

Pearson response to the Ofqual Consultation Lifting the Accreditation Requirement August 2014

Organisation details

To evaluate responses properly, we need to know who is responding to the 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.

About you*

Your details:

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Position:	Responsible Officer
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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.

Yes

No

Are the views you express on this consultation an official response from the organisation you represent or your personal views?*

- Personal views
- Official response from an organisation/group (please complete the type of responding organisation tick list)

If you ticked "Personal views", which of the following are you?

- Student
- Parent/carer
- Teacher (but not responding on behalf of a school or college)
- Other (including general public) (please state capacity)

If you ticked "Official response from an organisation/group", please respond accordingly:

Type of responding organisation*

- Awarding organisation
- Local authority
- School/college (please complete the next question)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative group/interest group
- Other representative group/interest group (please skip to type of representative group/interest group)

School/college type

- Comprehensive/non-selective academy
- State selective/selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- None of the above (please state what)

Type of representative group/interest group

- Group of awarding organisations
- Union
- Employer/business representative group
- Subject association/learned society
- Equality organisation/group
- School/college or teacher representative group
- None of the above (please specify)

Nation*

- England
- Wales
- Scotland
- Northern Ireland
- Other EU country (please state which)
- Non-EU country (please state which)

How did you find out about this consultation?

- Our newsletter or another of our communications
- Via internet search
- From our website
- From another organisation (please state below)
- Other (please state) *Direct from Ofqual*

May we contact you for more information?

- Yes
- No

*Denotes mandatory fields

Questions

Question 1:

Ofqual should remove the requirement that every regulated qualification must be accredited by Ofqual before it can be awarded.

What is your view of this statement?

Strongly agree	<input checked="" type="checkbox"/>
Agree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
No opinion	<input type="checkbox"/>

Question 2:

Ofqual should impose an accreditation requirement for GCSE, AS and A level qualifications.

What is your view of this statement?

Strongly agree	<input checked="" type="checkbox"/>
Agree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
No opinion	<input type="checkbox"/>

Do you have any comments or suggestions about this proposal?

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Question 3:

Should Ofqual impose an accreditation requirement for any other qualification or description of qualifications? If so, which qualification(s) and why?

We do not believe that there is a need for Ofqual to impose an accreditation requirement for any other qualification or types of qualifications.

Proposed regulatory framework to support our approach

Question 4:

Condition E6 (as quoted below) is appropriate to confirm our requirement that all regulated qualifications must appear on the Register of Regulated Qualifications.

Condition E6 ¹

E6.1 An awarding organisation must not make available a qualification unless it has first submitted that qualification to the Register.

E6.2 An awarding organisation must ensure that its submission of a qualification to the Register:

- (a) is in a form that may be published by Ofqual and revised from time to time
- (b) includes the number of hours of guided learning that the awarding organisation has assigned to the qualification [*we anticipate that this aspect will change after we consult on guided learning hours*]
- (c) contains only accurate information
- (d) contains all information about the qualification that is requested on the form.

What is your view of this statement?

- | | |
|-------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly disagree | <input type="checkbox"/> |
| No opinion | <input type="checkbox"/> |

Do you have any comments or suggestions about our proposed Condition E6?

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Question 5:

We provide statutory Guidance for a number of Conditions which sets out examples of compliance with specific Conditions. Awarding organisations are required to have due regard to this statutory Guidance.

¹ Condition J1.2(i) of the General Conditions of Recognition provides that all references to a qualification in the Conditions are to a regulated qualification.

Would you welcome statutory Guidance from Ofqual about Condition E6?

Yes (√)
 No ()

If yes, on what aspects?

Condition E6 imposes a number of requirements on awarding organisations that, in order to comply, they will need further technical guidance on.

For example, condition E6.2(a) requires awarding organisations to submit qualifications "in a form that may be published by Ofqual and revised from time to time." Further guidance would be helpful on what forms Ofqual may publish and what "...revised from time to time..." means.

For Condition E6.2(d) statutory guidance would be helpful, detailing what information Ofqual requires in order that awarding organisations can satisfy themselves that they comply, before they submit.

Question 6:

The draft accreditation criterion (quoted below) is appropriate to allow us to decide, where an accreditation requirement applies, whether we should accredit a new qualification:

An awarding organisation must demonstrate to Ofqual's satisfaction that it is capable of complying, on an on-going basis, with all of the General Conditions of Recognition that apply in respect of the qualification for which it is seeking accreditation, including all relevant Qualification Level Conditions and Subject Level Conditions.

What is your view of this statement?

Strongly agree ()
 Agree (√)
 Disagree ()
 Strongly disagree ()
 No opinion ()

Do you have any comments or suggestions about our proposed Accreditation -

It is essential that learners have confidence that what they have learned will be recognised as they progress to the next stage of learning or their career. We feel that it is appropriate for any organisation wishing to offer qualifications that have an accreditation requirement to undergo a review of its capability of complying with the same conditions.

Question 7:

Are there any specific positive or negative impacts on people who share particular protected characteristics² that we should consider in relation to these proposals?

Yes ()

No (✓)

If yes, what are they and how could any negative impacts be avoided or reduced?

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Question 8:

Are there any positive or negative regulatory impacts we should consider in relation to these proposals?

Yes (✓)

No ()

If yes, what are they and how could any negative impacts be avoided, reduced or managed?

We would like to see clarification on how monitoring is going to be managed, how regular monitoring activities will be and whether the imposition of an accreditation requirement on certain awarding organisations or certain of their qualifications will be made public.

It will be important that any concerns revealed by Ofqual monitoring activity are carefully managed, if learners are in the middle of taking those qualifications.

² Including those defined in the Equality Act 2010 and in Section 75 of the Northern Ireland Act 1998, namely: age, disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation and additionally in Northern Ireland political opinion and caring for dependents.