

Consultation on Reasonable Adjustments for Disabled Candidates in National Qualifications in Scotland



Response from Lead Scotland (Specialists in Linking Education and Disability)

Lead Scotland is a charity that enables disabled adults and carers to access inclusive learning opportunities. At a local level, we do this by providing direct support to learners¹ through flexible person-centred learning opportunities and individualised guidance and support to help them plan their learning journeys. At a national level, we provide information and advice on the full range of post-school learning and training opportunities, as well as influencing and informing policy development.

General comments

Lead Scotland welcomes further guidance regarding reasonable adjustments for disabled students during assessments and exams, however we would urge that all requests for reasonable adjustments are considered on a case-by-case basis to ensure that the needs of individual students are considered.

Proposal 1: In relation to all new and existing National Courses, it is proposed that SQA specifies that exemption of any assessment component which comprises 30% or more of the total course assessment should not be considered as a reasonable adjustment.

Lead Scotland supports this recommendation on the grounds that disabled students should be expected to meet core course competencies in the same way as non-disabled students. However, we would recommend that full consideration is given to the way in which other reasonable adjustments can be made for individual students (where required) to ensure that there are no unreasonable barriers.

Proposals 2-5: In relation to the following courses (at all levels), it is proposed that SQA specifies that exemption from demonstrating any of the 4 assessed skills of Reading, Writing, Listening or Talking should not be considered as a reasonable adjustment:

- the new National Literacy Units
- new National Courses in English, Modern Languages and Gaelic
- existing National Core Skills Communication Units

See our response to proposal 1.

Proposal 6 & 7: In relation to the new National Literacy Units and National Courses in Modern Languages/Gaelic at all levels, it is proposed that SQA specifies that human readers and scribes should not be considered as

¹ We receive local authority funding to directly provide services in Aberdeenshire, Dundee, Fife, Highland, North Lanarkshire, and Moray.

reasonable adjustments where reading and writing abilities are being explicitly assessed.

Lead Scotland does not support this recommendation. Many visually impaired students may be completely unable to read written material due to the extent of their impairment. While the use of screen readers is deemed to be a reasonable adjustment as they do not interpret text in the same way as human readers and do not provide additional vocal interpretation, Lead Scotland does not believe it is fair to make a distinction between these two types of support. In particular, we would point out that:

- appropriate staff training and monitoring should ensure that human readers are not providing additional nuance and meaning to text, and that they are not interpreting text on behalf of the student;
- many students may find the use of assistive technology during exam conditions distracting and/or difficult. This may place such students at an unfair disadvantage in comparison with non-disabled students who do not need to deal with this additional pressure during exams;
- in the real world (whether in future learning, employment or day-to-day life), many people with visual impairments may be unable to access assistive technology and will therefore rely on human support to access written text, e.g. if text is hand-written, in a format which is unreadable to a screen-reader, or where assistive technology is unavailable.

Similarly, we do not believe that use of a scribe provides disabled students with an unfair advantage in comparison with speech-recognition software. Many students with visual impairments or manual dexterity problems may be unable to write, or may find it very difficult to do so. The consultation commentary suggests that use of a scribe results in the student not having to recognise or correct errors in written text. While a scribe will obviously be using their own judgement regarding the spelling of words, a student using speech-recognition software would also have the benefit of spelling the words the student dictates. In addition, a scribe would not have control over the grammar or style of the student's words. As with students using readers, adequate staff training and monitoring should ensure that scribes are not correcting student errors.

Proposal 8: In relation to the new National Courses in Modern Languages and Gaelic, speech-recognition software should not be considered as a reasonable adjustment where the ability to write with technical accuracy in the target language is being specifically assessed.

Lead Scotland does not support this proposal. Please see our response to the proposal above.

Proposal 9: In relation to SQA-set questions in the external examination of all new and existing National Courses, it is proposed that SQA specifies that the explanation of any words or questions to candidates should not be considered as a reasonable adjustment.

While we broadly agree with this proposal in terms of ensuring that all candidates are assessed to the same level of competence, we would recommend that the SQA exercises discretion on this issue to take account of those disabled candidates whose impairment makes it difficult for them to comprehend instructions. This can be a particular issue for students with autistic spectrum disorders or those with

learning difficulties/disabilities. Given that the learning barriers such students experience can often be very different (even within the same impairment group), consideration would need to be given to the most appropriate means of explaining words or questions to ensure that this support meets their individual needs effectively.

Proposal 10: In relation to all new and existing National Courses in English, Gaelic and Modern Languages at all levels, it is proposed that SQA specifies that using British Sign Language (BSL) to demonstrate Reading, Writing, Talking or Listening abilities in the particular language should not be considered as a reasonable adjustment.

Lead Scotland does not support this recommendation, and would suggest that this proposal is at odds with Proposal 2 which does allow the use of BSL for Listening and Talking in the new National Literacy Units. Although BSL is recognised as a language in its own right, many deaf students may be unable to listen or talk, and BSL may therefore be their *only* means of communication (other than written communication). Not allowing its use during SQA assessment could therefore be perceived as discriminatory, as this would be treating disabled students less favourably than non-disabled students whose first language is not English (as such students have the option of listening and talking in another language).

In the real world (whether in future learning, employment or day-to-day life), BSL is an accepted and common means of communication for many people with hearing impairments (particularly where assistive technology is not available or appropriate). It would therefore seem unfair to disallow its use during SQA assessment.

Lead Scotland would therefore recommend that while use of BSL should continue not to be considered a reasonable adjustment for Reading and Writing (in order to maintain the value of the qualification), its use in Listening and Talking should be considered a reasonable adjustment.

Lead Scotland welcomes the opportunity to respond to this consultation and would be happy to assist the SQA in any future developments regarding support for disabled students.

**Lead Scotland
June 2012**