



Qualifications and
Curriculum Authority

QCA review of GCSE and GCE access arrangements from 2004 to 2006

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Executive summary

This report contains the findings of a review of access arrangements from 2004 to 2006 in relation to candidates taking GCSE and GCE examinations offered by the Assessment and Qualifications Alliance (AQA), Edexcel and Oxford Cambridge and RSA Examinations (OCR). The review comes before the revision of regulations to meet the requirements of the extension of the Disability Discrimination Act (DDA) 2005 to general qualifications, and the Disability Rights Commission's (DRC) code of practice for trade organisations, qualifications bodies and general qualifications.

Access arrangements were either approved on a case-by-case basis by the awarding bodies or, for certain types of arrangements, approved directly by centres. Awarding body approved arrangements increased by 17% from 2004 to 2006. These arrangements ranged from the use of a reader or scribe to the use of an alternative examination venue. Arrangements directly approved by centres included the use of a bilingual dictionary and allowing up to 25% extra examination time. Modified question papers, including Braille papers, were made available by awarding bodies upon request for candidates with visual impairment or who were blind, and candidates with hearing impairment or who were deaf. Applications for modified papers and the recording of centre-delegated arrangements were introduced via an online system at the start of the review period of this report. Applications for awarding body approved arrangements continued to be made on paper and evidence provided to each awarding body.

Over the period of the review, data on the number of centre-delegated access arrangements became more detailed as centres were trained to use the online application system and as centralised reporting arrangements improved. However, further work is needed to keep improving the reliability of the published data.

Staffing and training within awarding bodies were appropriate and internal procedures were fit for purpose and carried out with professionalism. In general, correspondence between awarding bodies and centres was thorough, explanatory and fair. However, it was concluded that awarding bodies need to ensure consistency in approving arrangements in a way that is open and transparent to centres. Evidence from meetings with awarding bodies and a review of documentation showed compliance with the *GCSE, GCE, GNVQ and AEA Code of practice*.

The percentage of late applications for access arrangements by centres is relatively high. Submission deadlines are around three to four months before the examination to allow time for awarding bodies to process applications. One awarding body charges for processing late applications (not including modified papers) but the other two do not. While the percentage of late applications for awarding body approved arrangements is 10–35%, the percentage of late requests for modified papers is at a higher level of 30–50%.

Further investigations into the quality assurance procedures for modifying question papers are needed and will be carried out by QCA as part of a review of the question paper setting process. Similarly, an investigation is needed into the extent and impact of a shortage of modifiers of question papers for hearing impaired/deaf and visually impaired/blind candidates.

Although awarding bodies' checking of applications is thorough, as is the checking of related paperwork within centres by the Joint Council for Qualifications (JCQ) centre inspectors, the actual implementation of access arrangements within centres remains largely unchecked.

Exams officers reported satisfaction with the level of help given on making applications, particularly from National Assessment Agency (NAA) field officers. However, further guidance was requested on implementing approved access arrangements, and feedback indicated some perceived inconsistencies between awarding bodies in approving applications.

The main issues within centres were those of a practical and logistical nature, and were associated with staffing responsibilities and resources. Some of the reasons for late applications include the volume of evidence required, the time taken to gather supporting evidence and late decision-making about candidate entries. In general, dealing with access arrangements was reported as a burdensome task for exams officers, though eased by the introduction of more centre-delegated arrangements and the online system for recording arrangements and applying for modified papers.

1. Introduction

- 1.1 Section 7 of the *GCSE, GCE, GNVQ and AEA Code of practice* requires awarding bodies to approve, when necessary, appropriate access arrangements for candidates with particular requirements to enable them to have access to fair assessment and demonstrate attainment. These arrangements are either applied for by centres and approved by awarding bodies or approved within centres.
- 1.2 QCA collects data annually from awarding bodies on the number of approved access arrangements. From 2004 to 2006, there was a rise in both the number of awarding body approved arrangements and, to some extent, centre-delegated arrangements. The reason for the rise was not obvious. One explanation could be centres' increased awareness and understanding of the type of access arrangements available for candidates with particular requirements so that more candidates had the arrangements they needed. However, the increase in the number of approved arrangements led to concern about the degree of rigour in the approval process. Equally, it is known that the method of collecting data on the number of approved centre-delegated arrangements changed. A change in the system, rather than a change in the number of approved arrangements, may have caused fluctuations in the

data. This review attempts to investigate the whole area of approval of access arrangements in more detail.

Rationale

1.3 Data collected from awarding bodies by QCA on the number of approved access arrangements gave only a limited picture of how centres and awarding bodies made judgements about how to apply access arrangements. While investigating the reasons for the increase in the number of approved access arrangements formed the main focus of this review, there were a number of additional factors that shaped the monitoring work in this area. These were:

- the QCA Board's wish to ensure that granting access arrangements was manageable within centres and did not create an unnecessary administrative burden
- the need to ensure that the public could have confidence that the system was being applied fairly and consistently
- a review of section 7 of the *GCSE, GCE, GNVQ and AEA Code of practice*.

Objectives

1.4 This review of access arrangements has the following objectives:

- to establish the extent and nature of access arrangements that are being granted by centres and awarding bodies and identify any trends
- to understand how centres administer and apply the various different access arrangements
- to establish whether awarding body procedures and record-keeping systems are sufficient to ensure that access arrangements are applied fairly and consistently
- to review the requirements set out in the code of practice.

Scope of review

1.5 This report concentrates on the academic years 2003/4 to 2005/6. It reviews the data on approved access arrangements and investigates procedures and practices for access arrangements relating to the three awarding bodies in England, namely AQA, Edexcel and OCR. The review included the following activities:

- analysing data and documentation relating to access arrangements operated by the three awarding bodies of AQA, Edexcel and OCR
- interviewing specialist staff in AQA, Edexcel and OCR

- interviewing the centre inspection service commissioned by the JCQ and run during the period of the review by AQA
 - canvassing the views of exams officers through a questionnaire with the help of the NAA's field officers and members of the Examination Officers' Association (EOA)
 - gathering information from staff of the NAA, the JCQ and QCA.
- 1.6 Thanks are given to AQA, Edexcel, OCR, the JCQ, the EOA, the NAA and the various centres which contributed to the findings of this report.

Background

- 1.7 Awarding bodies aim to make all GCSE, GCE, GNVQ and AEA qualifications accessible to candidates with particular requirements in a manner that does not undermine standards or compromise the assessment criteria of the qualification.
- 1.8 The qualifications regulators outline the arrangements that must be put in place by awarding bodies to meet the needs of candidates with particular requirements without undermining standards within section 7 of the code of practice. These requirements state that awarding bodies must give centres clear information about the types of arrangements available, as well as the eligibility criteria, application processes and deadlines. Section 7 also states that awarding bodies must give the regulatory authorities data about the arrangements on an annual basis.
- 1.9 AQA, Edexcel, OCR, the Welsh Joint Education Committee (WJEC) and the Council for Curriculum, Examinations and Assessment (CCEA), working as members of the JCQ, produce a common set of regulations and guidance relating to candidates who are eligible for adjustments in examinations. Each awarding body follows these regulations, which are updated and despatched annually to centres, with an aim of granting fair access while maintaining the integrity of qualifications. The regulations have grown over the years as requests from centres for new arrangements are made, considered by awarding bodies and introduced into the common regulations and guidance booklet.
- 1.10 In 1998, the JCQ handed over to centres responsibility for approving extra time for candidates in examinations. The move towards centre-delegated arrangements was introduced to reduce bureaucratic burden. By 2006, the number of centre-delegated types of arrangements had increased to 13, alongside 19 types of awarding body approved arrangements. For the purpose of this report and the review period covered, the tables below show the full list of types of awarding body and centre-delegated access arrangements available between 1 September 2005 and 31 August 2006.

Awarding body approved arrangements

Access arrangement	Eligibility and/or evidence requirement
Additional tapes/CDs	<ul style="list-style-type: none"> • Hearing impairment/deaf • Candidates requiring extra time
Alternative accommodation/venue away from the centre	Medical/psychological report
Braille question papers	Normal way of working for candidates who are blind or have visual impairment
Colour naming	Normal way of working for candidates with colour blindness
Early opening of question paper up to one hour before scheduled start time for matters such as photocopying to enlarge or provide coloured paper	Hearing impairment/deaf or visual impairment/blind
Extra time above 25%	Visual impairment/blind, hearing impairment/deaf, physical disability, multiple disabilities and severe learning difficulties
Live speaker	Hearing impairment/deaf
Modified enlarged A4 (18-point bold)	Visual impairment/blind
Modified enlarged A4 to A3 (24-point bold)	Visual impairment/blind
Modified language	Hearing impairment/deaf
Practical assistant	Physical disability

Access arrangement	Eligibility and/or evidence requirement
Reader/computer reader	<ul style="list-style-type: none"> • Psychological assessment carried out by a qualified psychologist, or specialist assessment carried out by a specialist teacher • Visual impairment/blind
Scribe/voice-activated computer	<ul style="list-style-type: none"> • Physical disability • Psychological assessment carried out by a qualified psychologist, or specialist assessment carried out by a specialist teacher
Sign interpreter (BSL, ISL and other sign languages)	Hearing impairment/deaf
Tactile diagrams	Visual impairment/blind
Transcript of recording	Hearing impairment/deaf
Unmodified A3 question paper	Visual impairment/blind
Voice-activated computer	<ul style="list-style-type: none"> • Physical disability • Psychological assessment carried out by a qualified psychologist, or special assessment carried out by a specialist teacher
Word-processor	<ul style="list-style-type: none"> • Physical disability • Psychological assessment carried out by a qualified psychologist, or specialist assessment carried out by a specialist teacher

Centre-delegated arrangements

Access arrangement	Eligibility and/or evidence requirement
Amplification equipment	Candidate's normal way of working
Bilingual translation dictionary	First language is not English, Irish (or Gaeilge) or Welsh. Such dictionaries must not be used in English, Irish (or Gaeilge) or Welsh examinations or where the language of the dictionary is the same as or similar to the one being tested.
Bilingual translation dictionary and up to 25% extra time	First language is not English, Irish (or Gaeilge) or Welsh and candidate has been in the UK for less than two years. Such dictionaries must not be used in English, Irish (or Gaeilge) or Welsh examinations or where the language of the dictionary is the same as or similar to the one being tested.
Closed circuit television (CCTV)	Candidate's normal way of working
Coloured overlays	Candidate's normal way of working
Extra time – up to 25%	<ul style="list-style-type: none"> • Statement of special education needs relating to secondary education • Psychological assessment carried out by a qualified psychologist, or specialist assessment carried out by a specialist teacher • Medical report demonstrating the need for extra time
Low vision aid	Visual impairment/blind
Optical character reader (OCR) scanners	Visual impairment/blind
Prompter	Candidate's normal way of working

Access arrangement	Eligibility and/or evidence requirement
Read aloud	Candidate's normal way of working
Separate invigilation	<ul style="list-style-type: none"> • Use of reader, scribe or word-processor • Medical reasons
Supervised rest breaks	<ul style="list-style-type: none"> • Medical reasons • Physical disability • Psychological difficulties
Transcript	<ul style="list-style-type: none"> • Handwriting difficult to decipher • Braille scripts

Tables adapted from *Access arrangements and special consideration, regulations and guidance relating to candidates who are eligible for adjustments in examinations, 1 September 2005 – 31 August 2006; GCE, AEA, VCE, GCSE, GNVQ, entry level and key skills*, with the kind permission of the copyright holders, the Joint Council for Qualifications.

- 1.11 Centres have been given the authority to use certain devices that are the normal way of working for the candidate and which do not have any bearing on the assessment. Such devices include coloured overlays, CCTV, optical character reader scanners, low vision aids, Braille machines and amplification equipment. Centres are asked to seek approval from awarding bodies for the use of any new technology that might invalidate the assessment objectives and which is not listed within the JCQ regulations and guidance booklet.

Consultation with groups representing the disabled

- 1.12 The awarding bodies' regulations and guidance booklet up to 2004 had been based on advice given by disability groups whose representatives attended the meetings of the Joint Council for General Qualifications (JCGQ) Special Requirements Committee, a sub-committee of the JCGQ (a predecessor of the JCQ made up of the awarding bodies offering general qualifications). The representatives were full members of the sub-committee.
- 1.13 The regulations and guidance booklet was completely rewritten by the JCQ for 2004/5, based on the advice given in documents in force at the time, including the Disability Rights Commission (DRC) code of practice for trade organisations and qualifications bodies and the Department for Education and Employment booklet on the definition of disability. The booklet was sent to the regulators, the DRC and various disability equality groups for comment. Only minor textual amendments were made to the 2005/6 and 2006/7 booklets and given that there were no significant policy changes

disability groups were not consulted. However, the booklets were sent to the convenor of the Access to Assessment and Qualifications Advisory Group who was from the qualifications regulator in Wales and represented all three qualifications regulators of England, Wales and Northern Ireland.

Arrangements from 2007

- 1.14 From 1 September 2007, disabled candidates have a legal right under the Disability Discrimination Act (DDA) to reasonable adjustments in the assessment of general qualifications with the exception of the application of a competence standard. This was already a right in vocational qualifications and training for employment. These provisions are contained in section 15 of the DDA 2005, which inserted a new Chapter 2A (sections 31AA to 31AF) into Part 4 of the DDA 1995. The Disability Rights Commission (DRC) extended its code of practice to cover general qualifications. This code of practice for trade organisations, qualifications bodies and general qualifications offers guidance on the impact of the DDA's extension to general qualifications. At the time of writing this report, this code of practice is in draft form awaiting approval from the Secretary of State for Children, Schools and Families and from Parliament. In October 2007, the DRC's role and remit were incorporated into the work of Equality and Human Rights Commission.
- 1.15 For its 2007/8 regulations and guidance on access arrangements, the JCQ consulted widely with disability equality groups, not only in relation to revising the regulations but also on providing clear information to centres on the use of an oral language modifier. The regulations and guidance were also shared with the regulators of external qualifications in England, Wales and Northern Ireland.

2. Number of approved access arrangements between 2004 and 2006

2.1 The *GCSE, GCE, GNVQ and AEA Code of practice*, paragraph 7.10, requires awarding bodies to collect data about access arrangements, broken down by qualification type, for:

- centre-delegated access arrangements: the number of individual candidates who have been granted up to 25% additional time
- awarding body-approved access arrangements: the number of individual candidate applications, by category¹, for access arrangements and the numbers granted.

In addition, paragraph 7.11 of the code of practice requires awarding bodies to report annually to the regulators on the number of candidates notified as having particular requirements from the above data.

2.2 In practice, QCA collects and publishes data on a wider range of centre-delegated arrangements and on a sub-section of categories of awarding body approved arrangements than stated in the code of practice, as can be seen later in this section. Data is collected for those centre-delegated arrangements where supporting documentation is held on file within the centre and is open to inspection.

2.3 QCA has collected data on the number of approved access arrangements at the end of each summer examination series since 2004. These data were published in March of each following year in QCA's *Report on the performance of awarding bodies for general qualifications*. The data show a general increase in the overall number of approved arrangements. The table below shows the combined data collected from AQA, Edexcel and OCR between 2004 and 2006.

¹ The categories of arrangements should be consistent with those set out in the awarding bodies' regulations and guidelines.

	2003/4	2004/5	2005/6
No. of GCSE and GCE subject entries*	7,442,314	7,442,445	7,620,798
No. of awarding body approved arrangements (excluding modified question papers)**	103,818	104,907	125,114
No. of centre-delegated approved arrangements***	81,825	43,869	78,833
No. of modified question papers****	22,037	20,346	20,539

* For the purpose of this report, the stated total of GCSE and GCE entries also includes entries for VCE, VCE AS, Applied GCE, Applied AS, AS, Applied GCSE and GCSE Short Courses. The number of GCSE and GCE entries indicates the total number of entries for all AQA, Edexcel and OCR GCSE and GCE subjects rather than the total number of candidates given that any one candidate may enter more than one GCSE and GCE subject. The subject entries are given as the number of candidates who sat the examination, as given at the time of issue of results.

** The data relate to the number of awarding body approved arrangements approved by AQA, Edexcel and OCR for GCE and GCSE examinations, rather than the number of candidates as an individual candidate may require a number of arrangements and may take examinations with more than one awarding body.

*** See sections 2.5, 2.6 and 2.7 below for explanation of the data.

**** The data collected from AQA and OCR relate to the total number of modified question papers produced; the data from Edexcel were for the number of candidates requiring modified question papers.

- 2.4 Collecting data on centre-delegated approved arrangements and modified papers has been less straightforward. With centre-delegated arrangements, there were problems as some of the data sets were incomplete and modified papers data were not based on the same set of criteria each year. Such problems made valid and reliable year-on-year comparisons difficult in all but awarding body approved arrangements.
- 2.5 In 2003/4, data came from paper-based applications for access arrangements received by each awarding body. However, there was some double-counting of those candidates taking examinations with more than one awarding body. The possibility of double-counting remained an issue for data on awarding body approved arrangements, as each awarding body was only aware of applications made for its own examinations.
- 2.6 The system for collecting data changed in 2004/5, when data were collected via NAA's online system. This system enabled centres to submit electronically details of centre-delegated arrangements and applications for modified question papers. Data for

centre-delegated arrangements were based on arrangements for examinations taken by individual candidates with no double-counting across awarding bodies. However, not all centres submitted data via the online system in its first year of introduction which may, in part, explain the fall in number of recorded centre-approved arrangements. This matter is explored further under 'Centre-delegated access arrangements' (paragraphs 2.10–2.17) below.

2.7 Data for WJEC and CCEA were included for the first time in 2005/6.

Awarding body approved arrangements

2.8 Overall, the number of awarding body-approved access arrangements, excluding modified question papers, has increased by just over 21,000 (17%) from 2004 to 2006. This increase is despite approval of some arrangements being delegated to centres in 2005, namely, use of a bilingual dictionary, supervised breaks, transcripts and prompters.

2.9 A breakdown of approved awarding body applications shows that between 2005 and 2006 readers continued to be the most requested awarding body-approved arrangement, with the largest increase in number of applications. This is followed by use of a scribe and use of a computer/word-processor. In contrast, the number of applications for more than 25% extra time decreased. A similar breakdown of data for 2004 is not available.

No. of requests approved by awarding bodies for:	2005	2006	Difference 2006 – 2005
reader	55,640	67,390	+ 11,750
scribe (including voice-activated computer)	28,324	34,821	+ 6,497
computer/word-processor	14,222	16,996	+ 2,774
extra time (more than 25%)	3,383	2,393	– 990
alternative venue	1,582	1,948	+ 366
use of signer	942	613	– 329
practical assistant	814	953	+ 139
OVERALL TOTAL	104,907	125,114	+ 20,207

These figures are for the number of awarding body approved arrangements rather than the total number of candidates, as an individual candidate may require a number of arrangements and may take examinations with more than one awarding body.

Centre-delegated arrangements

- 2.10 An increase in the different types of arrangements and changes in data collection methods meant that reliable year-on-year comparison of data on centre-delegated arrangements was not possible. In 2003/4, only the provision of up to 25% additional time to eligible candidates was delegated to centres for approval. As stated previously, there were just under 82,000 centre-approved cases in 2003/4 but this figure included some double-counting where a candidate had been entered for examinations with more than one awarding body.
- 2.11 In 2004/5, there were two significant changes affecting the collection of data on centre-delegated arrangements. Firstly, the NAA introduced a centralised online system for recording these arrangements and secondly, the number of types of centre-approved arrangements rose from 1 to the 13 listed in section 1.10 of this report. A sub-section of seven types of arrangements (as given in section 2.9 above) were collected via the NAA system. However, despite an increase in the number of arrangements delegated to centres for approval, the overall number of centre-delegated arrangements dropped by just short of 38,000. This apparent fall is thought

to stem from a combination of administrative reasons rather than being an actual decrease in the number of approved arrangements. Not all centres had received training on how to use the NAA system and it is thought that some centres did not enter details on the online system. The new online system also eliminated the previous double-counting of candidate data, which naturally caused a decrease in the figures when compared with 2003/4.

- 2.12 In 2005/6, NAA field officers continued to work with exams officers to train them in the use of the online system. At the end of the academic year, the overall number of centre-delegated arrangements rose to just short of 79,000. However, it was thought that the 2005/6 data might still not reflect the actual number of centre-delegated arrangements approved and implemented within centres. Again, the reasons for the increase are thought to be complex and a result of different factors.
- 2.13 In 2005/6, the deadline for centres to submit data on centre-delegated approved arrangements was brought forward from 1 July to 31 May to help identify centres for monitoring and inspection purposes. Some centres missed this earlier deadline and some centres did not use the online system and continued to submit data using the hard-copy form supplied in the JCQ regulations and guidance booklet. The JCQ regulations (page 84) stated that a hard-copy version of the form could be submitted 'by those centres that cannot access the online system'. In such cases, the awarding bodies transferred data from submitted hard-copy forms on to the NAA system. Centres who submitted hard-copy data were informed by the awarding body of the use of the online system, encouraged to use the system and told of the availability of training.
- 2.14 Centres can enter data on the NAA online system at any time during the academic year. However, as there is no data-matching exercise with actual candidate exam entries, it may be that some candidates were withdrawn from the examination but remained logged on the NAA system as requiring a centre-delegated access arrangement.
- 2.15 Finally, it is known that currently 20% of centres do not submit data for centre-approved access arrangements. NAA field officers have not been able to target such centres to find out the reason for the lack of registered data. It may be that such centres do not have any candidates requiring access arrangements or have approved arrangements within the centre without informing the awarding bodies.
- 2.16 It is therefore not possible to make valid year-on-year comparisons about centre-delegated arrangements at present. However, the data collected does show that the

largest number of approved centre-delegated arrangements relate to granting up to 25% extra time, followed by the use of a bilingual dictionary.

No. of centre-delegated arrangements approved for:	2005	2006	Difference 2006–2005
extra time (up to 25%)	35,319	56,900	+ 21,581
bilingual dictionary with extra time	4,083	6,286	+ 2,203
bilingual dictionary without extra time	1,680	9,382	+ 7,702
supervised rest breaks	1,919	3,539	+ 1,620
transcript	485	1,416	+ 931
prompter	383	1,310	+ 927
OVERALL TOTAL	43,869	78,833	+ 34,964

These figures are for the total number of candidates with centre-delegated arrangements, rather than the number of arrangements for candidates for each awarding body.

- 2.17 Data is collected only for those arrangements which require supporting evidence to be verified and approved by centres. These arrangements are shown in the table in section 2.16 above. Awarding bodies do not collect data for the seven other types of centre-delegated approved arrangements listed in the table in section 1.10 of this report.

Modified question papers

- 2.18 Different types of data were collected on approved applications for modified question papers between 2004 and 2006. Only the 2006 data are based on the same criteria across the three awarding bodies. As stated in section 2.3 above, the data for 2004 and 2005 were based on the number of modified question papers produced by AQA and OCR, whereas for Edexcel they were based on the number of candidates requiring modified papers. A significant increase for 2006 would have been expected once the criteria used by Edexcel were in line with those of the other two awarding bodies. However, the overall number increased by just less than 200, as can be seen in the table in 2.19 below.
- 2.19 The category of modified papers for candidates who are visually impaired/blind has the highest number of approved cases. The number of Braille papers has been falling over the three-year period.

Number of modified question papers	2004	2005	2006	Difference 2005–2004	Difference 2006–2005
Modified paper (visual impairment/blind)	11,742	12,120	12,119	+ 378	– 1
Enlarged paper (visual impairment/blind)	4,316	4,674	4,535	+ 358	– 139
Braille (visual impairment/blind)	1,789	1,708	1,443	– 81	– 265
Modified paper (hearing impairment/deaf)	4,190	1,844	2,442	– 2,346	+ 598
OVERALL TOTAL	22,037	20,346	20,539	– 1,691	+ 193

- 2.20 From January 2006 onwards, centres have been able to apply for modified papers via the NAA online system. Awarding bodies can view applications for modified papers on the NAA system only for their own awarding body.

Conclusion and further work

- 2.21 At present, the requirements of paragraph 7.10 and 7.11 of the code of practice regarding awarding bodies' collection of data on different types of access arrangements do not reflect current practice and require revision.
- 2.22 There have been initial problems with the collection of data during the move from use of hard-copy forms to online submissions for centre-delegated access arrangements. Further work is required to ensure that all centres are able to record such access arrangements.

3. Procedures for approving and using access arrangements

- 3.1 Section 7 of the *GCSE, GCE, VCE, GNVQ and AEA Code of practice* outlines requirements of awarding bodies in relation to access arrangements, ranging from staffing to providing guidance for centres and maintaining the integrity of the examination. In March 2006, QCA made visits to awarding bodies to interview staff concerned with access arrangements and to review awarding body documentation, including correspondence with centres.

Staffing

- 3.2 The code of practice, paragraph 7.2, states that awarding bodies should identify a person, team or department to be responsible for administering the arrangements for candidates with particular requirements. It also requires these staff to have appropriate training.
- 3.3 All unitary awarding bodies employ a specialised team of people who deal solely with access arrangements, including special consideration applications. Awarding bodies provide training to new members of staff during the course of their work. Mentors are provided for new staff and their work is monitored. A staff appraisal system is in place in all the awarding bodies and generally the staffing is stable within the access arrangement teams.
- 3.4 Working arrangements are very similar within each awarding body with teams placed in open plan offices, allowing for constant communication. All awarding bodies hold regular internal update meetings to discuss workload, processing of submissions, problems and issues.

Procedures for the approval of awarding body access arrangements

- 3.5 The code of practice, paragraphs 7.5 and 7.7, outlines requirements for administering appropriate access arrangements. These two paragraphs of the code of practice state that::
- the awarding body must, when necessary, approve appropriate access arrangements for candidates with particular requirements to enable them to have access to fair assessment and demonstrate attainment. The awarding body should not make access arrangements that will directly affect performance in the attributes that are the focus of assessment or otherwise affect the integrity of the award
 - the awarding body must ensure that its access arrangements:
 - do not invalidate the assessment requirements set out in the specification for the relevant qualification
 - reflect the current needs of the individual candidates as advised by the centre and, as far as is reasonably possible, their usual methods of working
 - do not give the candidates an unfair advantage compared with candidates for whom access arrangements are not being made

- maintain the relevance, validity, reliability, comparability and integrity of the assessment
 - take account of all current legislation that has an impact on equality of access to assessment and qualifications.
- 3.6 The awarding bodies address the requirements of paragraphs 7.5 and 7.7 of the code of practice through use of the common JCQ regulations and guidance and through the procedures outlined within each awarding body's own operational procedures file. Awarding bodies have different operational procedures for dealing with centre applications for access arrangements. The operational procedures vary in terms of the allocation of work within each awarding body, either allocating work by centre, with staff responsible for the range of access arrangements for regional groupings of centres, or allocating work according to type of access arrangement.
- 3.7 The JCQ regulations and guidance document has been drafted and revised by a committee of representatives from each awarding body. It has been added to over the years as new arrangements have been introduced.
- 3.8 While outlining the range of access arrangements available to candidates, the JCQ regulations and guidance state that an arrangement will not be permitted if it compromises the assessment criteria. In addition, centres are advised to consult awarding bodies at the beginning of a candidate's course of study to ensure that appropriate access arrangements can be made to allow the candidate to demonstrate the skills required by the examination.
- 3.9 The deadline for submission of applications for awarding body-approved access arrangements is 21 February for the summer examination series, or 21 March for candidates wishing to resit examinations in the summer after a January examination. On average, awarding bodies aim to respond to applications within three weeks but this may take longer if a centre has not submitted the correct supporting documentation or has applied for an inappropriate arrangement for the candidate concerned.
- 3.10 Although centres are advised to apply for arrangements at the beginning of a candidate's course and many applications are received just under two years before a candidate's examinations, awarding bodies reported that 10–35% of applications were received after the submission deadline in 2007. AQA processed just under 19,000 (35%) late applications, Edexcel had approximately 2,000 (10%) and OCR had around 7,000 (16%). While every effort was made to process these, awarding bodies did not guarantee that access arrangements would be granted for applications received after the published deadlines. Further correspondence between the awarding body and

centre might have been needed if additional supporting documentation, particularly for incomplete applications or clarification on a matter within the application, was required before a decision on whether approval for an access arrangement could be granted. Edexcel was the only awarding body to charge a £10 per application administration fee for applications received after the published deadline but also had the lowest percentage of late applications.

- 3.11 For some emergency applications, it was more appropriate for special consideration² to be applied than the use of an access arrangement.

Review of correspondence between awarding bodies and centres

- 3.12 Each awarding body keeps an audit trail of its correspondence with centres. Awarding bodies provided a range of cases for QCA's analysis of correspondence, including applications which were approved, rejected and pending across the range of different types of access arrangements. Awarding bodies also provided examples of correspondence from centres seeking advice on centre-delegated arrangements.
- 3.13 A review of a sample of different types of correspondence between awarding bodies and centres in 2005 and 2006 revealed detailed instructions, explanation and advice given to centres where applications were not approved. Correspondence also included letters of approval to those submissions that were in order and complied with the JCQ regulations. Letters from awarding bodies made full and appropriate reference to the JCQ regulations and guidance booklet. Awarding bodies explained any part of the regulations and exemplified specific requirements, where deemed necessary, to explain why approval was or was not given to specific applications and to help resolve any perceived misunderstanding of the regulations or inappropriate applications by a centre.
- 3.14 The awarding bodies were thorough in checking previous correspondence with a centre. In one example seen, a centre indicated that the awarding body had granted permission for an arrangement for a particular candidate, though back-checking by the awarding body revealed that this had not been the case. The centre was asked to report any previous misapplication of an arrangement to the awarding body's irregularities team for further action.

² 'Special consideration' involves procedures that may result in an adjustment to marks of candidates who have not been able to demonstrate attainment because of exceptional circumstances.

- 3.15 Correspondence from the awarding bodies to centres clearly stated the name and address of the centre, candidate's name, examination series, the decision of the awarding body and the specifications for which the application has been approved. Where necessary, specific advice and instructions were given to aid a centre in implementing the approved arrangements. Arrangements did not always apply to the whole examination – for example, in GCSE English, awarding bodies clearly stated in correspondence to centres that a reader would only be allowed for questions which did not specifically test the candidate's ability to read.
- 3.16 Some applications are quite complex with requests for a range of different access arrangements for the same candidate. For example, one candidate who had been diagnosed with cerebral palsy with quadriplegia, poor speech due to dysarthria, minimal hand functions and visual processing problems was granted the use of a reader, scribe, extra time, a practical assistant (for science) and a timer for use while taking GCSE examinations in a range of subjects. Such aids were used by and familiar to the candidate within a normal classroom teaching and learning situation.
- 3.17 Where centres sought further advice regarding centre-delegated arrangements, such advice was given without prejudice and was both full and helpful, while making clear that it was the responsibility of the head of centre to make the final judgement of approval.
- 3.18 Occasionally, two awarding bodies may take a different decision when considering an application for an access arrangement for the same candidate but for different specifications. This matter had been raised during the survey of exams officers outlined in section 4 of this report and illustrated in two examples of correspondence between awarding bodies and centres.
- 3.19 In one example, an awarding body declined an application for a reader for a candidate but the centre complained that a different awarding body had approved the use of a reader. However, it emerged that the centre had submitted a full set of background information on reading tests for the candidate only to the awarding body that had approved the application. Once this full set of reading test information was brought to the other awarding body's attention, a reader was also approved.
- 3.20 In another example, one awarding body had not allowed a scribe but another awarding body had. Evidence to the awarding body which rejected the use of a scribe showed that the candidate's spelling accuracy did not come into the below average range and that the candidate performed at a faster words per minute speed without rather than with a scribe. Both awarding bodies had allowed a reader for the candidate in question. The correspondence to the centre from the awarding body which had

rejected the application stated that they were unable to comment on the prior decision made by another awarding body for different subject examinations. It was not evident from the correspondence whether the same supporting evidence had been used in both applications or whether the need was the same in both awarding bodies' subject examinations.

- 3.21 Centres apply for arrangements to each awarding body offering examinations for which a candidate has been entered. Each awarding body is responsible for decisions on its own examinations. Arrangements may be appropriate and approved in one subject area but may not be appropriate, and hence not approved, for a different subject owing to the different nature of the assessments. However, if a candidate has been entered for examinations run by different awarding bodies in several subjects, there is a potential lack of clarity if one awarding body approves an arrangement but another does not.
- 3.22 When asked, awarding bodies stated that they were in regular contact with each other by email or telephone, particularly if discrepancies arose.
- 3.23 In some cases, an application was not turned down but was left pending owing to insufficient supporting evidence being submitted by the centre. The awarding bodies made clear within correspondence to centres what additional evidence was required with reference to the JCQ regulations, before approval could be given. When an awarding body requested further evidence, the onus was on the centre to take any necessary action and resubmit the application. The awarding body did not follow up such matters, given that a centre might decide to withdraw an application if further evidence was not available or if the centre later decided that the request for an arrangement was inappropriate.
- 3.24 Some centres apply for a particular access arrangement for a candidate when it is the professional opinion of an awarding body that another form of access arrangement would be more appropriate for the candidate. Correspondence from awarding bodies revealed that some applications were rejected but with advice to make a more suitable arrangement for the candidate concerned.
- 3.25 The correspondence files shared with QCA by awarding bodies in spring 2006 contained examples of applications for access arrangements that had been turned down. Reasons for turning down an application varied from straightforward to complex. In all cases, responses from awarding bodies gave detailed explanations for the reasons behind the rejections.

Examples of rejected applications included requests for:

- the use of a reader when supporting evidence demonstrated that the candidate had a reading score above the acceptable threshold and was therefore not eligible for a reader
- the use of various communication aids, which would prevent a required element of the assessment to be adequately and appropriately tested, for example, use of a voice output communication aid accessed via a joystick for a GCSE French speaking test. The application was turned down as speaking is a required assessment element of the examination
- exemption for a candidate from involvement in group work activities required in his entered subject of GCSE expressive arts, owing to health reasons resulting in the candidate not having the confidence or ability to work in a group setting. The centre was asked to provide further evidence of what the candidate was able to do against the assessment criteria and to consider whether the subject was suitable and the best choice for the candidate. The awarding body pointed out that all candidates, including those with disabilities or long-term health problems, were required to demonstrate attainment in each of the subject criteria being assessed
- extra time for a candidate to take examinations for which English was not her first language and who had lived in England for more than two years. After a two-year course, such a candidate was expected to have gained a technical subject vocabulary and enough carrier language to manage with a permitted bilingual translation dictionary alone
- unlimited extra time which was not an allowable access arrangement and which was judged by the awarding body to be not beneficial and too exhausting for the candidate. The awarding body proposed alternative arrangements for the particular candidate concerned
- use of a laptop during examinations for a candidate who had legible and comprehensible handwriting and did not have any learning difficulties.

Procedures for centre-delegated arrangements

3.26 The procedures for centre-delegated arrangements and how these have changed since 2004 are fully explored in section 2 of this report.

3.27 A signature is collected on a hard-copy form or a name inserted into the online form to confirm that the signatory is satisfied that the access arrangements have been granted in accordance with JCQ's regulations and guidance. Usually the examination officer is the signatory but sometimes this may be the head of centre or special educational

needs coordinator (SENCO). The awarding body makes no formal checks to ensure that this part of the form has been completed.

Issues with centres

- 3.28 During the visits, awarding bodies informed QCA of a number of issues that had arisen when working with centres applying for access arrangements. For example, there is pressure from centres for awarding bodies to relax the regulations governing access arrangements and to reduce the amount of evidence required to support applications. Also, there is pressure from centres for the awarding bodies to delegate the approval of more access arrangements from awarding bodies to centres. However, on occasions, centres themselves are under pressure from parents to apply for certain access arrangements and ask the awarding body to arbitrate in such situations.
- 3.29 For approval to be granted for certain access arrangements, either a psychological assessment must be carried out by a qualified psychologist or a specialist assessment carried out by a specialist teacher. However, centres report problems with both sets of professionals. Educational psychologists operate differently in different counties, and differently in the private sector. Centres have also raised concerns with awarding bodies about the costs of, and funding for, such assessments.
- 3.30 Awarding bodies reported that some centres need to be more aware of the practical implications when entering a candidate for particular qualifications. Such implications include staffing, accommodation and also the potential stress of taking examinations on the candidate.

Issues identified by awarding bodies

- 3.31 Awarding bodies reported a range of issues to QCA that require consideration during further revision of the regulations governing access arrangements in section 7 of the code of practice. There was general concern and expectation among awarding bodies that once the DDA is in operation, they will be challenged over the non-approval of access arrangements. There may be a need for an ombudsman and/or an expert panel to deal with such appeals. The JCQ has since stated that during the course of the academic year 2007/8, an expert panel (to be called the Access Arrangements Appeal Board) will be established to deal with appeals arising from decisions on access arrangements.
- 3.32 Other matters raised by awarding bodies include:
- the need for more subject-specific access arrangements, for example a review of whether mathematics candidates should be allowed a reader when accurately recognising a mathematical symbol is part of the assessment

- the need for awarding bodies to have much more robust quality assurance systems in place to monitor centres which are using access arrangements
- the need for additional monitoring to take place during the academic year, for example, to identify centres that have large numbers of candidates requiring arrangements and to visit on an advisory basis.

Malpractice

- 3.33 Malpractice can occur in access arrangements, most notably in the use of a reader, scribe or practical assistant. The monitoring of such help is extremely difficult. At present, monitoring is of centres' paperwork only as it is inappropriate for an auditor to be in an exam room with a candidate, scribe or reader and invigilator. There is often a fine line between what is legitimate and what is not legitimate. Awarding bodies must often take it on trust that centres are following procedures fairly.
- 3.34 If an awarding body identifies any suspected malpractice in relation to access arrangements an investigation will be undertaken. The awarding body may seek the assistance of the central JCQ centre inspection service. In addition, an awarding body may send a representative to advise a centre on the appropriate administration of access arrangements relating to one of its specifications. One such example occurred in GCSE art & design, where an awarding body adviser sent an adviser to give guidance on the work of a practical assistant and explained what the assistant was and was not allowed to do in the subject being tested.
- 3.35 The monitoring of candidates presupposes that centres register all candidates who qualify for an access arrangement, but this is not necessarily the case. Awarding bodies can only monitor registered candidates and occasionally they discover that a centre has been using an access arrangement without permission. It may also be the case that awarding bodies are unaware of centre-delegated approved arrangements if a centre has not notified the awarding body or logged the information via the NAA website.
- 3.36 In some cases, centres may be unaware that they are applying an access arrangement inappropriately. Such cases may not come to an awarding body's attention unless inadvertently mentioned during correspondence or if suspected by an examiner. Similarly, an awarding body may not be aware when access arrangements are deliberately and inappropriately applied. It may also be the case that some candidates who are eligible for access arrangements are being disadvantaged if a centre has not applied for or granted an arrangement. The extent of such cases is largely unknown. One awarding body suggested that a greater number of advisory visits should take place throughout the year, particularly to those centres that apply for

a large number of access arrangements or do not apply for any, rather than the present practice of sending centre inspectors to certain known problem or new centres.

- 3.37 Malpractice cases are passed on within awarding bodies to malpractice and irregularities teams for further consideration and the appropriate sanctions are applied. Sanctions vary according to the nature of the malpractice.

Modified papers

- 3.38 Paragraph 7.1 of the code of practice requires awarding bodies to consider the needs of all candidates, including those with particular requirements, when preparing question papers, tasks (including internally assessed tasks) and mark schemes, without compromising the assessment criteria. This should reduce the need for arrangements for candidates with particular requirements.
- 3.39 Paragraph 3.3.4 of the JCQ regulations outlines that: 'Some papers do not require modification, as specialist teachers are involved in the paper setting process. Awarding bodies hope to invite more language specialists to attend at this stage of the process, depending on the availability of teachers specialised in this field.' The extent to which language specialists attend question paper evaluation committee meetings is unknown and will be explored further through QCA's review of the question paper setting process.
- 3.40 In October 2005, the regulators published *Fair access by design – guidance for awarding bodies and regulatory authorities on designing inclusive GCSE and GCE qualifications*. This document was circulated to senior examiners and awarding body staff and incorporated within awarding bodies' year-on-year question paper writers' guidance documentation. OCR also provided training to support the written guidance.
- 3.41 One awarding body shared a paper with QCA drafted by the British Association of Teachers of the Deaf (BATOD) and the National Association for Tertiary Education for Deaf People (NATED) entitled *Language of examinations* which is presented to question paper evaluation committee meetings as guidance and an aide-memoire on the wording of question papers to reduce the need for amendment for hearing-impaired candidates.
- 3.42 The JCQ regulations and guidance document also makes reference to Braille and large print papers produced by the modifiers and producers in line with the publication *Best practice guidance for the modification and production of examination papers for candidates with a visual impairment* which is available from the Royal National Institute of Blind People (RNIB). QCA has not seen any guidance to question paper setters regarding the needs of candidates with other particular requirements. This

matter will be investigated further in QCA's review of the question paper setting process.

- 3.43 Centres are required to submit applications for modified question papers by 31 January for the summer examination series. Late applications can cause problems given the time it takes to modify a paper and awarding bodies do not guarantee that a modified paper will be available if applied for after the published submission deadline. AQA received around 30–45% of applications after the deadline. Approximately 30% of applications to Edexcel and OCR were late. Edexcel reported a fall in the percentage of late applications from 50% in 2006 to 30% in 2007.
- 3.44 Careful consideration is given to applications by awarding bodies to check whether the arrangement requested is the normal way of working for the candidate and is the most appropriate arrangement.
- 3.45 Awarding body-commissioned modifiers, usually teachers of visually or hearing-impaired candidates, modify the language and format of the question papers while ensuring the question remains the same and that it elicits the same response as unmodified questions. Awarding bodies reported that there was a general shortage in the number of modifiers of question papers for hearing impaired/deaf candidates.
- 3.46 For visually impaired/blind candidates, all material that is superfluous to the question may be removed and lead-in sentences introduced. Source material can be enlarged or produced in a tactile format. Awarding body officers or principal examiners, where possible, check that the modification has not fundamentally altered the paper. The code of practice does not state who should give the final approval to such modifications.

Centre inspection process

- 3.47 The JCQ runs a centrally managed Centre Inspection Service which has been contracted to AQA. The main focus of the inspection process is on the conduct of examinations within centres in England entering candidates for GCSE, GCE, Entry level certificates, and AEA and GNVQ qualifications offered by the JCQ awarding bodies.³ The central service provides an annual report on its work to each awarding body.

³ The JCQ centre inspection service also covers examination centres in Scotland entering candidates for examinations offered by any of the JCQ awarding bodies. Inspections in Wales are carried out by WJEC and in Northern Ireland by CCEA.

- 3.48 In 2006, around 98% of centres were inspected during either the winter or summer examination series. JCQ centre inspectors make unannounced visits, usually around the start of an examination session. Each inspector was issued with a checklist which mainly focused on arrangements within the examination room, invigilation and supervision, security of examination material and suitable accommodation for examinations. With regard to access arrangements, the following section is included in the checklist.

Candidates requiring access arrangements or granted additional time and/or rest breaks

Confirmation of approval of access arrangements/appropriate evidence of need available e.g. statement of special education needs or relevant report from an educational psychologist or appropriately qualified teacher.

Source: Report on Examination Arrangements for GCSE, GNVQ, GCE, VCE, AEA and Entry level, JCQ, January 2006. A checklist used by JCQ centre inspectors.

A separate checklist is used for inspections of GCSE and GCE modern foreign language speaking tests.

- 3.49 JCQ centre inspectors are informed before visiting centres of the dates and sessions (morning or afternoon) of examinations being taken by candidates at each centre. Inspectors do not have any prior information of whether a centre has had any access arrangements approved by an awarding body or within the centre. Inspectors are trained to ask at the centre whether there are any candidates in either category of approved arrangements and for sight of approval letter(s) from the awarding body and/or notification to the awarding body of centre-approved arrangements with any supporting documentation.
- 3.50 JCQ does not require centre inspectors to have specific expertise in the area of access arrangements, nor are they required to make judgements on the conduct of examinations where access arrangements are being implemented.
- 3.51 Evidence of any problems with the centre's documentation relating to access arrangements is reported by inspectors to the JCQ Centre Inspection Service and a copy of the inspector's report left at the centre. Any serious issues are pursued with the head of centre and the JCQ awarding bodies are informed of problems and outcomes.

- 3.52 In addition to making centre inspections while examinations are taking place, inspectors will also undertake any pre-registration visits to discuss any matters relating to JCQ regulations which staff of new centres may be unsure about. Advisory visits are also made and involve verbal feedback to the centre and a brief written report to the JCQ Centre Inspection Service. In addition, inspectors may make specific visits to centres if required by an awarding body in certain cases, such as where a breach of regulations has taken place. Centres may request a visit by an inspector at a charge.
- 3.53 All inspectors attend an annual training meeting organised by the JCQ Centre Inspection Service. All new inspectors are mentored during their first year of service by accompanying an experienced inspector on one visit and then undertaking an inspection while being observed by their mentor. The mentor sends a report on new inspectors to the JCQ Centre Inspection Service.
- 3.54 The close working relationship between the JCQ Centre Inspection Service and each awarding body provides a coordinated approach to centre inspections and a good means of communication between the two sides, allowing appropriate action to be taken when and where necessary. However, as stated above inspectors check only that the centre has the appropriate paperwork relating to approved access arrangements and do not make any checks that arrangements are being implemented appropriately.

Conclusion and further work

- 3.55 In general, awarding bodies complied with the requirements of paragraph 7.2, 7.5 and 7.6 of the code of practice during the period under review. Staffing, training and record-keeping were appropriate and internal awarding body procedures were, in general, fit for purpose and carried out with professionalism.
- 3.56 Correspondence between awarding bodies and centres was thorough, explanatory and, in general, demonstrated fairness. Nonetheless, awarding bodies need to ensure consistency in approving arrangements in a way that is open and transparent to centres.
- 3.57 The issue of late applications is in need of review. Submission deadlines are around three or four months in advance of the examination given the time needed for awarding bodies to process applications. One awarding body charges for late applications (not including applications for modified papers) but the other two do not. While the percentage of late applications for awarding body approved arrangements is between 10% and 35%, the percentage of late requests for modified papers is at a higher level of between 30% and 50%. There is a risk that there may not be time to

process such as late applications and that candidates may not get the access arrangement to which they are entitled.

- 3.58 Further investigations into the quality assurance procedures for modifying question papers are needed and will be undertaken by QCA in a review into the question paper setting process. Similarly, QCA will investigate the extent of a shortage of question paper modifiers.
- 3.59 Finally, although the checking of applications by awarding bodies is thorough, together with the checking of paperwork by the JCQ centre inspectors, the actual implementation of access arrangements within centres remains largely unchecked.

4. Survey of centres

- 4.1 Paragraph 7.6 of the code of practice requires the awarding bodies to provide centres with its regulations and guidelines for making access arrangements, including:
- conditions for eligibility
 - the range of access arrangements that need to be determined by the awarding body, indicating how and when applications should be made on behalf of candidates
 - the range of access arrangements that have been delegated to the centre, together with the associated requirements for decision-making, an evidence base and record-keeping.

Background

- 4.2 In the summer of 2006, QCA undertook a survey seeking the views of exams officers from centres on awarding body-approved access arrangements. The purpose of the survey was to establish whether the process of applying for and granting access arrangements for eligible candidates was manageable within centres and did not place unnecessary administrative burdens on them. The survey also aimed to establish whether the system was being applied fairly and consistently.
- 4.3 The survey provided an opportunity for exams officers to give their views on the ease of use and clarity of guidelines; support received from awarding bodies; the manageability and suitability of the current system; and what improvements they would like to see regarding the processes of applying for and administering access arrangements. The survey included open-ended questions and responses provided a helpful indication of further follow-up research activities. Given the nature of the survey, respondents answered only those questions where they wished to raise particular issues.

- 4.4 Two hundred and forty-nine exams officers responded to the survey. The respondents covered a range of different centre types and were located across England (see appendix). There were no significant patterns between centre types or location and the outcome of responses to the questions.
- 4.5 Not all exams officers indicated their background. However, when they did, it was evident that respondents had either teaching or administrative backgrounds. Three were new to the role of exams officer. Respondents were either from centres where the SENCO was responsible for both the collection of evidence and administrative side of the applications, or centres where it was the responsibility of the exams officer to complete the administrative side of the application based on information and evidence supplied by the SENCO.

Main findings

- 4.6 The main issue raised by exams officers was concern about the manageability of delivering approved access arrangements in centres in terms of time, money and resources such as staff and examination rooms. The key issues related to how individual centres organised roles and responsibilities, the practicalities of organising and implementing access arrangements within a school environment and the late identification of eligible candidates. However, the extent of the issues varied across centres and was not the same for all access arrangements.
- 4.7 The second main issue indicated by exams officers was that of significant administrative burden. This applied to both the exams officer's role in completing the application process and the SENCO's role in providing evidence of eligibility to awarding bodies. Over-duplication of materials featured strongly as a complaint where centres apply for the same access arrangement to a number of different awarding bodies for the same candidate. In addition, there was a perception that the way in which awarding bodies granted access arrangements and the level of guidance they gave differed. Nonetheless none of the respondents implied that the current system was unfair or open to abuse.
- 4.8 When collating evidence to meet conditions of eligibility for an access arrangement, the relationship between the exams officer and the SENCO significantly affected the efficiency of administering and applying for applications. Where centres had clear lines of responsibility and/or the exams officer worked cooperatively with the SENCO, respondents tended to find the process of applying for access arrangements easier and more manageable.
- 4.9 The JCQ guidelines currently do not outline the roles and responsibilities of exams officers and SENCOs in relation to applying for and administering access

arrangements on behalf of candidates as such staffing issues are an internal matter within centres. However, the application forms indicate that an exams officer's role should be only to administer the application, not to prepare the evidence for or validate eligibility. This is a specialist role, which usually lies with the SENCO. However, in practice, this is not always the case because of a number of factors such as workloads, recognised qualifications and different job descriptions.

- 4.10 In another example, the undefined roles of the exams officer and the SENCO meant that completing complex forms to meet conditions of eligibility was problematic. However, the complexity related to systems within the centre rather than in the forms. Parts of the application form required written statements from a qualified psychologist, a full or affiliated member of the Association of Educational Psychologists employed as an educational psychologist by a local authority, or a teacher holding a JCQ approved qualification. These statements are usually organised by the SENCO. In this particular case, the exams officer stated that gaining the required evidence from the SENCO was the element that took time to organise and achieve, rather than the work required to submit the form.
- 4.11 The JCQ guidelines were generally judged to be accessible, in terms of understanding the information required on the form, but the processes set up and followed by individual centres sometimes made completing the application form complex. Exams officers found that with experience and appropriate training, such as that provided by NAA field officers, completing application forms was unproblematic. Exams officers became clear on how an application should be made, what should be submitted for an application and who had responsibility for each part of the process. Even so, many exams officers wanted to see simpler forms to reduce the time spent completing them.
- 4.12 Only 22 (8.8%) respondents stated that the volume of JCQ guidelines increased the complexity of applying for access arrangements and in determining what evidence was required for an application. Only 17 (6.8%) exams officers stated that the volume of workload in relation to deadlines was problematic. When asked their views on the ease, use and clarity of JCQ guidelines, the responses varied from 'clear and easy to use' to 'difficult and time consuming'. Overall, the feedback on the ease of use and clarity of the JCQ guidelines was positive.
- 4.13 With the development of the NAA's online tool, *Centre access arrangements and modified papers (CAAMP)*, exams officers were clearer on how applications requiring supporting evidence should be made. Respondents to the survey stated that the CAAMP online tool was very easy to use and a good way to keep track of access arrangements. Within centres, nine exams officers specifically stated that the CAAMP

function for producing reports showing submitted centre-delegated access arrangements was easy to administer. Exams officers welcomed applying for modified papers online, as this was also deemed to be easier to administer than paper-based methods. When asked about the manageability and suitability of the current system, 50 (20.1%) respondents stated that these JCQ guidelines were clear. Only two exams officers stated that they had problems navigating the CAAMP online tool. One reason stated was the high turnover of exams officers at a centre, which meant that the experience gained in using the system was hard to retain. Exams officers noted that the JCQ guidelines were likely to be hard for inexperienced exams officers to use without basic training but this problem could be easily overcome if there was more training and guidance for exams officers new to their role.

- 4.14 Even so, when asked what support from awarding bodies was most beneficial in the process of applying for and implementing access arrangements, exams officers responded on a variety of matters. Of the 249 respondents, 150 (60.2%) stated that access to telephone advice from the awarding body was most beneficial, with 52 (20.9%) respondents stating that the awarding bodies had a good telephone service. Exams officers specifically wanted speedy and easy access to relevant awarding body officers or administration staff when a query arose. They sought understanding of the processes of applying for access arrangements and accurate decisions from knowledgeable subject-specific staff. They also wanted emergency arrangements to be dealt with quickly and accurately. In addition, exams officers specifically wanted clear guidelines in approval letters for access arrangements for individual candidates. Centres were keen to ensure that they were interpreting the JCQ guidelines appropriately and making sure they were following the correct procedures.
- 4.15 The administrative demands of submitting an application for awarding body-approved access arrangements was considered by many to be overly time-consuming because the current system was paper intensive and the JCQ guidelines did not always distinguish clearly between how to complete an application for a particular access arrangement and how to deliver it. As mentioned, it was specifically the demands on the exams officer to collect the required evidence from SENCOs and other educational specialists, to fill in forms and send information to each awarding body that was cited as making the current system difficult to manage. In centres where there was a large number of candidates in need of particular assessment requirements, there was an even greater administration burden on exams officers. All the necessary paperwork and photocopying involved in sending the same evidence materials to different awarding bodies was considered to be too detailed and time-consuming. Exams officers wanted to have a common submission point rather than having to send

applications to each awarding body for examinations taken by the one individual candidate.

- 4.16 Even with the CAAMP online tool and support from awarding bodies, some inexperienced exams officers were not always clear whether they were following the procedures fully. To overcome such concerns exams officers suggested that there should be specific checklists, rules or information so that staff and candidates could understand what was permitted, for example, tailored guidance for staff and candidates about the use of readers, scribes and invigilators. However, more experienced exams officers stated the guidelines on applying and administering access arrangements were clear. It was clear that centres did not want to misinterpret the guidance. Inexperienced exams officers wanted more training and support in identifying aspects of guidance that applied to different people and for the different arrangements that the JCQ guidelines cover.
- 4.17 Exams officers also wanted training to help with planning for the next academic year to allow them to be up-to-date with application processes. They asked for training to be given by experienced exams officers.
- 4.18 Many respondents cited their centre's own resourcing issues when implementing access arrangements for their candidates. Equally, there were other exams officers who did not provide any indication that they experienced difficulties. Even so, finding rooms, arranging invigilation staff, readers and scribes and rescheduling of examinations for sign interpreters were specifically mentioned as being problematic to organise. The extra planning and administration involved took up a great deal of time, money and resources. One exams officer stated that there was too much reliance on centres arranging staff, meeting additional costs and arranging venue access. These were not easy tasks to carry out in a busy school environment. The logistical problems were exacerbated when many candidates required specific access arrangements in one particular exam. For example, if a centre required 14 readers and scribes for one examination, the centre needed to organise 28 members of staff and 14 rooms in addition to the main examination room and alongside whatever else was happening in the rest of the centre during the examination period.
- 4.19 Exams officers also highlighted centre issues such as the lack of dedicated equipment, the amount of photocopying required and the expertise needed to implement certain access arrangements. In some centres, it was particularly difficult to arrange testing of candidates' reading levels because this had to be carried out by professionals external to the centre where internal expertise was not available.

- 4.20 The late identification of candidates with particular access arrangements put additional pressure on centres, awarding bodies and candidates. Deadlines are put in place by awarding bodies to ensure that they have adequate time and resources to make all the necessary arrangements for eligible candidates, for example, modified papers. Although exams officers were clear when deadlines for applications fell, the submission of late applications was not always due to a centre not carrying out their role properly or purposely delaying applications. Centres stated that reasons for late submissions differed as deadlines for applications did not always coincide with factors determining which examinations candidates would be entered for or the time available to collate the necessary evidence for eligibility. Other factors which affected late applications were late determination of entry for a particular tier at GCSE or even late decisions on examination entry at a subject level. Although these issues were specifically mentioned, it was unclear whether late identification of candidates' needs was a widespread problem for centres.
- 4.21 Seventy-nine respondents (31.7%) commented that more centre delegation would be beneficial for centres. The examples given were for last-minute arrangements such as a candidate with a broken wrist needing a scribe, or for applications for readers or word-processors. One exams officer suggested that as access arrangements were nearly always granted if backed up with evidence they could all be delegated to centres, but with spot checks to ensure that they were genuine with higher penalties for malpractice. However, as mentioned previously, evidence from awarding bodies suggested that their professional advice to certain centres may be that an alternative access arrangement would be more appropriate for a candidate or that for very late applications, post-examination applications for special consideration might be the better option.
- 4.22 No information was provided by the respondents about centres' quality assurance or record-keeping procedures. Therefore, it was difficult to gauge whether centres found it manageable to prove the eligibility of candidates or deliver access arrangements in line with JCQ guidelines or whether it placed unnecessary administrative burdens upon them.
- 4.23 Sixty-six exams officers (26%) cited concerns in their answers about inconsistent practices across the awarding bodies when dealing with access arrangements. When applying for readers and extra time, concerns about the major differences in terms of what had to be completed to obtain the different arrangements were raised. Exams officers expressed a need for consistency in what was necessary for an application for each access arrangement, whichever awarding body they were applying to. An exams officer gave the example of an application for a word-processor to which each

awarding body gave a different response. However, it was unclear whether the centre sent the same evidence for eligibility to each of the awarding bodies. Another example mentioned was that some awarding bodies granted particular access arrangements for two years, whereas others granted the same access arrangement for only 12 months.

- 4.24 One centre raised the issue that some access arrangements put candidates at an unfair disadvantage because it resulted in the assessment not being equal to that of other candidates. For example, Braille modern foreign language papers were judged more difficult for less able candidates in terms of reading skills than an unBrailled paper for the less able non-visually impaired candidates.
- 4.25 Centres raised the issue of inadequate guidance on implementing access arrangements in their centres. Although the JCQ guidance provides instructions on applying for and implementing access arrangements, the distinction between these areas within the document is judged unclear. Therefore, the perceived lack of detailed guidance for centres meant that some inexperienced exams officers were not certain that access arrangements were applied consistently in their centres. For example, one centre found there were anomalies in how guidelines were interpreted and followed by invigilators arranged by the centre. This inconsistent interpretation of the JCQ guidelines by invigilators and the centre meant that the candidates were not clear what was and what was not permitted. The centre in question tried to address this issue by having separate invigilators to follow individual candidates throughout the exam sessions. Even so this could still have an impact on and between candidates' overall performance.

Conclusion and further work

- 4.26 Section 7 of the code of practice focuses on the regulations and guidelines that awarding bodies must provide to centres on the conditions of eligibility and how to apply for access arrangements. Generally, exams officers were satisfied with the level of help given on making applications although further guidance was requested on implementing approved access arrangements. However, feedback indicated some perceived inconsistencies between awarding bodies in approving applications.
- 4.27 The main issues within centres were those of a practical and logistical nature, and associated with staffing responsibilities and resources. Some of the causes of late applications included the volume of the task, gathering supporting evidence and late decision-making about candidate entries.
- 4.28 In general, dealing with access arrangements was reported as a burdensome task on exams officers, though eased by the introduction of more centre-delegated

arrangements and the online system for recording such arrangements and applying for modified papers.

5. Summary of current and future work

Since the review of GCE and GCSE access arrangements was completed, a number of initiatives and projects have begun that will seek to address some of the issues raised in the report. In addition QCA has identified new strands of work for the coming year to address any remaining issues.

- 5.1 As part of the regular review of the *GCSE, GCE, GNVQ and AEA Code of practice*, the qualifications regulators will ensure it is compliant with the requirements of the DDA 2005.
- 5.2 QCA will review the data required from awarding bodies relating to reasonable adjustments and access arrangements in the 2008 examinations.
- 5.3 QCA has identified the need for a reduction in the administrative burden on centres applying for awarding body-approved access arrangements and the need for clarity and consistency to be ensured during the approval process.
- 5.4 The NAA, working in collaboration with the JCQ awarding bodies and the Examination Officers' Association, provides an annual programme of training events, aimed mainly at new exams officers, which includes an overview of access arrangements. In addition to this the NAA field team will continue to provide training and support to individual exams officers to familiarise them with the processes and practicalities of applying for and implementing access arrangements whilst sharing good practice from other centres.
- 5.5 QCA will review the guidance given by awarding bodies to question paper setters and awarding bodies' quality assurance procedures to ensure equality of access to question papers. The use of question paper modifiers and an investigation into the extent of the reported shortage of modifiers will be undertaken as part of this review. The review will report in 2008.

Appendix: Details of centres responding to a survey of exams officers

Centre type⁴

46.2% (115)	11–18 school	0.8% (2)	3–18 school
31.3% (78)	11–16 school	0.4% (1)	13–18 mixed comprehensive
6.4% (16)	Independent school	0.4% (1)	16–18 school
3.6% (9)	14–18 school	0.4% (1)	Independent sixth form
3.6% (9)	Further education college	0.4% (1)	Prison
2.0% (5)	Sixth-form centre	0.4% (1)	Adult
1.2% (3)	Special school	0.8% (2)	Unknown

Location of centres surveyed based on awarding body designated regions

Bedfordshire (3)	Hampshire (15)	Nottinghamshire (2)
Berkshire (1)	Hertfordshire (1)	Somerset (2)
Buckinghamshire (2)	Humberside (1)	South Yorkshire (4)
Cambridgeshire (10)	Inner London (25)	Staffordshire (10)
Cumbria (3)	Isle of Wight (1)	Suffolk (4)
Derbyshire (7)	Kent (11)	Surrey (7)
Devon (3)	Lancashire (6)	West Midlands (6)
Dorset (8)	Merseyside (12)	West Sussex (8)
East Sussex (5)	Norfolk (5)	West Yorkshire (12)
Essex (25)	North Yorkshire (8)	Unknown (15)
Greater London (21)	Northamptonshire (4)	
Greater Manchester (1)	Northumbria (1)	

⁴ Numbers in brackets are the actual number of responses