

BATOD submission to Ofqual consultation – Focus only on Principle 2

BATOD welcomes the principle that outlines clearly that “An awarding organisation must treat Learners fairly by acting and taking decisions with due impartiality and based on appropriate evidence”. BATOD is the only professional association for Qualified Teachers of Deaf Children and Young People (QToDs) in the United Kingdom (UK). The Association represents the interests of QToDs and the children and young people (CYP) they teach with a range of governments and other agencies, including Ofqual.

Deaf learners may benefit from a range of assessment methods, for example course work, should be offered which would allow time for reflection, processing and presenting work before submission. Deaf learners who cannot access listening and speaking in exams should be able to demonstrate ability in a different way.

Deaf learners are at a disadvantage when a ‘reader’ isn’t allowed and they cannot access a computer reader as the only other option of 50% extra time and read aloud does not allow the same access.

JCQ and SQA are members of the Ofqual ACF. SQA, the awarding body in Scotland accepts British Sign Language (BSL), an official language of the UK, should have equal status to English and therefore in Scotland a full translation can be used in assessments. However, the awarding bodies outside of Scotland do not allow the use of BSL as an access arrangement (AA). Deaf learners are at a disadvantage compared to their peers in Scotland.

BATOD believes that awarding bodies have a duty to make their awards fully accessible to deaf learners if they are to protect deaf learners from discrimination when accessing education under the Equality Act of 2010.

In England, all subject specific vocabulary is fingerspelt in exams. Fingerspelling all subject specific vocabulary in exams often renders the question incomprehensible for BSL users. In some questions every other word is a subject specific word which makes questions impossible to sign with any meaning. It is not normal working practise in lessons to fingerspell the subject specific vocabulary as the use of signs articulates the concept, supports the learning of the vocabulary and concepts, and it keeps the communication relay in pace with the teaching pace.

Fingerspelling subject-specific words not only does it not allow fair access, but it is *actually disadvantages* deaf learners. As it stands now, in order to prepare deaf learners for exams, centres need to add extra hours to their learning time simply to focus on the fingerspelling of subject-specific words. Centres must prepare glossaries listing the word, the sign used in the class, and a picture. The glossary is used to regularly embed the fingerspelt word into the memory, in preparation for the exam. Fingerspelling is typically used *only the first time the word is taught*, and thereafter a sign is negotiated and used, to 1. keep up with the class dynamic, and 2. as part of BSL language. So, because fingerspelling is rarely used in class for subject-specific words, it is not 'Normal way of working'. 'Hearing' peers are not subject to this extra layer of learning, so discrimination takes place.

For GCSE and A level pupils with BSL as their preferred language, allowing the use of subject specific vocabulary signs in assessments instead of demanding all subject specific vocabulary be fingerspelt would remove the discrimination. The Scottish examination system provides a functioning model within the UK.

BSL as an access arrangement:

Allowing BSL as an AA as standard would permit parity across all awards. BSL as an AA would render the existing AAs of less significance, would provide a level playing field nationally, and would present examinations in the language of the learner, much the same as English does for 'hearing' learners. It would move the burden for access from the centre (where thousands of staff perform the AA roles at the point of exam) to the awarding bodies, who would prepare one interpretation of examinations, rolled-out nationally. Awarding bodies would be confident that the examination questions are clear and appropriate. At the moment, they are not, having to rely on staff at hundreds of centres.