

From Transition to Transformation: Consultation Questions

Strategic Regulation of Awarding Organisations
and Qualifications



October 2010

Questions

Conditions on governance, management, quality assurance, resources and co-operation with the regulators

A. Do you agree that these conditions should be placed on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
X					

Comments

B. Do you agree that an awarding organisation's governing body should be required each year to confirm whether or not the organisation is complying with the full suite of recognition conditions?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
X					

Comments

Conditions on compliance with requirements for units and qualifications

C. Do you agree that these conditions should be placed on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
	x				

Comments ...Where there are no accreditation requirements for a qualification, it will be the responsibility of awarding bodies to decide for themselves whether their qualifications meet regulatory standards – it will be very difficult to ensure

consistency of interpretation. Paragraph 4.1.2 states that, in future, qualification criteria will be “clear and precise as to the level of demand required”. It is not clear how this will be done. In mathematics, the level of demand of a qualification is affected by the content of the specification, the nature of the questions asked in examinations on that content, the ways in which marks are allocated, and for what, and also the number of marks needed to achieve success. Is it the intention to completely specify these modifiers of demand in qualification criteria? If qualification criteria are to “define the level of demand required of learners” then they will need to be more specific than specifications often are at present. It is in the interests of awarding organisations to aim to have their qualifications “consistent with other comparable qualifications” (section 4.2), however, it is unclear how awarding organisations can ensure this in practice. If one organisation feels that another is setting the standard of a qualification too low, what should they do?

Qualifications criteria

D. Do you agree that we should revise the way that qualification criteria are developed and presented?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		X			

CommentsThere is certainly room for improvement in the way that qualification criteria are developed and presented. We welcome the suggestion of input from qualification users (4.1.3). However, it is important that the qualification criteria which result are suitable for purpose and so it is right to also make use of the expertise of awarding bodies as outlined in 4.1.2. It is not entirely clear what process will be used to finalise criteria – it is possible to have admirable principles with the devil in the detail making the process unworkable. It is possible to envisage the sum total of qualification user input resulting in draft criteria where the overall demand is too high. How will this be resolved? Please also note that the expectations on criteria in 4.1.2 are unrealistic; such documents are not capable of being ‘clear and precise as to the level of demand required’. It would be wiser to acknowledge that some degree of uncertainty in the meaning of the criteria is inevitable, whilst explaining that this uncertainty reflects the breadth of demand between the level below and the level above.

Qualifications framework

E. Do you agree with our proposal to require all regulated qualifications to be referenced to one qualifications framework within which awarding organisations choosing to offer credit-based qualifications follow specific design rules?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
	X				

Comments ... It is sensible to require a single qualifications framework that subsumes existing frameworks and referenced to the European Qualifications Framework, since this provides increased transparency for users.

Conditions requiring a clear definition of learning outcomes

F. Do you agree that we should place these conditions on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments 4.2.1 states “Awarding organisations must clearly define what a learner must demonstrate in order to be awarded a qualification. “ It is not clear what is meant by this. For some vocational qualifications it is appropriate that candidates should show mastery of all assessment objectives before being awarded the qualification because the assessment objectives are directly related to competence in the vocation. It is not usually necessary for candidates for general qualifications to show mastery of all of a level descriptor to be awarded that level. The suggested requirement for learning outcomes could cause great damage to general qualifications, depending on the number and scope of the learning outcomes. It is critically important that mathematics assessment focuses on candidates’ ability to use and apply the techniques they know creatively, and sometimes in unexpected ways. A large set of highly specific learning outcomes would lead to an atomised curriculum, and would depress mathematical attainment for all learners.

Conditions on assessment techniques

G. Do you agree that we should place these conditions on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
x					

Comments We particularly welcome the statement in 4.3.1 that “Validity is the central concept in the evaluation of the quality of assessments”

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Conditions on safeguarding standards

H. Do you agree that we should place these conditions on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
X					

Comments It is important that conditions to safeguard standards are carefully set out and monitored.

.....

Use of the accreditation requirement

I. Do you agree with the approach we will use to determine which qualifications should be subject to an accreditation requirement?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments The proposed approach might be suitable in the long term. However, it would be best to proceed with caution for qualifications which have a long history of being subject to accreditation, especially in view of the nature of criteria also changing. It would be best to know how consistently awarding bodies are able to interpret the new qualification criteria before leaving them to do so on their own.

Conditions to secure fairness for learners

J. Do you agree that we should place these conditions on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
	x				

Comments It is right to put in measures to ensure fairness for learners. However the requirement that an awarding organisation “collects and analyses sufficient data to enable it to monitor whether any features of its regulated qualifications or units disadvantage particular groups of learners” may be difficult to put into practice. For example, the data may show that boys tend to do less well than girls in a particular GCSE but it will be harder to know whether that is the result of a feature of the qualification or whether it is due to other factors outside the control of the awarding organisation.

.....

Conditions to address the needs of qualification users

K. Do you agree that we should place these conditions on awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
			x		

Comments 6.1.1 states that “Qualifications should be developed for a specific purpose and be fit for that purpose.” There is a potential conflict between this and 6.1.2 “The Act places on us a duty to make sure that learners have a good choice of qualifications but that there is not an excessive number of qualifications with different titles in a similar area serving similar functions.” For example, A Levels in Mathematics and Further Mathematics are currently used for a number of purposes (not one single purpose):

- As preparation for Higher Education courses in Mathematics
- As preparation for Higher Education courses in Science subjects
- As preparation for Higher Education courses in Engineering
- As preparation for Higher Education courses in Social Sciences
- As a support for other qualifications in science and social science which may lead to further training and/or employment.

Although Higher Education Mathematics departments might seem to be the most interested end users, most students of A Level Mathematics (and Further Mathematics) do not go on to do Mathematics degrees.

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Recognition criteria

L. Do you agree that by applying the recognition criteria we will distinguish between organisations that are fit to be recognised as awarding organisations and those that are not?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments:

Review of recognition applications

M. Do you agree that peer reviewers should contribute to the scrutiny of evidence submitted in support of a recognition application?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments

N. Do you agree that reviewers with relevant knowledge and experiences gained outside of the awarding organisation sector should contribute to the scrutiny of evidence submitted in support of a recognition application?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments.....

Overall conditions or recognition and guidance

O. Do you agree that the general conditions set out a reasonable set of requirements for all awarding organisations to meet?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments

P. Do you agree that the supporting guidance, set out in Annex 2, will help an awarding organisation understand the behaviours that would indicate compliance with the conditions?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments.....

Transition to transformation

Q. Do you agree that it is reasonable to allow each awarding organisation a period of 12 months to make sure it is complying fully with the conditions of recognition?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Comments

Annex 3: Equality impact assessment on our regulatory approach

The regulatory relationship

R. Do you agree that the requirement on awarding organisations to appoint a senior officer with, amongst other things, responsibility to the regulator for securing equality and inclusion is appropriate?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Please identify any suggested change you would recommend to this proposal on how better to promote equality for different learners.

Securing fairness for learners

S. Do you agree that the 13 specific conditions directed at ‘securing fairness for learners’ to be reasonable requirements to place on awarding organisations which will facilitate the promotion of equality for all learners?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
	x				

T. Do you agree that it is reasonable at this stage not to specify which particular equality groups should be identified for the collection of data?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Please identify any suggestions for change, stating how they might better promote equality for different learners.

See the comments for question J. It would be useful to have guidelines, devised by statisticians, for the data which should be collected.

Obligations on each awarding organisation to define clearly the knowledge, skills and understanding required (languages)

U. Do you agree that the language condition is a reasonable requirement to place on awarding organisations which will facilitate the promotion of equality for all learners?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Please identify any suggestions for change, stating how they might better promote equality for different learners.

Recognition requirements

V. Do you agree that the third recognition criterion (Annex 2) is a reasonable requirement to place on awarding organisations which will facilitate the promotion of equality for all learners?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
	x				

W. Do you agree that the 'indicators' or 'typical evidence' of how the requirements may be met are appropriate?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
		x			

Please identify any suggestions for change, stating how they might better promote equality for different learners.

The recognition criteria are in Annex1 (not Annex 2). Surveys need to be carefully constructed and interpreted in order to provide valid information; conducting such surveys centrally would be more efficient than having individual awarding organisations undertaking them.

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