

New Statutory Guidance: Consultation on New Statutory Guidance to Support the General Conditions of Recognition

How to respond to this consultation

The closing date for responses is 31 January 2016.

You can respond to this consultation in one of three ways:

- Complete the online response at <http://www.surveygizmo.com/s3/2480928/consultation-on-new-statutory-guidance-to-support-the-general-conditions-of-recognition>.
- Email your response to consultations@ofqual.gov.uk. Please include the consultation title 'Statutory Guidance' in the subject line of the email and make clear who you are and in what capacity you are responding.
- Post your response to Statutory Guidance Consultation, Ofqual, Spring Place, Herald Avenue, Coventry, CV5 6UB, making clear who you are and in what capacity you are responding.

Evaluating the responses

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the information page.

A third party may evaluate the responses on our behalf. Any personal data (such as your name, address and any other identifying information) will be processed in accordance with the Data Protection Act 1998 and our standard terms and conditions.

We will publish the evaluation of responses. Please note that we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us that you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may quote from your response anonymously.

Responding to the consultation

Your details

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the following information section.

We will publish our evaluation of responses. Please note that we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may quote from your response anonymously.

Please answer all questions marked with a star*

Name* **Ailin O’Cathain**

Position* **Policy Manager**

Organisation name (if applicable)* **Federation of Awarding Bodies**

Address: **133 Houndsditch, London EC3A 7BX**

Email: **ailin.ocathain@awarding.org.uk**

Telephone: **0203 7665353**

Would you like us to treat your response as confidential?*

If you answer yes, we will not include your details in any list of people or organisations that responded to the consultation.

Yes **No**

Is this a personal response or an official response on behalf of your organisation?*

Official response (please answer the question ‘If you ticked “Official response”...’)

If you ticked “Official response”, please respond accordingly:

Type of responding organisation*

- Awarding organisation
- Local authority
- School or college (please answer the question below)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative or interest group (please answer the question below)

Type of representative group or interest group

- Group of awarding organisations
- Union
- Employer or business representative group
- Subject association or learned society
- Equality organisation or group
- School, college or teacher representative group
- Other (please state below)

Trade Association for vocational awarding organisations.

The Federation of Awarding Bodies is the trade association for vocational awarding bodies with over 140 organisations in membership ranging from large generic awarding bodies to those working in specific occupational areas, including professional bodies. The majority of our members are regulated by Ofqual and we therefore have a significant interest in the proposed guidance on the General Conditions of Recognition (GCRs) and welcome the opportunity to make this submission for Ofqual's consideration.

This response is submitted on behalf of the FAB membership following consultation with them and with the Federation's Board of Directors. However, awarding bodies are a diverse community and our members may wish to make their own individual submissions containing their own particular perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

Nation*

England

Wales

Northern Ireland

Scotland

Other EU country: _____

Non-EU country: _____

The Federation's members operate in all of the nations listed above.

How did you find out about this consultation?

Our newsletter or another one of our communications

Our website

Internet search

Other

May we contact you for further information?

Yes No

The Federation of Awarding Bodies (FAB) welcomes the opportunity to comment on Ofqual's draft guidance to support the General Conditions of Recognition (GCRs). We recognise that Ofqual is aiming to develop guidance which supports awarding organisations (AOs) understanding of the GCRs without being prescriptive. We understand that striking the right balance within the guidance is likely to be challenging and we are happy to support Ofqual's on-going work to develop guidance on further GCRs in the future. We also recognise and welcome the efforts made by Ofqual, through the provision of consultation events for AOs in the Summer of 2015, to ensure that the draft guidance provides a sound basis for formal consultation activity.

Before we provide comments on each of the specific areas of draft guidance in the consultation document the Federation wishes to make some general points relating to the provision of statutory guidance:

1. The Federation's response to the Ofqual consultation on a Risk Based Regulation in April 2012 (which included draft guidance on Condition A8 Malpractice and Maladministration), made a number of points that we feel continue to be of relevance and we would like to restate these:

- The Federation and our members have always stated a preference for the GCRs to be written with a level of clarity which would negate the need for additional guidance. However, we recognise that given the way the GCRs are currently articulated that there is potential value in seeking to clarify the requirements through the provision of additional guidance. The Federation's preference continues to be that there should be a clear and unambiguous articulation of the GCRs which supports our members in their work to fully comply with the GCRs on a consistent basis.
 - There continues to be a degree of concern about the status of guidance and the potential for it to become an additional set of rules which adds to the requirements of the GCRs or prescribes specific ways of working which may not be suitable for all AOs. The Federation would not wish the guidance to become overly prescriptive or take a 'checklist' approach. Neither would we want it to add additional requirements on top of those already contained in the GCRs.
 - To be of real use to AOs, guidance must do more than simply restate the GCRs using different words; no value will be added by an exercise of this type.
 - Positive and negative indicators must be sufficiently different to one another if they are to add value to the guidance; simply mirroring the same point in both sets of indicators is of little value.
2. The Federation believes that the provision of guidance by Ofqual is likely to have been of greater value had it been produced when the majority of AOs were initially analysing and interpreting the GCRs (from May 2011 onwards). The Federation appreciates that Ofqual needs to manage and allocate its resources effectively but we would have expected that a full suite of guidance would have been available by this time.
 3. We welcome that Ofqual has undertaken work to gather AOs feedback on the priorities for the development of guidance. Page 6 of the consultation makes reference to plans to 'consult on more guidance next year' and it would be useful for AOs to have sight of a timetable/plan for the provision of further guidance related to the remaining GCRs. Anticipated dates by which further guidance will be available could perhaps be added to the Ofqual 'periodic table' of the GCRs. The Federation continues to be committed to supporting Ofqual's work to develop further guidance during 2016.
 4. In compiling our response, the Federation has used seven principles as the basis for our consideration of the draft guidance:
 1. Whether the guidance is clear.
 2. Whether the guidance is relevant to the specific GCR.
 3. Whether the guidance adds value/clarity over and above what is already contained in the GCRs.

4. Whether there are any gaps in the guidance/areas that could be added to increase the usefulness of the guidance.
5. Whether the guidance has potentially strayed into territory where it could become overly prescriptive.
6. Whether there is unnecessary repetition across the positive and negative indicators.
7. Where the guidance raises broader questions about the clarity of the regulatory requirements or is not in keeping with the interpretation of a Condition that has previously been provided by Ofqual.

Questions

Question 1: Do you have any comments on our proposed guidance for A5?

Yes No

The Federation feels that overall the draft guidance for A5 is helpful as it provides some information which clarifies the intended meaning of the Condition. Our specific points of feedback are:

- The guidance contains some statements that do not add any clarity or value to the information that is already contained in the GCRs. For example, bullet point 1 reflects only what is already clearly stated in the GCRs.
- Bullet point 2 requires AOs to 'accurately forecast the demand for its qualifications'. A more effective indicator may be that the AO has systems, processes and approaches that support the accurate forecasting of demand.
- Bullet point 3 would possibly benefit from the inclusion of a reference to a system/approach for **identifying** any shortcomings. The effective identification of shortcomings will be essential before an AO can go on to address them.
- The inclusion in bullet point 4 of sub- point 1 does not seem to be relevant in this section of the guidance. The Condition is about an AO's **ability, capacity and resources** to develop, deliver an award and we feel that guidance on evidence of support for a qualification would be better covered in the guidance to support E1.

Question 2: Do you have any comments on our proposed guidance for B3?

Yes No

The Federation feels that overall the draft guidance for B3 is helpful as it provides information which clarifies the intended meaning of the Condition. However, there are a number of points that would benefit from further clarification:

- Bullet point 1 adds little, if any, value as it reflects only what is already in the GCRs.
- Bullet point 2 may better reflect a positive situation within an AO if it is extended to state 'has staff who understand their roles and responsibilities when managing events and understand how and when to notify Ofqual and who within the organisation is responsible/authorised to notify Ofqual.'
- Bullet point 3's sentence structure does not aid clarity and perhaps the 'managing event' point needs to be made separately. Also, is there a professional judgement to be made about *how* to notify Ofqual? There is clearly a judgement to be made about *when* to notify the regulator but we believe the 'how to' is more a matter of procedural knowledge than judgement.

- Bullet point 7 on page 10, which relates to what information to provide to Ofqual when making a notification, is detailed and useful but is an example of an area where guidance could morph into becoming a prescriptive checklist. It is useful for AOs to have clarity on the types of information that Ofqual would value. However, each event is likely to be slightly different and it is important that the flexibility remains for AOs to use this list as a guide which they can deviate from, as they see fit.

A member has advised the Federation that the 'New Event Notification' section of the prototype of the new AO Portal includes a form that requires the level of detail which Ofqual has specified in the draft guidance. If an AO is required to notify Ofqual as soon as it becomes aware of an event, then not all of the required information is likely to be available at the point of notification as some of it will only be gathered during further consideration and investigation of the event. It will be important that any templates that are included in the Portal are not overly prescriptive and reflect the information that an AO could reasonably be expected to have access to when they first report an event.

- Related to the sub-points under bullet point 7, the Federation would appreciate clarification of sub-point 3 'taking into account any requirements from Ofqual about how particular types of event should be reported'. We are not aware of specific requirements relating to how to report particular types of event and would welcome clarification of these requirements.
- Sub-point 5 (top of page 11) and sub-point 11 appear to duplicate one another.
- The guidance is quite lengthy and would benefit from the inclusion of sub-headings in relevant places e.g. where it moves on to provide positive indicators relating to B3.3.
- The final bullet point in the positive indicators section addresses information that an AO should provide to Ofqual in situations where it plans to offer a qualification which is 'substantially different' to those it has previously offered. This is an area of the guidance that would benefit from further clarification about when a planned qualification is 'substantially different' enough to require pre-notification to Ofqual. The guidance does not currently help AOs to be confident in where to draw this line of distinction. Some examples may be useful in supporting AOs in the professional judgement that will be required.

It would be useful if Ofqual could clarify its expectation that, even where an AOs agreed scope of recognition includes specific levels and sectors, an AO is not free to move into offering qualifications at these levels and/or within these sectors if it has no history of such activity without first notifying Ofqual. It would also be useful to have an indication of what response an AO can expect following such a notification; is this notification just for Ofqual's information, will Ofqual ask the AO to provide further detailed information and could such a notification lead to audit activity from Ofqual prior to an AO being allowed to launch new qualifications in these areas?

It would also be useful to have a further clarification of what Ofqual means by 'type and content' which are the words used in the GCRs. In the guidance 'type and content' have been

interpreted as being 'nature, sector, level and assessment method'. The guidance seems to have expanded the definition of 'type and content' and we would request that Ofqual checks that this is a reasonable and intended interpretation before the guidance is finalised and published. The Register contains a list of 'types' such as Functional Skills, GCSE etc. and it would be useful if Ofqual would confirm that it is this list that they have in mind when referring to 'type'. Also, the term 'nature' is used in the guidance and it is not clear what this means. In the sub-points of the guidance the emphasis on 'substantial' difference is lost and it is not clear what plans an AO would need to notify Ofqual about.

- An additional positive indicator could be that the AO has internally articulated and exemplified is likely to be classed as an adverse effect or a potential adverse effect to support consistent decision making within the organisation and to avoid over or under-reporting of events to Ofqual.
- In the negative indicators section, bullet points 2 and 3 could be combined.
- Bullet point 4 could be made clearer by stating that 'it' is Ofqual and not the AO i.e. 'does not notify Ofqual of an event before *Ofqual* becomes aware of it through other means...'. The Federation's comments, below, in response to question 3 are also relevant here in terms of the need for clarity on when an AO should notify other AOs as there is some ongoing inconsistency of interpretation of this point.
- Bullet point 5 in the negative indicators replicates a positive indicator so adds little value to the guidance.
- Bullet point 7, about reoccurrences of events, would benefit from the addition of 'where it would have been possible to take effective preventative action in response to an earlier, similar event'. For example, learners have been cheating since exams began and every AO has probably dealt with an event of this nature. Despite the many safeguards that AOs have put in place learners will continue to find ways to cheat and there is no way that AOs can eradicate reoccurrences of this type of event from the system completely.
- Bullet point 12 replicates a positive indicator and only adds information about the need for notification to be sufficiently far ahead. The positive indicator could be amended to reflect this and the negative indicator could then be removed.
- Bullet point 13 could be extended to include not just marketing but also approving centres, registering learners and awarding.

Question 3: Do you have any comments on our proposed guidance for C2?

(X) Yes () No

The Federation feels that overall the draft guidance for C2 is helpful. This Condition is one which our members have been highlighting as a priority for the provision of guidance for some time and we welcome the work Ofqual has undertaken to now make this available. However, there are places

where the guidance seems to add to the requirements of the GCRs rather than aid understanding of what the current requirements are. Our points of feedback are:

- Bullet point 1 refers to the provision of 'training and support' by the AO to the centre. The Condition requires that 'information' is provided to the centres. The Federation is concerned that the guidance therefore goes beyond what is required to comply with the Condition and potentially adds a training provision burden onto AOs.
- The final bullet point, on page 14, lists a number of actions related to the management of third parties. However, the guidance seems to go over and above the requirements of the GCRs. C2 makes no reference to the processes required to manage the third parties that **centres** decide to work with. The Federation does not dispute the importance of the effective management of third parties but this area of the guidance appears to be prescriptive and related to an area that is not currently referred to in C2. It therefore appears that the guidance is being used to add to the current regulations, not clarify what the existing regulations require for compliance. Similarly, on page 15, reference is made to collecting and analysing data to inform risk but this goes beyond what one would reasonably interpret C2 to require.
- Bullet point 3, on page 16, touches on an on-going issue which the Federation has raised with Ofqual on a number of occasions; at what stage is an AO required to notify other AOs and agencies of an event. The most recent communications from Ofqual on this matter confirmed that to comply with the GCRs an AO needs to do this at the point where it is '**case proven**'. To notify other parties at an earlier stage, for example, where there is a 'concern' will potentially expose an AO to significant risks. The guidance suggests that compliance requires communication at the point at which an AO identifies 'a concern'. This is unhelpful for a number of reasons:
 - a- It is inconsistent with the information that we have most recently received from Ofqual on what is required to comply with the requirement to notify other AOs.
 - b- It illustrates the continued inconsistency and changing of the regulator's position on this point which is deeply unhelpful to AOs.
 - c- It opens AOs up to significant risks if they rely on the guidance to help them to interpret the requirements of the GCRs. These risks relate to data protection (which the point in the draft guidance seems to try to accommodate) but also risks of legal action for defamation etc.).

The Federation feels that it is important that Ofqual should publish a formal and final statement on its requirements in this area so we can avoid future inconsistency in the information provided by the regulator on this point.

Question 4: Do you have any comments on our proposed guidance for D3?

(X) Yes () No

The Federation feels that the draft guidance for D3 is very helpful in aiding the understanding of the requirements of this Condition. Some of the negative indicators are less helpful as they add little to what is contained in the positive indicators and the GCRs. Overall this is a useful piece of guidance.

Question 5: Do you have any comments on our proposed guidance for D7?

(X) Yes () No

The Federation feels that the draft guidance for D7 is very helpful in aiding the understanding of the requirements of this Condition. Our points of feedback are:

- It is not clear what the bullet point 'uses staff who have the necessary expertise to operate the Register of Regulated Qualifications to manage the withdrawal or surrender of its recognition and the associated withdrawal of the qualifications' means. This point could be more clearly presented, especially in relation to the requirements related to the withdrawal or surrender of recognition.

Question 6: Do you have any comments on our proposed guidance for E3?

(X) Yes () No

This guidance raises an important issue in relation to the new Ofqual Portal and Register which will require AOs to provide and maintain links to specifications which are publicly available. Condition E3 requires AOs to publish specifications and the guidance indicates that these should be 'readily available to users'. However, neither the GCRs nor the guidance seems to require that the access to the specifications need to be **fully open and public**. In the past, AOs have in some cases published specifications for users in protected areas of their websites so their centres can access them, as and when they require. A concern has been raised by a member that the Portal/Register requirements for the future 'open' access to specifications will present a competitive issue for AOs in terms of the extent of the information that is held in specification being available to all other competitor AOs in a market and overseas markets. The Federation would welcome clarification from Ofqual about whether the legal interpretation of the Condition actually requires this public and open access to specifications or not.

Question 7: Do you have any comments on our proposed guidance for E5?

(X) Yes () No

The Federation feels that overall the draft guidance for E5 is helpful as it adds clarity to what is required to comply with this Condition. Our points of feedback are:

- Bullet point 3 refers to the need of reviewers to have appropriate *seniority* as well as competence. The Federation believes that competence to conduct this final review is the critical factor and this may well be found in staff who are not at senior officer level. For example, an AO with subject teams who lead on specific qualifications will have qualification development expertise and competence. They may be well placed to review a qualification that has been developed by another team. They will have the competence to do this but hierarchically may not be senior. Our preference would therefore be that the reference to seniority is removed as competence is the critical factor in this case.
- The final bullet point in the negative indicators relates to errors made by the AOs in information that is submitted to the Register. The Federation would point out that the complex nature of the RITS system has in the past contributed to the errors made and we hope that the new Portal succeeds in providing AOs with an more intuitive and straightforward system to use which contributes to the reduction in future error rates.

Question 8: Do you have any comments on our proposed guidance for G1?

(X) Yes () No

The Federation feels that overall the draft guidance for G1 is helpful as it adds clarity to what is required to comply with the Condition. Our points of feedback are:

- Bullet point 3, sub-point 2 indicates that AOs should take costs of assessments into account. The Federation does not dispute that this is an important factor but feels it is important to state that there is a risk that some of the emerging assessment strategies for the new Trailblazer assessments will drive assessment costs up and there will be little that AOs who are also approved on the SFA's register of apprentice assessment organisations can do about this, other than withdraw from the market. Similarly, where other government agencies attach criteria which demand specific, non-negotiable, approaches to assessment this is not helpful to AOs who may otherwise have selected a more cost effective approach.
- Some of the negative indicators duplicate the Condition and/or the positive indicators. For example, negative indicator 1, sub-point 3 (do not cover the full range of demands targeted by the assessment) duplicates positive indicator 2, sub-point 1 (cover the full range of demands targets by the assessment).

Question 9: Do you have any comments on our proposed guidance for G3?

(X) Yes () No

The Federation feels that overall the draft guidance for G3 is helpful as it adds clarity to what is required to comply with the Condition. Our points of feedback are:

- Some of the negative indicators duplicate the positive indicators so add little value. For example, negative indicator 2 (which refers to language and stimulus materials) duplicates positive indicator 4.

Question 10: Do you have any comments on our proposed guidance for G6?

(X) Yes () No

The Federation feels that parts of the draft guidance for G6 are helpful. Our points of feedback are:

- The guidance seems to go further than the requirements of the Condition in that bullet points 9-13 focus on data collection in relation to reasonable adjustments. We cannot identify where this is required by the Condition and we therefore question whether this is 'guidance' to the existing Condition or the addition of an extra layer of regulatory requirements for AOs.

Question 11: Do you have any comments on our proposed guidance for G7?

(X) Yes () No

The Federation feels that parts of the draft guidance for G7 are helpful. Our points of feedback are:

- The guidance seems to go further than the requirements of the Condition in that bullet points 9-11 focus on data collection in relation to special considerations. We cannot identify where this is required by the Condition and we therefore question whether this is 'guidance' to the existing Condition or the addition of an extra layer of regulatory requirements for AOs.
- The guidance also seems to infer that a qualification by qualification approach should be taken to the provision of information relating to special considerations and not an overall approach which can then be applied to specific cases, as and when they arise. This granular approach is not articulated clearly in the Condition and we therefore question whether the guidance is adding to the Condition rather than clarifying its current meaning.
- The guidance has been useful in clarifying that access arrangements that are agreed prior to an assessment may be classed as special considerations where they are not in response to a 'disability' as defined by Equality legislation.

Question 12: Do you have any comments on our proposed guidance for G8?

(X) Yes () No

The Federation feels that parts of the draft guidance for G8 are helpful. Our points of feedback are:

- The guidance seems to go further than the requirements of the Condition in that bullet point 3 infers that an AO should be consulting with centres about assessment arrangements and providing training to centres (which is also referred to under bullet point 4). We cannot see where the Condition requires training activity to take place and feel this potentially adds an additional resource burden for AOs. AOs will provide information to centres to make the requirements clear, but the provision of training should not be seen as being a requirement for compliance with the Condition.

- In addition, bullet point 4, sub-point 4 does not aid clarity and would benefit from the addition of an example of the type of activity that Ofqual would view as being compliant in these circumstances e.g. a signed learner declaration.

Question 13: Do you have any comments on our proposed guidance for G9?

Yes () No

- The guidance seems to go further than the requirements of the Condition in that bullet point 3 infers that an AO should providing training to centres. We cannot see where the Condition requires training activity to take place and feel this potentially adds an additional resource burden for AOs. AOs will provide information to centres to make the requirements clear, but the provision of training should not be seen as being a requirement for compliance with the Condition.

Question 14: Do you have any comments on our proposed guidance on correcting incorrect results?

Yes () No

The draft guidance on incorrect results is useful overall and the Federation would suggest that:

- The guidance would benefit from further editing, particularly in the introductory stages. It takes quite a lot of time to get to the real point of the guidance. We understand the need to refer back to the GCRs and state where an AO will be non-compliant in cases where it has issued an incorrect result, but there is quite significant word count allocated to the introductory/scene setting section of the document.
- It is useful to have the factors that an AO should consider in such cases laid out in the guidance. This section would benefit from the addition of further information on the relative weighting of these factors in the decision making process.
- The guidance does not cover what an AO should do where it finds that an incorrect result has been issued but has no way of making contact with the learner(s). This situation can arise where there has been centre malpractice or fraud and certificates have been obtained for learners who have not demonstrated the required standards. If the centre ceases trading or refuses to cooperate then AOs may not be able to contact learners. In these cases it would be useful to have guidance on whether the result can be withdrawn, and logged as such on the AOs records, even if the learner may not be aware of the situation. Similarly, where a certificate has been issued and the learner is contacted but refuses to return it to the AO, it would be useful to have guidance on whether the result can be changed on the AOs records.
- Page 47 states that the default position is that AOs should change an incorrect result and this is useful to know. It might be helpful if this was stated as the starting point for the guidance

which then goes on to explore why an AO may decide to deviate from this default position. This may result in a clearer position on the types of considerations and factors that are likely to be sufficient to over-ride the default response.

- The final bullet point on page 44 would benefit from some further references to where Review Arrangements are in place and where Ofqual has put in place an appeal process.
- The guidance would benefit from the addition of information which clarifies what an AO should consider when they are dealing with a situation that may have resulted in **multiple learners** being issued with incorrect results. For example, if an AO identifies malpractice within a centre, and has reason to believe that this may have led to a number of learners being certificated before they have reached the required standard, it would be useful to have guidance on what the AO should consider in relation to the broad cohort of learners. This guidance should focus on whether the AO should consider withdrawing only the certificates that relate to specific learners who admit they knowingly obtained a certificate in an incorrect/ fraudulent manner or whether an AO should consider withdrawing certificates from a broader cohort on the basis of centre malpractice, even though the learners may not have been complicit in this activity. It would also be useful for the guidance to provide some clarity on whether public safety concerns can ever override the impact that certificate withdrawal could have on a learners in the broader cohort. For example, if centre malpractice led an AO to reasonably believe that a cohort of learners may have incorrectly obtained certificates in a social care qualification, would the fact that the learner may not be qualified and could potentially injure a vulnerable person override the impact that the withdrawal of the certificate could have on the learners? The guidance would benefit greatly from the exploration and clarification of this type of issue.

Accessibility of our consultations

We are looking at how we provide accessible versions of our consultations and would appreciate it if you could spare a few moments to answer the following questions. Your answers to these questions will not be considered as part of the consultation and will not be released to any third parties.

Do you have any comments or suggestions about the style of writing?

Yes No

- It would have been easier to clearly identify/reference the points to which feedback related if the bullet points under each section of draft guidance had been numbered.
- The Federation notes that Ofqual did publish a Word form for responses and we appreciate the provision of this form as it makes it easier for us to disseminate our draft response to members and gather their feedback and comments. This will also be useful to AOs where more than one person contributes their expertise to a response. It would be useful if Word response forms could be provided at the point of publication of the consultation and not added to the consultation page at a later date.

Do you have any special requirements to enable you to read our consultations? (for example, screen reader, large text, and so on)

Yes No

Which of the following do you currently use to access our consultation documents? (select all that apply)

- Screen reader / text-to-speech software
- Braille reader
- Screen magnifier
- Speech-to-text software
- Motor assistance (blow-suck tube, mouth stick, and so on)
- Other

Which of the following document formats would meet your needs for accessing our consultations? (select all that apply)

- A standard PDF
- Accessible web pages

- Large-type PDF (16 point text)
- Large-type Word document (16 point text)
- eBook (Kindle, iBooks, or similar format)
- Braille document
- Spoken document
- Other

How many of our consultations have you read in the last 12 months?

- 1
- 2
- 3
- 4
- 5
- More than 5