

16 October 2014

IMI Sector Skills Unit response to Ofqual's Consultation on the removal of the Regulatory Arrangements for the Qualification and Credit Framework

The IMI Sector Skills Unit is a standalone business unit of the Institute of the Motor Industry; The (IMI) being the professional association for those individuals working in the automotive retail sector. The IMI Sector Skills Unit holds the Sector Skills Council licence, and continues the duties of Sector Skills Councils such as employer-engagement, research, policy, National Occupational Standards ownership, qualifications development and Apprenticeship framework development and certification. The IMI Sector Skills Council is currently an Ofqual recognised Unit Submission Body and Rule of Combination body for the Qualifications and Credit Framework and we work impartially with all awarding organisations operating in the automotive retail sector.

1 Overall, The IMI Sector Skills Unit agrees with the general direction that is outlined in the consultation document. What should not be lost, however, are the positives that the Qualifications and Credit Framework (QCF) brought and it is pleasing to see that this is touched on throughout the consultation. We believe there are big challenges by removing the Regulation Arrangements for the Qualifications and Credit Frameworks, and that actually this could, if not handled carefully, completely destruct the vocational qualification system in terms of differences in standards, proliferation of qualifications and also employers walking away from qualifications because of the complexity and also lack of stability. Whilst we appreciate that the regulation will be of the awarding organisations through the general conditions, we would have concerns about how different qualifications across awarding organisations we're going to be monitored to ensure parity of assessment, level and outcomes.

By way of the response to the consultation we have not responded to each of the questions that have been asked as we felt this was not appropriate for us to do so, however, we have laid out our feedback as per below.

The IMI Sector Skills Unit (IMI SSU) is happy for our response to this consultation to be shared as appropriate, and we are more than happy to be contacted to discuss any of the aspects of the responses in further detail.

- Employer-voice and National Occupational Standards

One of the main concerns here is about impartial employer input into qualifications, particularly those qualifications that lead to employment or confirmation of competence. With the removal of the Regulatory Arrangements, what mechanisms will be put in place to ensure that the employer voice is heard directly (ie not through learning providers) and that also a coherence of qualifications that do not make the skills landscape confusing and convoluted for them. In addition where we have NVQ models of qualifications, what are the



mechanisms going to be for ensuring that competence-based qualifications, or NVQs, are going to be based on a nationally adopted standard? We welcome the note at point 2.2.1 about the value of organisations representing employer's wants and needs in the vocational qualifications, and this becomes even more important to emphasise in relation to the competence-based qualifications or NVQs to ensure that there is a consistent model across awarding organisations. What could be adapted here would be the role formally carried out by NTOs in partnership with the awarding organisations, which ensured that NVQs were based on National Occupational Standards, and were delivered in coherence with the Assessment Strategy developed with employers in the sector.

This must be preserved to maintain the integrity of the work-based qualifications, and any deviation from this threatens the reputation of competence-based qualifications, by awarding organisations developing conflicting models etc to one another.

- Proliferation of qualifications

One of the aspirations of the QCF, and still remains a centre point of feedback from employers, is to make the qualifications easier to understand and do what they say on the tin. It is not necessary the number of qualifications that becomes the issue, but the number of varying qualifications titles, especially where the qualifications may have different titles but lead to the same outputs. Care should be taken that closure of the QCF unit bank doesn't lead to proliferation of units and titles. We need to ensure that we keep as simple as possible the skills landscape for employers and learners, and fear that if we do not they will disengage. We acknowledge that in the consultation under point 2.7.4 of the consultation document that the number of qualifications stood at 16,800, but we would question whether the removal of the QCF Regulatory Criteria will address this, or whether we will see a similar number of qualifications but potentially, which will vary across awarding organisations.

- Consistency across awarding organisations

Aside from the concerns of proliferation of qualification units, titles and rules of combination articulated above, The IMI SSU would register concerns about how content and assessment may vary between awarding organisations, and ask the question about how Ofqual will measure and monitor qualification outputs across awarding organisations? How will we ensure that the level and integrity of the assessment of one awarding organisation will not be lower than another by assessment methods chosen? This needs careful thought, and if this is not considered thoroughly we could come back round to seeing the same issues that were seen with the NQF, which could see perverse drivers in consumer behaviour which do not support the quality aspirations of qualifications. This becomes particularly important where we are talking about competence-based qualifications or license to practice qualifications and this certainly supports the IMI Sector Skills Unit thinking in terms of a return to the National Training Organisation approach of setting National Occupational Standards and agreeing structures through the assessment strategies.

- Stability is key, as is messaging to stakeholders and we must learn from the past

Over the last 5 years, the IMI SSU under took major work which required cost and resource to introduce to the employers of the sector the QCF, including the benefits and also the workings of the QCF. This was on the back of much work with the NQF etc. We are just getting to the point where employers are familiar with the QCF, the workings of it

and the different naming conventions and the different types of qualifications that are in the sector, and now we are in the position where we have to go out and say that it is all going to be changing again. Care needs to be taken to ensure that this messaging is handled correctly, and that employer-led bodies are fully utilised in the messaging to ensure that employers and learners are kept up-to-date from a sector perspective.

Once any changes are made, we need some stability urgently. In the skills system there have been too many policy-led changes that have impacted on the end-user – ie the employer and learner, which is not of their making. The QCF in principle was something that the IMI were completely signed up to, and the aspirations of a unit, bite-sized approach was one that was welcomed by employers. But the trap was fallen into where the system was not fully tested from point a and b, and unfortunately where funding complications were introduced (eg unit funding) the QCF tripped up. Or another example was that there were going to be no qualification types at the beginning of the QCF – but then ‘NVQs’ were reintroduced. We must learn from this in that we need to fully test and carefully think out, with all stakeholder organisations, the implementation of any qualification system.

- The funding of qualifications with the removal of the Regulatory Arrangements

The IMI SSU believes that careful thought needs to be given to ensure that the funding of qualifications is clear, transparent and consistent for qualifications within a regulatory framework. How will it be ensured that where awarding organisations are developing their own qualifications that are not based on a shared structure that there will be equitable funding rates for qualifications? Who will be the gatekeeper for this, and how will it be ensured that funding does not become the driver for qualification take-up? These are key questions as again we have seen that funding has driven consumer behaviour and not necessarily for the right reasons or qualification outcomes

- Consistency across the 4 Nations

One of the pieces of constant feedback from employers in the sector is around the differences of the skills landscape and the portability of qualifications across the 4 home Nations. We must ensure that any changes do not create additional barriers to the portability of vocational qualifications, and also barriers to those employers who might be offering vocational provision across the 4 Nations.

- Timescales

We note the timescales to close the unit databank by January 2015. We believe that this is extremely ambitious. Why we believe that this is ambitious is that there may still be some units to which there are amendments being carried out in partnership with awarding organisations to units within qualifications as a result of recent National Occupational Standards reviews. We therefore believe that before the unit bank is closed, that sufficient time is given to enable unit submission bodies to get the units amendments through prior to the closure of the unit bank. To not do so we believe would leave units incomplete and leave them in the situation where they will not be up-to-date and may not be updated for some time.

In additions to the timescales associated with the closure of the unit databank, we also believe that the timescales need to be extended to enable standard setting bodies to work with awarding organisations to establish the way forward and this might, particularly for the competence-based qualifications, require substantial re-writing of assessment strategies, and even reverting to using the NVQ code of practice. This would also require substantial testing with the sector in terms of employers, learning providers etc.

- Design requirements of competence-based qualifications

Whilst we don't disagree with removal of the QCF design principles, we firmly believe that further thoughts need to be given to the underpinning requirements of competence-based qualifications – for example in terms of consistency, will these be required to be fully based on the National Occupational Standards; will there be the requirements for the full implementation of the NVQ Code of Practice to ensure consistency across competence-based provision around the assessment; and will there be the flexibility around the underpinning agreed assessment strategy. Of course, all of these questions presume that awarding organisations will have to work collaboratively with employer-led bodies around the competence-based qualifications particularly. As previously mentioned we believe that a firm decision on this needs to be made and communicated as part of this consultations findings.

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- Qualification structures and levels

The IMI SSU believes that qualification structures based on units, and a flexible mandatory and optional structure has worked extremely well with the QCF and the NQF and we would firmly support this being continued. What this also enables is the flexibility in the structures to enable application to support more than one job in the pathways. Whether or not the use of credit is applied should be left open and flexible for the awarding organisations to decide. Our view is that without the portability of qualifications and units across awarding organisation then the credit will occasionally become redundant. Nevertheless, the flexibility should remain.

Where we look at the use of 'Award, Certificate and Diploma' to refer to qualification size, we agree that this has sometimes been confusing to employers who have interpreted this as level, rather than breadth of learning. Ironically it is only now that the thinking has embedded and the Award, Certificate, Diploma does no longer need explanation. This being the case we have mixed views on whether the terms award, certificate and diploma should be lost. This is primarily based on the question as to what mechanisms will be used to define qualification size, which in our view does need defining because there are vast differences in the breadth of learning between 10 qualification and a 1000 hour qualification. Presumably the answer to this question will synergism with the current consultation on Guided Learning Hours, but it is our view that breadth still needs a way of clear articulation for the benefits of employers, learners and other stakeholders.

We also absolutely agree with the proposal that awarding organisations should articulate and measure the levels of qualifications and agree that this should be based against the



current levels. We believe that the current level descriptors are fit-for-purpose. We have no concerns with the removal of 'QCF' in the qualification titles but that as a general rule all qualifications should adopt a titling protocol that says what they do, the level but also guards against unnecessary proliferation of qualification titles in any framework which will only confuse stakeholders.

We hope that our response to the Ofqual consultation on the withdrawal of the Regulatory Arrangements for the Qualifications and Credit Framework has been useful, and please do not hesitate to contact us should you wish to discuss further.

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