

Pearson response to the Ofqual Consultation
Withdrawing the Regulatory Arrangements for the
Qualifications and Credit Framework
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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: Consultation on Withdrawing the Regulatory Arrangements for the Qualifications and Credit Framework

Section 1

Pearson's view

Pearson supports the long-term vision expressed in this consultation. The proposals allow for increased innovation in the design and development of qualifications, and for awarding organisations to take full responsibility for the quality of qualification content. However, in the short term, the dismantling of the QCF needs to be carefully planned to avoid the risks of both causing unnecessary confusion and having a negative impact on learners. Our response to this consultation is written with both these long- and short-term views in mind.

Section 2

Questions

Question 1. We propose to change the way we regulate some vocational qualifications by withdrawing the Regulatory arrangements for the Qualifications and Credit Framework. From now on, we will only use the existing General Conditions of Recognition – supplemented in some instances by new General Conditions or guidance – to regulate qualifications that have been or would have been designed to meet the Regulatory arrangements for the Qualifications and Credit Framework. To what extent do you agree or disagree with the proposed change?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

Are there any other options that we have not considered?

The dismantling of the QCF needs to be carefully planned in order to avoid creating confusion in the market and to avoid any negative impact on learners taking existing QCF qualifications. For this reason we recommend Ofqual plan for a transition period of 5 years.

Question 2. We propose to change existing recognition arrangements for some vocational qualifications, following the withdrawal of the Regulatory arrangements for the Qualifications and Credit Framework. We invite your comments on the proposed changes.

Whilst we are happy with the principle that QCF recognised awarding organisations shouldn't have to re apply for recognition, applying recognition at level and sector based only on existing provision could create some strange anomalies in an awarding organisation's provision.

The process of recognition will need to be robust whilst also being proportionate with the level of risk associated with the particular sector and the size of the request. For example, the process might be different for adding one low-risk sector at one level to that for adding a high-risk sector at all levels.

We cannot make any detailed comments on this proposal given the lack of detail currently available. We very much welcome the suggestion that Ofqual would have discussions with individual awarding organisation about their provision before applying this condition.

Question 3. What are the implications, if any, of closure of the unit bank?

We would anticipate that there need not be any issues with the proposed closure. However, where a unit is shared, an awarding organisation should only be allowed to withdraw its permission for other awarding organisations to own a copy in very exceptional circumstances and only in a case of where permission would have an adverse effect on learners. The timing of the closure of the unit bank needs to be carefully considered so that awarding organisations can adequately plan, to avoid its closure having any adverse effects on learners. It seems unlikely that the suggested closure date of January 2015 would be practical but we assume the technical consultation will provide an opportunity to explore the timing in further detail.

In your opinion, what would be the impact of this measure?

Generally, closure of the unit bank should have a positive effect on the ability of awarding organisations to maintain and quality assure qualifications.

In your opinion, are there any unintended consequences of closing the unit bank that we have not considered?

As previously mentioned, the timing of the closure of the unit bank needs to be carefully considered so awarding organisations can adequately plan, to avoid its closure having any adverse effects on learners.

The implications of the closure on awarding bodies and the details of the implementation need to be carefully considered. It has long been known, and is an underpinning rationale for the proposals made in this consultation, that not all units within the QCF are compliant. If the unit bank closes and awarding organisations then own, and are responsible for, any units they use, we would recommend that a transition period is agreed that means these units remain can remain in their current state until the awarding organisation that have inherited them either redevelop or withdraw them. Making changes to a significant number of units within existing QCF qualifications would place a significant burden on centres that would have to manage changes to their teaching and learning. A transition phase would also avoid a situation in which awarding organisations, and Ofqual, would have to undertake a substantial amount of work on units inherited from other bodies; a workload which would be disproportionate given the lifespan of many of the inherited units.

Question 4. Following the withdrawal of the Regulatory arrangements for the Qualifications and Credit Framework we will not impose design requirements about how QCF-type qualifications are structured nor on whether they are made up of units or in some other way. We invite your comments on our proposals.

Lifting the restrictions the QCF design requirements would give awarding organisations the freedom to design more innovative and appropriate qualification structures. Therefore, we welcome these proposals.

Further information is needed on how Ofqual plan to assure the comparability of standards across qualifications at the same level and within sectors.

Question 5. To address the withdrawal of the Regulatory arrangements for the Qualifications and Credit Framework on credit accumulation, we propose it should continue to be possible for qualifications to be credit-bearing, provided the qualifications are otherwise valid and reliable. We further propose that it should only be possible to attribute credit down to the smallest part of the qualification that can be discretely assessed. We invite your comments on our proposed approach.

We agree that it should be possible to continue to assign credit to qualifications where this would be of benefit to the learner and/or other end users of the qualification. We agree that it should only be possible to assign credit at the smallest part that can be discretely assessed, and that it should not be a requirement to assign credit at this level.

Question 6. To what extent do you agree or disagree with the following proposals:

(a) Awarding organisations should be permitted to, but should not have to, recognise credit awarded to a student by another awarding organisation:

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

(b) Awarding organisations which intend to allow credit transfer or which intend to recognise prior learning in some other way must publish a clear policy approach to doing so.

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

(c) Ofqual should facilitate the availability of information about each awarding organisation's approach to the recognition of prior learning.

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

Are there any other options that we have not considered?

The facilitation of information should be through links to appropriate websites.

Question 7. Following the withdrawal of the Regulatory arrangements for the Qualifications and Credit Framework, the assessment arrangements for QCF-type qualifications will be governed simply through our General Conditions of Recognition. We invite your comments on this approach.

We agree that QCF qualifications should be governed through the General Conditions of Recognition. This will simplify the qualification landscape and increase transparency, and thus potentially increase public confidence in the qualification system.

Question 8. Following the withdrawal of the Regulatory arrangements for the Qualifications and Credit Framework, we will not put in place rules to support or facilitate unit sharing.

Where qualifications include collaborative elements, we will focus on whether they meet our regulatory requirements and whether there is clear accountability with each awarding organisation being wholly responsible for all of the qualifications which it offers. We invite your comments on our proposed approach.

We are content that there will be no arrangements to support unit sharing, once the unit bank has been closed. Where collaborative arrangements are desirable between awarding organisations or other bodies it is more appropriate that such arrangements are agreed between them. It is appropriate that Ofqual focuses on ensuring that such arrangements lead to valid qualifications.

In your opinion are there any other impacts which these proposals are likely to have?

No.

Question 9. We have suggested a number of steps to address issues arising from unit sharing, including use, ownership and accountability. To what extent do you agree or disagree with our proposed approach?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

Are there any other options that we have not considered?

See previous responses.

Question 10. When we withdraw the Regulatory arrangements for the Qualifications and Credit Framework, our General Conditions will provide sufficient limitation on an awarding organisation's ability to make use of 'award' 'certificate' and 'diploma' in the title of a qualification. To what extent do you agree or disagree with our proposed approach?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

The removal of the link between size and title of a qualification will improve the clarity of titling for end users as individual awarding organisations will be able to apply their use in a way that makes sense for their portfolio and end users. However, given the familiarity with the concept of award, certificate and diploma representing increasing sizes it may be worth considering keeping this relationship.

Question 11. When we withdraw the Regulatory arrangements for the Qualifications and Credit Framework we will no longer require the use of the term (QCF) in the title of qualifications. We have set out proposals dealing with removal of the term (QCF) from the title of qualifications and the time limits for making those changes. To what extent do you agree or disagree with our proposed approach?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

We believe that this requirement should be implemented for new qualifications.

However, existing qualifications should still refer to the QCF, and stay on the QCF as they have been developed on to this framework. To change the titles of existing qualifications will confuse providers and learners. New requirements for existing

qualifications, including the removal of the QCF title, should apply either after their next review date, or within 5 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.

This would also allow for a more sensible timeframe to remove the term QCF from any qualification support materials. We have around 2,000 qualifications – and many thousands of learners – that will be affected by these proposals.

Question 12. We will still want to have a clear way to explain the relationship between the different qualifications we regulate. We propose an awarding organisation should be required to allocate the right level to each of its regulated qualifications to indicate the relative demand of the qualification. We also propose that the qualifications framework should use eight levels (1 to 8) and three entry levels, as now.

We invite your comments on the proposed approach.

We agree that the current qualification levels are appropriate. However, greater clarification/guidance is needed re the requirement 'to assign a level that most closely matches the achievement associated with the qualification'. One advantage of the QCF regulations is that they allow combinations of different level units to be combined and are explicit on how to assign a level to such a qualification. This is a valuable feature for many qualifications and for the learners who take them. Recent feedback from Ofqual on non QCF qualifications has been that the entire content of a qualification should be at the level of the qualification. Awarding organisations will need clarity on this issue to ensure comparability across similar qualification across awarding organisations and allow us to continue developing this type of qualification.

Question 13. An awarding organisation that had correctly attached a current QCF level descriptor to a qualification should not be required to change that description. To what extent do you agree or disagree with this statement?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know / no opinion

Question 14. We have identified a number of ways in which the proposals on withdrawal of the Regulatory arrangements for the Qualifications and Credit Framework may impact on persons who share a protected characteristic. Are there any other potential impacts we have not identified?

- Yes No

If yes, what are they?

Question 15. Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Yes No

If yes, please comment on the additional steps we could take to mitigate negative impacts.

No comments.

Question 16. Have you any other comments on the impacts of the proposals in this document on persons who share a protected characteristic?

Yes No

If yes, please comment in relation to the specific proposals.

We are concerned about the future of unit funding in the light of the withdrawal of the QCF. The unemployed, including those on Traineeships, and OLASS learners, benefit from the flexibility of unit funding which can offer bite-sized learning responsive to individual learner and local employer needs. We would welcome clarity on how this flexibility might continue to be supported in the future.

Question 17. Are there any potential regulatory impacts of the proposals in this document that we have not identified?

Yes No