**The Mathematical Association response to the Ofqual consultation**

**‘Guidance on designing and developing accessible assessments’ January 2022**

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To what extent do you agree or disagree that the content of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

Agree. The content is helpful, although there are omissions/weaknesses and places where there is insufficient detail. Where we have identified these, we have included them in the responses below.

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To what extent do you agree or disagree that the style of the draft guidance will help awarding organisations to design and develop assessments that are as accessible as possible for Learners?

Strongly agree. The style as presented helps by paragraphing the structures the awarding bodies need to address. Where the paragraph used bullet points it might be helpful to label them, (using e.g. a), b),... or i), ii),...) to make them easier to identify.

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To what extent do you agree or disagree that the draft guidance will have a beneficial impact on all Learners taking regulated assessments?

Strongly agree. The extra detail and examples highlight where consideration needs to be made to encompass the widest range of Learner differences.

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To what extent do you agree or disagree that the draft guidance will be relevant to assessments across the full range of qualifications that we regulate?

Agree. However certain subjects may need additional consideration by the very nature of the subject. For example, a Learner’s mathematical ability might be developmentally beyond his/her ability in English language so there must be emphasis on assessing the mathematics rather than the candidate’s ability to use the English language, whether written or spoken. It is also important for the reading age of a question to be below the actual age of the candidates for the exam so that the question can assess mathematical skills rather than proficiency in reading, unless the level of reading is part of/pertinent to what is being assessed.

We note that Qualifications Wales are currently reforming GCSEs in mathematics and numeracy to support the new curriculum for Wales and that questions have been raised about the suitability of the current numeracy examination. The current numeracy examination involves questions in long worded contexts which have been found not to be equally accessible to all candidates. Therefore, it has now been suggested that these contextualised questions be incorporated, to a lesser degree, into a new GCSE mathematics qualification, worth 1.5 GCSEs, and that a shorter non-GCSE numeracy qualification (which may not be taken by all learners) be used in future to assess real-life skills.

Long worded contexts are likely to be equally problematic in examinations in England.

**Question 5**

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

Assessment instructions:

This is an example of where, if points were labelled, it would be easier to clarify which one is being commented upon.

Point three - ‘respond in a range of ways’ - Could annotated diagrams be acceptable?

Final point - ‘hold large amounts of information’ would apply to remembering more complex mathematical formulae. Memorising formulae can be very challenging for students with various special educational needs. Learners with short-term memory issues (e.g. those with dyslexia) would be disadvantaged: they might well know how to apply the formulae and solve the problems but the need for memorising causes stress and confusion so this becomes a memory test rather than a test of mathematical ability.

For the GCSE mathematics examinations in the summer and autumn of 2022, a formula sheet will be provided for candidates, as an outcome of the joint DfE/Ofqual contingency consultation. The provision of such a sheet beyond 2022 would support accessibility. It is helpful that the formulae will be on a separate sheet rather than being printed at the front of the exam paper itself, as this avoids the need for students to have to move between two locations in a paper to transfer the information, which again would be a more difficult process for some.

We note that all candidates for IGCSE mathematics are given a sheet of formulae, thereby removing a potential barrier and providing a level playing field for candidates. We also note that IGCSE mathematics is used as the examination of choice by many schools with candidates from countries other than the U.K. and for whom English might be a second language. We suggest that strategies already exist for writing of questions for IGCSE which make them more accessible in terms of the language and context used and that these could be usefully applied more broadly.

**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?

Agree. Condition G3 is convoluted and should be removed provided that all the conditions and expectations are covered in the new document.

**Question 7**

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

Specific mention of approaches that could be considered such as moderation across subjects regarding use of, and difficulty of, language, i.e. cross curricular exemplars to provide consistency.

Sample assessments should be made available to centres at least twelve months in advance where there is a marked change in style/approach for a series/paper/section/questions to enable centres to prepare their Learners for the change.

**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?

The assessment culture should not be ‘middle class white’. For instance in mathematics, not all children understand mortgages, planning the laying of a new carpet or decorating rooms. Playing cards and dice are only appropriate when Learners have experienced them but not all will have done so in the home setting.

Contexts such as wallpapering a room, paving a patio and pricing arrangements in different parts of a theatre are outside the home experience of many students, whether due to socio-economic circumstances or having English as an additional language. Therefore, such contexts are likely to be a significant block to the comprehension of the question being set. Such contexts could readily be adapted, for instance paving part of a school playground which avoids the use of the word ‘patio’, unfamiliar to some candidates. Likewise booking seats for a show in different parts of a school hall avoids use of language such as ‘the stalls’ and ‘the circle’ in a theatre. If a working knowledge of certain real-life contexts is an expectation in GCSE mathematics examination papers, those contexts and any key related vocabulary should be prescribed.

The ongoing analysis of the performance of Learners with protected characteristics and socioeconomic status on different questions should help this to be continually reviewed and, where applicable, to be addressed. This analysis could be collated and published to be used to help inform further amendments to guidance.

**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?

As expressed above and also by continuing to liaise with interest groups once assessments have been developed and used.

Additionally, question by question analysis of students’ responses to examinations in past series would offer important insights into which contexts which proved to be less accessible for students with access arrangements (frequently relating to SEND) and/or to candidates from schools with many FSM candidates or EAL students. This would help to discern whether there has been a negative impact on particular groups and thereby inform the writing of future exam questions. Publication of this analysis would also be beneficial to teachers to raise awareness of unwitting cultural assumptions.

**Question 10**

Do you have any other comments on the impacts of the proposals on Learners who share a protected characteristic or socioeconomic status?

This guidance is comprehensive but there are still some points that are open to different interpretations by, and within, awarding bodies.

**Question 11**

Do you have any comments on the estimated costs of awarding organisations, large and small, complying with our proposed guidance?

No response.

**Question 12**

Are there any steps we could take to reduce the regulatory impact of our proposals?

No response.

**Question 13**

Are there any costs or benefits associated with our proposals which we have not identified?

No response.

**Question 14**

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

No response.

**Question 15**

Please provide any comments you may have on when any new guidance should be introduced.

No response.