

# Pearson response to the Ofqual Consultation Guided Learning Hours October 2014

## Organisation details

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

Yes  No

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

Personal response (Please answer the question 'If you ticked 'personal views'...')  
 Official response (Please answer the question 'Type of responding organisation')

**If you ticked 'Personal response' which of the following are you?**

- Student
- Parent or carer
- Teacher (but responding in a personal capacity)
- Other, including general public (Please state below)

**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)

**School or college type**

- Comprehensive or non-selective academy
- State selective or selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- Other (please state 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)

**Nation**

- England
- Wales
- Northern Ireland
- Scotland
- Other EU country:
- Non-EU country:

**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

Ofqual: Guided Learning Hours – consultation on the relevance of qualifications for the Raising of the Participation Age policy and estimating the size of qualifications

## Section 1

### Pearson's view

*Please consider the text below as our main response to the consultation. Below this we have answered the questions in the consultation form.*

*We have focussed on four main areas, and make five main recommendations.*

### 1. Clarification of definitions

Pearson very much welcomes the clarification of the definition of Guided Learning Hours, Directed Study Hours and Dedicated Assessment Hours. The definitions of these terms have been unclear for some time and not standardised across awarding organisations, regulatory and funding bodies and other bodies prescribing qualification content. We agree with the definitions as set out in the consultation.

#### **Recommendation i**

Ofqual should produce a simple guide to the new definitions with further clarification and examples. This would help awarding organisations and other bodies, and those less familiar with the new terms and their definitions working in schools, colleges, training providers and employer bodies.

The definition and the guide should also make it very clear to providers that the values assigned are a *guide* rather than a *rigid requirement*.

### 2. Assigning **all** values (Guided Learning, Directed Study, and Dedicated Assessment) to qualifications

We agree that it should be a requirement that all qualifications for which we assign what we currently call glh, should be assigned a value for Guided Learning.

We do not agree however, that all three values should be required if an awarding organisation allocates Guided Learning to a qualification. By definition, if a value for Guided Learning and a value for credit are assigned, then a figure for Directed Study has been assigned but in cases where credit is not assigned, it should be left to the discretion of the awarding organisation as to whether values for Directed Study and Dedicated Assessment are assigned.

The potential range of learners might be such for vocational qualifications that there could be a significant range of time required for Directed Study. Unintended consequences might arise from specifying the time required for this type of learning particularly when this is a new and untested approach. Innovation in teaching and learning and changing technology will allow for new and different teaching and learning tools which will have an impact on these values, and specifying them to

such a detailed degree may have a negative impact on encouraging provider innovation and flexibility.

Where values *are* assigned we agree that the Ofqual definitions should be used.

### ***Recommendation ii***

When Guided Learning is assigned it should be left to the discretion of the awarding organisation as to whether or not a value for Directed Study and/or Dedicated Assessment is set.

## **3. Methodology**

Ofqual proposes that Guided Learning, Directed Study and Dedicated Assessment values be evidenced by statements from a reasonable number of centres and learners, and by any relevant information which is reasonably available to the awarding organisation, including information from users of similar qualifications and organisations with relevant expertise including employer organisations, funding agencies, inspectorates and the Learning Records Service.

Ofqual recognises that calculating the time taken to complete a qualification is not an exact science, and gives examples of how the time taken to complete a qualification can vary:

*'The time that any individual within a group of students will need to complete a qualification is likely to vary, sometimes significantly.'*

*'Some qualifications, particularly vocational qualifications, will have different learning pathways involving optional units.'*

*'For new qualifications that are substantially different from existing qualifications, it may be particularly difficult for an awarding organisation to estimate how much time it will typically take to complete before it is actually taught for the first time.'*

*'Some students will study for particular qualifications in different ways, for example full-time college students and distance learning students may be studying for the same qualification.'*

Values of size assigned by awarding organisations are intended to provide a guide, to help centres plan, and to help learners to understand the demand of the qualification they are undertaking in terms of their time. In practice the actual time devoted to guided learning hours by centres and/or learners can, legitimately, vary from the values assigned by an awarding organisation.

We do not believe that collating evidence from centres and learners is a reliable way of evidencing that values set for Guided Learning, Directed Study and Dedicated Assessment are 'correct'. The amount of time an 'average' learner takes to gain a qualification cannot be reliably evidenced by collating evidence from a small number of centres, and the number of centres we would need to collate evidence from to come up with a reliable figure would not be practicable.

More importantly the evidence collated will be valid in that it will tell us how much time schools, colleges and training providers are taking to deliver qualifications, but will not be a reliable indicator of how much time schools, colleges and training providers should be taking to deliver qualifications. A number of factors will come into play when assigning time to qualifications alongside the recommended Guided Learning and Directed Study time, such as learner ability, timetabling restrictions, teacher availability. A report commissioned by Edexcel for the Welsh Assembly Government Department for Children, Education, Lifelong Learning and Skills (DCELLS) (September 2007) investigated assigning credit to AS and A level qualifications. Focus groups were held on learning time and it is interesting to note that:

*'Participants agreed that it was important to give centres guidance on minimum expectations of learning time to enable them to plan their courses. They also noted that contact time was variable and reflected other school demands that were beyond the control of individual departments.'*

Collating evidence from centres is not likely to give us useful information when it comes to setting these values for qualifications.

When planning and developing qualifications awarding organisations already work with a range of experts, practitioners and employer bodies to set guided learning hours. Awarding organisations should collect evidence of how these values are set during this development to evidence how these values have been arrived at and evaluate this evidence during the lifetime of a qualification to inform revisions and new similar qualifications.

### **Recommendation iii**

Values should be applied using the new definitions to new qualifications using existing processes which are sufficiently robust. More robust auditable evidence data will be required as part of this process.

## **4. Credit, timescales and retrospectively assigning values**

Ofqual proposes to allow awarding organisations 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, as an amendment.

Pearson considers this to be too short a timeframe particularly given the potential impact on current qualifications. In addition to this work, awarding organisations will also be implementing the changes that will come about as a result of the removal of the QCF. Making changes to a significant number of qualifications within existing QCF qualifications would place a significant burden on centres that would have to manage changes to their teaching and learning. We have around 2,000 qualifications – and many thousands of learners – that will be affected by these proposals. We also need to give our customers time to understand how the changes may affect their learners by developing a careful, proportionate, communications strategy.

We do not believe it is possible to make an assumption that the change to definitions will have no impact on credit. Given the relationship between credit and guided learning hours, it is possible that the lack of a common, well-understood, definition of guided learning hours has had an impact on credit. It could be that Dedicated Assessment Hours have been included in the calculation of credit, or it could be that Directed Study Hours have not been included in the calculation of credit. Credit as defined in the consultation does not include assessment, although in the 2008 QCF regulations it could: 'credit achievable in 10 hours of learning time regardless of the method of assessment'. (Pearson does accept that dedicated assessment is not learning and should not be included in credit.) It therefore follows that if the glh of a particular qualification needs to change, then it is entirely possible that the credit will change too.

Given this, allocating Guided Learning and Directed Study to qualifications will not require a simple amendment to a qualification. If credit values change as a result of the clarity of the new definitions then the qualification will need to be revised with a new QN number.

In addition to this it is difficult to assign Guided Learning, Directed Study and Dedicated Assessment values retrospectively. Most qualification on the register will be revised or replaced over the next few years and re-evaluating the Guided Learning, especially if it involved Ofqual's proposed methodology (i.e. going out to centres to collect evidence) for all qualifications that might be taken by learners under RPA, is a disproportionate expectation.

#### ***Recommendation iv***

There should be no assumption that credit value will be unaffected by the clarification of the definitions. This will have an effect on retrospectively assigning values and on timeframes.

#### ***Recommendation v***

New requirements should 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. This would balance the needs of the end users against the resource implications for awarding organisations and allow for a transition period for schools, colleges, training providers, and employer bodies. It would also give awarding bodies time to incorporate research into the Guided Learning required for qualifications into the qualification development processes.

## Section 2

### Questions

**Question 1: Are there any activities where you would be in doubt as to whether they should be included in 'Guided Learning'?**

No.

However, as mentioned in the recommendations, Ofqual should produce a simple guide with further clarification and examples. This would help awarding organisations and other bodies, and those less familiar with the new terms and their definitions working in schools, colleges, training providers and employer bodies. The definition and the guide should also make it very clear to providers that the values assigned are a guide to time rather than a rigid requirement.

**Question 2: "The proposed definition of 'Directed Study' is clear and appropriate." What is your view of this statement?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer.**

It includes all the elements used in previous definitions and brings these into one place; this is helpful.

It would be helpful to have further detailed guidance on what is included in Directed Study. For example the issue of what constitutes work experience might be given further thought to ensure a shared understanding across awarding organisations; at what point does a period of work experience become a work placement, and should that also be included in the definition of Directed Study?

**Are there any activities where you would be in doubt as to whether they should be included in 'Directed Study'?**

'Pieces of work associated with assessment' but not supervised or invigilated can be included in this definition. It will be helpful if it is clearly stated that these can be pieces of work submitted as part of summative assessment, for example, as part of a vocational portfolio.

**Do you have any other comments or suggestions about this definition?**

Ofqual should produce a simple guide to the new definitions with further clarification and examples. This would help awarding organisations and other bodies, and those less familiar with the new terms and their definitions working in schools, colleges, training providers and employer bodies.

The definition and the guide should also make it very clear to providers that the values assigned are a *guide* rather than a *rigid requirement*.

**Question 3: "The proposed definition of 'Dedicated Assessment' is clear and appropriate."**

What is your view of this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer.**

We would question whether the terminology 'dedicated assessment hours' clearly explain that this is the time a student spends on being assessed in a controlled environment, as is defined in the consultation. Clearer (but perhaps less neat) would be 'Controlled [environment] assessment hours (CEAH/CAH).

**Are there any activities where you would be in doubt as to whether they should be included in 'Dedicated Assessment'?**

No.

**Do you have any other comments or suggestions about this definition?**

Ofqual should produce a simple guide to the new definitions with further clarification and examples. This would help awarding organisations and other bodies, and those less familiar with the new terms and their definitions working in schools, colleges, training providers and employer bodies.

The definition and the guide should also make it very clear to providers that the values assigned are a *guide* rather than a *rigid requirement*.

When Guided Learning is assigned it should be left to the discretion of the awarding organisation as to whether or not a value for Directed Study and/or Dedicated Assessment is set.

**Question 4: Do you have any other comments on the three components of Total Qualification Time? For example, are there other parts of learning time or activities that you expect the definitions to cover that they do not? If so, what are they?**

The three elements together may cause confusion as all three contain an assessment element; Guided Learning includes guided assessment, Directed Study included unsupervised assessment and Dedicated Assessment includes invigilated assessment. This will need careful handling by the awarding organisations until our writers become familiar with the new definitions.

**How we will regulate: our new approach**

**Question 5: Do you have any comments about our proposed General Conditions?**

- Addition to J1 – defining the TQT so that all AOs use the same criteria for Guided Learning Hours is helpful.
- E6 amendment – this is fine, as the footnote in the consultation states this applies only to regulated qualifications.

**Which paragraphs are clear and helpful? Why?**

- E7 – clear.
- E7.9 (a) 'AOs will be required to revise any estimate of TQT as Ofqual requires.' It will be helpful if Ofqual informs AOs as to its evidenced reasoning for any such requirement for this.

**Which paragraphs do you feel need to be clearer? Why?**

No comments.

**Question 6: What Guidance would be most helpful to you in relation to the proposed General Condition E7? Why is this? You may wish to consider what might be positive and negative indicators of compliance with the proposed General Condition.**

Our answer to this question reflects our view expressed in Section 1 of this response that the rules outlined in Sections 3, 4 and 5 of condition E5 would not produce reliable evidence.

**Question 7: Is there anything else we should reasonably expect an awarding organisation to consider when determining a qualification's relevance for the Raising the Participation Age policy (relevance 'for 2008 Act purposes')?**

No.

**Question 8: "The Criteria document will help awarding organisations in making the required determination of a qualification's relevance for 2008 Act purposes."**

**What is your view of this statement?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer.**

No comments.

**Question 9: Are there other methods we should reasonably expect an awarding organisation to consider when calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment?**

Yes – see Section 1 of this response.

**Question 10: "The Criteria document will help awarding organisations in calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment."**

What is your view of this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer.**

See Section 1 of this response.

**Question 11: What are your views on the proposed wording of the draft new Criteria?**

The way they are laid out in the consultation is quite complex and could be made clearer and simpler.

**Which sections are clear and helpful? Why?**

No comments.

**Which sections do you feel need to be clearer? Why?**

Sections 3.5-3.7 inclusive – the paragraphs are referring to the need to make comparisons in existing qualifications and make estimates for new qualifications. However the layout of the paragraphs makes this difficult to understand.

**To what extent will these Criteria help awarding organisations to make the required determinations?**

No comments.

***Implementation*****Question 12: "Our proposals will have no impact on Credit values, unless the awarding organisation establishes that its previous estimate of the size of a qualification needs to be changed."****What is your view of this statement?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Please give reasons for your answer.**

Our answer to this question reflects our view expressed in Section 1 of this response.

Pearson agrees that definitions of guided learning hours and credit in current QCF qualifications have been variously interpreted and applied.

On that basis some current qualifications will include Dedicated Assessment in credit, and some may not include Directed Study, and this will vary between similar qualifications. This means that we cannot assume that the application of the new definition of Total Qualification Time will not have an impact on credit.

**If you feel there are other implications for Credit, what are they?**

Changing credit during the life of a qualification will have consequences for learners already awarded credit and can disadvantage learners under the General Conditions by making difficult any comparability between current learners and those previously certificated with the same qualifications. This in turn could have an adverse effect on the learner outcomes (B3.2 (d)).

**Do you have any other comments?**

No.

**Question 13: What would be a reasonable length of time after the introduction of a new approach for an awarding organisation to evaluate hours of Guided Learning, Directed Study and Dedicated Assessment for its qualifications? Why is that?**

We would suggest that this needs to be after a minimum of 3 years. One or two cohorts need to take a qualification before a sensible assessment of Guided Learning can be made. There will be insufficient evidence prior to that and where qualifications are significantly changing, teachers are unlikely to establish a clear pattern of teaching and learning in the first year.

***Equality impact*****Question 14: Are there any specific positive or negative impacts on people who share particular protected characteristics<sup>1</sup> that we should consider in relation to these proposals?**

No.

**How could any negative impacts be avoided or reduced?**

No comments.

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<sup>1</sup> Including those defined in the Equality Act 2010, namely: age, disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation.

***Regulatory impact*****Question 15: What positive or negative regulatory impacts should we consider in relation to these proposals?**

Pearson puts the needs of the learners foremost. The potential requirement to alter credit in live qualifications that have already been awarded will create confusion and uncertainty in the marketplace.

12 months is an insufficient time period to embed a robust and quality process given the number of qualifications affected.

It is important that learners, centres and other users are clearly communicated with, and reassured that the qualification standards are maintained. The best way to do this will be to give significant notice of intended changes to qualifications in terms of the move from GLH (existing qualifications) to TQT (new qualifications).

**How could any negative impacts be avoided, reduced or managed?**

By only applying the new requirements 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.

***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.**

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

( ) Yes (x) No

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

The document was written in a way that made it quite difficult to read.

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

( ) Yes (x) 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, etc.)
- 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