

Pearson response to the UCAS Consultation Proposals for a new Tariff

May 2014

Thank you for giving Pearson the opportunity to give feedback on your proposals for the introduction of a new Tariff.

Design principles

Pearson generally supports the new design principles and holds the view that the proposals for the new Tariff will make it transparent, comprehensive and sustainable.

Calculation of Tariff points

The ways in which the size and demand are assessed are simple and transparent, as is the calculation of the Tariff points. The scale that you have proposed results in a good correlation with the present Tariff. The only downside is that the values of the points are less straightforward than the current values. For example, the current series of values of 40, 60, 80, 100, 120 and 140 for A levels is a simpler sequence of numbers than the proposed values of 16, 24, 32, 40, 48 and 56.

Pearson appreciates the reason for reducing the Tariff points for the AS levels from 50% to 40% of an A level. However, we perceive that that this may make the incorporation of a fourth AS level into study programmes less attractive and, consequently, some A level programmes may have a reduction in breadth.

Management of the Tariff

We can see the benefits in making the process of adding qualifications to the new Tariff HE provider-led. This reflects our own processes in qualification development. We regularly engage with a wide range of HE providers to elicit views on our current qualifications and we have HE representation on our subject advisory groups for all of our level 3 qualifications. This ensures that our new and revised qualifications are supported by HE. However, we have concerns over your proposals for the process for management of the Tariff. The issues that we have are as follows:

- a) We see as problematic the fact that you are proposing that there will be only one opportunity per year for qualifications to be added and that the timeline for the process for both new and revised qualifications will run from September to April for qualifications already accredited by September. Meeting the September deadline for accreditation (leading to first teaching the following September) may not always be possible for reasons that may be beyond the control of awarding bodies. For example, in national redevelopments, delays in the development of the subject criteria may push the accreditation date beyond September. Also, there was a case recently where childcare qualifications were required to make

minor amendments to meet new 'Early Years Educator' criteria with a timeframe that led to accreditation in January. In both cases, the proposed new UCAS process would result in the qualifications being awarded UCAS Tariff points 7-8 months after the start of first teaching. Our experience shows that schools and colleges are very reluctant to start to teach qualifications before they have received UCAS points. Some flexibility in this respect is needed to allow for circumstances such as these.

- b) The process is rather protracted. Often, the target of awarding bodies is to achieve accreditation of their qualifications by July to ensure that specifications are in centres by September one year ahead of first teaching. These qualifications would have to wait 8-9 months for confirmation of inclusion on the Tariff. The announcement in April would present problems to schools and colleges as they hold options evenings/open days in mid autumn/early spring to recruit students to their courses for the following year. As stated above, schools and colleges are reluctant to offer qualifications that are not on the Tariff and it would be late in the year to withdraw a qualification from the curriculum offer in April. When making option choices, students and their parents would also want to know whether their chosen courses would lead to higher education.
- c) The individuals within HE institutions with whom we engage and whom we involve in our development process may not be the same people that UCAS contacts. It would help to know how you would be engaging with HEPs to ensure that there was clear communication between all interested parties.
- d) We have serious concerns about your proposal to limit the number of new qualifications to 30 QIPs per year. As indicated above, centres are reluctant to offer qualifications that are not on the UCAS Tariff and this restriction could result in learners not being offered qualifications that are the most appropriate for their needs. It is not clear on what basis selection will be made. You indicate that there will be flexibility over the requirement for support from 20 HEPs in the case of more specialist qualifications but, where there are more than 30 new qualifications under consideration, will the amount of HE provider support be a factor? Ideally, there would be no restriction on numbers of qualifications. However, if such a limit were imposed, the criteria for inclusion in this list of 30 would need to be made clear in advance to ensure there was a level playing field and there would need to be an appeals process in place. UCAS would certainly need to consider exercising some flexibility over the number of new qualifications to be incorporated on to the Tariff if government were to introduce requirements for a large number of new qualification types.
- e) It is unclear as to whether a new title in a suite of qualifications, for which there is already a QIP, will be regarded as being in this category of 'new qualifications'. Although QIPs are not part of this consultation, we make the observation that they may not all look the same. If an awarding body offers a suite of

qualifications of the same type, there will be just one generic QIP but if the awarding body offers a single qualification of a certain type, the QIP is likely to be more subject-specific.

- f) Awarding bodies have to submit new/revised qualifications to the DfE for inclusion in 16-19 Performance Tables and this process requires letters of support from HE institutions to confirm that they are acceptable as entry requirements for their degree programmes. It would be helpful if the UCAS and DfE processes parallel each other in terms of timeframe and the letters of recognition obtained by the awarding bodies from HE providers could provide UCAS with evidence of HE support.

Our proposals for the management process are as follows:

- There should be some flexibility about the requirement for accreditation by September
- The length of the process should be shortened so that it feeds in better to the school/college planning cycle
- The process should run parallel to the process for inclusion of qualifications in the DfE Performance Tables. The letters of recognition from HE providers obtained by awarding bodies for this process could also be used as evidence for inclusion in the UCAS Tariff. This would avoid putting the burden on UCAS to collect this support and would help to shorten the length of the process.
- The criteria for inclusion in the Tariff need to be clear and transparent and there needs to be an appeals process in place

Inclusion of international qualifications

Pearson welcomes the inclusion of international qualifications in the new Tariff but not if the current policy continues of including only those that are accredited in the country of origin. Firstly, as UCAS is aware, the regulatory processes vary widely in other countries and checks would need to be made to ensure that they meet the high quality standards of the UK. More importantly, a retention of this policy would continue to exclude the international A levels offered by the UK awarding bodies. We ask UCAS to review this policy as it would be illogical if there were a big increase in international qualifications included in the Tariff, but an exclusion of UK international A levels which are highly regarded around the world and which are based on UK regulated design and quality assurance principles.

As UCAS will be aware, previously Pearson offered a range of its UK regulated AS/A levels to overseas centres but this offer had to be reviewed when Ofqual announced the decision to remove the AS/A Level January exam series in England from January 2014. We foresaw that this would have a major impact on Pearson Edexcel students in many countries, especially those in Asia Pacific, Middle East and the Indian sub-continent, where the January series of examinations is required for local and international university entrance. The English qualification system is well respected around the world

and Pearson considered it vital that we maintain the provision of this important 'export'. Consequently, in order to meet the requirements of these overseas students, Pearson created a new suite of AS/Advanced levels solely for the international market for first teaching from September 2013. These have exam series in both January and June in order to fit in with the university start dates in different countries.

Pearson ensures that there is a comparable standard between the regulated UK A levels and the self-regulated International AS/Advanced levels by:

- having an overlap between the development teams, the examining teams and the awarding teams for the UK AS/A levels and the new International AS/Advanced levels
- applying Ofqual's Code of Practice for AS/A levels to the awarding of the new International AS/Advanced levels

UCAS indicates in its proposals that inclusions in the new Tariff should be led by HE providers. Pearson has established confidence in its new International AS/Advanced Levels by obtaining confirmation that they are accepted as entry qualifications for undergraduate degree programmes from a wide range of universities, both in the UK and around the world, thereby providing evidence of widespread HE support. We reiterate our concern that the ability of UK awarding bodies to continue to 'export' their international AS/A levels may be put in jeopardy if overseas centres see that their 'home' qualifications attract UCAS Tariff points while the international AS/A levels do not. A consequence of this may be that learners would not be offered qualifications that best meet their progression needs.

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