

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:

Lesley Davies

Position:

Responsible Officer

Name of organisation or group (if applicable):

Pearson Education Ltd

Address:

190 High Holborn
London WC1v 7BH

Email:

karen.hughes@pearson.com

Telephone number:

02071904294

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

Awarding organisation

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?

Strongly agree

Please give reasons for your answer

Assigning levels to qualifications assists users to select appropriate qualifications for their or their learners' needs.

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

A change in the level of the qualification would have significant impact on the users of the qualification; therefore we would consider it to be a major change requiring an awarding organisation to notify Ofqual and others of the proposed change.

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

A change in the level of the qualification would have significant impact on the users of the qualification; therefore to protect their interests it is appropriate to put in place, and comply with, a plan to provide clear and accurate information about the change to all relevant users of the qualification.

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

A change in the level of the qualification would have significant impact on the users of the qualification; therefore, to protect their interests it is appropriate to provide clear and accurate information about the change to all relevant users of the qualification.

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

Strongly agree

Please give reasons for your answer

Providing different descriptors for knowledge and skills allows for the development of qualifications more able to meet learner needs, be that for an exclusively knowledge based qualification, exclusively skills based qualification or a combination of the two. Having the two set of descriptors will thus provide for more flexibility in design of qualifications. We assume it would even be possible to develop a qualification targeted at different levels for knowledge and skills if that were appropriate for the users of that qualification.

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

No

Please give reasons for your answer

We considered whether there was case to be made for 'understanding' level descriptors, but on balance it was felt that this was not desirable as it appears to be adequately covered in the proposed knowledge descriptors. Additionally, we feel that the provision of two sets of descriptors balances the need for flexibility against complexity; a third set would introduce an unmanageable level of complexity for both users and AOs.

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

It will always be difficult to completely exclude ambiguity from the level descriptors; but in general we agree that the proposed level descriptors reflect the requirements of a qualification at each level but feel there will inevitably be a few grey areas between adjacent levels.

In particular, at levels 4 and 5 there is good alignment and no obvious inconsistency between these qualification descriptors and those at level 4 and 5 in the Framework for Higher Education Qualifications in England, Wales and Northern Ireland (August 2008).

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

No

Please give reasons for your answer

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

As the title of the qualification is usually the first piece of information a user of the qualification considers, it is appropriate that this key piece of information is contained within it, to enable them to select qualifications appropriate to their or their learners' needs.

However, it is essential that the levels are understood by the general public and users of qualifications and we believe information on the framework should be publicised and promoted by DfE/BIS/Ofqual.

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

Yes

Which Conditions are clear and helpful? Why?

General Condition E9 - Qualification and Component levels

There are 7 parts to this condition, and they are clearly articulated, with definitions as appropriate in section J (ie. 'component').

General Condition E10 - Recognition of Prior Learning

The definition has changed to define more accurately how it can be attained (ie, accredited), as well as unaccredited learning, that is eligible for RPL. This has been slightly ambiguous before and is more clearly articulated in this new Condition.

General Condition E2 - Requirements on qualification titling

The condition states explicitly what is expected of an awarding organisation when making an amendment to a qualification title.

Which Conditions do you feel need to be clearer? Why?

Condition of Recognition E7 – Total Qualification Time

In paragraph 2.29 on page 15, it states that a condition will not need to be imposed requiring awarding organisations to determine whether a qualification is relevant for RPA purpose. However, criteria for determining the relevance for the purposes of the Education and Skills Act 2008 have been mentioned on pages 37 – 39 and then proposed on page 52. Clarification on this would be helpful around the relevance and significance of these criteria, if a condition is not being imposed.

We are aware that the TQT condition is a sunrise provision in that we will be informed in the future when it will become effective. However, it is important to note that individual awarding organisations may not be able to make changes to TQT for qualifications that are in current SASE apprenticeships. Trailblazer apprenticeships qualifications will not be fully implemented until 2017 – 2018; if these sunrise provisions become effective before that then individual AOs would be unlikely to be able to change the learning time on qualifications within the current SASE apprenticeships. The effective date for this sunrise provision should be considered in the context of current apprenticeship requirements and the development timescales of the new Trailblazer apprenticeships. (Please see our response to Question 13)

General Condition E3

It is unclear as to whether the publishing of the rationale for assigning more than one level to a qualification is going to be included in the specification, as a requirement in E3.2. Also, E3.2 (j) will need to be replaced by proposed E3.2(k), (l), and (m).

The new condition E3.4 is covered by the current condition E3.3 in terms of publishing a clear and accurate specification and not misleading the users of the qualification, therefore it is superfluous.

General Condition J1 - Interpretation and Definitions

The definition for TQT, should be amended to read 'in order for an average learner...' (Please see our response to Question 13)

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

Yes

Which sections of guidance are clear and helpful? Why?

General Condition E10 - Recognition of Prior Learning

The guidance is clear and useful.

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

General Condition E9 - Qualification and Component levels. Guidance on level requirements

P 29: 2 (d) – is the publishing of the rationale for assigning more than one level to a qualification going to be included in the specification, as a requirement in (E3.2)?

The guidance on Page 36 of the consultation on level, in relation to: 'awarding organisations and users should not expect all of a qualification's content and assessment to be at the level the learner is expected to reach on conclusion of the qualification' could be a little ambiguous. We would recommend rewording along the lines of "AO's should be permitted to set a proportion of learning at a different level to that of the qualification as a whole as long as their approach can be justified."

General Condition E2 - Requirements on qualification titling

We agree with the comments in paragraph 2.47 of the consultation document about the use of the terms 'award', 'certificate' and 'diploma' in titling. This states that they have been used as 'a form of shorthand to describe small medium and large sized qualifications.' It then points out a shortcoming in the way this was applied under the QCF, in that 'a diploma can be anything from 37 to 100s of credits in size,' and carries on to say that the terms 'award', 'certificate' and 'diploma' could continue to be used in titles as long as they were not used in a misleading way.

We were surprised, therefore, when we read the Positive Indicators in relation to Condition E2.5 which states that the terms should only be used in relation to specific ranges of TQT. This would seem to be at odds with the line taken in paragraph 2.47. We agree that 'award', 'certificate' and 'diploma' should be used to signify smaller and larger sizes of qualification, but where there is a suite of qualifications that may all have a TQT of 370 or more, it becomes confusing to have to affix a range of adjectives in front. It would be helpful if the Indicator could be re-worded to say 'The use of terms "award", "certificate" and "diploma" only to indicate a small, medium or large sized qualification relative to the qualification suite. Where a qualification is not part of a larger suite at the same level, a small qualification is one that has a TQT in the region of 1-120, medium etc....'

The Negative Indicators for this condition also refer to not using terms such as 'higher' or 'extended' unless the qualification is provided as a progression route from another qualification. This wording is ambiguous, and we recommend that it is made clearer by an additional Positive Indicator which states 'terms such as "higher", "extended" or "advanced" are only used where the qualification provides progression within a level (for example from "level 3 diploma" to "level 3 extended diploma", or from a lower level.'

Condition of Recognition E7 – Total Qualification Time

The relationship between the Condition, criteria and guidance is unclear.

There are 8 sides of criteria, with further guidance starting on P47. If the criteria are to remain as part of the conditions then they would benefit from being presented in a more user-friendly manner.

In the proposed guidance for Condition E7 for TQT, the second sentence in the first paragraph Page 47 states "These activities are those set out in the qualification's specification". This wording suggests that within a specification we must define the teaching approach taken by institutions delivering a qualification. This would not be appropriate or realistic, and it is acknowledged later in the same paragraph that there will be variation in the actual time taken. This approach is not workable and needs further thought and discussion.

Linked to this is the expectation in terms of the last bulleted paragraph under positive indicators section on page 48 - this requires awarding organisations to consider evidence of the actual time it typically takes the first cohort of learners to complete the qualification and revise the numbers if appropriate. This seems an onerous requirement. In addition, we don't believe that the time taken during the first delivery time of the qualification is sufficient and valid evidence to base changes on. During first delivery, centres are getting use to the new qualification and this may have some impact on TQT - if changes are made just based on first delivery then this might have an adverse effect on future cohorts. If centres do not raise issues relating to TQT it would be fair to assume that there are no issues with the number of hours - this is already captured under the 4th bullet point, therefore the last bullet point is unnecessary.

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

Whilst, the criteria give clear examples of where a qualification may or may not be deemed relevant for RPA purposes, as there is no proposed condition relating to RPA, we would question their status in this document.

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?

Very unhelpful

Please give reasons for your answer

The proposed approach for defining and calculating Total Qualification Time (TQT) is onerous and will likely result in lack of consistency in calculation, particularly the calculation of Directed Learning. There are many queries and concerns around the criteria for calculating TQT. For example, what is considered as a "reasonable number of centres"? TQT cannot be presented in a range where there are optional routes or pathways for a qualification; the qualification can only be assigned the lower number of hours - this will have a negative impact on some vocational qualifications where pathways have significantly different numbers of learning hours. As a result, we would like to propose to Ofqual that they reconsider the definition and calculation of TQT, particularly removing the requirement to calculate Directed Learning, which is properly the preserve of the teaching institution, not an AO which has no direct involvement in institutional decisions about the delivery of the qualification.

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

The use of the term "study" has certain connotations related to "book learning". The use of learning better describes the potential range of learning activity that could be encompassed with in a programme of study.

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

We do not support the requirement to identify the amount of time related to this form of assessment in specifications. However, if it is to be included we would prefer Invigilated assessment. "Invigilation" is a widely understood term and Invigilated assessment is an accurate description of the activities outlined in the condition. Dedicated assessment could describe an activity that fell into either directed study or directed learning e.g. compilation of a portfolio of drawings in an art qualification.

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?

Unit Bank

We have concerns with the proposal to allow AOs to decide who to give their units to and the requirement that units that are not given will need to be replaced within two years of the unit bank closing. This could potentially negatively impact on AOs' ability to offer the affected qualifications beyond this time period. Therefore, we propose that where shared units are currently being used by AOs they should automatically be given a copy of the unit by the owner. There are many units that have been collaboratively developed but uploaded by different organisations which means that on RITs these organisations are identified as the owners but technically these AOs do not have intellectual property rights. If units are automatically given to AOs currently using them then this would remove the potential conflict around how these units are shared and used post QCF and avoid any adverse effects to users of the qualification. We also propose that unless there are exceptional circumstances no AO should have the right to refuse the use of a unit by another AO currently using it in a qualification.

Titling

The requirement to remove the term 'QCF' from existing qualification titles by 31 December 2017 will be burdensome for awarding organisations and confusing for users of the qualifications. We propose that the term 'QCF' should be removed as and when the existing qualifications come up for review.

Within the consultation document there are indicators of size that are appropriate for the use of award, certificate and diploma in the title of a qualification. It is unclear whether these are just guidance or will be statutory. We do not support the use of such indicators. Our experience of developing QCF qualifications showed that such restrictions lead to confusion in titling rather than clarity when used with suite of qualifications. We would suggest that the 3 terms are used to reflect relative size rather than actual size.

We note that the use of "higher" has been signaled as a negative indicator. The use of "higher" in our BTEC HND suite is a clear indicator of progression from our BTEC National suite; therefore we assume the use of 'higher' in this instance would be permitted. Additionally the use of HND is protected in law. (Please refer to our response to Q11)

Three country regulation

Page 7 of the consultation document states that the regulators in Wales and Northern Ireland will be taking note of the outcomes of this consultation. Unless Wales and Northern Ireland also embrace the withdrawal of the QCF at the same time as the changes in England there will be a negative impact on users of the qualification and confusion across the industry.

Credit

This consultation lays out a position that the calculation of credit should be based on TQT and that all AOs need to calculate credit for all qualifications in the same way. We do not support this assertion. The credit or "worth" of a qualification is judged by the users of that qualification and can be different for the same qualification for different purposes eg funding and progression. We therefore recommend that it is not for the regulator to determine a single system of credit assignment but for individual AOs to work with the users of their qualifications and each other, as appropriate, to attach credit in a way that is meaningful for both learners and users of the qualification.

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

Large-type word document (16 point text)

eBook (Kindle, iBooks or similar format)

Other: normal word document

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

More than 5