

Here are BATOD's comments on the Ofqual consultation document entitled: Guidance on designing and developing accessible assessments

### Terminology change (page 7)

We previously suggested a change in this paragraph on page – thank you for adopting it.

“**deaf learners** (those whose first language is English and those whose first language is British Sign Language), **whose English language skills might develop at a later age because of lack of exposure to English in their earlier years**”

There is one further change as applied above - terminology has recently evolved so that 'deaf' now replaces 'deaf or Deaf'. There are several other examples of this in the document.

### Page 8

We propose the following wording revision

“we commissioned some Qualified Teachers of the Deaf **from BATOD's team of accredited modifiers of the language of examinations** to review a sample.”

### Additional note

Further to these points BATOD fully endorses the following comments made by Derek Heppenstall, a qualified Teacher of the Deaf and highly experienced modifier of the language of examinations. He also trains Language Modifiers through Communicate-Ed. Derek has represented BATOD in exam access arrangement related forums and contributed to BATOD's publication on language modification in exams and on LMs as an access arrangement.

“I think the proposed guidance is clearly written and identifies the main issues.

### Assessment Instructions

The instructions and rubrics in an assessment should not:

- require Learners to hold large amounts of information in their working memory, unless the assessment construct requires otherwise

In my experience, rubric is getting clearer, but not in all cases, especially where computer marking is involved. I received this example from a colleague recently. It is from the Reading section of an English paper. It is difficult to modify rubric such as this, even at source.

Read again the first part of **Source A** from lines **1 to 12**.

Choose **four** statements below which are **true**.

- Shade the **circles** in the boxes of the ones you think are true.
- Choose a maximum of **four** statements.
- If you make an error cross out the **whole box**
- If you change your mind and require a statement that has been crossed out then draw a circle around the box

Centres are aware that a Reader or language modifier is not allowed in the Reading section of a paper. They may be unaware that the rubric may be explained and may not have provided support in this exam, so the candidate will have to struggle through the rubric without help.

## Language

**Bullet Point 5** Names are very useful to avoid the passive voice but may be difficult to choose if the examiner is considering both familiarity and multicultural issues.

**Bullet Point 9** 'How' is a difficult question word. I usually replace with 'in what ways' when appropriate

## Sentence structures

I think your advice is sound. I find that careful sentence structure is key to language accessibility. The more I modify, the more I think word order is the biggest language barrier. Use of passives, relative clauses, pronouns, etc. can force the reader to track back and forth for meaning so the text becomes less cohesive. In many cases, using shorter sentences removes this barrier.

### Comments on your questions where appropriate

#### Question 1

Content of the draft guidance is clear and comprehensive given the scope of your task.

#### Question 3

Designing papers that are clear and accessible is an important aspect of validity and should benefit all learners.

#### Question 4

The guidance should be relevant to all qualifications regulated by Ofqual and others too perhaps. At Communicate-Ed we provide LM training to DVLA.

Historically, language modification has mainly been the concern of Awarding Organisations offering General Qualifications. Recently, however NCFE has also been using BATOD accredited modifiers to modify papers at source. I think this has been very successful and question writers are becoming more aware of the importance of accessible language. I think it would be beneficial for other technical and vocational AOs to use language modifiers.

#### Question 6

Proposed guidance is clearer and more specific than G3.



I think most of G3 has been covered in proposed guidance (I'm sure you have checked!) so see no reason not to remove it (how's that for a double negative?!)"

**Teresa Quail; Paul Simpson, co-National Executive Officers**