

POLICY, PROCEDURES and GUIDANCE ON ASSESSMENT ARRANGEMENTS FOR DISABLED STUDENTS

1 Preamble

- 1.1 This policy is intended to facilitate the implementation of the University's responsibilities to disabled students¹ (and those with long-term medical conditions) with regard to the Disability Discrimination Act 1995 as amended by the Special Educational Needs and Disability Act 2001 (SENDA) and the Disability Discrimination Act (2005) which, among other things, introduced the Disability Equality Duty. It also takes account of the QAA Code of practice section 3: Students with disabilities, October 1999, [currently being reviewed and updated] and a number of 'good practice' publications.
- 1.2 The policy relates to the University strategic objective of providing an outstanding student experience and seeks to safeguard against the key institutional risks of: failure to provide an outstanding experience, leading to decline in levels of recruitment, retention and achievement, and student satisfaction (2); failure to achieve (and meet the needs of) a diverse student population (3); and poor quality assessments (8).
- 1.3 The intended audience for the strategy is all University academic and learning support staff, staff in Student Services and Registry Services, the Student Welfare Officer and support staff of the Students' Union, and students.
- 1.4 It is important to note that the experience of disability is highly individualised and people with the same impairment may have very different needs when it comes to making adjustments to practice. It is therefore essential, when determining arrangements for disabled students, that this is done through discussion with the disabled persons themselves with regard to their particular needs – and possible solutions. This principle underpins the policy, procedures and guidance set out in this document.

2 Policy

- 2.1 The University seeks to comply with statutory obligations relating to the disability discrimination legislation in a positive and proactive manner to ensure that disabled students are not discriminated against. There are four types of discrimination against disabled people that are unlawful:
- **Direct discrimination** applies where a student is treated less favourably solely by reason of their disability, for example if a person with a hearing impairment was refused a place on a coaching course because it was assumed they could not successfully complete the course

¹ Throughout this document the term 'disabled student' is used. This term is used to reflect the social model of disability which takes the view that it is not impairments themselves, but the environment (physical, organisational, cultural) that disables people. Where environments are accessible and inclusive the 'problem of disability' can often disappear. While the University and its staff cannot usually do anything to remove a person's impairment they can make reasonable adjustments to the environment which may be 'disabling' the student.

- **Disability related discrimination** applies where a student is treated less favourably because of a reason related to their disability. An example would be a refusal to allow a student who uses a wheelchair, due to mobility impairment, to attend a field trip because of concerns about safety. The refusal was not directly due to the impairment itself, but due to concerns about safety, which related to the impairment. Whether or not this disability related discrimination is lawful depends on whether or not it can be justified
- **Failure to make reasonable adjustments** applies where a HEI fails to make a reasonable adjustment placing a disabled student at a substantial disadvantage in comparison with a person who is not disabled. An example would be failing to provide written examination or assignment briefs in alternative formats for students with visual impairments
- **Victimisation** occurs where a person is treated less favourably as a result of having brought proceedings, given evidence or made an allegation of unlawful discrimination.

2.2 The University recognises that the duty to make reasonable adjustments is an anticipatory duty to disabled people generally, and not just to particular individuals. It is committed to a policy of promoting equal opportunities for disabled people and is working towards creating an inclusive learning and teaching environment which will enable all individuals to participate fully in the academic and social life of the University.

2.3 In this context, the University will take all reasonable steps to ensure that assessment and examination policies, practices and procedures provide disabled students with the same opportunity as their peers to demonstrate the achievement of learning outcomes (QAA Code of practice section 3, precept 13), without compromising academic standards.

2.4 In so doing, the University recognises that it is essential that all learning outcomes and assessment criteria reflect genuine competency standards² for the aims, level and purpose of the course.

2.5 A genuine competence standard applies equally to all students and may not be modified. However, depending on the need of the individual disabled student, the means by which that student is enabled to demonstrate the standard can be adjusted/adapted.

2.6 The needs/entitlements of disabled students should be considered when courses and modules are designed, to ensure that assessment and other practices (including, for example, field trips, group work, placements, laboratory work etc) are accessible and inclusive by design, so that only minimal adaptations or adjustments are necessary for individuals. Evidence that elimination of disability related barriers has been considered will be necessary³. Ideally, the mode of assessment should have been designed

² Competence standards are defined by section 28S of the DDA Part 4 as “an academic, medical or other standard applied by or on behalf of a [HEI] for the purpose of determining whether or not a person has a particular level of competence or ability.” Competence standards must be genuine, objectively justifiable and proportionate ie they apply to everyone and should be fair and valid. They apply to admissions criteria, assessment criteria and placement criteria. In the context of assessment, it is important that learning outcomes and assessment criteria are scrutinised to ensure they are non-discriminatory. Reasonable adjustments are not made to competence standards, but reasonable adjustments may need to be made to the way in which the standards are implemented and assessed.

³ This will become an essential consideration for the approval and review of programmes.

with sufficient flexibility to meet the needs of a wide range of learners and preclude the need to change the way the work is assessed.⁴

- 2.7 The University will ensure that policies and procedures for requesting modification to assessment and examinations are widely publicised and easy for students to follow, and will endeavour to ensure that they are applied consistently across the institution. It is the University's responsibility to give students opportunities, at various different stages of their course, to disclose disability, dyslexia or a long-term medical condition and to ensure appropriate confidentiality. It is the student's responsibility to ensure that the University is aware of his/her disability and to apply for any variation in assessment conditions within deadlines which are established for this purpose. Any request must be supported by acceptable medical or other evidence of disability or long-term medical condition.
- 2.8 Appropriate modes of assessment for individual disabled students will usually be determined by a Disability Co-ordinator, taking into account the recommendations of any independent needs assessment report. In some circumstances it may be appropriate to consult the student's personal tutor/course leader and/or module tutor with a view to enabling the student to demonstrate their ability to meet the learning outcome/assessment criteria.
- 2.9 A record of the agreed arrangements will be kept on the student's file and will apply for the duration of the course, unless the student formally requests that they be re-considered.

3 Procedures

3.1 Requesting and approving alternative arrangements

- 3.1.1 Students requesting alternative assessment arrangements should first discuss their needs with the Disability Co-ordinator/Assistant Disability Co-ordinator. A range of possible alternative arrangements are set out in Annexe 1.
- 3.1.2 Documentary evidence (medical or specialist) must be produced to support the request. This evidence should normally be no more than two years old at the time of the student making an initial application for alternative assessment arrangements, and should have been conducted when the student was aged 16+. In the case of dyslexia or other specific learning difficulty, a diagnostic report carried out when the student was aged 16+ will be sufficient.
- 3.1.3 Students must normally apply for alternative assessment arrangements at least four weeks before the date of the assessment. Late applications will not normally be considered unless directly related to the individual's impairment, although due consideration will be given to individual circumstances.
- 3.1.4 The Disability Co-ordinator/Assistant Disability Co-ordinator will complete Form DDS1 and retain a copy of the documentary evidence to accompany

⁴ For example, an assessment for a history module may take the form of a presentation. Rather than specifying that this must be an oral presentation, as this requires the ability to speak in front of an audience, the assessment criteria simply specifies a 'presentation'. This allows disabled learners some flexibility in how they deliver the presentation even though the marking criteria will remain the same for all students. Criteria such as 'effective communication of ideas' and 'creative use of technology' would apply to all students; whereas criteria such as 'making eye contact with audience' would be inappropriate as this would pose a barrier for those with visual impairment or autistic spectrum disorder. Students could use technology to 'voice' a Powerpoint presentation or make a tape recorded or videoed production to respond to the assessment.

the form, which will be held on the student's file. Copies of completed Form DDS1 will be forwarded to the student, and details will be posted on the intranet based class lists which can be accessed by course and module leaders and the Examinations Officer.

- 3.1.5 Requests for alternative assessment arrangements will normally be agreed between the student and the Disability Co-ordinator/Assistant Disability Co-ordinator and, where appropriate, after liaising with the course or module leader concerning learning outcomes. Where there is disagreement regarding the proposed alternative assessment arrangements, the case will be referred to the Director of Quality and Educational Development who will consult with relevant parties.

3.2 Examination and test arrangements

- 3.2.1 Subject to 3.1.3 above, students should present a copy of the completed Form DDS1 to module leaders in respect of class tests – this must be done in good time, and in any case normally at least three weeks before the date of the class test.
- 3.2.2 Where an allocation of extra time for University examinations is agreed, this will normally be 15 minutes per hour (or 25%) unless a different amount is deemed necessary on the basis of independent evidence in individual circumstances. Where extra time is agreed for students this should also be allocated for class tests as well as more formal examinations.
- 3.2.3 In cases where an adjustment for University organised examinations is required such as the use of a computer or use of an amanuensis, the necessary arrangements will be made by the Examinations Officer for the student to sit their examination(s) in a separate room from the main body of students.
- 3.2.4 In other cases, eg course 'tests', the student's Institute will make the necessary arrangements, taking advice from the Examinations Officer and the Disability Co-ordinator as appropriate on the organisation of the venue, invigilation and other practical arrangements for the student.⁵ A disabled student's support worker may not act as an invigilator for a student with whom they have a professional support role. However, support workers may be used as invigilators for those students with whom they have no relationship.
- 3.2.5 It will be the responsibility of the invigilator(s) to ensure that examinations and tests involving disabled students are conducted in accordance with agreed alternative arrangements, including the allocation of extra time, and that as far as possible in other respects, the usual rules for the conduct of examinations are observed.

3.3 Marking student assessments

- 3.3.1 Students who have difficulties presenting information in written format as a result of their impairment⁶ have the option of using a Sensitive Marking

⁵ For within course tests the module/course leader will have responsibility for making the necessary adjustments to the provision, for example, arranging a separate room, and will need to liaise with the DDS to arrange for other support such as a scribe or Braille copies of test papers.

⁶ For example, students with specific learning difficulties such as dyslexia may have difficulties with handwriting, spelling, punctuation or grammar. Students with hearing impairments who are pre-

Request form⁷ which may be attached to any examination or coursework assessment. Students have an academic responsibility to only use the Sensitive Marking Request form if this has been agreed by the Disability Co-ordinator. Tutors can request confirmation of entitlement for a student to use a Sensitive Marking Request form by contacting the Disability Co-ordinator.

- 3.3.2 Sensitive Marking Request forms permit students to retain some degree of anonymity⁸, but alert the marker to the need for sensitive marking and provides confirmation to the students that their work has been marked in this way.
- 3.3.3 Sensitive marking refers to the way in which marking tutors appraise the work, with full knowledge that it has been completed by a disabled student, in order to ensure feedback on the assessment is sensitive to the student's disability. **Sensitive marking does not refer to the judgement about the grade to be awarded for the work**; as for all student work this should be in accordance with the learning outcomes and assessment criteria.
- 3.3.4 Guidance will be provided to staff on good practice in marking the work of pre-linguistically deaf students and those with specific learning difficulties (ie dyslexia, dyspraxia, ADHD and in some instances those on the autistic spectrum) (See Annexe 2.)
- 3.3.5 Where students are diagnosed with a specific learning difficulty at a point in their course when they have already submitted assessments, they may apply for a review of any written assessment (examination or coursework) that has already been graded.
- 3.3.6 Students should complete a Request for Review application available from Student Services/Registry Services, and the completed form, together with the coursework to be reviewed, should be submitted to the Complaints and Appeals Officer in Registry Services. It is the student's responsibility to ensure work previously submitted (except examination papers) is made available for review.
- 3.3.7 Assessments presented for review must be considered by two markers independently, and marked in line with the guidance at Annexe 2.

Version reference: 1 Final

Document approved by: Academic Standards and Quality Enhancement Committee via Learning, Teaching and Student Experience Committee, June 2009

Date document comes into effect: September 2009

Author of the document: Director of QED/Head of Student Services, and Disability Co-ordinator

Date document is due for review: 2011/12

linguistically deaf may also have difficulties with the grammatical structure of English, and students with visual impairments may have difficulties presenting information.

⁷ The Sensitive Marking Request form comprises a statement that the student is registered with the Disability and Dyslexia Service and has been authorised to use the form. It contains a summary of the guidance to staff on good practice with respect to marking the work of students with specific learning difficulties and other disabled students (Annexe 2), and requests the marking tutor to sign the form to confirm that they have used the guidance in marking the student's work.

⁸ Students using Sensitive Marking Request forms must appreciate that where class numbers are small, in many instances anonymity will be compromised.

ANNEXE 1: ALTERNATIVE ASSESSMENT ARRANGEMENTS

1 It is not possible to set out all the possible arrangements that may be required by disabled students. Here we focus on the most common adjustments to assessment, however all students will be considered on an individual basis whatever their disability.

2 General adjustments

- Additional time allowance to permit students who are deaf or dyslexic to spend more time ensuring they understand the question or checking their answers for spelling and grammar, and/or for students who because of their impairment(s) do not have the stamina to write or concentrate for sustained periods
- Allowing time for rest breaks for students who experience fatigue, discomfort or who have difficulties sitting for long periods
- Alternative examination location for students who have panic attacks (for which medical corroboration will be required), or for those students who need to move around, and/or are making use of other adjustments. In all such cases an approved invigilator must be present
- Use of amanuensis (scribe). Students may need some time to practice with an amanuensis in advance of the formal assessment
- Use of a computer. This will necessitate ensuring that the computer is 'clean', has no access to the internet, and that students are competent in the use of equipment chosen and that a technician is on hand to deal with technical problems
- Use of assistive technology, including specialist software, electronic spellcheckers or coloured overlays for dyslexic students
- Extended deadlines may be recommended exceptionally by the Disability Co-ordinators for specific pieces of work/module assessments where, because of the nature of the student's disability and the scheduling of deadlines, it would be in the student's interest to do this – such extensions should not exceed a maximum of two weeks.

3 Specific adjustments

- Students who are blind or partially sighted may be permitted to present or request material in Braille, large print, audiotape or in electronic format. Examination/test papers should be provided in a medium appropriate to the student's visual impairment. They may be permitted to undertake formal assessments using adaptive technology, and/or using an amanuensis or reader
- Students who are deaf or hard of hearing⁹ may be permitted to have examination or test papers 'overwritten' to modify the carrier language (this must be undertaken by a suitably qualified person eg. a teacher of the deaf), to have questions communicated in sign language, or by oral rephrasing, or by lipspeaking

⁹ For students who have a hearing loss, written and spoken English can cause significant problems due to a delay in acquiring language in early childhood. This can manifest itself in the student having a limited vocabulary, poor grammar and syntax, and a general poor grasp of the use of language. In addition, for students who use British Sign Language, English will, in most instances, be their second language. Care must be taken to ensure that students are not penalised in the assessment process by the use of overly complicated language and some adaptation of the 'carrier' or non-technical language may be required.

- Students who have a physical disability may be permitted to use a reader or amanuensis, to use adaptive technology or a computer, or to have alternatively presented papers
- Students who have dyslexia or other specific learning/disabilities¹⁰ may be permitted additional time for examinations or formal tests as appropriate to the individual circumstances. Exceptionally, a written examination may be replaced by an oral examination, in which case the oral examination must be recorded so as to be available for internal/external moderation. In appropriate circumstances, use may also be made of an amanuensis, audio-tape, or computer to record/produce or transcribe examination answers.

In many cases it will be possible to make adjustments to enable disabled students to undertake the same assessment methods as other students, but in some cases it may be more appropriate to offer an alternative mode of assessment to prevent a student being substantially disadvantaged, whilst also ensuring appropriate academic rigour. For example:

- a student with dyslexia or who is pre-linguistically deaf might be permitted to make a presentation or video instead of a written project
- similarly students who experience difficulty in writing might be able to use a scribe or take an oral examination instead of a written examination
- a student who has difficulty communicating orally, may be permitted to provide a written presentation instead of an oral presentation.

Often the possibility of alternative assessment modes can result in more flexibility or choice for all students rather than special arrangements solely for disabled students.

¹⁰ Students requesting alternative arrangements on the grounds of specific learning differences such as dyslexia, dyspraxia, dyscalculia, AD(H)D or Asperger's Syndrome, must provide the Disability Co-ordinator with a diagnostic assessment and recommendation completed by a suitably qualified psychologist or other specialist. This should normally be no more than two years old at the time of the student making an initial application for alternative assessment arrangements, and should have been conducted when the student was aged 16+. It must be submitted at least four weeks before the first assessment for which an alternative arrangement or adjustment is sought.

ANNEXE 2

GOOD PRACTICE WITH RESPECT TO MARKING THE WORK OF DISABLED STUDENTS

1 Introduction

1.1 These guidelines emphasise the importance of good practice with respect to marking the work of certain disabled students. However it should be remembered that such principles of good practice should be the basis for marking all students' work, whether disabled or not.

1.2 For these guidelines:-

(a) 'work' includes any formative or summative coursework assignment, examination paper, independent study, dissertation, thesis or other documentation that is presented by a student for assessment and awarding of a mark and/or feedback on the quality of that work

(b) 'student(s)' refers to both pre-linguistically deaf students or those with specific learning differences (SpLD). Both have similar difficulties in relation to written expression. Some points only refer to SpLD students and are referred to as such.

1.3 The aims of these guidelines are:

- a) to ensure that students' work are marked fairly, neither compensating or penalising for disability related effects, and
- b) to assist staff in recognising and disregarding disability related effects, and
- c) to enable markers to give positive feedback and make comments on the work of any student in such a way that:
 - i) the student will be able to learn from the comments
 - ii) a marker does not waste time making comments that are unlikely to be understood or heeded by the student.

PRE-LINGUISTICALLY DEAF STUDENTS AND THOSE WITH SPECIFIC LEARNING DIFFERENCES (dyslexia, dyspraxia, ADHD, and occasionally autistic spectrum disorders)

2 General Guidelines

2.1 **Guideline 1: Read fast, looking for ideas, understanding, knowledge and skills**

2.1.1 By reading a student's work fast, it is usually easier to assess the work for the ideas, understanding, knowledge and academic skills that are present. Fast reading is best done by:

- ignoring any mistakes of spelling, grammar, punctuation or syntax (unless a competency standard)
- not initially correcting or commenting on the spelling, grammar, punctuation or syntax.

2.1.2 However, where a student's work makes no sense at all the tutor is not expected to re-interpret what the student has written.

2.1.2 SpLD students use more time and mental energy than their peers to put ideas into words. The apparent lack of order in the work of a SpLD student can be the result of a mismatch between their way of thinking and the expected patterns of academic writing. By reading fast, the reader can more readily find the thought patterns lying beneath the surface.

2.2 Guideline 2: Let the student know that marking is about the learning outcomes/assessment criteria

2.2.1 Make it clear to the student that the marking is about the learning outcomes and assessment criteria, and for ideas, knowledge and understanding of subject matter and analytical, critical and evaluative or other skills, and not the technicalities of spelling, grammar and punctuation (unless specified in the assessment criteria).

2.2.2 SpLD students often retain a strong memory of the ideas that they want to communicate and cannot see that what they have written does not reflect their ideas. It takes about a day for the memory to die. This retained memory means:

- during exams, SpLD students may be very unlikely to see mistakes
- in planning coursework, students must either hand in poorly corrected work or cut down on reading time to allow enough time to elapse between writing and proof-reading in order that the latter may be effective.

2.3 Guideline 3: Make constructive and clear comments about what is good as well as how it can be improved

2.3.1 The student may mistake the complete absence of corrections to language as a sign of improvement and this can lead to demoralising re-appraisal.

2.3.2 Comments will be more helpful if they indicate where a student has done well and explain why some work is good, rather than if they are adversely critical. Comments will be most effective if there is an explanation of what is required, or what is wrong.

2.3.3 Be aware that many SpLD students will have experienced negative reactions to their written work throughout their educational careers. It can be helpful to separate marking of transcription/communication errors in use of English from marking of content, eg by using different coloured pens (not red, because of its negative connotations) to make feedback clear.

2.3.4 The marking criteria for each module should be made clear for all students in the module guide. If criteria are clear the emphasis for students will be to develop the required skills. Where correct spelling, punctuation and grammar are deemed to be legitimate competency standards and made explicit, it is good practice to indicate the marks that may be lost for poor spelling etc – typically no more than 2%-5%. It may be helpful to correct selected spellings only (eg technical vocabulary) and let the student know this.

2.3.5 Where possible it is helpful to discuss the level of correction that the student will be able to use. This will in part depend on the student's level of understanding of the technicalities of language and presentation; sometimes there is a conscious knowledge but an inability to use it; sometimes there is no conscious basic knowledge. When the student has conscious knowledge of language and presentation, the errors that occur can be marked in the

margin against the line where they are found. The aim is to let the student locate the errors and correct them. Use a system of symbols that is convenient, such as: **sp** for spelling mistake, **ss** for sentence structure, **pn** for punctuation, **gr** for grammar, **lt** for layout. If some indicative feedback/corrections on spelling, punctuation etc is given, it need be only on one or two pages.

2.3.5 Many problems can remain in disabled students' work even with the benefit of assistive software and spell-checking, including:

- homophone substitutions (eg there/their, effect/affect, course/coarse)
- phonetic equivalents (eg frenetic for phonetic, homerfone for homophone)
- incorrect word substitutions (eg distance for disturbance)
- American spelling (eg colorful, fueling).

2.3.6 Students can struggle to read handwriting, so word processed feedback is preferable.

BLIND AND VISUALLY IMPAIRED STUDENTS

2.4 Guideline 4: Be aware of the difficulties a student will have in presenting their work and in accessing feedback

2.4.1 A blind or visually impaired student may not be aware of mistakes in the presentation of their work eg poor quality print. Even with the benefit of assistive software, there may be difficulties with:-

- line-spacing and formatting
- incorrect homophone substitutions (eg there/their, effect/affect)
- American spelling.

2.4.2 Do point out poor presentation to the student but make it clear that the marking is about the learning outcomes and assessment criteria, and for ideas, knowledge and understanding of subject matter and analytical, critical and evaluative skills.

2.4.3 Written feedback should be in electronic format to enable blind and visually impaired students to access it.

3. Confirmation that the guidelines have been applied in marking

3.1 The "Sensitive Marking Request form", which the student will attach to the front of their course work or examination paper, should be signed by the tutor/marker. This confirms to the student that their work has been marked in accordance with these guidelines.

Version reference: 1 Final

Date document comes into effect: September 2009

Author of the document: Director of QED/Head of Student Services, and Disability Co-ordinator

Date document is due for review: 2011/12

[This document replaces Academic Regulations and Procedures, Section O.5: Policy concerning the needs of students with Special Needs (issued 2005)]



Signature.....

Date.....

Sensitive Marking Request Form

Student Number:

Nature of Disability*:

By using this sheet I am making the following declaration:

I am registered with the Disability and Dyslexia Service (DDS) and have received its authorisation to use this cover sheet which indicates to the marking tutor the need for sensitive marking as defined in the University's policy (Policy, Procedures and Guidance on Assessment Arrangements for Disabled Students).

I have signed my agreement to the above declaration in the top right hand corner. To ensure the University's policy of anonymous marking is maintained I have folded the corner over and stapled the flap down.

I understand that use of this form, if not registered with the DDS, will be considered an offence under the University's cheating procedures.

* Students may choose to indicate the nature of their disability to the marker, or may choose to leave this blank.

A BUSY MARKER'S BRIEF SUMMARY OF GOOD PRACTICE GUIDELINES ON FEEDBACK TO PRE-LINGUISTICALLY DEAF STUDENTS AND THOSE WITH SPECIFIC LEARNING DIFFICULTIES

- Read fast, looking for ideas, understanding and knowledge.
- Make constructive and straightforward comments using the learning outcomes and assessment criteria for the assignment.
- Let the student know that marking is about the learning outcomes/assessment criteria.
- If marking also takes into account spelling, grammar and punctuation, differentiate the marking (eg by using two pens to annotate, one for ideas, the other for English, or a system of annotation for correcting English).
- If the English is corrected, explain what is wrong with it and why the correction is better; do not correct everything.
- Be sensitive: many students have experienced negative reactions to their written work through lack of understanding in the past.
- Word process feedback if possible.
- Make sure the Sensitive Marking Request form is signed - this lets the student know that the guidelines on good practice in marking the work of dyslexic students have been noted.

A BUSY MARKER'S BRIEF SUMMARY OF GOOD PRACTICE GUIDELINES ON FEEDBACK TO BLIND AND VISUALLY IMPAIRED STUDENTS

- Do identify poor presentation but let the student know that marking is about the learning outcomes/assessment criteria.
- Ensure the student receives feedback in an electronic format.

Marking Tutor:

I have marked this work in accordance with the Policy, Procedures and Guidance on Assessment Arrangements for Disabled Students, having noted the brief summary of the Guidelines given above.

Signed: Tutor Name: Date:.....