



**The Rt Hon. the Lord Blunkett  
House of Lords  
London  
SW1A 0AA**

18 March 2019

Dear Lord Blunkett,

**Parliamentary Question HL13904: To ask Her Majesty's Government what provision is made for students with visual impairments undertaking GCSE and A Level examinations to ensure that they have their chosen reading format available.**

**Parliamentary Question HL13905: To ask Her Majesty's Government what powers they have provided to the Office of Qualifications and Examinations Regulation to monitor the consistency and accuracy of examination papers transcribed into other reading formats such as Braille.**

Lord Agnew of Oulton has asked Ofqual to respond to you directly regarding your recent parliamentary questions. A copy of this response will be placed in the Libraries of both Houses.

### **Provision for students with visual impairments taking GCSEs and A levels**

Awarding organisations who offer GCSEs and A levels are subject to a duty (under the Equality Act 2010), and which is reflected in our regulatory requirements, to make reasonable adjustments for disabled students to remove or reduce the disadvantage that they would otherwise experience due to their disability when taking their assessments. For students who are disabled due to visual impairment, this might be in the form of a modified exam paper or through the use of assistive technology.

The four exam boards routinely provide examinations in a variety of different reading formats, including:

- enlarged print (available in 3 different sizes),
- Braille (both UEB and SEB),
- tactile diagrams (with either Braille or print labels), and
- electronic (PDF) format for use with computer-reading software.

If these standard arrangements do not meet the needs of a particular student, then the student (or, more usually, their school/college) can request alternative formats. The awarding organisation – in line with its Equality Act duties – must provide such a format where that would be a reasonable adjustment.

In November 2018 Ofqual published Official Statistics on access arrangements for GCSEs, AS and A levels during the 2017/18 academic year. While the overall number of approved access arrangements fell 0.5% on the previous year, the number of modified question papers rose by 4%, building on the increase of 26% seen in the previous year. 4,225 discrete modified exam papers were issued for GCSE, AS and A level exams in summer 2018, in addition to 2,373 standard papers.

### **Ofqual's powers to monitor examination papers in other reading formats**

Ofqual has both general and specific powers which allow us to monitor the consistency and accuracy of all GCSE and A level examination papers, in whatever format they are provided. For example:

- Section 134 of the Apprenticeships, Skills, Children and Learning Act 2009 (ASCLA 2009) requires us to set [General Conditions of Recognition](#). Our Conditions require awarding organisations to provide assessments that are fit for purpose that reduce the need to make reasonable adjustments for disabled students and to make reasonable adjustments where they are needed. We require each awarding organisation that offers GCSEs, AS and A levels to notify us if there has been an error in its assessment materials, including when the error has been made in a modified paper. When an error arises, we will intervene if an exam board is not taking appropriate steps to mitigate the impact of the error on the students who were affected by it. We do not check any exam papers before they are taken.
- When an awarding organisation appears likely to, or does fail to, meet its Conditions, section 151 of ASCLA 2009 gives us the power to direct it to take (or refrain from taking) particular steps to make sure it complies with our expectations. Section 151A gives us the power to levy a monetary penalty for a breach of the Conditions and, in the most serious of cases, section 152 gives us the power to remove the awarding organisation's regulated status when it failed to meet the Conditions to which it was subject.

Ofqual facilitated RNIB's 2016 research '[Provision of accessible GCSE papers](#)'. We are currently talking to the RNIB about a follow on project to consider the quality of modified examination papers for blind and visually impaired students.

I do hope this information is useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Collier', with a long, sweeping horizontal stroke underneath.

**Sally Collier**  
Chief Regulator