

Consultation Summary Paper

Ofqual consultation on Guided Learning Hours

16 October 2014

Opened 24/07/2014, closed 16/10/2014, Pearson lead/s: Caroline Hughes and Siân Owen

A brief introduction to Pearson

Pearson is the world's leading learning company. Our education business combines 150 years of experience in publishing with the latest learning technology and online support. We are also part of the wider Pearson family which includes Penguin, Dorling Kindersley and the Financial Times. We provide education and assessment services in more than 70 countries. Our qualifications, courses and resources are available in print, online and through multi-lingual packages, helping people learn whatever, wherever and however they choose.

A summary of the consultation

This consultation is about how awarding organisations (AOs) should decide whether a qualification is likely to be used by persons in work in England aged 16 or 17 to help them meet their legal duties to participate in education or training; and calculate and describe the time students will typically need to spend studying for a qualification. Ofqual is consulting on a new approach to how the size of a qualification is estimated because it, and AOs, are subject to relevant statutory duties in relation to the Government's Raising of the Participation Age (RPA)¹ policy. Existing estimates made by AOs and expressed as guided learning hours (GLH) have not always been based on a common approach, and Ofqual is proposing changes to how they regulate qualifications that are allocated credit. Ofqual wants to ensure that credit values are robust and consistent across AOs. (Also see the Ofqual consultation on the QCF.)

A summary of the Pearson response

Pearson very much welcomes the clarification of definitions in the consultation - of Guided Learning (GL), Directed Study (DS) and Dedicated Assessment (DA). Definitions of terms have been unclear for some time and have not been standardised. We recommend that Ofqual produces a simple guide to the new definitions with further clarification and examples. The guide should also make it clear to providers that the values assigned are a guide rather than a requirement. We have reservations about some of the proposals in the consultation however:

Assigning all values (GL, DS, and DA) to qualifications – We agree it should be a requirement that all qualifications for which we assign what we currently call glh, should be assigned a value for GL. We do not agree that all three values should be required if an AO allocates GL to a qualification. It should be left to the discretion of the AO as to whether values for DS and DA are assigned.

Methodology – Ofqual proposes that the values assigned be evidenced by statements from centres and learners, and relevant information reasonably available to the AO. We do not believe that collating such evidence is likely to give us useful information when it comes to setting these values. Values should be applied to new qualifications using existing processes which are sufficiently robust. More robust auditable evidence will be required as part of this.

Credit, timescales and retrospectively assigning values – Ofqual proposes to allow AOs 12 months to make the relevant changes to qualifications that are on the Register, to indicate the size of their qualifications using the new definitions. Pearson considers this to be too short a timeframe particularly given the potential impact on current qualifications. We recommend that new requirements be implemented for new qualifications immediately upon roll out of the new General Conditions requirements, and for existing qualifications either after their next review date, or within three years, whichever is sooner.

¹ The government has changed the law so that from start of the 2013/14 academic year, all young people are required to continue in education or training until the end of the academic year in which they turn 17. From summer 2015 this will be until their 18th birthday.