

University of Bradford

Learning Teaching and Assessment Strategy

Policy and Guidance on the Inclusive Assessment of Students

1. Introduction

The following policy and guidance has been developed to ensure that the University of Bradford complies with its obligations in relation to the Disability Discrimination Act 1995 (DDA), the Special Educational Needs and Disability Act 2001 (SENDA) and the Disability Equality Duty (DDA 2005). It also aims to help develop best practice for the inclusive assessment of all students.

Disability legislation protects disabled students in all aspects of their studies. In developing a policy and guidance on making 'reasonable adjustments' to assessment practice, the University of Bradford is being proactive in promoting anti-discriminatory practice. Under the DDA it is unlawful to put disabled students at a substantial disadvantage. Under the Act there are 4 forms of unlawful discrimination:

- Direct Discrimination, which is less favourable treatment because of a person's impairment
- Failure to make reasonable adjustments
- Disability Related Discrimination
- Victimisation

2. Scope of the policy and guidance

2.1 Assessment and examinations policies, practices and procedures need to provide disabled students with the same opportunity as their peers, to demonstrate the achievement of module and programme learning outcomes. Adjustments for disabled students will be designed to offer equal access to the assessment and equal opportunity to demonstrate knowledge and competence. The same academic standards will be applied to all regardless of impairment.

2.2 This policy and guidance covers all the University of Bradford's procedures in relation to all forms of assessment and includes examinations, both formal and otherwise, coursework, class tests, phase tests, lab tests, practicals, and presentations. Formal examinations are those handled administratively by the University Examinations Office and may themselves be of various types, e.g. closed book, short answer questions; MCQs; single essay; and so-on. A main purpose of assessment is to evaluate whether a student has achieved the required

learning outcomes and can demonstrate the appropriate academic competencies achievement and skills. To do this, assessments must be rigorous regarding standards so that all students are genuinely tested against an academic benchmark. If they are to fulfil their purpose they must also be flexible regarding the mode of measurement so that each student has an equal opportunity to demonstrate their achievement. In some circumstances this may mean a change to existing assessment practices while still ensuring that, valid and reliable assessment strategies are used and without compromising academic standards. In all cases it will mean being clear about precisely what is being assessed so that modifications may be made without compromising academic standards. The competencies themselves need to be disability proofed, to ensure they are genuine and relevant, if not they need to be changed.

2.3 This policy and guidance therefore governs both assessment via formal examination and that falling under the control of Schools, their departments, divisions or individual members of staff. This policy and guidance also relates to assessments under the jurisdiction of external bodies, eg people administering placement assessments for vocational and professional courses and those administered by qualifying/regulatory bodies e.g. GMC. Deans of Schools are ultimately responsible for ensuring that the Policy and guidance is followed within their School. This policy and guidance governs the assessment of all students and thus includes: part time, associate, undergraduate, taught postgraduate and research students, with permanent or long-term impairment requiring adjustment.

2.4 Definition of Disability

This policy and guidance uses the Part 1 of the Disability Discrimination Act to define a disability. This policy and guidance will therefore relate to students with a wide range of impairments and conditions including:

- Physical or sensory impairment
- Mental health difficulties, such as depression
- Specific learning difficulties such as dyslexia
- Health conditions, such as Alzheimer's, HIV, epilepsy, arthritis and cancer

The impairment must have a substantial, adverse effect on a person's ability to carry out normal day-to-day activities and have lasted for at least 12 months or be likely to last for 12 months or more.

2.5 In the University of Bradford any request for adjustment to assessment must be based on a recommendation from the Disability Service

following an assessment of the student's requirements and backed up with relevant evidence in the form of one of the following:

- A medical practitioner's letter or report
- A mental health practitioner's letter or report
- An up to date educational psychologists report
- A qualified teacher's report

- 2.6 The policy and guidance will operate within established policies and procedures and will enable disabled students to fully demonstrate their ability in connection with their assessment.
- 2.7 If it is conceivable that some adjustments which might be needed by some disabled students would not be possible, perhaps because they would conflict with academic or other prescribed standards, then it is essential that if appropriate, this information is made available to disabled applicants for the course or programme of study.
- 2.8 Many of the adjustments required for the assessment of disabled students can and should also be applied to course delivery, such as providing text/materials in an alternative format or assistive technology
- 2.9 This policy and guidance does not govern the assessment of students with temporary illness or impairment. Such cases for adjustment should be made in accordance with Section 4 of the Regulation on the Conduct and Invigilation of Examinations.

3. Statement of general principles

Recognising difference and knowing when and how to change learning and teaching and assessment practice for disabled students, is called: making 'reasonable adjustment'. The duty to make 'reasonable adjustments' is the cornerstone of the Disability Discrimination Act and applies to disabled students with a range of impairments.

Disabled students have a responsibility to ensure that they let the University know if they have an impairment that may entitle them to adjustments to assessment processes.

Each student's requirements will be different. If equality of opportunity and academic rigour are to be in balance, adjustments need to be determined on an individual basis. For these reasons it is not feasible to draw up rigid procedures. Equality is not about treating people in the same way, but about treating people equitably.

It is not unlawful to afford more favourable treatment to disabled students so that extra time in exams, an amanuensis, or use of CCTV may represent more favourable treatment but are clearly appropriate and different ways of ensuring

equality in assessment. The following general principles should be adopted to provide a broad framework within which decisions about individual students can be taken:

- 3.1 All reasonable steps should be taken to enable disabled students to demonstrate their ability to fulfil the assessment requirements. The duty to make reasonable adjustments goes beyond simply treating disabled people less favourably. In some cases it may mean taking additional steps to which non-disabled people are not entitled. The duty to make reasonable adjustments arises where a provision, criterion or practice, other than a competence standard applied by or on behalf of the education provider places disabled people at a substantial disadvantage compared to people who are not disabled.
- 3.2 All students are expected to respond to the questions set for assessment, although adjustments may be made to enable disabled students to do so in differing ways. For example a disabled student may be able to respond to the questions set in an exam, using a computer.
- 3.3 All students are expected to be able to interpret the questions in the manner required by the assessment, although adjustments may be made to enable disabled students to do so in differing ways. For example a student with dyslexia who has difficulty with interpreting the written word may have a reader or have the exam questions recorded.
- 3.4 If any modification to questions is required for disabled students, these should be confined to the essential minimum. For example a student whose first language is British Sign Language (BSL) may have the language in an exam paper modified, but this should be kept to the minimum.
- 3.5 In some cases it may be necessary to adapt the mode of assessment in order to make a reasonable adjustment; any modifications must ensure that academic standards are not compromised. For example, a disabled student who would be significantly disadvantaged by having to provide an oral presentation in front of a group might be offered the opportunity to pre-record their responses or to undertake a written response. Notwithstanding this, it is important to ensure that when learning outcomes for a programme or module are developed and/or reviewed, care is taken to ensure that they do not present unnecessary barriers to disabled students.
- 3.6 No students should be allowed to circumvent the learning outcomes of the module. Although reasonable adjustments can be made to the learning to ensure it is accessible. This is especially important in the case of professional programmes - such as nursing, optometry,

pharmacy - where there is an overriding requirement that the student demonstrates that they meet all the professional standards associated with the award. Reasonable adjustments may be made to assessments to enable students to demonstrate that they have met the professional requirements, but the professional standards themselves cannot be changed. All providers are responsible for implementing the competence standards (whether internal or external) in a non-discriminatory way. In cases where professional programmes are required to meet standards set by external bodies, course or programmes should consult with the relevant professional body to discuss the application of the standards in respect of individual disabled students.

- 3.7 Any adjustments or provision should not give a disabled student an unfair advantage over the other students
- 3.8 In making reasonable adjustments health and safety should not be compromised. However health and safety issues should not be used spuriously as an excuse for not making adjustments. Health and safety law and the DDA when used appropriately work together to ensure that disabled students can be assessed in a safe and secure environment. It is essential that the risk assessment process is seen as an inclusive and enabling process, identifying the adjustments needed rather than being used as a process which excludes. Risk assessment should be carried out in partnership with the student. Advice may be sought from the Health and Safety Office and the Disability Service.

4. The process for facilitating adjustments to assessment arrangements

- 4.1 As soon as a disabled student or one with long term health condition alerts the University to their need for reasonable adjustment, an assessment of needs/entitlements, should be undertaken with the student, and written permission from the student to communicate information relating to their entitlements should be obtained by the Disability Service.
- 4.2 The student should contact the Disability Service to submit a formal request, normally two months in advance of an examination date or the submission date for an assignment.
- 4.3 The Disability Service acting under delegated responsibility from the University Senate, will carry out an independent and professional assessment of the impact of a student's impairment. Any requests for adjustments to assessment must be approved by the Disability Service

and backed up by appropriate evidence, such as an Educational Psychologist's report or medical evidence.

- 4.4 Recommendations for reasonable adjustments must be achieved in consultation with the student and made on an individual basis depending on the student's requirements, so as to minimise possible discrimination and not to advantage the student, (see paragraph 3.7 'Statement of General Principles' above). Examples of suitable adjustments are outlined below and advice may be obtained from the Disability Service.
- 4.5 The Dean of the School (or their nominee) responsible for the module for which adjustment is requested will have the final responsibility and authority to approve requests, following consultation with the Disability Service, as outlined in these procedures.
- 4.6 Students who have disclosed that they are disabled to a member of staff in their School and have not had an assessment of their needs/entitlements, should be referred (with the student's permission) or self-refer to the Disability Service for reasonable adjustments to be agreed.
- 4.7 The School responsible for the administration of the course of study should be proactive in ensuring that disabled students are informed of their right to request adjustment. Opportunities to promote this should be provided at induction, and at ongoing points during their course of study, via course tutors, module leaders and personal tutors.
- 4.8 For centrally organised formal examinations, the Disability Service, with written permission from the student, will make the name of the student and the details of the recommended adjustments available to the Examinations Office through the agreed electronic systems (SAINT), on or before the agreed deadline.
- 4.9 The Disability Service, with written permission from the student, will make the name of the student and the details of the adjustments available to the Dean or nominee, from the student's home school, via a Learner Support Profile and through the agreed electronic systems (SAINT), for information.
- 4.10 For locally organised assessments, the Disability Service, with written permission from the student, will make the name of the student and the details of the adjustments available to the Dean or nominee, from the student's home school, via a Learner Support Profile and through the agreed electronic systems (SAINT).

- 4.11 Any financial costs incurred in regard to approved arrangements for disabled students for formal examinations administered by the Examinations Office will be borne by the central examinations budget.
- 4.12 Any costs incurred for locally administered assessments will be borne by the student's home School.
- 4.13 The Examinations Office will be responsible for the accommodation and invigilation of the centrally administered examination of all students requiring adjustments.
- 4.14 Schools will be responsible for the accommodation and invigilation of locally administered assessments and should contact the Disability Service for advice regarding arrangements if necessary.

5. Examples of adjustments

Outlined below are some recommendations of how adjustments can be made to a range of assessments. Effective adjustments that enable disabled students to demonstrate that they have met the learning outcomes will rely on a dialogue and mutual understanding between the student, the Disability Service and the School. The examples below are offered as suggestions and should not be applied in the same way to all students with similar impairments or health condition, but negotiated on an individual basis.

These have been extracted from the guidance commissioned by the Disability Rights Commission (now the CEHR) produced in partnership with SKILL, Universities UK, Universities Scotland, Higher Education Wales and SCOP, with support from the Higher Education funding Council (HEFCE). Further details of a range of examples can be found in the DDA Code of Practice (revised) for providers of post-16 education and related services at:

[http://www.equalityhumanrights.com/Documents/Disability/Education/Code%20of%20Practice%20\(revised\)%20for%20providers%20of%20post16%20education%20and%20related%20services.doc](http://www.equalityhumanrights.com/Documents/Disability/Education/Code%20of%20Practice%20(revised)%20for%20providers%20of%20post16%20education%20and%20related%20services.doc)

5.1 Adjustments to formal written examinations

Many disabled students may be put at a substantial disadvantage by a written examination because they do not write, or have the stamina required to write or concentrate for a sustained period of time. In some cases it may be the examination paper itself that presents a barrier, because the language in which it is written may be easy to misinterpret by a student whose first language is Sign Language or who has dyslexia. The following list, while not exhaustive, provides some examples of reasonable adjustments:

- Amending the language in exam papers so that the wording of the paper is as clear and straightforward as possible and to avoid unnecessary jargon.
- Providing a reader to read out questions.
- Providing the paper in large print, Braille or other formats.
- Allowing extra time for students who are deaf or dyslexic so that they can spend more time ensuring they understand the question, or checking their answers for spelling and grammar.
- Allowing time for rest breaks for example to students who experience fatigue or who have back problems and need to stretch.
- Providing an amanuensis (scribe). Students may need some time to practice with an amanuensis before the exam. Amanuenses may need to have some familiarity with the subject matter.
- Allowing a student to submit scripts on computer. This will also entail making sure that the computer is “clean” and that technicians are on hand to deal with problems.
- Ensuring that those with extra time or other arrangements sit their exam in a separate room (with a separate invigilator) to prevent them disturbing, or being disturbed by, others.
- Adjusting the examination timetable and keeping the student in “isolation” to allow a student who as a consequence of their impairment experiences significant fatigue, to take appropriate rest between examinations.

5.2 Support Workers

In many cases disabled people will require human support to undertake examinations and assessments. The involvement of another person in the assessment does not devalue the qualification as long as sensible precautions are in place.

- All examinations should be invigilated, including those where a student has a support worker, language service professional or amanuensis with them.
- Amanuenses, language service professionals and other support workers usually need to have some knowledge of the subject.
- Support workers need to have appropriate practical skills or qualifications for the task. For example, in a viva, a language service professional’s skills need to be sufficient to reflect the breadth of knowledge and ability of the student.
- Support workers need to understand the limitations of their role. For example, those acting as ‘hands’ in practical sessions should act only under instruction.

- Students' friend's relatives or immediate tutors should not usually act as support workers in examinations or assessments.

5.3 Viva, Orals and Presentations

Vivas and presentations may be easier than written examinations for some disabled students, but much harder for others. It may be helpful to bear in mind the following:

- Students who find standard means of communication difficult, or who use sign language need to be able to make presentations in alternative ways, or be given additional time to communicate.
- Sign language interpreters or other support workers need to have high level skills if they are not to disadvantage the student.

5.4 Group work

In group work it is important that both the disabled student and the non disabled students in the group can contribute equally to the project and have the opportunity to show their abilities. If academic staff have concerns or would like advice on facilitating inclusive group work they should contact the Disability Service.

- In group situations, with the disabled student's permission, tutors may need to talk through, any practical difficulties that might arise because of an individual's impairment and make sure any appropriate adjustments can be implemented.
- Other students may need awareness raising so that they can appropriately involve a disabled person in the group. In some instances the group may need disability equality training so that for example they know how to communicate with a deaf person.
- Where group discussions are assessed, adjustments may need to be made to ensure full contributions from students with communication impairments. For example, if a hearing impaired student who uses lip reading as a means of communication is to contribute fully, it will be essential for all members of the group to be aware of the need to face the disabled student and let them know when they are speaking/ or sensitive to the need to give time to a student with a speech impairment.

5.5 Practicals and performances

In vocational and professional courses and in practical subjects, disabled people need to show their practical skills like other students. Some disabled students who need adjustments in written assessments may not experience any barriers in practical situations and so may not need adjustments. For others it may be

necessary to make adjustments to the practical assessment to enable disabled students to demonstrate their abilities.

- Some students may require assistants to act as extra hands. For example a student with manual dexterity problems might use an assistant, under instruction to measure chemicals or operate machinery.
- Some students may require extra time. For example someone with a mobility difficulty may be eligible for extra time to move between patients when taking patient histories for a medical exam.

5.6 Computer assisted assessment

Technology can unlock doors but also create new barriers for disabled people. Good practice guidelines are available from the World Wide Web Consortium (W3C) and also from TechDis In setting up computer assisted assessment staff will need to consider and ensure that:

- Workstations with enabling technologies are available where necessary and that the assessment is accessible to those using such technologies (for example, screen reading software) or those who cannot use a mouse.
- That the layout and structure of the assessment is suitable for students with dyslexia or with partial sight.
- That any sound clips have text alternatives or sub-titles.
- That the software can allow students to have extra time or to take rest breaks during the assessment.
- That tutors monitor automated marking to ensure, for example, it does not pick up misspellings as wrong answers?

5.7 Dissertations and course work

Some students may be disadvantaged by the requirement to produce regular course work or longer pieces of work. Discussion between the tutor and student will help in most cases to ensure that both the integrity of the assessment and the requirements of the student can be accommodated. In some cases the following may be reasonable adjustments:

- Provision of study skills support covering essay writing or dissertation skills.
- Flexible deadlines for coursework.
- Comments on course work in alternative formats.
- Support in researching booklists for those unable to 'browse' in the library.
- Presentation of course work in alternate formats BSL on video, audio tape, large print, orally or a combination of these?

5.8 Work-based assessment

In many cases, once adjustments have been made to working conditions or assessment criteria or methods no adjustments will be needed. In other cases some adaptations will be required and these may include:

- Ensuring that assessors in the workplace have been trained in how to assess disabled people.
- Assessment criteria are adjusted to take into account any adaptations that have been made to the placement?

5.9 Alternative modes of assessment

It may be possible to make adjustments to enable disabled students to use the same assessment methods as non disabled students. In other situations it may be appropriate to offer alternative assessment methods to prevent a student being placed at a substantial disadvantage and to ensure academic rigour is maintained. Any alternative modes of assessment will need to be negotiated between the student, the Disability Service and the School following an assessment of needs/entitlements.

- A student with dyslexia or whose first language is sign language might be able to make a presentation instead of producing a written project.
- Similarly students who have difficulty with writing might be able to take a viva instead of sitting written examinations.
- A student who for reasons relating to their impairment, eg mental health difficulties experiences debilitating levels of stress or fatigue at examination time then production of additional course work rather than a final exam could be considered.

5.10 Keeping adjustments under review

It is almost impossible to set up adjustments at the beginning of a student's academic career which will hold good right to the end of a course. Lecturers and students may need to experiment with different adjustments to see what works best, especially if a person's condition or impairment fluctuates. Different adjustments may be appropriate for different types of assessment, and a student's requirements may change over time.

- Students should be asked to give feedback on adjustments to assessments after each assessment period or at the end of each semester. Adjustments for individual students should be routinely and regularly reviewed, by the Disability Service and with the student.
- The University Data Centre should be advised by each School to produce statistics on the examination and assessment results of

disabled students, to compare with those of non-disabled students so that any difficulties can be identified. These should be disaggregated so that the University is able to evaluate what is happening to students with different impairments and can target action eg to students with mental health issues or dyslexia.

Other resources and advice

For more information on good practice for disabled students in examinations and assessments see:

- **LTSN Generic Centre Assessment Series No 8: A Briefing on Assessing Disabled Students**
Available on www.ltsn.ac.uk/genericcentre/projects/assessment
- **Teachability: Creating an accessible curriculum for students with disabilities**
Available on www.teachability.strath.ac.uk
- **Demos Project**
For a module on assessment and other materials related to disabled people www.demos.ac.uk
- Code of Practice for the Assurance of Academic Quality and Standards in Higher Education. Section 3: Students with Disabilities
Available from the Quality Assurance Agency for Higher Education www.qaa.ac.uk
- **Dyslexia in Higher Education: Policy, provision and practice**
Report of the National Working Party on Dyslexia in Higher Education
University of Hull, 1999
- The Coordinator's Handbook
Skill (see below), 1997
- **Accessible Curricula**
Available on www.techdis.ac.uk

For information on making electronic material accessible see:

- **TechDis website**
www.techdis.ac.uk
- **DDA Code of Practice (revised) for providers of post 16 education and related services**
[http://www.equalityhumanrights.com/Documents/Disability/Education/Code%20of%20Practice%20\(revised\)%20for%20providers%20of%20post16%20education%20and%20related%20services.doc](http://www.equalityhumanrights.com/Documents/Disability/Education/Code%20of%20Practice%20(revised)%20for%20providers%20of%20post16%20education%20and%20related%20services.doc)