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## Pearson Consultation response

Ofqual consultation

Specifications on reasonable adjustments

29 July 2016

### Questions

**Question 1: To what extent do you agree or disagree that we should recommend to DfE that our specifications apply to the qualifications listed on page 12?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 2: Are there any changes to the list that you would recommend and, if so, why?**

- Yes  No

**Question 3: To what extent do you agree or disagree that exemptions should only be allowed where no other reasonable adjustment is available?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

We agree that an exemption should be a last resort and would want to encourage deliverers to ensure that learners are able to access assessments appropriately before the learners are registered onto a qualification.



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**Question 4: To what extent do you agree or disagree that exemptions should not be permitted where they would form more than 40 per cent of the total (weighted) marks for the qualification?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

In order to protect the validity of a qualification, it is important that learners have been able to demonstrate a meaningful proportion of the skills and knowledge required. As stated above, centres must be encouraged to ensure that learners are able to access qualifications and assessments from the outset (with appropriate adjustments as required) and should not use an exemption as an accepted route for achievement.

**Question 5: To what extent do you agree or disagree that for GCSE (9-1) English language, where an exemption applies for the spoken language component, no other exemption may apply?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

The majority of exemption requests currently received are for the speaking/listening component. It is extremely rare to receive requests for more than one component. We feel it is appropriate to maintain the requirement that no more than one exemption can apply.

**Question 6: To what extent do you agree or disagree that for A level science subjects and A level geology, where an exemption applies for the practical component, no other exemption may apply?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 7: Are there any other subjects for which we should make specific provisions?**

- Yes  No



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**Question 8: Are there any factors we have not set out here that we should consider to ensure that students are not unfairly advantaged or disadvantaged by our proposed approach to exemptions in qualifications with separately reported results?**

Yes  No

**Question 9: To what extent do you agree or disagree that exemptions should only be permitted for a whole component and only where a student can access no part of that component?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 10: To what extent do you agree or disagree with our proposal that changes to grade boundaries or marks should not be permitted as a reasonable adjustment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

It would be inappropriate to adjust the grade boundary for an individual learner, as we would then be varying the terms under which the qualification grade was awarded for that learner. This would go against Equality legislation and must be avoided. Changes to marks should only be applied as part of the Special Considerations process, where there has been a temporary issue which may have affected a candidate's performance.

**Question 11: To what extent do you agree or disagree that we should continue to prohibit the use of readers where a student's reading ability is being assessed?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

It would be helpful to specify in the condition that this applies to the use of a human reader, as without this clarification the implication is that electronic readers are also not allowed. We assume that the use of electronic readers will continue to be allowed, but agree that the use of a human reader would be inappropriate if the skills being assessed is reading.



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**Question 12: To what extent do you agree or disagree that we should prohibit the use of a human scribe, speech recognition system or other writing aid where a student's writing ability is being assessed and where this would prevent the student demonstrating that ability?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 13: To what extent do you agree or disagree that the use of another language (such as British Sign Language) should not be permitted as a reasonable adjustment where this would prevent a student demonstrating their understanding and use of the particular language that is being assessed?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 14: To what extent do you agree or disagree that practical assistants should be permitted, but that students should not be rewarded for skills that they have not themselves demonstrated?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

The wording of the specification in this case appears rather ambiguous and can be interpreted in a number of ways at present - including that a practical assistant cannot be used at all. If the wording of the specification cannot be clarified, then we would strongly recommend the inclusion of very clear guidance (such as that provided in the consultation document) to ensure that this cannot be misinterpreted.



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**Question 15: To what extent do you agree or disagree that we should restrict the provision of materials to students as a reasonable adjustment where these are not generally provided to other students?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 16: Do you have any comments on any of the approaches set out in relation to the provision of materials to students as a reasonable adjustment? Which is your preferred approach and why?**

Yes  No

Our preference would be to adopt Option C.

Question paper rubrics list those materials which can help learners but which do not directly relate to the skills, knowledge and understanding being assessed. Therefore, if materials are not listed in the rubric, we cannot think of an example where it would be appropriate to allow their use and which would not compromise our ability to judge the learner's true performance.

**Question 17: To what extent do you agree or disagree with our proposal not to prohibit the use of Oral Language Modifiers (OLMs) as a reasonable adjustment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

We are concerned that there is an expectation that the Awarding Organisation would be able to police the 'appropriate' use of OLMs during an examination. In general, the use of an OLM represents a risk to the integrity of an examination, as there are no clear guidelines as to training requirements or how it can be judged whether an individual OLM is acting appropriately. Use of an OLM could equally lead to a candidate being disadvantaged or advantaged if modification of carrier language is incorrect or if technical terms are explained.

**Question 18: Are there any other specifications not covered in this consultation that we should make?**

Yes  No



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**Question 19: To what extent do you agree or disagree that where an exemption is granted, this should be indicated on the student's certificate?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 20: To what extent do you agree or disagree that we should not specify the form of any indication that is placed on the student's certificate?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 21: We have identified a number of ways our proposals may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified? If so, what are they?**

- Yes  No

**Question 22: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic? If so, please comment on the additional steps we could take to mitigate negative impacts.**

- Yes  No

But some of the specifications could be clarified or, as a minimum, need to have clear examples and guidance attached.

**Question 23: Have you any other comments on the impacts of the proposals on persons who share a protected characteristic?**

- Yes  No



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**Question 24: We have not identified any ways in which the proposed specifications will unduly increase the regulatory burden of our proposals. To what extent do you agree or disagree with this assessment?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

We are concerned that, if the specification relating to the use of Oral Language Modifiers is adopted, this will create additional burden owing to the expectation that we will 'put in place arrangements to ensure they are used appropriately'. The policing of this would be very difficult to implement.

**Question 25: Are there any additional steps we could take to reduce the regulatory burden of our proposals?**

- Yes  No

Prohibiting the use of OLMs and allowing AOs to withdraw this arrangement would reduce the regulatory burden and also would reduce risks to the integrity of assessments.