

# Consultation on exceptional arrangements for awarding vocational, technical and other general qualifications in summer 2020

## Your data and rights

Name
Paul Simpson
Position (if applicable)
National Executive Officer
Organisation (if applicable)
British Association of Teachers of the Deaf
Telephone number
07506 400270
Email
batod_neo@icloud.com
Do you wish any part of your response to remain confidential?
No

## Consultation questions

Q1: To what extent do you agree or disagree with our proposed approach to qualifications which fall out of scope of the extraordinary regulatory framework?
Neither agree nor disagree
Q2: To what extent do you agree or disagree with our proposed approach to determining to which learners the extraordinary regulatory framework applies?
Neither agree nor disagree
Q3: To what extent do you agree or disagree with the balance we are proposing to strike across the 3 elements of: delegation to awarding organisations, flexibility, and consistency?
Neither agree nor disagree

Q4: To what extent do you agree or disagree with the key principles we have set out?

Strongly disagree

**Comments:**

On page 8 we read "minimise disadvantage to learners with special educational needs, protected characteristics or other vulnerable learners". However, this is not in the key principles and BATOD feels strongly that it should be.

Q5: To what extent do you agree or disagree with our proposal to allow awarding organisations to deliver their qualifications as normal where they are able to?

Agree

Q6: To what extent do you agree or disagree with our proposed approaches for the different categories of qualifications?

Neither agree nor disagree

Q7: To what extent do you agree or disagree with the aims of our proposed approach to calculating results?

Agree

**Comments:**

In order for this to work it is essential that specialist input contributes to the decision-making.

Q8: To what extent do you agree or disagree with our proposal that the minimum evidential threshold is that any approach to providing calculated results needs to be based upon at least one source of trusted evidence along with a sufficiently robust basis for quality assurance?

Agree

**Comments:**

Where appropriate the evidence should be subject to specialist scrutiny

Q9: Do you have any comments on the approach to providing learners with calculated results?

In relation to the assumption of reasonable adjustment in the calculation of results it is important to have specialist involvement where relevant (eg from Qualified Teachers of the Deaf from centres or specialist sensory support services) but indeed in all decision-making re assessment etc. We are strongly of the opinion that awarding bodies should be required to ensure that they have taken the specific needs of candidates with SEND into account. In view of the large number of awarding bodies it should be a clear instruction from Ofqual that this is done and not left up to individual bodies.

Q10: To what extent do you agree or disagree with our proposed approach to the adaptation of assessments?

Disagree

**Comments:**

The choice of 'strongly disagree' is because it is not clear how it will be ensured that the needs of deaf candidates (and others) will be considered and safeguarded. If, for example, assessments are adapted to be delivered online there will need to be specialist input to ensure the language is appropriate and that subtitles and BSL interpretation are added. It would not be reasonable for awarding bodies not to do this on grounds of cost. It would not fit with the expressed desire to ensure that such candidates are not disadvantaged. Therefore, we think that Ofqual should make clear to all awarding bodies that any adaptations have to be undertaken with specialist input and not discarded on grounds of cost. Awarding bodies should be required to declare that they had put these measures in place and taken these issues into account.

Q11: To what extent do you agree or disagree that delaying or re-scheduling assessments should be the option of last resort?

Disagree

**Comments:**

Whilst it should not be encouraged, a delay may be preferable to inappropriate adaptations which deny effective access to deaf candidates.

Q12: To what extent do you agree or disagree with our proposals around decision-making and record keeping?

Agree

Q14: To what extent do you agree or disagree with our proposed position on the delivery of an assessment opportunity to learners in autumn 2020?

Agree

**Comments:**

However, we think that Ofqual should "play close attention to whether awarding organisations are meeting" the assessment and other needs of deaf candidates. This is why such a requirement should be included in the principles Ofqual will be scrutinising as stated in our response to Q4.

Q15: To what extent do you agree or disagree with our proposed approach to appeals?

Disagree

**Comments:**

Candidates should be able to appeal about a failure to take note of specialist expertise in decision-making re assessments (eg from Qualified Teachers of the Deaf from centres or specialist sensory support services).

Q16: To what extent do you agree or disagree with our proposed position in relation to certificates?

Agree

Q17: To what extent do you agree or disagree with our proposed approach in relation to private learners?

Agree

Q18: To what extent do you agree or disagree with our proposed approach in relation to learners who are not yet registered for an assessment?

Neither agree nor disagree

**Comments:**

In all cases appropriate decisions about access arrangements need to be taken involving the input of specialist expertise (eg from Qualified Teachers of the Deaf from centres or specialist sensory support services).

Q19: To what extent do you agree or disagree with our intention to not require any particular approach for adapting assessments and/or issuing results to international learners?

Neither agree nor disagree

**Comments:**

The same requirements for appropriate access arrangements to be applied and taken into account need to apply.

Q20: Do you have any comments about our proposed position in relation to awarding organisations facing financial difficulties?

not at the moment

Q21: To what extent do you agree or disagree with our proposed position in relation to the issuing of results for Functional Skills qualification learners?

Neither agree nor disagree

Q22: Do you have any comments on the proposed regulatory framework?

not at the moment

Q23: Are there other potential equality impacts that we have not explored? If yes, what are they?

Yes

**Comments:**

It is a concern that adapted assessments may disadvantage some deaf candidates if specialist input has not been involved. In particular where online assessments are used instead of face to face assessment it is crucial that the language is appropriate and that subtitles and BSL interpretation are provided. Specialist input is essential eg from Qualified Teachers of the Deaf from centres or specialist sensory support services to avoid disadvantaging the candidates.

Q24: Do you have any views on how any potential negative impacts on particular groups of students could be mitigated?

We feel strongly that Ofqual should provide clear guidelines to awarding bodies in relation to ensuring that appropriate specialist input is taken into account in decision-making about assessment adaptation and the calculation of grades - from relevant Qualified Teachers of the Deaf from centres or specialist sensory support services who work with the students. Specific guidance from Ofqual where deaf students are involved would be essential.

Centres and awarding bodies should declare that such specialist input had been taken into account – the lack of which could be challenged by appeal.

Q25: Are there any regulatory impacts, costs or benefits associated with the implementation of this framework that are not identified in this consultation? If yes, what are they?

No

Q26: What additional costs do you expect you will incur through implementing this framework? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.

n/a

Q27: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?

**Comments:**  
n/a

## Feedback

We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation?

1 2 3 4 5

Very hard to read

X Very easy to read

Do you have any comments or suggestions about the style of writing?

none

## Your details

Which nation or country are you based in?

England

**Other country:**  
United Kingdom

How did you find out about this consultation?

Ofqual's newsletter

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

## Your details (official response)

Which of these options best describes your organisation?
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Other representative or interest group
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### Your details (representative group)

Type of representative or interest group
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School, college or teacher representative group
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