





Consultation

# Guidance on designing and developing accessible assessments

A response to Ofqual submitted by the Autism Education Trust, Ambitious about Autism and the National Autistic Society

24 January 2022

# **Contents**

1. Ir	troduction	. 2
1.1.	Contributing organisations	. 2
1.2.	Consultation group	. 3
1.3.	Communication	. 3
1.4.	Structure of our response	. 3
2. R	esponses to questions	. 4
2.1.	Question 1	. 4
2.2.	Question 2	. 4
2.3.	Question 3	. 5
2.4.	Question 4	. 5
2.5.	Question 5	. 6
2.6.	Question 6	11
2.7.	Question 7	11
2.8.	Question 8	11
2.9.	Question 9	11
2.10	). Question 14	12
3. F	urther observations	13
4 Δ	nnandiy 1   Casa study	15

### 1. Introduction

The Autism Education Trust, Ambitious about Autism and the National Autistic Society have compiled a joint response to the consultation on the proposed Guidance on designing and developing accessible assessments (the Guidance) published by Ofqual.

Our response reflects the key areas of difference in autism and highlights the adjustments required to design and develop accessible assessments for this group of young people.

We have also discussed some broader issues in relation to the assessment process which can be barriers to fair access for autistic young people. Too often individual access arrangements lack the flexibility and understanding required to remove disadvantage.

### 1.1. Contributing organisations



The Autism Education Trust is a not–for–profit organisation supported by the Department for Education.

We offer education professionals training, practical tools and a wealth of free resources to better support autistic children and young people aged 0 to 25.

### www.autismeducationtrust.org.uk



Ambitious about Autism is the national charity for children and young people with autism.

We provide services, raise awareness and understanding, and campaign for change.

Ambitious about Autism is a registered charity in England and Wales (1063184) and a registered company (3375255).

### www.ambitiousaboutautism.org.uk



The National Autistic Society is here to transform lives and change attitudes to help create a society that works for autistic people.

We are registered as a charity in England and Wales (269425) and in Scotland (SC039427). The National Autistic Society is also a company limited by guarantee (01205298).

www.autism.org.uk

# 1.2. Consultation group

# **Autism Education Trust**

# **Pam Simpson**

Board Member, Autism Consultant and Trainer

### **Emma Chantler**

Programme and Content Manager

# Ian Adam Bellamy

**Board Member** 

### Ambitious about Autism

### **Ellie Whitlock**

Communications and Policy Officer

### National Autistic Society

# **Thomas Brayford**

Policy and Parliamentary Officer (Education and Employment)

### 1.3. Communication

Communication with contributing organisations and the consultation group regarding our response should be directed to Emma Chantler:

emma.chantler@autismeducationtrust.org.uk

# 1.4. Structure of our response

Our response first addresses a number of the questions posed by Ofqual in the consultation document (pp.20–25). We then proceed to document our broader observations relating to the assessment process and ensuring fair access to assessment for autistic people.

### 2. Responses to questions

### 2.1. Question 1

To what extent do you agree or disagree that the content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

 We agree that the Guidance will support awarding organisations to design and develop accessible assessments.

However, the Guidance alone will not ensure accessibility for autistic learners, who may still require individualised access arrangements and whose learning needs should be understood by those designing and developing the assessments, as well as those supporting them in their educational settings.

 To better fulfil its stated purpose, the Guidance should provide awarding organisations a clear understanding of possible access arrangements and processes for learners requesting these. In doing so, the Guidance should emphasise the need for young people and their families to be involved in these decisions early on.

For more information on how this can be achieved, we would direct awarding organisations to the Autism Education Trust's Exam Accommodations Guidance for Examination Boards:

https://www.autismeducationtrust.org.uk/resources/exam-accommodations-quidance-examination-boards

 Further consideration should be given to understanding what processes awarding organisations presently follow, both because these will be slightly different depending on the organisation and they will provide a good starting point to see what practice is currently in place.

Ofqual will then be in a position to refer back to these reference points in the future and see how processes have evolved since the Guidance was introduced.

### 2.2. Question 2

To what extent do you agree or disagree that the style of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

 We agree that the style of the draft Guidance is clear. In terms of presentation, it would be beneficial to move the sections on anticipating reasonable adjustments and awarding organisations' processes (pp.18–20) to the beginning of the document to set the context for the Guidance that follows.  Pages six to eight note some categories of learners who are more likely to be unfairly disadvantaged by decisions made in assessment design and development (deaf learners, learners with learning disabilities, learners on the autism spectrum, etc).

This is an important point and should be emphasised. Ofqual should consider including this content in the main body of the Guidance and providing awarding organisations some reasons why decisions made in assessment design and development can unfairly disadvantaged disabled learners.

Testimony from learners who have experienced such disadvantaged, along with some key examples of how this could have been avoided, would be particularly useful in emphasising this issue to awarding organisations. We can direct to such information for inclusion if desired.

This point is directly linked to reasonable adjustments.

We would suggest Ofqual emphasise that, even when care has been taken in the design and development of assessments, some learners will still require reasonable adjustments and that more detailed guidance is available (for example, adjustments for autistic learners' sensory differences: <a href="https://www.autism.org.uk/advice-and-guidance/professional-practice/adjustments-sensory">https://www.autism.org.uk/advice-and-guidance/professional-practice/adjustments-sensory</a>)

### 2.3. Question 3

To what extent do you agree or disagree that the draft guidance will have a beneficial impact on all Learners taking regulated assessments?

- We would emphasise that consultation with stakeholders will be necessary to ensure that the Guidance has been applied in a relevant and meaningful way. An ongoing process of review and monitoring moving forwards will be important in determining if it has been beneficial.
- With regard to autistic learners, designing and developing accessible assessments will require those who are reviewing assessments to have autism expertise and autistic learners should have the opportunity to comment as part of this process.

#### 2.4. Question 4

To what extent do you agree or disagree that the draft guidance will be relevant to assessments across the full range of qualifications that we regulate?

- We would anticipate this to be the case.
- Can Ofqual confirm that the Guidance will be applicable to practical assessments as well as written assessments?

#### 2.5. Question 5

Do you have any specific comments on the draft guidance? Please refer to the relevant section in your response.

Please find our specific comments listed as numbered points for Question 5, placed under the relevant section heading and noting the page location in the draft Guidance.

### Introduction

Ofqual's statutory guidance (p.6)

An awarding organisation does not have to follow it if it has good reason not to, as it may find different ways to meet a Condition.

5.1. Any content on autism, co—occurring conditions, and the Guidance more generally, should be as easy as possible for awarding organisations to access and understand. This will aid with consistency in developing accessible assessments based on what awarding organisations understand best practice to be and reduce the potential for divergence based on different understandings of what autism is.

Background to this consultation (pp.6–7)

Learners whose first language is not English, who might be less familiar with colloquialisms, humour or customs included in a task or in stimulus materials

5.2. This is also relevant to autistic learners.

### Proposed guidance

The assessment construct (p.10)

5.3. We believe the language throughout this section is somewhat opaque. It is essentiality about validity: how well an assessment is measuring what it sets out to do rather than something else.

It observes that constructing tasks clearly and concisely allows learners the opportunity to demonstrate their knowledge, skills and understanding on the topic being assessed to the best of their ability, without being impeded by other factors such as language.

This is an important principle. It is important for readers of the Guidance to know and relevant to autistic learners. We would encourage Ofqual to reinforce this point but express it more directly.

Assessment structure (p.10)

# Awarding organisations should consider the impact of the sequencing of tasks on Learners.

5.4. This point would benefit from being strengthened prior to being exemplified re. improving accessibility for autistic learners.

It is not so much the order of tasks – whether they are more or less complex – presenting a barrier, so much as learners being able to form a judgement on which tasks are the more demanding, and where they will be found within the assessment, prior to commencing work.

Clear and concise instructions in an appropriate format (written, verbal, etc) would support this understanding – in the case of an examination, for example, providing an instruction to consider all the relevant questions and their weight prior to response, or that the questions can be answered in any order (if this is the case).

### Assessment instructions (p.11)

# ...unnecessary text.

5.5. There are multiple mentions of "unnecessary" text, barriers, etc, throughout the Guidance (see pp.10, 11 and 18), with "unnecessary" appearing to be meant in the context of greater volume being superfluous and hindering understanding.

Whilst the general principle is relevant, it needs to be balanced with a note of caution for autistic learners. A comprehensive set of instructions may assist autistic learners in understanding and completing an assessment in a way that demonstrates they possess the required knowledge, skills and understanding, so long as the instructions are clearly formatted and reasonable adjustments are in place to enable the processing of this information (for example, additional time to complete a task).

There is a risk of the Guidance encouraging a loss or reduction in content/context for brevity, in the belief that this will aid understanding and improve accessibility. For some autistic learners, this would risk an assessment becoming less accessible.

# Require Learners to hold large amounts of information in their working memory.

- 5.6. It is unclear what is meant by "large amounts".
- 5.7. Holding information in memory can be a particular source of difficulty for autistic learners. We would note that it is possible to support autistic learners through providing additional resources and tools (for example, providing blank pages for notes and planning within an examination paper).

### Language (pp.11–13)

Give the expanded form of abbreviations the first time they are used – for example, "International Monetary Fund" for "IMF".

5.8. This is an important consideration for autistic learners.

For extended or particularly complex assessments, awarding organisations should consider providing the full form of a word or phrase each time it is used (unless the assessment specifically requires knowledge of abbreviations).

This may aid accessibility where multiple abbreviations and acronyms are currently encountered, or where the same abbreviations and acronyms occur in multiple tasks within an assessment – potentially being encountered hours apart from the perspective of the learner completing the assessment.

5.9. Further to the point on phrasal verbs: phrasal verb constructions may confuse autistic learners because of multiple or unclear meanings associated with the chosen words.

Awarding organisations should consider single—word verbs as an alternative, so as to communicate their intended meaning in a concise and unambiguous way where at all possible.

### Sentence structures (p.13)

Put any background information to the task or question in a separate sentence or paragraph.

5.10. Awarding organisations should consider the benefit of distinguishing background information alongside the Guidance on materials, context, images and colour (pp.14–20).

Source text or materials (pp.14–15)

Have line numbers, paragraph numbers or section headings if appropriate to help Learners.

5.11. To add to this point, in an assessment comprised of multiple tasks, the same format for line numbers, paragraph numbers, etc, should be consistent across all tasks if possible. Not just internally consistent within each task.

Images (pp.16–17)

However, images can be a barrier to others, including some Learners on the autism spectrum who might find them distracting.

5.12. This can be true when the image is superfluous because the information has been provided in another accessible format for the learner in question (for example, in appropriate text). But this is not universally the case: images can improve accessibility for some autistic learners.

# ...balance the interests of different Learners when deciding whether to use an image.

5.13. Some further explanation should be provided on how this is achieved. It is unclear as written.

### Layout (p.18)

Consider using shorter paragraphs, section headings, subheadings or lists to break up long sections of text.

To add to this:

- 5.14. Ensure that any formatting of content is consistently styled throughout the assessment that it is the same from one task to the next.
- 5.15. Questions, along with any materials or sources relating to them, should be grouped together in a logical way, so as to avoid any overlapping of content or requirement for learners to navigate materials when this is not the skill being assessed.
- 5.16. Key information that awarding organisations wish to emphasise to learners as part of the assessment should be presented in a consistent manner (for example, underlined, bolded or highlighted font in text).

### Anticipating Reasonable Adjustments (pp.18–19)

5.17. This section is disproportionately light on content and low in prominence relative to its importance in achieving the purpose of the Guidance: supporting awarding organisations to design and develop assessments that are as accessible as possible for learners across a wide range of qualifications.

We would recommend including more disability—specific content in the Guidance and can offer this for autism: a summary of frequently encountered needs and appropriate adjustments, sources of authority (evidence—based practice) and links to further information. This should be provided for all those who may be at a disadvantage.

Such information/examples are occasionally provided and referenced in–text in the Guidance as drafted. This would benefit from being more consistently and completely done throughout the Guidance. This would align with the Equality Analysis (pp.22–23) and Annex C (pp.33–36).

Awarding organisations should consider whether an anticipated Reasonable Adjustment might raise accessibility issues for a particular task. For example,

awarding organisations should consider how images would be provided in alternative formats, or how screen—reading software would "read" a table of data.

5.18. Although the Guidance is concerned with the design and development of assessments in a way that facilitates reasonable adjustments, with an emphasis on how tasks are defined and completed, we cannot separate this from the environment in the case of many autistic learners. Access to an appropriate sensory environment is analogous to needing a reader or software for learners with other disabilities.

Please see <u>Appendix 1</u> for a case study illustrating broader accessibility considerations for autistic learners.

5.19. We would note that with computer–based examinations, particularly relating to functional skills, setup and layout can disadvantage learners (for example, the need to repeatedly scroll to see information that would otherwise remain in view).

This can unfairly disadvantage autistic learners in cases where the ability to navigate information is not the skill being assessed.

# An awarding organisation's processes (p.20)

5.20. Staff training and organisational development are directly relevant to building a culture of continuous assessment and improvement. This should be acknowledged in the Guidance.

The Autism Education Trust offers a suite of resources (professional development programmes) to support individuals and organisations to build their knowledge and practice to support autistic learners.

An awarding organisation should ensure staff members involved in assessment design and development consider the diversity of the Learners likely to take the assessment.

5.21. Does this imply staff training? If so, it should be stated clearly in the Guidance.

An awarding organisation should also gather and respond to stakeholder feedback on the accessibility of its assessments.

- 5.22. In the context of disability, we would note the importance and relative ease with which awarding organisations can engage with disabled learners to get the information they need via established and receptive channels (for example, the Autism Education Trust's Autistic Young Experts).
- 5.23. Our understanding of best practice when supporting disabled learners is subject to change with ongoing research and development.

For this reason, we would additionally encourage Ofqual to conduct a full review of the Guidance on a regular basis (yearly) to consistently improve the accessibility of assessments.

### 2.6. Question 6

To what extent do you agree or disagree that, once we introduce our guidance on designing and developing accessible assessments, we should remove the existing guidance to Condition G3?

• The proposed Guidance reflects the existing Guidance for Condition G3. It therefore seems unnecessary to have both.

#### 2.7. Question 7

Are there any other aspects of design and development on which guidance on accessibility would be useful for awarding organisations?

 Guidance on aligning assessment content requirements and accessibility would be useful (for example, GCSE Mathematics examinations require learners to reason mathematically, make deductions and inferences and draw conclusions).

#### 2.8. Question 8

We have not identified any ways in which the proposed guidance would impact negatively on Learners who share a protected characteristic or socioeconomic status. Are there any potential impacts (positive or negative) we have not identified?

 Autistic learners would benefit from being informed of any changes introduced to the design and layout of an assessment, so that taking the assessment can reflect learners' usual access to learning and thus avoid unnecessary stress and anxiety.

### 2.9. Question 9

Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on Learners who share a protected characteristic or socioeconomic status?

- It is essential for all those involved in the design and development of assessments to have up—to—date knowledge of the protected characteristics and how these impact on learning.
- Is it suggested that training should be accessed? How should this be monitored by awarding organisations?

### Within the Guidance as drafted

Some Learners with learning difficulties, including those with dyslexia. (p.7)

- It would benefit readers for the Guidance to establish early on, in a clear and succinct way, that disabilities often co-occur. They may also intersect with other protected characteristics re. the public sector equality duty and the purpose of the Guidance.
- An example of this is illustrated in the case study featured in Appendix 1.

Designing and developing assessments that are accessible for the widest range of Learners is not always straightforward. (p.9)

- We recognise this and suggest that the publication of the Guidance is not an
  end point. Our understanding of autism doesn't stand still; we are collecting
  evidence on how autistic learners engage with the different forms of
  assessment they encounter and how they can best be supported via
  reasonable adjustments to demonstrate their capability.
- For Ofqual and awarding organisations, creating the Guidance represents a starting point. It should be subject to regular review moving forwards – a living document.

Teaching places a great emphasis on reflective practice and assessment needs to do the same.

### 2.10. Question 14

Do you have any comments on, including any suggestions for improving, the readability and accessibility of the guidance?

### Within the Guidance as drafted

Some Learners on the autism spectrum. Their literal understanding of language could make it difficult for them to respond to a task that is unnecessarily ambiguous or unclear. They might also be distracted by a needless image used in a task. (p.7)

- Autism is first introduced to the reader as relevant to the topic of accessibility via assessment design and development on p.7. Within the Guidance itself, illustrative examples are currently provided on pp.15, 16 and 22.
- Autism would benefit from being introduced in a more complete way. The Autism Education Trust's terminology guidance and three key areas of difference are relevant here:

- A processing difference which can be experienced re. social understanding, sensory processing and information processing.
- If a working definition of autism is provided early on, or in the form of a
  glossary of terms, this would form the basis of the reader's and Ofqual's
  understanding of autism for the purpose of the Guidance and provide a more
  holistic basis from which autism could be referred to or exemplified later in the
  Guidance.
- Illustrative examples are currently provided in an intermittent way (examples relating to autism, for instance, are currently provided on pp.15, 16 and 22).

Ofqual may wish to consider a glossary of terms as an annex or appendix to the Guidance, with links to further information.

### 3. Further observations

In addition to our responses to Ofqual's questions, we wanted to share some general observations relating to the Guidance and its stated purpose of supporting awarding organisations to design and develop assessments that are accessible to learners across a wide range of qualifications.

- There is a need for training in autism for professionals involved in developing and reviewing assessments.
  - A national training programme is available from the Autism Education Trust and was developed with support from the Government (the Department for Education) to improve understanding of autism and communicate good, evidence—based practice to professionals across England. It should be utilised in the quest to create more accessible assessments and can be routinely accessed across the country.
- It is important to receive input from autistic learners who have been through the assessment process at the development and review stage if accessible assessments are to become a reality.
  - Autistic learners (and learners with other disabilities and/or co-occurring conditions) are stakeholders in the process, would offer valuable input and want to contribute. This work can be supported through existing networks (such as the Autism Education Trust's Autistic Young Experts).
- There is a wider issue around access arrangements specifically, that unless they represent a learner's every day working practice, they are not permitted.
  - However, if a learner is out of education (or educational premises) due to anxiety, as is often the case with autistic learners, then reasonable adjustments cannot become everyday practice. This is a significant barrier to access to fair assessment.

• In order for examinations to be accessible, there needs to be a straightforward and fair process for getting adjustments such as extra time or rest breaks.

It has become more difficult in the last year for autistic learners and learners with a learning disability to get 25% extra time. <u>Under the 2020–21 Joint Council for Qualifications guidance</u>, a Special Educational Needs Coordinator (SENCo) only needed to confirm that the candidate has at least one below average standardised score of 84 or less which relates to an assessment of speed of reading, speed of writing or cognitive processing measures which have a substantial and long–term adverse effect on speed of working.

In new guidance for 2021–22, a SENCo must confirm that the candidate has at least two below average standardised scores (or one average and one low average) relating to two different areas of speed of working. Learners may be allowed to take supervised rest breaks if they do not qualify for extra time, provided it is his/her normal way of working within the centre. While this may work for learners in special schools, it may not work for learners in mainstream schools if the learner does not regularly take supervised rest breaks throughout the school day.

- To promote accessibility, the format of assessments could be reviewed to look at the length and content of assignments, with autistic learners in mind. An index, a glossary of terms and appropriate highlighting of key terms in questions could also make examination papers more accessible.
- The type of assessment matters too. Not all assessment takes the form of
  written assignments and examinations. Some subjects require learners to do
  an oral assessment (for example, foreign languages, English Language
  (speaking and listening) and Functional Skills). These assessments should
  take account of poor verbal and conversational skills, which form part of such
  assessments. Autistic learners are often unable to use gestures, may avoid
  eye contact, may appear uninterested or inattentive and may miss certain
  social cues.
- It is important to identify the right people to ask when it comes to developing accessible assessments:
  - Who are awarding organisations involving when it comes to improving accessibility?
  - o How are they making these decisions on who to involve?
  - Once they have decided who should be involved, how are they engaging with the relevant stakeholders?

This decision—making process should be recognised and addressed within the Guidance.

While ensuring the content of assessments is accessible is important, how
examination technique is taught in schools will also be key in determining how
accessible assessments are for autistic learners.

Some autistic learners can struggle to understand images or diagrams if they look different to those they have seen in class. Teachers need to prepare autistic learners to understand examination questions and how to encounter content which may look different to what they have seen before.

For the Guidance to have the best possible impact, it should reference the necessity of teachers having a good understanding of the challenges autistic learners can face with assessments and how to address them. Teachers should be aware of latest assessment criteria and able to convey this in an accessible manner to autistic learners.

 Finally, while our focus has been directed on autistic learners, it is important to emphasise that the creation and publication of the Guidance will benefit all learners, not just those with disabilities or other accessibility needs.

Making assessments more accessible will help all candidates to comprehend questions and instructions, allowing them to better demonstrate their knowledge and abilities.

# 4. Appendix 1 | Case study

A parent contacted the National Autistic Society's Education Rights Service regarding her daughter, who has been diagnosed with autism and an eating disorder, and her AQA Applied Science course.

### [Starts]

In November 2021, [learner's] school contacted the AQA Exam Board regarding concerns about the nutrition section of the AQA Applied Science examination due to be undertaken on 13<sup>th</sup> January 2022.

[Learner] becomes very distressed during Applied Science lessons which concentrate on specific aspects of digestion, such as:

- Intake/energy which use real life food examples.
- Macro and micronutrients in the body.
- Symptoms of deficiency.
- Disease and disorders that develop from deficiency.

The exam board's response to the school's request for special considerations for [learner] was:

In circumstances such as this, the Exams Officer is permitted to access the paper an hour before the exam so that she can look through the paper and pre-warn the student of any triggers present in the paper. If you feel that because of her eating disorder she becomes unwell during the exam, not just distracted by a question, then you may apply for special consideration.

Whilst I welcomed the agreement that the Exams Officer is permitted to access the paper an hour before the exam so that they can pre—warn [learner] of any triggers, the exam board is suggesting that if there are any triggers we must wait until she becomes unwell during the exam before special considerations can be applied for.

This is completely unacceptable and demonstrates a distinct lack of understanding or appreciation for her medical condition and the effects of being subjected to this type of question could have. In [learner's] case, simply seeing a question of this nature would have an adverse effect on her performance within the examination, but could also have further, more far—reaching repercussions — and, in a worst—case scenario, it could cause a relapse in her condition. This having previously occurred and resulting in her being hospitalised for nearly five months.

I wrote back to the exam board on this basis; however, their further response was:

I can confirm that Ofqual does not permit schools to cover up or censor any part of the exam materials, this includes for health reasons, religious reasons or phobias.

When deciding access arrangements, a student's normal way of working should be considered. Perhaps there are stress relievers (for example, fidget spinner, stress ball, music) that the student uses to cope in the classroom, and we are happy to discuss the possibility of the student using these arrangements in exams.

Supervised rest breaks and separate invigilation may also be of help to the student. The parent has mentioned about special consideration being applied for if their child is unable to answer any questions, and although it won't be on questions alone, if the student does suffer during the exam, then you could apply for special consideration.

By being able to open the paper early and pre—warning the student of any questions that may cause a trigger, the student then has the option not to read that question and bypass it if they feel they need to.

Are there any other coping mechanisms that the student feels may help them that they use as their normal way of working that we could look at replicating during the exam?

Again, this demonstrates a distinct lack of understanding or appreciation for [learner's] medical condition and the effects of being subjected to this type of question could have. She already has a number of special considerations for any examinations undertaken (for example, use of a computer, individual room, rest breaks, ability to take in

something to help keep her calm, etc). None of these considerations will, however, support her to be able to complete certain sections of the Applied Science paper. The questions are not always contained on one page and [learner] would therefore have sight of the questions whilst trying to complete the rest of the paper.

The term "normal way of working" is used within the phrasing of response from the exam board; however, in this instance [learner's] normal way of working is to be excused from lessons / discussions / work that contains these sorts of triggers as they would cause significant and undue stress for her. I appreciate that the difficult questions for [learner] within the exam could potentially account for only a small section of the overall exam, but by the same token it could easily be a significant part of it and could well make a difference with a grade boundary.

[Learner] received distinctions for the Unit 1 examination set by the school (due to the Covid–19 pandemic) in Year 12 and the Unit 2 coursework. We therefore do not want her to be penalised for the limitations her medical condition places on her in respect of the challenging topics in this year's examinations. The Applied Science qualification is extremely important to [learner] as she is planning to undertake an Apprenticeship in horticulture when she finishes Year 13.

Following the exam board's last response, I wrote back giving the following suggestions after speaking to [learner]. I have spoken to her, and she has made the following suggestion which, in the circumstances, I feel is fair and reasonable:

- The Exams Officer views the paper one hour prior to the exam.
- Any questions that are identified as going to cause [learner] distress are copied on separate sheets of paper and these questions on the actual exam paper are covered over.
- [Learner] can be given the exam paper to complete and if she chooses, she
  can turn over the copied questions and decide if she is able to attempt the
  questions or not.

In these circumstances we can limit the amount of distress caused until all other questions are answered. Alternatively, the exam board can provide [school] with an exam paper with all questions on separate pages. The Exams Officer can place the pages with questions that will cause [learner] distress at the back and indicate to her which pages these are.

I have not yet received a response. [Learner] is a very private person who is unable to openly discuss her eating disorder and autism diagnosis with anyone apart from us as parents, her ED Care Coordinator and Support Worker, Autism Support Worker and Consultant. As [learner's mother] I feel very strongly that no young person should be penalised due to any mental or physical disability, especially in circumstances when they cannot voice these concerns openly for themselves.

Whilst I appreciate that as [learner's] Applied Science Examination is being held on 13<sup>th</sup> January 2022 you may not be able to advise in time, she is not the only student to be placed in this situation. I would welcome your support in helping others not to

be faced with the same situation as [learner] and for exam boards to develop strong, robust policies to support young people with health–related issues to enable them to meet their full potential.

# [Ends]

This concludes our response to the consultation on Ofqual's proposed Guidance on designing and developing accessible assessments.