



25 June 2025

Dear Ofqual

This is a joint submission from The British Association for Deaf Children and Young People (BATOD) and The Deaf Teachers of the Deaf (DTOD).

BATOD is the only professional association for Qualified Teachers of Deaf Children and Young People (QToDs) in the UK. The Association represents the interests of QToDs and the children and young people (CYP). The Association supports QToDs and organises continued professional development (CPD) courses and national and regional meetings to provide relevant up-to-date information and to disseminate good practice. Strong links are maintained between BATOD and the UK governments, as well as voluntary bodies, especially the National Deaf Children's Society (NDCS), in order to contribute to policy development in this field.

The Deaf Teachers of the Deaf (DTOD) is a professional network that promotes the advancement of Deaf Teachers of the Deaf and supports deaf teachers working in education. They facilitate information, advice, support and networking opportunities networking, information, support and advice.

### Question 1

**Proposal:** Ofqual proposes requirements and guidance about the language and accessibility of assessments.

**Question:** To what extent do you agree or disagree?

BATOD and DTOD agree to Ofqual proposing requirements and guidance about the language and accessibility of assessments.

### Question 2

Do you have any comments on the proposed requirements and guidance about the language and accessibility of assessments?

BATOD and DTOD recognise DfE's subject content is designed for students with no prior knowledge of BSL and aims to provide a foundation of how sign language works.

BATOD and DTOD support the consideration that the assessments to be made available in both English and BSL as part of the standard assessment model as they would mean that deaf students who use BSL as their preferred language need not apply for a reasonable adjustment to access the assessments in BSL. The proposal to have some responses in written English and BSL as it will allow deaf students the option to engage with the language and vocabulary, they feel confident with for the response.

BATOD and DTOD support the proposal to limit this to what a student would be required to know.

There is a large population of children with a range of needs. Research indicates 40% of deaf children have additional needs. We feel the wording should reflect the case-by-case assessment of a student's ability to avoid a blanket exclusion of some cohorts due to labels that are associated with their needs.



For example, some students who have vision impairments, physical disabilities, autistic profiles may be able to produce signs with the same hand shape, placement and movement as other students without needs.

BATOD and DToD request that positive language is used throughout all material ie deaf is used to denote all levels of deafness not the term 'hearing impairment'. BATOD and DToD 'Moving towards using positive language around Deafness/Hard of Hearing' document 2024, available to view via [this link](#).

### Question 3

**Proposal:** Ofqual proposes requirements and guidance about the vocabulary and grammar in the qualification.

**Question:** To what extent do you agree or disagree?

BATOD and DToD strongly agree exam boards should be expected to make clear what students must learn.

### Question 4

Do you have any comments on the proposed requirements and guidance about vocabulary and grammar in the qualification?

BATOD and DToD agree where students are tested on their ability to infer plausible meanings of single signs, the exam board should make the supporting context clear in the question or instructions for the task.

BATOD and DToD recognise no Awarding Body has a deliberate policy of confusing candidates by phrasing questions in obscure language. Therefore, in line with existing practice across the wider examination diet, the language used must be modified to ensure there is no ambiguity. We would recommend subject specialists who understand the language used are involved. This aligns with the practice of using BATOD accredited Language Modifiers at the point of earliest stages.

### Question 5

**Proposal:** Ofqual proposes prohibiting access to dictionaries in the assessments.

**Question:** To what extent do you agree or disagree?

BATOD agree the exam board must take reasonable steps to ensure that students do not have access to a dictionary when taking exams and assessments or during any formal preparation time for the non-exam assessment.

### **Question 6**

Do you have any comments on the proposal to prohibit access to dictionaries in the assessments?

BATOD and DTOD believe this qualification should have the same validity as for equivalent qualifications in other subjects.

If dictionaries were used, they would need to account for regional variations.

### **Question 7**

**Proposal:** Ofqual proposes requirements about the use of stimulus materials in assessments.

**Question:** To what extent do you agree or disagree?

BATOD and DTOD strongly agree the exam board must produce stimulus materials for the exams and, where necessary, the non-exam assessments. The stimulus materials:

- must include recorded BSL that will be used to test students' understanding of BSL
- may also be in other formats, as appropriate to the assessment

### **Question 8**

Do you have any comments about the proposed requirements for the use of stimulus materials?

BATOD and DTOD feel the stimulus materials should not be generated by AI. BATOD strongly recommends Deaf native BSL users are used, and regional sign variations are evidenced. A list of the regional sign variations should be provided to all centres.

### **Question 9**

**Proposal:** Ofqual proposes making a small amendment to the wording of AO3.

**Question:** To what extent do you agree or disagree?

BATOD and DTOD disagree with the suggestion to remove the reference to "placement" in the wording of AO3.

**Question 10**

Do you have any comments about the proposal to amend the wording for AO3?

Within the National Curriculum, Key stage 1 and 2 pupils “should continue to add to their knowledge of linguistic terms, including those to describe grammar”. Placement of signs in space is a crucial aspect of BSL grammar, therefore knowledge of ‘placement’ as a linguistic term should be explicit.

**Question 11**

**Proposal:** Ofqual proposes guidance for each of the assessment objectives.

**Question:** To what extent do you agree or disagree?

BATOD and DToD agree.

**Question 12**

Do you have any comments about the proposed guidance for the assessment objectives?

BATOD and DToD recognise under the Equality Act 2010, exam boards must already make reasonable adjustments for disabled students to make sure they can demonstrate the required knowledge, understanding and skills. We also recognise the purpose of reasonable adjustments is not to change the nature of what is being assessed by the qualification, but to provide students with a fair opportunity to demonstrate what they know and can do in relation to that qualification.

BATOD and DToD feel exam boards should actively consider other reasonable adjustments as they design their assessments to ensure some students are not prevented from being able to engage with the prescribed subject content.

BATOD and DToD seek clarification about the context of use of English in this statement ‘Where AO1 marks are allocated, there is to be no reward for the use or quality of students’ English in responses’.

BATOD and DToD recommend continuity in the use of terminology eg ‘BSL utterances’ - utterances’ are not associated with BSL. We suggest amending to ‘where BSL signs/handshapes/production are meaningful and cohesive, but fluency may not be as developed as in rehearsed BSL’.

**Question 13**

**Proposal:** Ofqual proposes requiring that there are 2 NEA components.

**Question:** To what extent do you agree or disagree?

Agree

BATOD and DToD recommend a clear definition of what is meant by “proficient BSL signer” with knowledge of related regional sign language. Perhaps use a Signature level equivalence so that centres can judge. Signature levels are likely to be known than Common European Framework of Reference for Languages levels.

#### **Question 14**

**Proposal:** Ofqual proposes detailed requirements about the “BSL Portfolio”.

**Question:** To what extent do you agree or disagree?

Agree

#### **Question 15**

**Proposal:** Ofqual proposes detailed requirements about the “Interactive Assessment”.

**Question:** To what extent do you agree or disagree?

Agree

#### **Question 16**

Do you have any comments about the proposals for the NEA requirements?

BATOD and DToD feel the higher % for the Interactive Assessment is reasonable as it will demonstrate students' signing skills in a 'live' situation, in person, whereas the BSL Portfolio is more 'rehearsed'.

#### **Question 17**

Do you have any comments on the wording of the proposed subject level conditions?

No

#### **Question 18**

Do you have any comments on the wording of the proposed subject level requirements?

BATOD and DToD feel the wording includes all the necessary BSL grammar knowledge.



**Question 19**

Do you have any comments on the wording of the proposed subject level guidance?

No

**Question 20**

Are there any potential equality impacts that Ofqual has not identified?

Yes

**Question 21**

Ofqual has not identified any adjustments that could be made for students with a visual impairment or affected manual dexterity to produce signs that would still enable them to demonstrate the knowledge, skills and understanding required for the qualification.

BATOD and DToD feel it is not valid to imply students who may be registered blind, have affected manual dexterity would be unable to access this through reasonable adjustments.

**Question 22**

Do you have any suggestions for how any potential negative impacts on particular groups of students could be mitigated?

BATOD and DToD suggest awareness raising for BSL teachers so that they understand how public examinations are adapted for a wide range of hearing and deaf candidates. For example, in relation to BSL this may include visual frame BSL, hands on BSL, a candidate with a physical disability affecting arm movement using a smaller signing space, a candidate with autistic spectrum conditions perhaps finding eye contact difficult at times. Deaf communities have wide experience with deaf people with a wide range of differences in the way they use BSL because of other issues. However, the exam boards need to ensure the BSL tutors have this awareness in relation to how changes can be made to assessments, and often are.

**Question 23**

Are there any potential costs or burdens that Ofqual has not identified?

No



**Question 24**

N/A

**Question 25**

Are there any steps Ofqual could take to reduce the costs or burdens of the proposals?

BATOD and DToD propose the use of native BSL users on the exam boards to assess which may mitigate the incurring additional costs for interpreters if hearing/non-signing examiners assess exams.

BATOD and DToD would recommend the BSL curriculum co-produced by deaf schools and co-ordinated by Frank Barnes School is adopted as part of the national curriculum to establish a process of standardising progress through BSL study. It could also support resources sharing between schools offering the GCSE.

Confidentiality and feedback

Where you have requested that your response or any part remains confidential, we will not include your details in any published list of respondents. However, we may quote from the response anonymously in order to illustrate the kind of feedback we have received.

**If there is any part of your response that you wish to remain confidential, please indicate below.**

Do you wish any part of your response to remain confidential?

(Required) No

If you require any other information, please do not hesitate to contact me, the National Executive Officer, on [exec@batod.org.uk](mailto:exec@batod.org.uk).

Yours sincerely

**Teresa Quail**  
**BATOD National Executive Officer**