condition G3.

We have decided to introduce the guidance largely as set out in the consultation. The guidance will sit under Condition D of the General Conditions in the Ofqual Handbook and will replace the existing guidance to Condition G3.

### The scope of the new guidance

As we state in the introduction to the guidance:

This guidance is for awarding organisations when they are designing and developing assessments – particularly, though not exclusively, exams or other written assessments. The guidance concerns the accessibility of assessments for students, referred to hereafter as Learners.

We decided to focus the guidance on the accessibility of assessments rather than on qualifications or qualification design.

A clear theme from the consultation feedback was demand for additional guidance with more focus on practical, performance-based (including vocational and

occupational), digital (delivered on-screen and online) and remote assessments, and further guidance on use of assistive technology in assessment.

We considered expanding the scope of the proposed guidance to cover these areas in more detail. However, the new guidance takes the approach of high-level principles, and the demand is for more detailed guidance on these areas. We would need to carry out further research and consult with stakeholders before developing additional statutory guidance.

We will consider providing guidance for awarding organisations that addresses these aspects of assessment.

Some respondents noted the importance of accessibility being addressed in subject content and in qualification design, however changes to subject content and qualification design are outside the scope of this guidance, and beyond Ofqual's remit. We have shared consultation feedback with the Department for Education, where relevant.

## Examples

Many responses asked for more examples or case studies to be included in the guidance. We considered the use of examples when drafting the proposed guidance. We decided to use examples cautiously to keep the guidance manageable in length and avoid being too prescriptive or burdensome.

As this is guidance to which awarding organisations must have regard, rather than detailed rules for awarding organisations to follow, we consider the approach achieves the right balance between guidance and examples. We have, however, slightly expanded or amended some of the examples in response feedback. Some of these changes are detailed below under [‘Content of the new guidance’](#).

## Drafting changes

In response to feedback, we made some minor drafting changes where we agreed it was helpful to do so. We have summarised below the main revisions made in the section [‘Content of the new guidance’](#).

## Design and development

We asked in the consultation whether there were any other aspects of design and development on which guidance on accessibility would be useful for awarding organisations.

There were 68 online responses to this part of the question. Much of the feedback related to requests for further guidance (particularly on practical and performance-based, and digital or on-screen assessments) and additional examples to be included in the guidance – which we have addressed above.

Some respondents commented on the content, style and layout of the guidance. We considered this feedback when updating the guidance. The main changes we made to the guidance in response are detailed under '[Content of the new guidance](#)' below.

## Readability and accessibility

We made some minor drafting changes to the guidance to improve its readability.

We are required to write the guidance in accordance with the Government Digital Service (GDS) style guide which covers use of bullets and numbering, headings and bold or italic text. This means we have not been able to make all suggested changes in response to specific comments.

The [GDS style guide was subject to user research](#) which was used to create the training and [guidance for planning, writing and managing content on GOV.UK](#). [Around 1 in 5 of the UK working population is classed as disabled](#) and adjustments needed to access government information are individual and needs vary across the population. We are committed to providing accessible versions of publications in line with government legislation, WCAG 2.1 level AA requirements and best practice identified by GDS, the Government Communication Service and the Central Digital and Data Office. Where publications do not meet an individual's specific requirements, we accept requests to provide alternate accessible versions.

Several respondents asked us to provide a 'student friendly' version of the guidance, or a glossary of terms. The accessibility guidance has been designed to support awarding organisations in complying with their obligations under Ofqual's General Conditions of Recognition. The purpose of the guidance is not to provide information directly to Learners; it is for awarding organisations, although Learners are welcome to read the guidance if they would find it helpful. We sought Learners' views on the proposed guidance during the consultation process and considered their responses. We decided not to produce a further version of the guidance because it is technical in nature and aimed at helping awarding organisations to comply with their accessibility obligations under our Conditions. However, we have produced a one-page summary of the Principles contained within the guidance.

We decided not to produce an additional glossary of terms because Section J of the [Ofqual Handbook](#) sets out all the terms we have used in a defined sense throughout our Conditions and Guidance. Where we use a term with a defined meaning, we

capitalise the term and include a definition in Section J. If we use a word that is not capitalised it is not being used in a defined sense and has its ordinary meaning.

Two respondents (a parent or carer, and a representative or interest group) called for an easy read version of the guidance to be made available, and for it to be produced in languages other than English. We do not routinely publish easy read versions of documents. This is statutory guidance for awarding organisations and necessarily contains some technical language. Readers can request our documents in an accessible format if a document is incompatible with their accessibility needs.

## Implementation

Feedback on when the guidance should be introduced was mixed, ranging from immediately to 2024. There were 85 online responses to this question.

Thirty-eight respondents called for the guidance to be introduced immediately, in time for summer 2022 exams, or as soon as possible. When we publish the guidance, papers for summer 2022 exams will have been finalised as awarding organisations prepare assessment materials well in advance.

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

Twenty respondents called for a period of over 6 months before the guidance would be implemented. Some suggested a period of 6-12 months before implementation, to allow awarding organisations to review and update examination materials. Fourteen respondents suggested implementation in 2023. Two awarding organisations told us drafting had started for 2023 assessments and called for implementation from 2024.

Some awarding organisations asked whether they would be expected to apply the guidance retrospectively to assessments that were already in development, or to assessments that had been finalised. Awarding organisations prepare materials well in advance of learners taking assessments. There would be no requirement for awarding organisations to change assessments that had already been finalised. However, if when reviewing their systems and processes, and/or when reviewing any assessments during their design or and development, an awarding organisation found a significant accessibility issue we would expect them to address that given the existing obligations under the General Conditions of Recognition.

Over two-thirds of the respondents who expressed a view about the timing of the guidance called for implementation to be sooner not later.

As the guidance does not impose new obligations on awarding organisations, we consider it reasonable that guidance will take immediate effect upon publication (which means awarding organisations will have to have regard to it). However,

Ofqual will not take any proactive steps to monitor awarding organisations' response to the guidance for 6 months after the guidance is published.

We appreciate the need for some lead time for awarding organisations to review and potentially update their systems and processes, so they can show they are having regard to the guidance. As such, while awarding organisations should have immediate regard to the guidance, we will expect this to be reflected in any assessments they commission 6 months or more after the guidance is published.

## Evaluation

Some respondents commented on the importance of Ofqual monitoring how awarding organisations have taken the guidance into account and evaluating its impact on learners.

A few respondents referred to awarding organisations' compliance with the guidance. To clarify, the guidance will be statutory which means awarding organisations must have regard to the guidance (rather than having to 'comply' with it, as they would with Ofqual's Conditions).

We plan to monitor how awarding organisations have responded to the guidance, and to evaluate its impact. We will expect awarding organisations to be able to demonstrate that they had regard to the guidance in the writing of assessments commissioned 6 months or more after the guidance was published.

# Content of the new guidance

## Introduction

In response to feedback about the challenges of accessible design for awarding organisations, we have acknowledged in the 'Introduction' to the guidance that designing and developing assessments that are accessible for the widest range of Learners is not always straightforward. We initially included this statement in the 'Background' section but not in the main body of the proposed guidance.

## The assessment construct

We added an explicit reference to validity in this section of the guidance. As some respondents rightly pointed out, the proposed Principle about the assessment construct is essentially about validity: how well an assessment measures what it sets out to do rather than measuring something else. We have reinforced this point and expressed it more directly.

The revised section is now entitled: 'Validity – the overarching principle'. The Principle, that 'an assessment task should only measure what it is intended to measure', is unchanged. We have revised the wording below the principle to highlight the importance of each Learner being able to demonstrate their true level of attainment. The amended wording reads:

The purpose of an assessment task is to enable a Learner to demonstrate their level of attainment in relation to specific elements of knowledge, skills and understanding.

To enable this, the task should only test those elements of knowledge, skills and understanding that it is intended to measure. If a task is intended to measure basic numerical skills, the task should not require Learners to also negotiate complex language (for example, in the wording of the question). However, if the task intends to measure Learners' understanding of complex language, then complex language should be the central element of the task.

## Assessment structure

Two awarding organisations suggested removing the word 'additional' from the Principle below, as they felt it suggested there were already barriers:

'The structure of the assessment should not create additional unnecessary barriers for particular Learners.'

We agree with this comment and have amended the Principle.

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

We considered whether to amend the guidance to reflect this feedback. On balance, we decided that the guidance as drafted allows for awarding organisations to consider these points as part of their approach to sequencing of tasks.

## Assessment instructions

The proposed guidance stated that the instructions in an assessment should:

be in the active voice and give direct instructions. For example, “You have 2 hours to complete the assessment”, “Answer all the questions”

Based on respondent feedback that it is good practice for assessment instructions to clearly state where a Learner has an extra time allowance that has not been included in the standard time allowance, we have expanded this example – which now states:

be in the active voice and give direct instructions. For example, “You have 2 hours” or “you have 2 hours plus any extra time allowance” to complete the assessment”, “Answer all the questions”

## Language

The principle in this section is about the language used in an assessment task being appropriate for the assessment level and construct, and not creating unnecessary barriers to learners.

Respondents suggested some Learners’ actual age may differ from their reading age. We have added a bullet point asking awarding organisations (unless the construct requires otherwise) to:

consider the reading age of Learners who would typically take the assessment

There was some support for awarding organisations giving the expanded form of abbreviations on first use. However, 3 respondents suggested for extended or complex assessments, where some learners may encounter abbreviations and acronyms in different parts of the assessment, awarding organisations should consider providing the full form of a word or phrase on each use, unless the assessment construct requires knowledge of abbreviations. We have reworded the

guidance to ask awarding organisations to consider the most appropriate way to present abbreviated phrases.

The original wording said:

**Unless the assessment construct requires otherwise**, an awarding organisation should aim to:

- give the expanded form of abbreviations the first time they are used - for example, “International Monetary Fund” for “IMF”

Based on the respondents’ feedback, we amended this wording to state:

- ‘consider the most appropriate way to present abbreviated phrases, including whether to give the expanded form of abbreviations only the first time they are used. For example, “International Monetary Fund” for “IMF”’

Some respondents asked for the guidance to include references to awarding organisations avoiding words that are specific to an understanding of particular cultures or socioeconomic backgrounds. In response to this feedback, we amended the guidance to state:

**Unless the assessment construct requires otherwise**, an awarding organisation should avoid:

- words that are specific to a region, country, or particular culture or socioeconomic background, that may not be familiar to some Learners taking the assessment

## Sentence structures

Following feedback that direct speech can be less accessible than reported speech (if it breaks the flow of the context and reading, or makes sentences longer), we removed the statement that (unless the assessment construct requires otherwise) awarding organisations should:

use direct quotations in speech marks rather than reported speech – for example, “The teacher said: ‘I taught 3 classes today’”, rather than “The teacher said she had taught 3 classes on that day”

## Source text or materials, context, images and colour

We removed the overriding Principle in the guidance on source text or materials, context, images and colour as it repeated points covered by the Principles that followed.



## Source text or materials

Based on awarding organisation feedback, we amended the Principle in the guidance on source text or materials to state:

Source text or materials should only be provided in an assessment where they support the measurement of the assessment construct.

Previously, this Principle had stated source text or materials should only be used in a task where they are central to the measurement of the assessment construct.

## Context

We made a minor amend, for clarity, to the following Principle:

Where a task is set in a context that is not central to the assessment construct, the context should not make the task less accessible for particular groups of Learners.

The revised wording now states:

Tasks should only be set in a context where that supports the measurement of the assessment construct.

We amended the text on context for clarity. It originally stated:

**Unless the assessment construct requires otherwise**, an awarding organisation should:

- be sensitive to contexts that will not be equally familiar to all Learners, and try to ensure no particular group of Learners is advantaged or disadvantaged. A lack of familiarity with the context may make it more difficult for blind Learners or deaf or Deaf Learners to perform well in a task.

The bullet now states:

- be sensitive to contexts that will not be equally familiar to all Learners, and try to ensure no particular group of Learners is advantaged or disadvantaged by the choice of context. For example, blind or deaf Learners might find it more difficult to perform well in the task if their disability means the context in which the task is set will be unfamiliar to them.

## Images

We amended the Principle on images to state that images should only be used in an assessment where they support (rather than where they are central to) the measurement of the assessment construct:

Images should only be used in an assessment where they support the measurement of the assessment construct. Where images are used, they should be clear.

Based on feedback, we expanded an example of images being a potential barrier to Learners on the autism spectrum to reference other disabled Learners. We also added a reference to use of descriptors where images are used, based on respondent feedback on the importance of verbal descriptions being included with pictures to support Learners with a visual impairment. The guidance now states:

...images can be a barrier to others, including some Learners on the autism spectrum or Learners with attention deficit hyperactivity disorder (ADHD) who might find them distracting, and Learners with a visual impairment. Where images are used in an assessment, awarding organisations should consider the need also to describe the image.

To address concern from some respondents about potential for the guidance to deter awarding organisations from including useful images to provide greater context, we added the following to the guidance on images:

If an image supports or emphasises the ideas in the text, the image might be a useful element of the task. Awarding organisations should consider how useful the image would be for the Learners overall, and whether its usefulness would outweigh any problems it might cause for particular Learners.

## Layout

We made some minor amends to the layout section of the guidance to reflect respondent feedback, including:

- expanding the example in the bullet on ensuring that, where possible, Learners can readily access all relevant information for a particular task to make it clear that the reference to avoiding having to turn between different pages also applies to avoiding scrolling up and down on on-screen assessments
- adding a bullet guiding awarding organisations (unless the construct requires otherwise) to:

be mindful of the range of formats in which Learners will be taking the assessment, such as modified large print and onscreen. For example, number questions and sub-questions clearly for Learners using assistive technology, as use of numbers, letters and roman numerals together, such as '1(a). i', can lead to translation errors in 'text to speech' software

## Alternative formats and assistive technology

Noting feedback that more guidance on use of assistive technology would be helpful, we included at the end of this section of the guidance some additional text which states:

Awarding organisations should use appropriately validated lists of the assistive technology disabled Learners taking the assessment might use. They should check whether the assistive technology will work with their assessments.

Based on feedback that it would be helpful to refer to onscreen best practice and guidance, we have also added a link to the [W3C Web Accessibility Initiative \(WAI\) supplemental guidance](#) to the Web Content Accessibility Guidance (WCAG 2). Although this guidance is not specifically about assessments, it contains advice on using clear and understandable page structure and content, including use of white spacing.

## An awarding organisation's processes

Several respondents suggested awarding organisations should contact disability specialists for advice and expertise on designing and delivering accessible assessments. In response to this feedback, we have added the following:

An awarding organisation should ensure those involved in assessment design and development consider the diversity of the Learners likely to take the assessment. It might consult learners or groups that work with or represent the Learner cohort or individuals with relevant expertise. In particular it might consult groups that represent Learners who share a protected characteristic, or that represent disadvantaged Learners.

## Equalities impact assessment

Before we consulted, we considered the potential impact of our proposed guidance on Learners who share protected characteristics or socioeconomic status. We set this out in the equalities impact assessment included in the consultation document and invited views on this. We did not identify any negative impacts of our proposed guidance for people who share protected characteristics or socioeconomic status.

Some consultation respondents expressed concern that the guidance might discourage awarding organisations from using features that might support particular Learners or Learner groups in accessing assessments (for example, images). Some respondents suggested that assessments that reflected the guidance might be of more benefit to some Learner groups than others, or that the guidance would be more beneficial to particular Learner groups if it had a different focus or additional content.

We believe assessments that reflect the guidance should support accessibility for Learners generally and will not have negative impacts for people who share protected characteristics or socioeconomic status. The guidance does not prohibit or discourage awarding organisations from using assessment features that might support accessibility. Rather, it seeks to alert awarding organisations to the potential for particular assessment features to present unnecessary difficulties for some Learners, and to encourage awarding organisations to consider how beneficial (or otherwise) the inclusion of a particular feature would be for the range of Learners likely to take their assessments.

In presenting general principles to support accessibility, we believe the guidance should help awarding organisations to reduce or remove the negative impact imposed by irrelevant features in their assessment materials that might make it more difficult for Learners to demonstrate their knowledge, skills and understanding. While this is likely to be of particular benefit to those Learners for whom such features are most likely to hinder them in demonstrating their knowledge, skills and understanding, we anticipate that this approach will support accessibility and equity across the Learner cohort.

## Regulatory impact assessment

We set out our view of the potential regulatory impacts of the proposed guidance in the consultation. We have set out our updated impact assessment below.

As we stated in our draft regulatory impact assessment, the [Apprenticeships, Skills, Children and Learning Act 2009](#) requires that recognised awarding organisations have regard to the guidance we publish. This means they must review the guidance and consider it when making decisions about their approach. Guidance is not a further set of rules. Where an awarding organisation has good reason to depart from the guidance, it can do so.

We considered the regulatory impact of introducing this new guidance and the new guidance replacing the existing guidance to Condition G3. We did not propose any changes to the Conditions, and our proposed guidance does not change the existing obligations on awarding organisations, including compliance with Equalities Law.

We anticipated that introducing additional guidance would increase the overall impact of our requirements because awarding organisations will need to have regard to new information. However, the guidance should help awarding organisations to understand better how to comply with our existing requirements and to further improve their practice in this area.

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

Thirty-one respondents suggested steps Ofqual could take to reduce the regulatory impact of the guidance, including positive messaging around accessibility (especially digital accessibility), providing more examples in the guidance, and having efficient regulatory oversight of the implementation of the guidance.

The consultation feedback suggests the costs of introducing the guidance will vary between awarding organisations, but no awarding organisations said costs were likely to be prohibitive. Thirteen awarding organisations said costs would be minimal or zero, and 2 respondents thought there would be a cost saving.

In total 60 respondents commented on the estimated costs to awarding organisations following the introduction of the proposed guidance.

Three respondents identified initial additional costs associated with the guidance but described these as mainly one-off costs. Four respondents said the cost to implement the guidance was difficult to quantify but was likely to vary between

awarding organisations. Six awarding organisations said they needed further information about implementation to estimate costs.

Ten respondents anticipated increased costs to awarding organisations following the introduction of the guidance. Three respondents said smaller awarding organisations may be particularly affected by any financial burden and asked for sufficient notice to make any necessary changes to assessment materials.

Ten respondents identified costs for staff training, continuous professional development, and reviewing systems and processes but did not quantify these. Other respondents made general comments about costs that were outside the scope of the guidance.

Having considered the respondents' views, we decided to introduce the guidance with immediate effect, but with an expectation that awarding organisations will be able to demonstrate that they had regard to the guidance in the writing of assessments commissioned 6 months after the guidance was published.

Respondent feedback suggests there will be some costs to awarding organisations to update their systems and processes, and ensure staff are conversant with the guidance. However, we expect that any cost burden should be balanced against the benefits of the guidance, including helping awarding organisations to comply with Ofqual's Conditions.

Since the guidance is 11 pages long, and in part replaces existing guidance, we anticipate the burden of familiarisation with the guidance will be minimal. We still consider the impact of the guidance we are putting in place to be proportionate and appropriate to help awarding organisations comply with the Conditions.



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