

## Consultation Summary Paper

### Ofqual consultation on After the QCF: A new qualifications framework

17 June 2015

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*Opened 25 March 2015, closed 17 June 2015, Pearson lead: Karen Hughes*

*Link to website: <https://www.gov.uk/government/consultations/after-the-qcf-a-new-qualifications-framework>*

#### A brief introduction to Pearson

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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

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This consultation is about the rules and guidance Ofqual need to put in place after the withdrawal of the rules for the Qualifications and Credit Framework (QCF). It explains how Ofqual propose to manage the withdrawal of the QCF rules, and sets out the small number of new rules Ofqual propose to put in place instead. The decision to withdraw the QCF rules was announced in December 2014 after a review and consultation carried out last year.

Ofqual also consulted last year on requiring a more accurate and consistent approach to describing a qualification's size. The findings from the consultation on Guided Learning Hours have now been published. The QCF consultation sets out the regulations Ofqual propose to introduce to put accurate and consistent size measures in place.

Last year's QCF consultation also proposed a simple descriptive framework be introduced to cover all regulated qualifications that we regulate. Ofqual propose that this will be known as the Framework of Regulated Qualifications (FRQ) and will describe general and vocational qualifications taken in England and vocational qualifications in Northern Ireland. This consultation sets out the regulations Ofqual propose to introduce to support the effective operation of the new framework.

#### A summary of the Pearson response

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Pearson supports the majority of the proposals put forward in the consultation. However, we have concerns about three areas and make the following key points in our response:

- **TQT:** 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. We 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.
- **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 negatively impact on AOs' ability to offer affected qualifications beyond this time period. We propose that where shared units are currently being used by AOs they should be given a copy of the unit by the owner.
- **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. In addition, we suggest that the 3 terms (award, certificate and diploma) are used to reflect relative, rather than actual, size.