SCOTTISH
QUALIFICATIONS
AUTHORITY

Equal Opportunities Committee Disability Inquiry — Removing Barriers and Creating Opportunities

Submission from the Scottish Qualifications Authority (SQA)

February 2006

1   Introduction

Education and training — the key to unlocking potential — is at the heart of Scotland's heritage and culture. Education and training bring benefits to each one of us and to the communities within which we live. Qualifications are the currency which we use to show how we have engaged and what we have achieved in education and training.

SQA is deeply aware of its responsibilities and duties in this area, both in relation to stakeholders, such as colleges and universities, and, even more importantly, to individual learners. Whilst progress is being made, we know that we have to work with education and training providers to focus our energies more directly on those learners who have additional support needs to increase their participation and achievement in qualifications.

SQA is also subject to many of the provisions of the Disability Discrimination Act, and, in October 2004 qualifications bodies were brought under the employment provisions of the Act. Vocational qualifications such as Scottish Vocational Qualifications (SVQs) were also covered for the first time.

The Race Relations (Amendment) Act first introduced the concept of a positive duty to work to achieve race equality to public bodies in 2001. Subsequent to that, amendments to the Disability Discrimination Act bring a new public sector duty on disability into effect in 2006. SQA is required to publish a Disability Equality Scheme (which is modelled on our existing Race Equality Scheme) and it is likely that all awarding body functions will be brought within the scope of the DDA by September 2007. This means that all qualifications will be covered by the provisions of the DDA. SQA welcomes these provisions which will give legal force to our ongoing work to ensure that qualifications in Scotland are as accessible as possible to all learners.

Awarding bodies meet their responsibilities under the Act by designing inclusive qualifications and assessments and by making available reasonable adjustments to assessments. Work is continuing in SQA to ensure that qualification standards and assessments are clearly written and not discriminatory and that we apply reasonable adjustments to published assessment arrangements in response to individual support needs which are consistent with national standards.

All of our activities are overseen by a cross-cutting Diversity Steering Group (DSG), which has a remit to look at policies and practices across all aspects of the organisation. The DSG has members drawn from a variety of different parts of the organisation, and reports directly to SQA's Executive Team.

2   SQA and Its Qualifications

SQA is an executive non-departmental public body (NDPB) which was established under the Education Act (Scotland) 1996 which was subsequently amended to the Scottish Qualifications Authority Act 2002.

SQA is the national awarding body in Scotland and develops, administers and certificates all qualifications below degree level. We are responsible for the development of qualifications for schools, colleges, companies and other training providers in Scotland.

SQA has a statutory role as the accrediting body for Scottish Vocational Qualifications (SVQs). SQA's Accreditation Unit is responsible for accrediting SVQs, approving both National Occupational Standards (NOS) and awarding bodies to offer SVQs.

We offer a wide range of qualifications at different levels and many different subjects to choose from (please see **www.sqa.org.uk** for more details). The main qualifications that we provide are:

♦   Standard Grades — primarily for the S3 and S4 school population
♦   National Units, National Courses, Scottish Group Awards, Scottish Progression Awards and Access qualifications — primarily for the school and further education population
♦   Higher National Units and Higher National Certificates (HNCs) and Diplomas (HNDs) and Professional Development Awards (PDAs) — primarily for colleges
♦   Scottish Vocational Qualifications (SVQs) and their component Units, and other work-place assessed qualifications — primarily for colleges, training providers and employers

2.1 Access qualifications

Access Clusters are groups of three related Access Units which together form a coherent package. They differ from National Courses in that they have no external assessment. They are available at levels 2 and 3, with Access 3 being benchmarked on Standard Grade, Foundation level. Table 1 provides information on entries and awards:

Table 1: Entries and awards for Access Clusters, 2004				
	Entries		Awards	
	2003	2004	2003	2004
Access 2 Clusters	2,264	2,344	1,398	1,617
Access 3 Clusters	9,154	12,759	6,399	9,207

In 2003 SQA introduced a new range of qualifications at what is called Access 1 Supported Level. These new Supported Level Units are designed specifically for learners with complex needs and learners who may always need a degree of adult support. These qualifications allow for this group of learners to be certificated within the national system of qualifications. Since 2003 interest in these qualifications has grown and we are looking to develop more qualifications at this level.

3 Qualifications for all

In 2005 SQA updated its Equal Opportunities Policy for Candidates and published its 'Qualifications for All: Equality of Access to SQA Qualifications' policy, which is available from our website **www.sqa.org.uk**.

Central to our work is the belief that each candidate is entitled to be treated fairly and with respect. In practice, this means that we will take every possible step to ensure that we develop:

♦ worthwhile qualifications, based on national standards which are accessible to candidates who have the potential to achieve them

♦ valid, reliable and credible assessments, and effective quality assurance processes which are sensitive to the needs of individual candidates. These must not compromise our overall aims of fairness and consistency.

3.1 'Actions speak louder than words'

Policies are, of course, hugely important but at the end of the day it is what organisations do that makes a difference. The priorities which underpin our 'Qualifications for All: Equality of Access to SQA Qualifications' policy are listed below:

♦ working in partnership with stakeholders and SQA centres (such as universities, colleges, schools, independent schools, employers and private training providers) to ensure that all candidates enjoy equality of access (or 'fair access') to our qualifications

♦ doing more than simply complying with our duties under legislation in areas such as discrimination and support for learning

♦ developing qualifications which conform to accessibility and quality criteria

♦ ensuring that standards and assessments for SQA qualifications are clearly written and fit for purpose, and are not discriminatory

- ♦ making access to assessment as open as possible by allowing reasonable adjustments to our published assessment arrangements (in response to individual support needs), so long as they are consistent with national standards

- ♦ ensuring that our website and publications are accessible to users, and providing alternative formats as required

4 Equality and fairness for SQA candidates

Our commitment to candidates underpins everything that we do. We are continuously reviewing and improving systems and processes to enable us to identify the different needs of individual candidates and make the necessary adjustments where required to ensure that no candidate (or group of candidates) is disadvantaged. The text of our 'Qualifications for All: Equality and Fairness for SQA Candidates' leaflet is available from our website **www.sqa.org.uk**.

5 Disability monitoring

In service provision, monitoring service user engagement and satisfaction is hugely important to continuous improvement and meeting user needs and expectations. Monitoring data can tell SQA which groups are using our services, and how satisfied they are with them. We can then consider ways of reaching under-represented groups and making sure our services are designed to meet their needs, and provided fairly.

5.1 Equality data source options

SQA currently collects and disaggregates candidate attainment data on the grounds of age and gender. We are looking at ways of increasing these datasets to include candidate characteristics such as ethnicity and disability. The two main ways of approaching collecting data on the basis of ethnicity and disability are either to collect the data ourselves or to use a secondary source or sources such as the Scottish Executive and the Scottish Funding Council.

We have recently completed an internal analysis of these options and agree that a group involving SQA's Research and Information, Customer Relations

and Data Management Teams is set up to develop a consultation and implementation strategy.

5.2 Data on declared disabilities

We can use data on declared disabilities to:

♦ highlight possible inequalities
♦ investigate their underlying causes
♦ remove any unfairness or disadvantage

6 Facing up to (real and perceived) barriers to learning

Helping learners engage with learning is a complex issue. An individual may have to overcome personal barriers, such as low self-esteem and lack of confidence and a range of 'institutional' barriers such as inadequate or misleading information or a lack of assistive technologies etc. This section does not claim to be a 'definitive list' of 'barriers' but rather an identification of the areas where SQA is working to make a difference in partnership with education and training providers such as schools, colleges, universities and employers.

6.1 Psychological or attitudinal

We are all encouraged to 'see the person not the disability' but unfortunately, in practice, negative assumptions are still being made about what disabled people can and cannot do which may limit the opportunities available to them. This can have a negative effect on disabled people themselves whose expectations and aspirations may adapt accordingly. Through good quality training and networking, knowledge about what it means to have a particular disability will increase and decisions about engagement in a particular course or qualification can be made on an informed basis. We have already provided training on the implications of DDA 2005 on the design of qualifications for senior qualification and quality assurance staff, for example, Moderators and will be cascading this more widely across the organisation.

6.2 National Occupational standards

There is evidence to suggest that there may be barriers in some subject and occupational areas and SQA seeks to work in partnership with education and training providers to apply the general guidance provided in codes of practice relating to provisions of the DDA and, more specifically, to each occupational and subject area. We need to ensure that we share a common understanding of what we mean by 'accessible' national standards across subjects and occupations so that learners can access appropriate qualifications and progress as smoothly as possible through our qualification framework.

6.3 Qualifications design

Very broadly speaking, qualification design issues are SQA's responsibilities and delivery issues are the responsibility of education and training providers. Learners with disabilities and/or additional support needs may encounter real or perceived barriers in the way that the qualification is constructed or 'designed'. Some of the 'barriers' relate to competence standards and as such are not 'removable' but others may be based on long held traditional views of what a 'typical' learner profile for that qualification is, and which could be removed. The DDA and a national focus on 'individualised learning' are providing the momentum to review qualifications and to try and provide more creative and inclusive design rules.

SQA's Equality of Access policy commits us 'to developing qualifications, based on national standards, which are accessible to learners who have the potential to achieve them.' We will do this in a way that is fair and consistent. We have also agreed 'e-friendly' principles and practice and there is a degree of overlap between the accessibility and e-learning agendas which are, arguably, the biggest drivers for change in the way that we design and assess qualifications. The more SQA uses e-assessment, for example, the greater use we can make of assistive technologies.

We are therefore, setting up an 'Accessibility Tool-Kit' project charged with providing SQA with 'hands-on, practical tools' to help:

♦ design 'user-friendly' qualifications and assessments
♦ conduct 'user-friendly' checks of existing qualifications
♦ ensure that assessment materials and practice facilitate user access

The resource itself will be a prototype of a dynamic, user-friendly product and be flexible enough to adapt to evolving national and internal needs and expectations. SQA may seek to develop this resource in partnership with external stakeholders such as the Scottish Executive and the soon to be established Scottish Equalities Unit, based at SFEU, for example. We have already had an expression of interest from the UK awarding bodies'

'Accessible Assessment Forum' which has just produced draft 'Accessibility Guidance for Staff involved in the Design of E-assessment Delivery Software and Content.'

6.4 Assessment arrangements

Learners with disabilities and/or additional support needs may experience difficulty in accessing the published assessment arrangements for a particular qualification and request that a 'reasonable adjustment' be made to facilitate access. For example, a candidate may ask for extra time or a scribe in an examination.

SQA has a long tradition, inherited from both predecessor organisations, of working to meet the needs of candidates by allowing changes to the published assessment arrangements procedure, wherever this does not impact on the integrity of the assessment.

Candidates for National Qualifications, such as Highers and Standard Grades, apply to SQA to have the published assessment arrangements varied. In these qualifications, SQA prescribes the assessments and the conditions in which they are undertaken, and thus candidates have to contact the organisation directly where a change is required. Data relating to recent uptake of this facility, which is known as 'Assessment Arrangements' (AA) is available in Appendix 1.

SQA also offers advice to centres such as colleges on applying assessment arrangements in Higher National and Scottish Vocational Qualifications. In these qualifications, centres are responsible for assessing candidates, while SQA moderates the assessment process to maintain standards. In these qualifications, given that centres are responsible for assessments and the arrangements for these assessments, it is appropriate for centres to make the appropriate decisions on varying those arrangements, with guidance from SQA where required. It is part of SQA's quality assurance processes that approved centres must put in place appropriate assessment arrangements for candidates with disabilities and/or additional support needs.

6.5 Physical

As part of its quality assurance role, SQA oversees the deployment of a large pool of associates who visit colleges and other SQA centres on a regular basis, to carry out visiting examination and/or moderation duties. Disability awareness is part of the training which we offer and associates are asked to comment on 'fair access' to the qualifications under inspection as part of their feedback reports to SQA. Comments are not restricted to the estate but cover

issues such as font size, availability of adapted formats, assessment arrangements etc.

6.6 Lack of empowerment/involvement

Disabled people can feel a sense of frustration that their views are not being taken into account in service design and delivery and consider that progress is too slow. SQA is aware that engaging with candidates either through a provider interface such as a school, college or university or directly via our website, for example, is something that we need to develop. SQA is drawing up an 'engagement with candidates' survey project plan at the moment with a view to contacting candidates directly as we do not wish to increase the administrative burden on education and training providers. This will provide all learners, including those with disabilities and/or additional support for learning needs, to tell us directly what their concerns and suggestions are. SQA will build on the findings of this major exercise to inform practice in line with the new Duty to promote Disability Equality which requires public bodies to involve disabled service users in designing and delivering services — consultation alone is not sufficient but merely regarded as a first step to building effective two-way communication channels.

6.7 British Sign Language (BSL) courses

It is within the context of ensuring equality of access to qualifications that we are keen to respond to a perception that we may not be meeting the needs of existing and prospective users of British Sign Language in Scotland as effectively as we could.

Around 750,000 Scots have some form of hearing loss and around 50,000 have severe or profound deafness. An estimated 70,000 people in the United Kingdom use British Sign Language (BSL) as a first language, 6,000 of whom live in Scotland. As a linguistic minority, native speakers of BSL have little access to the majority, English-speaking culture. SQA makes provision for candidates to access their assessments in National Qualifications using BSL, and accepts that there is a need to review the National Occupational Standards that underpin Higher National and Scottish Vocational Qualifications to ensure that there are no unnecessary barriers which prevent candidates who use BSL from achieving qualifications.

With support and advice from the Scottish Executive's British Sign Language and Linguistic Access Working Group we are pleased to say that we have begun the process of revising our British Sign Language (BSL) qualifications by rewriting the existing Professional Development Award in the first instance. We intend to build on our existing association with a wide range of education establishments and training providers to position ourselves as the

main provider of national, credible and worthwhile qualifications in BSL which will effectively meet learners' needs and aspirations. The scale of the task is such that we need to take a staged approach to revision and development.

6.8 SQA's e-enablement work

SQA is currently undertaking a wide variety of work to enable various parts of its business to be carried out electronically. This allows for greater flexibility in many areas, and creates opportunities for us to further reduce the barriers that prevent candidates with disabilities from achieving their full potential. As was mentioned in section 6.3, SQA is currently working on creating an accessibility toolkit which will help to ensure that qualifications development work is carried out to the highest possible standards. This work will look at how technological solutions can be used to remove barriers.

To ensure that that it is taking full account of accessibility issues in its e-developments, SQA is taking close account of the work of TechDis. Funded by the Joint Information Systems Committee (JISC), TechDis 'aims to be the leading educational advisory service, working across the UK In the fields of accessibility and inclusion'. It offers practical advice on accessibility issues arising from the use of e-learning and e-assessment. TechDis has presented to a group of SQA staff and at a wider conference on e-assessment organised by SQA.

Work is already being carried out to introduce e-assessment to National Qualifications. In 2006, candidates will be able to undertake assessments in some Mathematics, Biotechnology and Computing qualifications online.

In the Summative On-line Assessment Resources (SOLAR) project, SQA is working to develop summative, online assessment for students undertaking Higher National Qualifications. A variety of other projects are also underway to introduce e-assessment in other qualifications.

Exploration of accessibility issues in e-assessment formed a specific strand of work within the Pass-IT project, a two-year research project involving all the key national agencies in education and training in Scotland and Heriot-Watt University. As part of the project, e-assessments were delivered to visually impaired learners through the use of screen readers. The project's work in this area was commended by an independent evaluation undertaken by an organisation with extensive experience of the use of assistive technologies.

Other projects currently in planning will allow candidates to submit electronic portfolios of work, and to undertake a wider range of internal assessments for National Qualifications online. SQA is also working to build up electronic banks of questions in a number of different subject areas.

Whilst all of this work is being carried out for the benefit of all of SQA's candidates, there are likely to be greater benefits for candidates with disabilities or additional support needs, as all of these changes will increase the potential flexibility of assessment. This could mean, for example, that smaller changes to arrangements, such as increased font size, or an alternative colour scheme, could be carried out without contacting SQA. In the longer term, this work may also mean that the timings of assessments can be more flexible, with candidates being able to be assessed when they are ready, rather than when an examination diet takes place.

7 Joint UK awarding body initiative

The DDA is UK legislation and SQA is keen to ensure that it works in partnership with other UK awarding bodies to develop and carry out good practice in relation to our duties to disabled learners in Scotland. The Qualifications Curriculum and Assessment Authority for Wales (ACCAC) chairs a UK-wide Advisory Group that seeks to promote and improve access to qualifications and assessment. The Group's membership includes awarding bodies, the Joint Council for Qualifications, the Federation of Awarding Bodies (FAB), the Disability Rights Commission and representation from government departments.

ACCAC, on behalf of the four UK regulators and working in collaboration with a wide range of stakeholders, has developed a good practice guidance document Fair Access by Design, available from its website: **www.accac.org.uk**. This document focuses on how to eliminate barriers in GCE A/AS level and GCSE specifications, exam papers and coursework tasks at the design stage. ACCAC is sponsoring the development of a parallel document for vocational qualifications. While this document is designed for the GCE awarding bodies and regulatory authorities in England, Wales and Northern Ireland, it is also of interest to SQA. We are adapting this guidance document to suit our own purposes.

While from 1 April, ACCAC's responsibilities will transfer to the Welsh Assembly Government, the work on access will continue as part of the 'public authority' responsibilities for qualifications under the DDA. A new action plan for 2006/7 and beyond is attached as Appendix 2. This brings together strands of work being taken forward by one or more of the organisations represented on the advisory group, and whose progress the group monitors. ACCAC is currently seeking views on these proposals from Advisory Group members.

Appendix 1

Assessment Arrangements, Diets 2004–2005

The total number of AA requests for diet 2005 was 41454, submitted on behalf of 9814 candidates.

Number of candidates and requests for AA, 2004–2005

Year	Number of Candidates requesting AA	Number of AA requests
2004	9904	45680
2005	9814	41454

The profile of AA requests by level was broadly the same for both years. The majority of requests came from Standard Grade candidates. However, the proportion of the total entries was lower in 2005 than 2004. On the other hand, Intermediate 1 and Intermediate 2 requests as a proportion of all requests have increased. This is in line with the continuing decrease in Standard Grade entries and corresponding increase in Intermediate entries.

AA requests by level, 2004–2005

Level	2004 Requests as % of all AA requests	2005 Requests as % of all AA requests
Standard Grade	60.1%	57.9%
Intermediate 1	7.3%	8.2%
Intermediate 2	13.0%	13.1%
Higher	18.0%	19.0%
Advanced Higher	1.6%	1.8%

The proportion of requests from Higher candidates has increased slightly (by 1%) and that from Advanced Higher candidates has remained stable.

Requests in 2005 as a percentage of total entries have decreased from 2004 at all levels (see graph, below). The level with the highest number of requests as a percentage of entries in both 2004 and 2005 was Intermediate 1.

AA requests as a percentage of total entries, 2004–2005

Level	2004 Requests as % of entries	2005 Requests as % of entries
Standard Grade	6.3%	5.8%
Intermediate 1	10.6%	9.3%
Intermediate 2	7.4%	6.2%
Higher	5.0%	4.8%
Advanced Higher	4.3%	4.1%

Analysis by centre, authority and centre type

There were AA requests from 548 centres across all authorities. The vast majority of requests came from Education Authority — Secondary Schools (86%). Over the two years, there has been a drop in the number of requests from all centre types except further education colleges where they have increased by 17%.

AA requests by centre type, 2004–2005

	AA requests 2004	AA requests 2005
Education Authority — Secondary School	39227	35712
Education Authority — FE Centre	3	0
Education Authority — Special School	725	369
Independent — Secondary School	4318	3838
Further Education College	1145	1344
Independent — Special School	262	191

Analysis by primary difficulty

The table below shows the principal reasons for requesting assessment arrangements. In 2005 (as with previous years), the majority of requests are submitted because of Specific Learning Difficulties/Dyslexia. At all levels, this accounts for between 50% and 60% of Assessment Arrangement requests, which is slightly lower than in 2004.

The other main reasons for AA requests across all National Courses are Specific Learning Difficulties/Other, Specific Learning Difficulties/Dyspraxia, and Visual/Hearing Impairments.

Percentage of requests by Difficulty by Level

Main reason for AA	Standard Grade	Intermediate 1	Intermediate 2	Higher	Advanced Higher
Visual/Hearing Impairments	3.4%	4.9%	5.0%	4.5%	5.2%
General Learning Difficulties (MLD)	8.5%	11.4%	3.2%	1.9%	1.4%
Specific Learning Difficulties/Dyslexia	54.0%	54.3%	59.6%	58.5%	57.5%
Specific Learning Difficulties/Dyspraxia	4.9%	3.9%	4.2%	4.2%	5.8%
Specific Learning Difficulties/Other	8.0%	6.6%	9.3%	8.9%	11.3%

Appendix 2

(Draft) UK Awarding Body Action Plan 2006/7

Area of action	Target	Lead Responsibility
1. Keep criteria and codes under review	Review GCSE and GCE criteria, including 'DDA-proofing', and consult on revised A level criteria and GCSE criteria in line with timetables in the 14–19 Implementation Plan. Check functional skills standards and criteria for specialised diplomas for DDA compliance in line with timetables in the 14–19 Implementation Plan. Publish revised Code for GCE/GCSE/VCE, having reviewed section on making adjustments to assessment, by 31 March 2006.	Regulators
2. Update the JCQ regulations and guidance for GCE, VCE, GCSE, GNVQ, Entry Level and Key Skills	Publish a revised version of the document and distribute to centres in September 2006. Notify centres of the outcome of the public consultation on specialist teacher qualifications by Spring 2006. Review future provision of modified papers to permit access to candidates with various types of disability and to prepare for e-assessment by creating an early electronic version of the hard copy by September 2007.	Joint Committee for Qualifications
3. Monitor Awarding Bodies' guidance for vocational qualifications	Monitor the effectiveness of the "Good practice guide to the application of reasonable adjustments and special consideration in vocational qualifications" and report to CEOs by December 2006.	Federation of Awarding Bodies
4. Harmonise arrangements for qualifications and tests	a) Map the differences between national curriculum tests and general qualifications processes. b) Determine the implications or impacts of any changes to either system. c) Commission research to indicate the feasibility of any changes to either system.	Shared — Regulators/JCQ/ National Assessment Agency
5. Improve accessibility in the design of vocational qualifications	Produce guidance for vocational awarding bodies on 'Access by Design in Vocational Qualifications' by March 2006.	ACCAC
6. Consult on DDA regulations covering general qualifications	Launch consultation exercise on the DDA regulations by May 2006.	DfES working with Welsh Assembly Government, Scottish Executive and Dept. for Employment & Learning in NI.
7. Draft DRC CoP for general qualifications	Advisory group will meet DRC to make input into draft CoP by March 2006.	DRC