

After the QCF: A New Qualifications Framework

1. Your details

We collect some standard details about all those who respond to our consultations.

The information you provide will be held by us. It will only be used to help us shape our policies and regulatory activity. We will treat your identity in confidence. However, we may wish to publish your organisation's view unless you inform us if you would not like us to do this.

Please provide us with the following information set out under the headings below.

Name:

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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.

No

Are the views expressed in response to this consultation your personal views or an official response from the organisation you represent?

Official response from an organisation/group

You selected 'official response from an organisation/group', please state which type of responding organisation you represent

Other representative group or interest group

Type of representative group or interest group

Employer or business representative group

Nation

England

How did you find out about this consultation?

Our newsletter or another of our communications

May we contact you for more information?

Yes

2. Consultation questions

1. To what extent do you agree or disagree that awarding organisations should assign an appropriate level to their qualifications?

Agree

Please give reasons for your answer

Awarding Organisations should be free to assign an appropriate level - provided there is clear guidance on the level descriptors, and the mechanisms to ensure that this is done with consistency. Where common qualifications and units are used across awarding organisations, it makes sense to limit proliferation that this is done in a joined up approach possibly through an independent body. The ways that this was done in the QCF is a good example of how collaboration works in assigning levels, where awarding organisations worked collaboratively with independent employer-led bodies. What is clear, is that the levels assigned should be clearly checked and verified.

2. To what extent do you agree or disagree that changing the level of a qualification would constitute a major change requiring an awarding organisation to notify us and others of the proposed change?

Strongly agree

Please give reasons for your answer

The changing of a qualification level is a important and drastic change to a qualification. It will change the purpose, occupation that it relates to - and should be treated as a new qualification. Everything will be affected around this change, guidance for centres/learners, assessment - and it is therefore much easier to treat as a new qualification. What should not be underestimated is the amount of work, time and cost that will be required of awarding organisations making these changes. The scale and breadth of the changes is no easy task requiring changes to assessment, promotion materials, syllabuses, websites, certificates etc. Are there going to be some funds released to support AOs in these activities?

3. To what extent do you agree or disagree that if an awarding organisation changes the level of a qualification it should be required to put in place, and comply with, a plan to protect the interests of learners?

Strongly agree

Please give reasons for your answer

Absolutely. The learner is key to this. A change to a level of a qualification is not an easy change, nor should it be treated as such. You have to carefully consider those who might already be registered against and have achieved the qualifications, and compare this to those who will in the future. A plan detailing how contact will be made with approved centres and learners must be agreed and put in place - and with Ofqual monitoring this to ensure no adverse effect on the learner undertaking the qualification. We still believe, however, that any changes to level should mean that the qualification should be seen as a new qualification, which would lead to more effectiveness of this plan.

4. To what extent do you agree or disagree that if an awarding organisation changes the level of a qualification it should provide clear and accurate information about the change to all relevant users of the qualification?

Strongly agree

Please give reasons for your answer

Key stakeholders need to be made aware of the changes of levels. One point worth considering around the messaging is the communication with centres, learners and employers - whom are already phased by the constant change in the skills and qualification system. Employers have now got to grips with the levels associated with the QCF - and so to communicate not only changes to levels, but, on a broader conversation that there is a change to the qualification framework - ie the withdrawal of the QCF and the introduction of the FRQ - in itself has the power to disengage stakeholders.

5. We propose to have level descriptors for two categories: knowledge and skills. To what extent do you agree or disagree with this proposal?

Neither agree nor disagree

Please give reasons for your answer

Whilst we agree with these descriptors, clear articulation needs to be given to underneath these headings to clarify what constitutes either a knowledge and skills qualifications. What about where you have combined skills/knowledge qualifications? A full analysis of whether current qualifications - and particularly the assessment methods fall into just these two categories needs to be carried out. We believe that there may be examples of qualifications that sit between both the knowledge and skills categories. Then a cross check of the level descriptors needs carrying out against the categories needs carrying out.

6. Are there any other categories for which you think we should have descriptors?

Yes

Please give reasons for your answer

Whether this needs to be a separate category or not - but certainly competence-based qualifications or NVQs needs to be fitted in - this might be under skills, but clear articulation needs to be given to those qualifications that are carried out in the workplace, which are not skills checks and are not carried out in simulated environments. Whilst NVQs were considered a broken brand - it still has legs in certain sectors and we believe that employers in the sector still hang on to and understand what an NVQ is.

7. To what extent do you agree or disagree that our proposed level descriptors reflect the requirements of a qualification at each level?

Agree

Please give reasons for your answer

Whilst we agree with what has been presented - what we don't feel is that sufficient detail has been provided that would enable the effective and consistent allocation of levels across qualifications and awarding organisations. For the process of allocating levels - further prescriptive detail which minimises the risk of allocating incorrect levels needs allocating.

8. Is there anything we could add to our proposed Requirements or guidance to help awarding organisations to use the level descriptors?

Yes

Please give reasons for your answer

Please see above. We believe that further more prescriptive detail than enables effective allocation of levels is needed.

9. We currently require qualification titles to include the level of the qualification. To what extent do you agree or disagree that we should retain this requirement?

Strongly agree

Please give reasons for your answer

Employers and stakeholders find this extremely useful. Without it the measurement of attainment of the level from the learner becomes extremely complex. We would strongly advise maintain retaining this requirement to preserve the interpretation of levels of qualifications achieved. Removal could cause inconsistency, uncertainty and confusion on the part of stakeholders.

10. Do you have any comments about our proposed General Conditions?

No

11. Do you have any comments about our proposed guidance?

Yes

Which sections of guidance are clear and helpful? Why?

Further, more detailed guidance needs providing. We believe that there should be a pilot across awarding organisation to use the guidance and all of the information given to test the level of detail needed.

Which sections of guidance do you feel need to be clearer? Why?

12. To what extent do you think the draft RPA Criteria will help an awarding organisation determine whether a qualification is relevant for RPA purposes?

Helpful

Please give reasons for your answer

But we do question again whether further information/guidance and detail is required. Again we would have concerns around the amount of work on behalf of awarding organisations to complete and demonstrate the evidence needed to demonstrate compliance with these requirements for every single appropriate qualification.

13. How helpful do you think the draft TQT Criteria and guidance will be when awarding organisations calculate the values for a qualification's Guided Learning, Directed Learning and Invigilated Assessment?

Don't know / no opinion

Please give reasons for your answer

It really feels that a pilot needs to take place with further refinement of these criteria and guidance to test whether they are robust enough - and to measure the calculations across different awarding organisations to ensure comparability. This is key to the TQT effectiveness, and we are in the very real danger of falling into the same trap that is being talked about with the QCF - ie inconsistent application of Guided Learning Hours. Where AOs have similar if not the same quals - how will we ensure that the TQT values will be consistent? Again, this is a massive amount of work for awarding organisation, which should not be underestimated; but also where there are currently 'shared' qualifications - we do wonder whether there is the opportunity for AOs to work together.

14. We originally proposed to describe: "The activity of a Learner in preparation, study or any other form of participation in education or training which takes place as directed by – but not under the Immediate Guidance or Supervision of – a lecturer, supervisor, tutor or other appropriate provider of education or training" as "Directed Study".

In response to feedback we are considering describing such activities as "Directed Learning". Which of these descriptions would you prefer us to use?

Directed learning

Please give reasons for your answer and suggest any alternatives you would favour

Directed learning encompasses more than 'study' does. Learning captures a multitude of methods including work place 'learning', where 'study' implies very much and academic focus.

15. We originally proposed to describe: "The participation of a Learner in the activity of being assessed for a qualification, where the assessment is subject to Invigilation but takes place without the benefit to the Learner of the Immediate Guidance or Supervision of a lecturer, supervisor, tutor or other appropriate provider of education or training" as "Dedicated Assessment".

In response to feedback we are considering describing such activities as "Invigilated Assessments". Which of these terms would you prefer us to use?

Invigilated assessment

Please give reasons for your answer and suggest any alternatives you would favour

It says what it is - and is also a term well known in the skills sector and appreciated by centres.

16. We have identified a number of ways in which our proposals may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential impacts we have not identified or any additional ways in which potential impacts could be mitigated?

No

17. Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

No

18. Have you any other comments on the impacts of the proposals in this document on persons who share a protected characteristic?

No

19. Are there any potential regulatory impacts of the proposals in this document that we have not identified?

Yes

If yes, what are they?

As previously mentioned the communication to stakeholders is key and this should not be underestimated - especially around the changes to the levels and introduction of a new framework. In addition, the amount of work required on behalf of the awarding organisations is colossal and should not be underestimated. The timescales for implementation, if agreed, should reflect this. We would also strongly advise that the principles and detail laid out in the consultation are fully tested on a controlled basis with awarding organisations first.

3. Accessibility of our consultations

We want to write clearly, directly and put the reader first. Overall, do you think we have got this right in this consultation?

Yes

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

No

Which of the following document formats would you prefer to use when reading our consultations? (Select all that apply)

A standard PDF

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

3