

## Responding to the consultation

### Your details

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the following information section.

We will publish our evaluation of responses. Please note that we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may quote from your response anonymously.

Please answer all questions marked with a star\*

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### 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.

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 views' which of the following are you?

Student

Parent or carer

Teacher (but responding in a personal capacity)

Other, including general public (Please state below)

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**If you ticked "Official response from an organisation/group", 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)

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**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)

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**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

Regular conversations with Ofqual

**May we contact you for further information?**

Yes

No

## Questions

### Question 1

To what extent do you agree or disagree that awarding organisations should assign an appropriate level to their qualifications?

Strongly agree

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

It is clearly right that AOs should make clear for learners, employers and providers the level at which the qualification has been designed, so that everyone has clarity and confidence in what the qualification signifies and the level which the learner has achieved.

### Question 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

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

I agree that any change of level to a qualification should be made clear. The process of notifying Ofqual of any change must be a routine and unburdensome one.

### Question 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

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

Awarding bodies have a fundamental duty of care to learners. So we agree that an AO should provide Ofqual with details of any change to the level at which a qualification is offered, and a plan to ensure learners are not disadvantaged by any change to level. Any such plan should not become an unnecessary administrative burden with additional costs that would have to be borne ultimately by providers and learners.

#### **Question 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

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

I agree that this would give clarity for the learner and it should be for the awarding organisation to determine the appropriate level of information about the change to its qualification that it provides.

#### **Question 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

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

This is a welcome simplification.

#### **Question 6**

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

Yes

No

**Please give reasons for your answer**

Adding further categories would undo the simplification you propose.

#### **Question 7**

**To what extent do you agree or disagree that our proposed level descriptors reflect the requirements of a qualification at each level?**

Strongly agree

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

These seem fine as an overall guide, but they need to be interpreted flexibly so that they do not stymie innovative qualification design.

#### **Question 8**

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

Yes

No

**Please give reasons for your answer**

Further prescriptive guidance is not necessary.

#### **Question 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

Agree

Disagree

Strongly disagree

Neither agree nor disagree

**Please give reasons for your answer**

This will help give clarity.

#### **Question 10**

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

Yes

No

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

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

We suggested in our response to Ofqual's previous QCF consultation that TQT should consist simply of GLH plus "anything else", rather than the model on which you have consulted of GLH plus "Directed Learning" plus "Invigilated Assessment". We therefore feel that condition E7 is overly prescriptive and unnecessarily complex and confusing. For those reasons, it should be simplified as suggested above.

#### **Question 11**

**Do you have any comments about our proposed guidance?**

Yes

No

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

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

Simplifying the definition of TQT to just "GLH plus anything else" will allow Ofqual to reduce and simplify and improve the guidance accordingly.

#### **Question 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?**

Very helpful

Helpful

Unhelpful

Very unhelpful

Don't know / no opinion

**Please give reasons for your answer**

There should first of all be strong qualifications which meet employers' and learners' needs. The relevance of the qualification for RPA purposes should flow from its design and purpose, not the other way round.

### **Question 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 helpful

Helpful

Unhelpful

Very unhelpful

Don't know / no opinion

**Please give reasons for your answer**

Please see my answer to question 10. The notions of "Directed Learning" and "Invigilated Assessment" are meaningless and add no value for the learner or the employer. The simpler formulation of GLH plus "anything else" should be used.

### **Question 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 study

Directed learning

**Please give reasons for your answer and suggest any alternatives you would favour**

Neither. Please see my answer to question 10.

### **Question 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?

Dedicated assessment

Invigilated assessment

Please give reasons for your answer and suggest any alternatives you would favour

Neither. Please see my answer to question 10.

#### Question 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?

Yes

No

If yes, please provide them here:

#### Question 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?

Yes

No

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

#### Question 18

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 here in relation to the specific proposals:

**Question 19**

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

**Yes**

**No**

**If yes, what are they?**