

**Guided Learning Hours: a consultation
on the relevance of qualifications for
the Raising the Participation Age policy
and estimating the size of
qualifications**

Analysis of consultation responses

By

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Ofqual/15/5653



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Executive Summary

- 1.1 The focus of the Ofqual consultation analysed in this report is on how an awarding organisation (AO) should:
- decide whether a qualification is, or is likely to be, used by persons in work in England aged 16 or 17 to help them meet their legal duties to participate in relevant education or training; and
 - calculate and describe the time students will typically need to spend undertaking certain activities when studying for a qualification
- 1.2 In total 45 individuals and organisations responded to the online consultation, together with a further 57 MS Word versions of the online survey received by Ofqual. Each of the 57 MS Word versions of the online survey were entered into a final dataset for analysis, giving a final response of 102. A further 7 written submissions were received by Ofqual which did not conform to the online structure but have been reviewed and included in the text analysis.

Estimating the size of qualifications – Total Qualification Time

Question 1

- 1.3 Ofqual began the consultation by asking if there are any activities where respondents would be in doubt as to whether the activities should be included in 'Guided Learning'. Online learning and e-learning were frequently mentioned as activities that should perhaps not be considered as 'Guided Learning'. Another important theme identified centred on work experience and practical activities, as some respondents indicated they are unsure of when, if ever, these may be considered 'Guided Learning'. Passive supervision and induction were two further areas called into question regarding their inclusion in 'Guided Learning'.

Question 2

- 1.4 Ofqual presented respondents of the consultation with a statement: "The proposed definition of 'Directed Study' is clear and appropriate." Respondents were asked to state their view on this and then justify their reasoning. The majority of respondents (62%) disagreed that the proposed definition of 'Directed Study' is clear and appropriate.
- 1.5 Among those who disagreed that the proposed definition is clear and appropriate, a significant proportion commented on a lack of clarity in the context of work experience, on-the-job training, and practical skill development. Many respondents in disagreement also stated that they feel the lines are

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blurred between 'Directed Study' and other categories, 'Guided Learning' in particular.

- 1.6 Conversely, among respondents who agreed that the proposed definition of 'Directed Study' is clear and appropriate, some acknowledged the flexibility of the term or accepted that there may always be ambiguity and grey areas.

Question 3

- 1.7 Ofqual presented respondents with the statement: "The proposed definition of 'Dedicated Assessment' is clear and appropriate." A small majority of respondents (54%) disagreed with this statement.
- 1.8 Many felt that it was particularly unclear when considering an examination or assessment that is not timed or invigilated. There was a strong focus in respondents' comments on formative assessments and other non-traditional methods.
- 1.9 Others called attention to a perceived lack of clarity around vocational qualifications (VQs) and workplace assessments, feeling that the current guidelines of 'Dedicated Assessment' are more directed towards academic studies.
- 1.10 Among those who agreed, some stated that although they feel the proposed definition of 'Dedicated Assessment' is clear and appropriate for invigilated and timed assessments, there could be more clarity provided for other forms, like work-based assessments.

Question 4

- 1.11 Respondents to the consultation were asked if they had any further comments on the three components of Total Qualification Time (TQT), such as other parts of learning time or activities that they would expect the definitions to cover.
- 1.12 Mentions were made about seeking clarity on where work experience and vocational qualifications fit into the TQT model. Other respondents maintained that there should be more differentiation made between traditional studies and work experience. Respondents argued that the definitions of the three components of Total Qualification Time are too strict and do not leave necessary opportunity for exceptions to be made.
- 1.13 Conversely, some stakeholders expressed their approval or simply indicated that they feel the three components of TQT are reasonable, sensible, appropriate, etc.

General Conditions

Question 5

- 1.14 Question 5 in the consultation referred to the General Conditions that Ofqual has proposed. A theme that emerged was that the language used in the General Conditions was not always clear to non-legally trained individuals. Several respondents related this point specifically and to the language used in E7.1 (b).
- 1.15 Another key theme was the sentiment that the TQT requirements would be demanding for AOs to comply with and would have a significant impact upon the resources AOs need to apply. With relation to the impact on resources, specific reference was made by a small number of respondents, including the FAB response, to the General Condition E7.2 and the inference that Ofqual can alter the TQT criteria and if this happens updates would then need to be made by AOs. This was considered to further increase the burden on AOs.

Statutory Guidance

Question 6

- 1.16 Question 6 in the consultation referred to the consideration that Ofqual will give to writing statutory Guidance which will provide AOs with further information about the proposed General Condition E7. A key theme that emerged from the comments was that Guidance should provide information on the amount and type of evidence required to support the calculation of learning hours. A related theme expressed by respondents about the nature of the Guidance was that it should provide scenarios and worked examples to guide organisations through the process.
- 1.17 The response provided by the FAB outlined a series of positive and negative indicators of compliance with the proposed General Condition E7. These responses were repeated by a number of other individual awarding organisations and provide the main bulk of the responses received with regards to suggested positive and negative indicators (see page 26).

Criteria

Question 7

- 1.18 The consultation document sought respondent views on the draft Criteria that would give effect to Ofqual's proposals. A strong theme that emerged within the responses received from AOs related to the need to clarify whether relevance should be determined if a qualification was intended for use by learners covered

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by the 2008 Act or whether there is a possibility that any learner taking the qualification may be covered by the Act.

- 1.19 It was also argued that the impact (of the proposed Criteria for the intended use of the qualification versus the possible use being unclear) would be an unnecessary burden on AOs and impact negatively on AOs resources.

Question 8

- 1.20 There was overall agreement (55%) that the Criteria document will help awarding organisations in making the required determination of a qualification's relevance for 2008 Act purposes.
- 1.21 Further guidance was also mentioned as something which would aid the decision making process and assist with compliance. Specific mention of what might be deemed to be "reasonable steps" required of AOs and the types of information needed were also raised.
- 1.22 Among those who gave negative answers (either disagree or strongly disagree), reservations tended to be quite specific in nature with little consensus. However, one theme which was mentioned more than once is that the proposed Criteria could be considered too prescriptive.

Question 9

- 1.23 Question 9 within the consultation asked respondents for other methods to consider when calculating values. The requirement that awarding organisations are expected to assign the lowest number of hours to a qualification is a point which is made within a number of responses. The most common manifestation of this objection concerned the route taken for a particular course of study. However, in addition to the routing for individual courses, the lowest number of hours was also linked to learning ability / stage of learning.

Question 10

- 1.24 There was a lack of consensus in relation to the helpfulness of the Criteria document. A small majority (52%) disagreed that the Criteria document will help awarding organisations in calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment.
- 1.25 A perceived lack of clarity about requirements, including which activities should be classed under which area, was a main theme amongst the reasons for disagreeing that the Criteria document will be helpful. In addition to concerns over lack of clarity, a perception of additional workload for awarding organisations was also raised.

Question 11

- 1.26 Question 11 within the consultation related to the proposed wording of the new draft criteria. Initial reaction to the proposed wording of the new draft Criteria was broadly skewed towards the sentiment that the language is too complicated and therefore not particularly user friendly. A recurring criticism is that the language should be less 'legalese' in style and that by changing this aspect, it would greatly aid comprehension.
- 1.27 Feedback on which sections are particularly clear and helpful is relatively limited. However, out of those who did comment, a noticeable number indicated that they would find it difficult to make a judgement without working through the Criteria or having to undertake an exercise to produce a definitive answer.
- 1.28 When asked to what extent the new Criteria will help awarding organisations make the required determinations, the response is relatively mixed. A noticeable theme to emerge is that the benefits or otherwise can only really be assessed in practice. In common with other points within the consultation, the point was made that the adoption of the Criteria are likely to give rise to increased bureaucracy and costs.

Implications for Credit values for qualifications

Question 12

- 1.29 The consultation asked to what extent respondents felt "Ofqual's proposals would have no impact on Credit values, unless the awarding organisation establishes that its previous estimate of the size of a qualification needs to be changed". Most respondents (57%) agreed with this statement.
- 1.30 Some respondents agreed with the statement and did not think previous estimates of size would need to be revised. This was because previous estimates of size were calculated in a similar way to that proposed.
- 1.31 Those who disagreed believed the new method would result in significant changes and that retrospectively changing credits based on a new system would not be fair.

Transition period

Question 13

- 1.32 Ofqual consulted with respondents on what they feel would be a reasonable length of time after the introduction of a new approach for an awarding organisation to evaluate the three components of TQT for its qualifications.

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- 1.33 A significant proportion of stakeholders argued that 12 months would not be a sufficient length of time for this evaluation to take place. They often suggested that a minimum of two years would be more reasonable.
- 1.34 Reasons for believing that 12 months is insufficient included allowing awarding organisations time to review and republish their qualification specifications, allocate resources, consult with end users, evaluate funding, conduct training, and ensure conditions and audits are in place.
- 1.35 The Federation of Awarding Bodies (FAB) has recommended that the evaluation of the three components of Total Qualification Time (TQT) should be carried out in a staged approach. They feel that 12 months is unreasonable and suggest that the implementation of three phases would allow for a smoother transition.

Equality analysis

Question 14

- 1.36 Respondents were asked to consider the impact of the proposals on people who share particular protected characteristics and highlight any specific positive or negative impacts.
- 1.37 Two common and related themes emerged within the comments. Firstly a number of respondents, AOs in the main, stated that learners with any protected characteristic may not have the profile of a 'typical learner'. Respondents also argued that students with learning difficulties may be likely to find it difficult to understand how much time they need to dedicate to a qualification. This was considered to be a particular issue for this group as respondents argued students with learning difficulties would need more time than the values in the TQT.
- 1.38 In relation to the disadvantage that 'non typical' learners may face, respondents argued that AOs should be allowed to develop additional statements that explain that values in the TQT are estimates and may vary for different types of learners. Related comments also referenced that Ofqual should allow AOs to report a range of values within aspects of TQT to manage or reduce potential impacts.

Regulatory impact

Question 15

- 1.39 Respondents were asked to outline what positive or negative regulatory impacts Ofqual should consider in relation to these proposals. The strongest theme

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amongst the comments referred to the negative regulatory impact the proposals would have on the resources and workloads of AOs. While reform was supported, caution was raised that Ofqual should not over-burden the sector and ensure change happens at a more measured pace.

- 1.40 A number of respondents mentioned that the regulatory impact of the proposals would be seen in the form of increased costs (due to additional resources, systems and meetings etc. needed). It was argued that these additional costs and resources needed would divert resources from other activities such as innovation. Respondents believed this may then stifle new qualification development, affect quality and ultimately additional costs would be passed onto the end user.
- 1.41 When asked to suggest how any negative regulatory impacts could be reduced or managed, respondents argued that a clear plan of the regulatory changes should be published which identifies the impacts upon AOs. Secondly, another repeated point was the need for analysis of the impacts of the proposed changes on AOs to take place so that AOs could have a better understanding of the risks presented by the proposals.
- 1.42 A third theme amongst the responses was that negative regulatory impacts could be managed or reduced through considering the timescales for change and allowing a reasonable time for change.

Consultation context and overview

Introduction

1.43 This Ofqual consultation focused on how an awarding organisation should:

- decide whether a qualification is, or is likely to be, used by persons in work in England aged 16 or 17 to help them meet their legal duties to participate in relevant education or training; and
- calculate and describe the time students will typically need to spend undertaking certain activities when studying for a qualification

1.44 Ofqual consulted on a new approach to how the size¹ of a qualification is estimated because:

- Ofqual and the AOs they regulate are subject to relevant statutory duties in relation to the Government's Raising the Participation Age (RPA) policy;²
- existing estimates made by awarding organisations and expressed as guided learning hours (GLH) have not always been based on a common approach and in some cases are thought to be excessive; and
- Ofqual are proposing changes to how they regulate qualifications designed to meet the Qualifications and Credit Framework (QCF) regulatory arrangements. The QCF regulations require awarding organisations to determine Credit values for their qualifications as a measure of size. Ofqual consider it important that Credit values can continue to be developed for qualifications. Any such Credit values need to be robust and consistent across awarding organisations.

1.45 Ofqual has a duty to publish criteria that an AO must apply when it decides whether a qualification is likely to be used by 16 or 17 year olds in England who are in work and who need to discharge their statutory 'duty to participate' in relevant education or training; and how, if so, it must assign hours of guided learning to that qualification. Ofqual will then regulate how awarding

¹ In the consultation, when 'size' was mentioned this referred to the time that students will typically need to spend undertaking certain activities when studying for a qualification.

² Education and Skills Act 2008 and Apprenticeships, Skills, Children and Learning Act 2009

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organisations discharge their duties over estimating what at present are known widely as 'guided learning hours' (GLH).

Consultation method and respondent profile

1. Respondents were encouraged to submit their response to the consultation questions online or to submit via hard copy/email. In total 45 individuals and organisations responded to the online consultation, together with a further 57 MS Word versions of the online survey received by Ofqual. Each of the 57 MS Word versions of the online survey were entered into a final dataset for analysis, giving a final response of 102.
2. A further 7 written submissions were received by Ofqual which did not conform to the online structure but have been reviewed and included in the text analysis.
3. The opening section of the consultation asked respondents to categorise themselves as to whether they were providing an 'official response from the organisation you represent' or whether the response was a 'personal view'. Following this categorisation, respondents were asked to classify themselves further using several questions on their personal and organisational characteristics.
4. This categorisation was used as the basis of sub-groups by which the responses to the consultation have been analysed. The final decision on the make-up of these classifications was made by Ofqual and the table overleaf shows how the responses have been categorised for analysis purposes.

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Figure 1: Responses by stakeholder categories (exclusive of hard copy written responses)

Respondent type	Number of responses	Percentage
Personal responses	10	10%
Teacher	3	
Educational specialist	2	
General public	3	
Organisational responses	90	88%
Awarding organisation	74	
Other representative group or interest group	10	
Private training provider	1	
Local Authority	1	
School/college	3	
Total	102	

Please note that the sub groups do not add up to the total number as two respondents did not provide data for the groups/sub groups.

- Alongside the online consultation Ofqual held two stakeholder events. These events were an opportunity for awarding organisations to discuss the details of the proposals. The outputs of these workshop discussions were not formal consultation responses and therefore have not been analysed in this report.

Guidance on analysis

6. The closed questions are presented in tables with the frequencies of responses against each answer. The tables use the respondent categorisation set out in figure 1 to present the findings cross-tabulated with respondent category.
7. Due to the small number of responses in certain groupings the data has been analysed by the following groupings:
 - Personal view (10)
 - Organisational view (88)
 - Awarding organisation (74)
 - Other representative group or interest group (10)
 - Other organisation [School/college, LA, training provider] (5)
 - Total (102)
8. The number of respondents within some stakeholder categories is very low. Given this, it is potentially misleading in a consultation with this number of responses to display the results as percentages so simple frequency counts have been used and percentages only provided for the total sample.
9. Respondents were also able to report which nation they were from. A large number of respondents who completed MS Word versions of the consultation selected more than one nation. Within the online consultation respondents were only allowed to select one nation, therefore it would have been misleading to input the nation into the data file.
10. Given the dominance of responses from AOs to the overall sample (73% of all responses) caution is also advised in interpreting the top line percentage sample figures. The analysis has been approached in a more qualitative way given the small number of respondents in each group. These views cannot be analysed or seen as representative of these groups as a whole.
11. The consultation included five closed questions which had invitations to explain why respondents answered the closed connected question in a particular way. Four of the questions were open questions with a secondary open ended follow up to further investigate the initial question focus and therefore need to be analysed together. Six questions were stand-alone open ended in format.

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12. The open ended responses to all questions elicited varied responses, ranging from generalised comments about the propositions, to comments about specific detail of the proposals. All comments were analysed in a very similar way, with each response read and the theme of the comments categorised but without formal coding. These responses were then analysed on a thematic basis by noting the themes of each response to highlight differences and trends in opinion between and within the respondent types.
13. The written submissions received outside of the online consultation were catalogued into a thematic grid and each response analysed for the key themes emerging from them. The purpose of this report is to summarise the strength of opinion received in response to the key consultation questions. The summary report cannot reflect every level of detail of all the responses.

Consultation analysis

14. The main section of the report provides an analysis of the responses received to the online consultation and takes into account the views expressed via separate written submissions.
15. The report is structured around each question within the consultation and provides an analysis of the quantitative data broken down by each stakeholder category. Where relevant the report provides further explanation of these responses through an analysis of the qualitative responses received.

A new approach to size

Estimating the size of qualifications – Total Qualification Time

Question 1

16. **Ofqual began the consultation by asking if there are any activities where respondents would be in doubt as to whether the activities should be included in ‘Guided Learning’. Many respondents identified areas where they would appreciate clarity, and several key themes can be recognised.**
17. **Online learning and e-learning** were frequently mentioned as activities that should perhaps not be considered as ‘Guided Learning’. Many respondents (18) were unsure whether having a **‘live supervisor’** (consultation response) would qualify while a small number (three) were more forthright and stated that even in that circumstance, the activity should not count. Consistently, respondents indicated that they were looking for clarity on when online studies would be included in ‘Guided Learning’, as they seemed to feel the lines were blurred in this context.

‘Queries around E-learning where most of it is unguided as per the definition. For examples asking questions online and tutors responding.’

Awarding organisation: ISMM

‘It is also not clear whether the Guided Learning definition includes online learning where learners are following instruction through, for example, a webinar. If this is done in real time, with the tutor theoretically able to respond to direct questions then this seems to fit within the guided learning definition. However, if a webinar is pre-recorded, which category will this be defined within?’

Awarding organisation: apt awards

‘The definition reflects a very old-fashioned view of learning and ignores the widespread use of e-learning and other forms of structured learning which is undertaken without the “immediate guidance” of a tutor.’

Awarding organisation: Institute of Leadership & Management

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18. Another important theme identified centred on **work experience** and **practical activities**, many respondents (23) indicated they are unsure of when, if ever, these may be considered 'Guided Learning'. It was commonly implied that **vocational qualifications** were different to general qualifications and should therefore be defined more explicitly in the context of 'Guided Learning'.

'Whilst it is easy to see how Guided Learning in this context can be measured in a traditional classroom taught qualification, it is not clear how this applies to work-related qualifications where the focus is on the development of practical skills. The difference between Directed Study and Guided Learning is unclear for situations where learners may be working on individual projects within the same room, such as the creation of a piece of furniture. If the tutor stays in the room, is this Guided Learning, and if they leave the room, does this now become Directed Study?'

Awarding organisation: apt awards

'It is unclear where work based assessment both formative and summative should be.'

Awarding organisation: PAA\VQ-SET

'The definitions will be hard to apply to vocational qualifications which are not based on teaching in a classroom. The definition of Guided Learning includes "teaching in the workplace", the consultation document includes "learning in the workplace (that is, work experience)" as an example of Directed Study, although it is not listed in the definition.'

Awarding organisation: City & Guilds

19. Furthermore, **passive supervision** has been mentioned by numerous respondents (11) in reference to whether or not it should be included in 'Guided Learning'. Responses referred to instances such as, supervised study periods and formal assessments where a tutor, examiner, **invigilator** or technician is present and available for support, but is not necessarily interacting with the students.

'In this context it should relate to activities where there are interventions only and not where the learners are passively supervised only.'

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Awarding organisation: Open Awards

‘Graded examinations are assessed by a visiting examiner who is not an invigilator but who is also not the learner’s teacher, tutor or has any involvement with the delivery of the qualification. It is therefore unclear as to whether this should be part of GLH or DAS.’

Awarding organisation: International Dance Teachers Association

‘The exclusion of time being assessed without immediate feedback (invigilation) is unnecessary and then requires a third type of hour. It would be simpler to include it [in the definition of GLH].’

Other organisation: Association of School and College Leaders

20. **Induction** is a related activity that has also been called into question. It has been suggested that if students do not have direct access to a tutor to answer questions and provide information, it should not qualify.

‘HABC feel that there is inconsistency across awarding organisations in relation to what categorises as induction activity and where this fits in guided learning.’

Awarding organisation: Highfield Awarding Body for Compliance

Question 2

21. **Ofqual presented respondents of the consultation with a statement: “The proposed definition of ‘Directed Study’ is clear and appropriate.” Respondents were asked to state their view on this and then justify their reasoning. The majority of respondents (62%) disagreed that the proposed definition of ‘Directed Study’ is clear and appropriate.**
22. Overall, 28 respondents agreed and 60 respondents disagreed with the statement. There were also 11 respondents who indicated they neither agree nor disagree.

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Figure 2: “The proposed definition of ‘Directed Study’ is clear and appropriate.” What is your view of this statement? (Q2)

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Total
Personal responses	0	3	0	5	2	10
Organisational responses	3	21	10	49	4	87
Awarding organisation	2	15	8	43	4	72
Other representative body or interest group	0	3	2	5	0	10
Other organisation [School/college, LA, training provider]	1	3	0	0	0	4
Total (n)	3	25	11	54	6	99
Total %	3%	25%	10%	56%	6%	

23. Among those who disagreed that the proposed definition of ‘Directed Study’ is clear and appropriate (who represent the majority), a significant proportion (26) commented on a lack of clarity in the context of **work experience, on-the-job training, and practical skill development**. Stakeholders questioned whether work experience counts as ‘Directed Study’, but most argued that it should rightly be included within the scope of the definition.

‘It is unclear as to whether assessment of practical skills and knowledge fits within the definition for Directed Study or Dedicated Assessment.’

Awarding organisation: GQA Qualifications Ltd

‘The definition of Guided Learning includes “teaching in the workplace” and the consultation document includes “learning in the workplace (that is, work experience)” as an example of

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Directed Study. This is confusing and for some vocational qualifications it should be noted that there is no strict divide between teaching and learning in the workplace.'

Awarding organisation: City & Guilds

'The title does not accurately reflect the definition statement and is not inclusive of all learning. The tile should be 'Directed Learning' as the definition rightly includes development and practice of workplace skills. 'Study' implies cognitive development only.'

Awarding organisation: PIABC

24. Many respondents (16) in disagreement also stated that they feel the **lines are blurred** between 'Directed Study' and other categories, 'Guided Learning' in particular.

'It is not clear, particularly within work-based qualifications, where Guided Learning stops and Directed Study starts.'

Awarding organisation: apt awards

'What is the difference between Directed Study and GL - it seems very unclear. Does this include: e-learning - a mandatory element and level of contribution which is monitored to ensure it's achieved by the learner. Directed practice, Mandatory reading, self study or private study or private practice time, revision time, time spent on reflective journals - it seems appropriate that these are included but is that Ofqual's intention?'

Awarding organisation: Quallsafe Awards

'The proposed definition of 'Directed Study' is not clear, particularly in regards to the reference to assessment in Directed Study and in Guided Learning. The definition needs to more clearly define what is meant by assessment as it could be construed that assessment is counted twice.'

Other organisation: Scottish Qualifications Authority, Accreditation

25. Conversely, among respondents who agreed that the proposed definition of 'Directed Study' is clear and appropriate, a few (three) acknowledged the

flexibility of the term or accepted that there may always be **ambiguity** and grey areas.

‘There are always going to be grey areas. A judgement will be needed. The whole notion of guided learning is inexact when dealing with individuals. It will inevitably be a reasonable average.’

Organisational response: TLM

Question 3

26. **The next part of the consultation focussed on the proposed definition of ‘Dedicated Assessment’.** Ofqual presented respondents with the statement: **“The proposed definition of ‘Dedicated Assessment’ is clear and appropriate.”** A small majority of respondents (54%) disagreed with this statement.

27. Overall, 35 respondents agreed and 54 respondents disagreed with the statement. There were also 10 people who indicated they neither agree nor disagree.

Figure 3: “The proposed definition of ‘Dedicated Assessment’ is clear and appropriate.” What is your view of this statement? (Q3)

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Total
Personal responses	1	1	0	5	3	10
Organisational responses	6	26	10	38	7	87
Awarding organisation	4	19	10	32	7	72
Other representative body or interest group	1	4	0	5	0	10
Other organisation [School/college, LA, training provider]	1	3	0	0	0	4
Total (n)	7	28	10	44	10	99

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Total %	7%	28%	10%	44%	10%	
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28. A small majority disagreed with this statement, indicating that the proposed definition of ‘Dedicated Assessment’ is *not* clear and appropriate. Many (21) felt that it was particularly unclear when considering an examination or assessment that is **not timed** or invigilated. There was a strong focus in respondents’ comments on **formative assessments** and other non-traditional methods, and some (eight) indicated they feel the definition of ‘Dedicated Assessment’ is **too narrow**.

‘Graded examination assessments are not invigilated but they are examined under controlled conditions by a visiting examiner. It is unclear as to whether these should be seen as part of GLH or DAS.’

Awarding organisation: International Dance Teachers Association

‘This is clear for traditional, invigilated examination, however much less clear for different/more innovative assessment methodologies. In particular, the timed aspect is unclear.’

Awarding organisation: Laser Learning Awards

29. Respondents who disagreed that the definition of ‘Dedicated Assessment’ was clear and appropriate called attention to a perceived lack of clarity around **vocational qualifications** (VQs) and **workplace assessments**. Feeling that the current guidelines of ‘Dedicated Assessment’ are more directed towards academic studies.

‘With regards to vocational assessment not all assessment is time bound due to its practical nature.’

Awarding organisation: Lantra

‘Definition is only clear for invigilated timed exams. Most VQ assessment falls outside this for example work based task assessments.’

Awarding organisation: ISMM

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30. Among those who agreed, some (six) stated that although they feel the proposed definition of 'Dedicated Assessment' is clear and appropriate for **invigilated** and **timed assessments**, there could be more clarity provided for other forms, like work-based assessments.

'It is clear for invigilated exams but may be less clear for other methods of assessment.'

Awarding organisation: CIPS

'It is clear that this definition refers to assessments which take place under controlled conditions and which are invigilated but do not allow for direct feedback from a teacher or supervisor.'

Awarding organisation: Sports Leaders UK

Question 4

31. **Respondents to the consultation were asked if they had any further comments on the three components of Total Qualification Time (TQT), such as other parts of learning time or activities that they would expect the definitions to cover.**
32. For this question, there were a wide variety of suggestions put forward, but several key themes emerged.
33. Firstly, many (12) mentions were made about seeking clarity on where **work experience or work-based learning** and **vocational qualifications** fit into the TQT model. This is consistent with themes identified throughout earlier questions in this consultation.

'Workplace assessment, which is not invigilated and the assessor does not "guide" the learner, is an essential part of the process for such qualifications and should not be outside the calculations for credit.'

Awarding organisation: GQA Qualifications Ltd

'Our main comment is 'why is all of this necessary for the vocational qualifications market?' It is really much more appropriate for schools and colleges.'

Awarding organisation: English Speaking Board

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34. Further, respondents maintained that there should be **more differentiation** made between traditional studies and work experience.

‘It would be more meaningful if Total Qualification Time could be separated into Study Time and Work Experience Time. Study Time would comprise the three suggested components of Guided Learning, Directed Study and Dedicated Assessment. There does not appear to be any need to break down Work Experience further.’

Personal view: Director, Network Exams

35. Many respondents (18) argued that the **definitions** of the three components of Total Qualification Time are too strict and do not leave necessary opportunity for **exceptions** to be made. A wide variety of these types of exceptions were suggested, including variability in learning times, age category, and the ways by which awarding organisations define specific activities.

‘All measures of time are specified as being for a “normal learner”. This concept is not defined and this will inevitably lead to subjectivity in interpretation.’

Awarding organisation

‘Unfortunately you start from a wrong premise regarding the value and use of the current GLH/credit values. Would an AO have to calculate qualification based on the time for the average 16 yo. even if the qualification was to be primarily used by older people?’

Personal view: Consultant

‘This also begs the question that if a learner completes all the GL and DSH, but does not take the “dedicated” assessment, could they claim and be awarded credit? Presumably not the intention, but has this been considered?’

Personal view: Chair of Board of Trustees of AO?

36. Further, comments were made about the need to address the variety of **delivery methods** and **learning arrangements** employed in the education system, including distance learning and e-learning.

‘How will this apply to online assessment?’

Awarding organisation

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‘I think there should be a formally stated recognition of variability in taught, study and assessment time, otherwise the definitions will be used by awarding bodies to create frameworks which force schools to adopt specific timetables for specific amounts of time for each course.’

Personal view: Principal

37. There were also many responses (12) identifying a lack of clarity around **revision** and **induction**, and these are points supported by the Federation of Awarding Bodies (FAB).

‘Induction and revision are areas that require clarification in terms of whether they should be counted within TQT and, if so, in which element.’

Organisational response: FAB

‘Clarification as to whether and/or where, tutorials, inductions, and support from teaching assistants count within TQT.’

Awarding organisation: IMI Awards Ltd

38. Conversely, a small number of stakeholders (three) expressed their **approval** or simply indicated that they feel the three components of TQT are reasonable, sensible, appropriate, etc.

‘The three components of Total Qualification Time are appropriate in our view and should allow schools, colleges and work placements/employers a clear view of what time and resource requirements are needed for school, college and specific work related opportunities.’

Local Authority: Bucks Learning Trust on behalf of the Buckinghamshire County Council

‘This is welcome development and reflects the growing diversification in the way students can conduct their learning and the ways they can submit evidence of their competencies, knowledge and skills. It also reflects the profound effect learning technologies has had on the ability of students to increase their ability to manage more of their own learning and its administration.’

Personal view: FE Teacher & e-learning Advisor

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Regulation

General Conditions

Question 5

39. Question 5 in the consultation referred to the General Conditions that Ofqual has proposed. These conditions were provided in full in appendix B of the consultation document and respondents were asked three open ended questions about the proposed General Conditions, these were:

Do you have any comments about our proposed General Conditions?

Which paragraphs are clear and helpful? Why?

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

40. An analysis of the comments provided to these questions has produced the following themes. Starting with the overarching comments, a theme that emerged was that the **language used in the General Conditions was not always clear to non-legally trained individuals**, which many users may be. This was a view put forward by the AOs who responded.
41. A small number (two) of the comments related to this were offered as a general description of how the General Conditions are presented, as this example highlights:

‘The General Conditions are written at a high level, which are not always clear to a non-legally trained individual.’

Awarding Organisation: Trinity College London

42. However, more of the comments (four) about the ability of non-legally trained individuals to understand the General Conditions related to specific parts of the conditions, with section E7.1 (b) mentioned in particular.

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43. The assumption here was that the phrase ‘in making this determination’ implied that AOs would be making the decision regarding RPA relevance and they must apply the TQT criteria³.
44. Respondents also commented that E7.1 (b) implied that the TQT criteria need only be applied once an AO has determined that a qualification is relevant for 2008 Act purposes. These were assumptions mentioned by several respondents and they **argued that the language should be clearer in relation to E7.1 (b):**

‘E7.1 (b) – the language ‘in making that determination’ is not helpful here as it implies that as AOs are making the decision regarding RPA relevance they must apply the TQT criteria. We assume that this Condition is intended to require that the TQT criteria need only be applied once an AO has determined that a qualification is relevant for 2008 Act purposes.’

Awarding organisations (various)

‘We are sure that to legally trained individuals the current language is clear but it is potentially misleading to a non-legally trained reader. Given that it is AOs and not legal experts who are the target audience for this Condition we would hope to see an amendment to this in the final version of the Condition.’

Awarding organisations (various)

45. A second theme that emerged from the comments was that the TQT requirements would be demanding for AOs to comply with and would **have a significant impact upon the resources AOs need to apply.**

‘Very demanding for AOs, particularly for qualifications with small take up.’

Personal view: Educational specialist

³ Under the ASCL Act 2009, awarding organisations are required to make a decision regarding qualifications’ relevance for RPA purposes. Where qualifications are relevant for RPA purposes, the TQT Criteria would need to be applied.

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46. With relation to the impact on resources, specific reference was made by a small number of respondents (six), including the FAB response, to the General Condition E7.2. In particular the statement that **Ofqual can alter the TQT criteria and if this happens updates would then need to be made by AOs**, this was considered to be further increasing the burden on AOs:

‘The requirement to review TQT in line with any updates made by Ofqual also provides for AOs to have to review and update some or all of their qualifications on a regular basis, if changes are made on this basis, and will involve updates to qualifications documents. This could have a significant impact on AOs' time, and it would be helpful for Ofqual to develop some guidance regarding timescales within which AOs would be expected to make the relevant updates.’

Awarding Organisation: CABWI Awarding Body

‘Condition E7.2 would be unmanageable and resource intensive for AOs as we would need to re-evaluate qualification TQT whenever Ofqual makes changes, and, in turn, revise all marketing and supporting materials related to the qualification.’

Awarding Organisation: ABMA Education Ltd

47. While not a common theme, AQA took this view further and questioned the need for gathering and providing evidence of a qualification's relevance. AQA argued it 'seems unnecessary to determine a qualification's relevance when the only effect of this is to require the AO to determine the TQT for a given qualification'. Instead AQA suggested evidence should be gathered and provided as to why a qualification is *not* relevant for the 2008 Act.

We propose instead that awarding organisations should be required to gather and provide evidence as to why a qualification is not relevant for the purposes of the 2008 Act, in the event that the awarding organisation wishes not to determine TQT for that qualification. This would dramatically reduce the bureaucratic burden on awarding organisations, while continuing to ensure that this provision of the 2008 and 2009 Acts is complied with.

Awarding Organisation: AQA

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48. A further theme that emerged within the comments related to **the need for AOs to provide ‘appropriate evidence’ to support the calculation of learning hours**. Particular concerns were raised that this would be difficult for ‘higher level qualifications’ which can be based upon smaller cohorts of learners. As the following quote highlights:

‘Whilst in some qualifications the calculation of guided learning can be easily calculated, for particularly higher level qualifications the level of directed study (or self-directed study) can be much more difficult to quantify and based on a much smaller cohort of learners with sometimes very different learning styles and methods.’

Awarding Organisation: Imperial Society of Teachers of Dancing

49. A number of comments did though conclude that the General Conditions were **clear and reasonable**.

‘The General Conditions seem clear and reasonable’.

Awarding Organisation: Chartered Institute for Securities & Investment

50. A very small number of comments referred to specific aspects of the General Conditions that were clear and helpful. With many other respondents not offering a response or referring to previous comments on the content.
51. In the small number of cases where specific references were made paragraphs 4.12-4.15 of the proposed Criteria were referenced as being particularly clear and helpful to AOs.

‘Paragraphs 4.12 – 4.15 are generally clear and helpful in setting out the obligations of awarding organisations, although the rationale for such obligations remain obscure.’

Other representative or interest group: Voice

Guidance

Question 6

52. Question 6 in the consultation referred to consideration that Ofqual will give to writing Guidance which will provide AOs with further information about the proposed General Condition E7. The purpose of the Guidance would be to help AOs determine which qualifications are relevant for 2008 Act purposes, or how hours of TQT must be assigned.
53. The consultation document sought views on what information would be helpful to include in any Guidance, if this was produced. The consultation question was:

What Guidance would be most helpful to you in relation to the proposed General Condition E7? Why is this? You may wish to consider what might be positive and negative indicators of compliance with the proposed General Condition.

54. An analysis of the comments provided to these questions has produced the following themes around the content of any guidance and the style in which it might be delivered.
55. A key theme that emerged from the comments was that Guidance should provide information on the **amount and type of evidence required to support the calculation of learning hours**. This was a view offered by a range of different AOs (six) and reflected in the FAB response. The following is an example of the nature of these comments:

‘Guidance would be helpful in relation to the amount and type of evidence required to justify...the calculation of learning hours, drawing on a range of qualifications rather than the usual suspects of GCSE/A level etc.’

Awarding organisation: Rockschool Ltd

56. A related theme picked up by respondents on the nature of the Guidance was that it should **provide scenarios and worked examples** to guide organisations through the process.

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‘Guidance, with examples, as to what is, and what isn’t, a qualification relevant for RPA purposes, and the evidence expected, again with examples.’

Awarding organisation: apt awards

57. The response provided by the FAB **outlined a series of positive and negative indicators of compliance with the proposed General Condition**. These responses were repeated by a number of other individual AOs and provide the main bulk of the responses received with regards to suggested positive and negative indicators.
58. These have been repeated below to summarise the comments received:

‘Positive Indicators could therefore include:

- The AO has clear systems and procedures in place for determining the relevance of each regulated qualification that it offers for 2008 Act purposes.
- The AO has followed their procedures and has made such a determination for each regulated qualification which it offers.
- There is suitable evidence to support the decision made by the AO in relation to the determination of the relevance of each regulated qualification it offers for 2008 Act purposes.
- There is a clear plan in place for the review of the determination of relevance for 2008 Act purposes and a clear understanding of when an earlier review may be required.
- There is a clear communication in the specification for each qualification relating to the qualification’s relevance for 2008 Act purposes.
- A TQT value and values for the elements that contribute to TQT have been assigned to all relevant qualifications.
- There are systems, processes and checks in place to ensure that, where a qualification is not relevant for 2008 Act purposes, learner of the appropriate ages are not able to register for that qualification.
- There is a process for users of the qualification to feedback their views of the determination and provide evidence for consideration in any future review of the relevance of a qualification for 2008 Act purposes.

Negative Indicators could include:

- Incorrect determinations in relation to relevance for 2008 Act purposes have been made for some or all of the qualifications that an AO awards.
- The review schedule has not been followed and determinations have not been updated accordingly.
- A review of the determination related to one or more qualification that has been required by Ofqual has not been carried out.

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- All elements of TQT have not been assigned to a qualification that is relevant for 2008 Act purposes.
- An element of TQT has been assigned to a qualification that is not relevant for 2008 Act purposes but values have not been assigned for all elements of TQT.
- Learners covered by the requirements of the 2008 Act have achieved a qualification that has been determined as not relevant for 2008 Act purposes.
- The determination of a qualification's relevance (or not) has been based on flawed evidence or assumption'

Other representative body: Federation of Awarding Organisations

Criteria

Question 7

59. The consultation document sought respondent views on the draft Criteria that would give effect to Ofqual's proposals. The proposed Criteria were presented in full in Appendix B of the consultation document, respondents were asked:

Is there anything else we should reasonably expect an awarding organisation to consider when determining a qualification's relevance for the Raising the Participation Age policy (relevance 'for 2008 Act purposes')?

60. A strong theme within the responses received from AOs related to the need to clarify whether relevance should be determined on **whether a qualification was intended for use by learners covered by the 2008 Act** or whether there is a **possibility that any learner taking the qualification may be covered by the Act**.
61. This was a common theme in around 15% (14) of the responses received. A number of responses used the same language to articulate this point, mirroring the FAB response, as highlighted in the response below:

'AOs would find it useful to have clarification of whether a qualifications relevance for 2008 Act purposes should be based on whether the AO intends the qualification to be used by learners covered by the 2008 Act or whether it must be determined as being relevant if there is any possibility whatsoever that a learner of those ages could in theory take the qualification. If an AO does not intend a qualification to be used for 2008 Act purposes and

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their data shows that no one of the relevant ages has ever been registered for it, will this be viewed as sufficient evidence upon which to base a determination that it is not relevant?’

Awarding Organisations (various)

62. It was also argued that if the intended use of the qualification for RPA purposes versus the possible use of the qualification for RPA purposes isn't clear in the Criteria that this **may cause an unnecessary burden on AOs**. One AO commented that:

‘We would hope that Ofqual will not impose a regulatory system “on the off chance” that something might be the case. For example, it would be disproportionate for us to survey all FE colleges in England, just in case they might enter one of their employed learners on one of our courses. And it would be disproportionate for Ofqual to expect an awarding organisation such as ours to be surveying for all of our registered qualifications, when there might be only a handful of such learners in one year and none in succeeding years.’

Awarding organisation: Cambridge International Examinations

63. While only mentioned by three respondents, a further theme that emerged within the comments was that Ofqual should expect an AO to **focus on the benefit / relevance of the qualification to the individual now and in later life** when determining a qualification's relevance for the Raising the Participation Age policy. The following two quotes reflect the small number of responses that made this point:

‘How it will benefit the learner - will it be for a particular skill for a particular role or will it be useful across a number of roles.’

Awarding organisation: ISMM

‘Relevance should relate to what is most appropriate in meeting the needs and serving the interests of the particular age group, rather than conforming to what many people will view as a fairly artificial and bureaucratic set of standards.’

Other representative or interest group: VOICE

Question 8

64. **The consultation asked respondents their view on the Criteria document, using the following statement: “The Criteria document will help AO in making the required determination of a qualification’s relevance for 2008 Act purposes.” There was overall *agreement* (55%) that the Criteria document will help AOs in making the required determination of a qualification’s relevance for 2008 Act purposes.**
65. Half (50%) said that they agreed with the statement with a further five per cent saying that they strongly agreed. Just under 2 in 10 (19%) said that they either disagreed or strongly disagreed.

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Figure 4: The Criteria document will help awarding organisations in making the required determination of a qualification’s relevance for 2008 Act purposes.” What is your view of this statement? (Q8)

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Total
Personal views	0	1	6	2	0	9
Official response from an organisation/group	5	45	19	12	3	84
Awarding organisation	2	39	16	10	3	70
Other representative group or interest group	2	5	1	1	0	9
Other organisation [School/college, LA, training provider]	1	1	2	1	0	5
Total (n)	5	47	25	15	3	96
Total %	5%	50%	26%	16%	3%	

66. Respondents were asked to give reasons for their answers as to whether the Criteria document will help AOs in making the required determination of a qualification’s relevance for 2008 Act purposes. Those who gave positive answers (either agree or strongly agree) **often mentioned both a positive point as well as assumptions and definitions which perhaps could be improved upon.** For example, an assumption which a specific paragraph was based upon was questioned in a number of responses.

‘The definitions are mostly based on reasonable assumptions apart from paragraph (e) which assumes an age/stage relationship between level 3 and 16-17 year olds.’

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Awarding organisations (various)

67. Further guidance was also mentioned as something which would aid the decision making process and assist with compliance. Specific mention of **what might be deemed to be “reasonable steps”** required of Awarding Organisations and the types of information needed were raised.

‘More guidance is required on what Ofqual deems to be “reasonable steps” required of Awarding Organisations and the types of information that should be included in determining the requirement. Further guidance is needed on how an AO can legitimately decide whether a qualification is not relevant for the purposes of the 2008 Act’

Awarding organisation: Engineering Construction Industry Training Board (ECITB)

‘The criterion that requires awarding organisations to take reasonable steps to gather estimates of the number of hours currently undertaken from a proportion of centres could be clarified further.’

Other representative group or interest group: CITB - Construction Industry Training Board

68. Among those who gave negative answers (either disagree or strongly disagree), reservations tended to be quite specific in nature with little consensus. However, one theme which was mentioned more than once (3 respondents) is that **the proposed Criteria could be considered too prescriptive**. This tended to cover specific aspects of the Criteria such as whether it is reasonable to ask an awarding organisation to monitor the ages of learners registered on its qualifications for purposes of RPA. Others were more general such as:

‘The proposed criteria are over prescriptive and as stated in our above answers, we do not believe they support the principles-based approach to regulation.’

Awarding organisation: OCR (Oxford, Cambridge and RSA Examinations)

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Question 9

69. Question 9 within the consultation asked respondents for other methods to consider when calculating values. The consultation question in full was:

Are there other methods we should reasonably expect an awarding organisation to consider when calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment?

70. When analysing the open ended comments for this question, it is apparent that a few themes were common. The **stipulation that AOs are required to assign the lowest number of hours to a qualification** was queried in a number of responses (11 awarding organisations). The most common concern was the **route taken for a particular course of study**:

'The idea that we also have to assign TQT to the shortest pathway available within a qualification, where a number of optional routes exist, is not realistic. This may not be the most popular route, and may steer centres towards delivering those units / modules within the shorter pathway whether right for the learners or not, as this will have an implication on funding allocation'

Awarding organisation: apt awards

'If a qualification has a route through it that is shorter than other routes and this route is the basis for the values that are assigned to the whole qualification, then this may impact on the credit value of the qualification.'

Awarding organisations (various)

71. However, in addition to the routing for individual courses, the lowest number of hours was also linked to **learning ability / stage of learning**:

'The lowest number of hours may not be the option that is most frequently followed by learners and does not therefore seem to be consistent with the requirement to base estimates on 'typical learners'.'

Awarding organisations (various)

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'A student doing a GCSE in the sixth form (or adult in FE) will typically do it much faster than a Y10 pupil, because they have a different starting point in terms of skills. The OFQUAL document seems to omit the recognition that it is difficult to give meaningful numbers to TQT elements, unless they relate to specific starting points of student cohorts, as the hour values of the TQT elements will be very different, depending on the starting points of different types of learners.'

Personal views

72. In addition to being required to use the lowest number of hours, reservations were also expressed for the **requirement to gather information from learners** (11 from awarding organisations and two from public comments). These concerns typically centred on practicality, accuracy and administrative impacts.

'The requirement for AOs to gather information from learners about the hours of Directed Study related to Similar Qualifications will have significant resource implications and has the potential to result in widely different estimates being provided by different learners. Learners are unlikely to understand what Directed Study does and does not include and AOs will then be in a position where they need to explain this before they can have any hope of gathering reasonable estimates. The resource implications of this for AOs are likely to be significant.'

Awarding organisations (various)

'We are very concerned about the requirement to gather information from learners about DSH, both in terms of resources required to do this (not least because learners will have no idea what DSH is and will need clear explanations and examples, are highly unlikely to have recorded time taken to do anything, and have no motivation to give accurate or honest answers to this type of question even if they can make a guess at hours spent on different activities), and therefore the validity, reliability and in turn usefulness of this information. This requirement is completely unrealistic.'

'If learner input is required this can vary greatly due to the range of learner ability and can be difficult and time consuming to collect'

Awarding organisations

73. **Flexibility to incorporate staff experience/knowledge and the professional judgement of subject experts** was a concept touched upon by a number of awarding organisations (four). It was suggested that this element of professional discretion would aid estimation of TQT components.

'We believe that AOs should be given a great degree of flexibility in their choice of methods used to determine the above as those methods will vary from sector to sector, as long as sufficient rationale is provided to support the choice of methods for particular qualification. For example, as a significant number of our IESOL qualifications is taken as examination only, we will have to rely on professional judgement of our subject experts, as well as data available in professional literature on the subject to arrive at our estimation of the TQT components.'

Awarding organisation: *NCFE*

'There will always be unusual cases which require some flexibility of approach. One example of this might be qualifications designed for e-learning/distance learning, where the majority of asynchronous tuition will class as DSH rather than GLH (which would include synchronous e-learning/distance learning events). Such qualifications would therefore appear to have a low proportion of GLH and a high proportion of DSH, but may well still be perfectly valid and reliable qualifications. As long as the regulators are prepared to apply common sense and flexibility this should not be a barrier under the proposed system'.

Awarding Organisation

'Professional judgement of AO officers should be a contributory method.'

Awarding organisation: *ASDAN*

'There is value in allowing a good deal of discretion in course design to support ideas, novel approaches and continuing innovation. Awarding bodies should allow a degree of flexibility of say 5 or 10% either way of any proportions they allocate, leaving it to teachers to design around these softer boundaries to maximise the ability to customise programmes of study to suit a particular college or school.'

Personal views: FE Teacher & e-learning Advisor

Question 10

74. **Respondents to the consultation were asked whether the Criteria document will help awarding organisations in calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment. There was a *lack of consensus* in relation to the helpfulness of the Criteria document.**
75. A small majority (52%) disagreed (disagree or disagree strongly) that the Criteria document will help awarding organisations in calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment. This is higher than the number who agreed (27%). A further 1 in 5 (21%) neither agreed nor disagreed.

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Figure 5: “The Criteria document will help awarding organisations in calculating values for a qualification’s Guided Learning, Directed Study and Dedicated Assessment.” What is your view of this statement? (Q10)

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Total
Personal views	0	1	2	0	6	9
Official response from an organisation/group	2	23	17	18	24	84
Awarding organisation	2	18	14	15	23	72
Other representative group or interest group	0	3	2	2	1	8
Other organisation [School/college, LA, training provider]	0	2	1	1	0	4
Total (n)	2	24	20	19	30	95
Total %	2%	25%	21%	20%	32%	

76. Among those who said that they agreed with the statement, there is little evidence that support is unequivocal. Most reasons contained some element of caveat or reservation.

‘On the whole Trinity agrees, but it will require careful consideration of how DSH will be established and monitored. The area of DSH is subjective and dependant on how the individual teacher’s time is spent. Therefore, this will require research and evidence as stated in the criteria to determine this.’

Awarding organisation: Trinity College London

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77. When analysing the reasoning given for those who disagreed with the statement that the Criteria document will help awarding organisations in calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment, a number of common messages can be observed. For example, a perceived **lack of clarity about requirements**, including which activities should be classed under which area. This is mentioned mostly by AOs (21) but is a point also picked up by members of the public / those expressing personal views (three).

'Furthermore, the Criteria document does not add any clarity to what activities should be included within each of the elements of TQT so will not help AOs in deciding what activities to count within each element.'

Awarding organisation: CIPS

'The criteria document does not provide clarity on the issues raised above with regards to determining guided learning hours, directed study hour or dedicated assessment time.'

Awarding organisation: *BIIAB*

78. In addition to concerns over lack of clarity, a perception of **additional workload for AOs** was also raised by a small minority (12), often in conjunction with the previous theme.

'The Criteria document does not add any clarity as to what should be included in each element of time. We have a number of concerns which have been noted above and we foresee a burdensome bureaucracy developing around the application of the Criteria.'

Awarding organisation: Future (Awards and Qualifications) Ltd

'The criteria document will place an unreasonable burden on centres and AOs and does not add any clarity to what activities should be included within each of the elements of TQT so will not help AOs in deciding what activities to count within each element.'

Awarding organisation: UAL Awarding Body

Question 11

79. Question 11 within the consultation related to the proposed wording of the draft new criteria. This section presented four opportunities for respondents to leave open comments. The text which prompted this was as follows:

What are your views on the proposed wording of the draft new Criteria?

Which paragraphs are clear and helpful? Why?

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

To what extent will these Criteria help awarding organisations to make the required determinations?

80. Initial reaction to the proposed wording of the draft new Criteria was broadly skewed towards the sentiment that the **language is too complicated** and therefore **not particularly user friendly**. A recurring criticism is that the **language should be less 'legalese' in style** and that by changing this aspect, it would greatly aid comprehension. This was mentioned most commonly by AOs (11) and also in three personal views from members of the general public.

'The wording should be considerably easier to read, clearer and generally more user friendly, and less legalese in style.'

Awarding organisation: PAA\VQ-SET

'As stated needs further clarification and user friendly language'

Awarding organisation: ISMM

81. Further suggestions to improve the proposed wording were to include **examples of expectations and requirements** within the Criteria. One contribution suggested that an addition of **a glossary would also prove helpful**.

'It would be helpful if it could be made more user friendly and include detailed examples of expectations and requirements. For example, use of terms such "any relevant information" and "which is reasonably available" raise more questions than provide answers.'

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Awarding organisation: Engineering Construction Industry Training Board (ECITB)

‘The wording of the criteria document has sufficient detail to set out the methodology to be applied by awarding organisations, but is open to interpretation. To assist awarding organisation in its implementation a glossary of terms used could be included.’

Awarding organisation: Gateway Qualifications

82. Despite critical comments, often regarding the complexity of the language used, some (three) did find it **clear and understandable**. However, even when specific commenters found it understandable, reservations were sometimes expressed as to whether this would be the case for others.

‘It reads clearly. My only concern ever is how others can manipulate it.’

Awarding organisation

83. Feedback on which sections are particularly clear and helpful is relatively limited. However, out of those who did comment, a noticeable number (five) indicated that they would **find it difficult to make a judgement without working through the Criteria or having to undertake an exercise to produce a definitive answer**. However these respondents acknowledged that by their very nature, the Criteria are repetitive and cross referential which impacts upon clarity and levels of understanding.

‘It is difficult to make a judgement about this question without working through the criteria.’

Awarding organisations (various)

‘The Criteria are by their nature very repetitive, and cross-reference each other throughout the document. This is not the most user-friendly document to read, when trying to extrapolate the actual requirements for AOs, although we recognise that there may legal/regulatory constraints on the language that can be used.’

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Awarding organisation: CABWI Awarding Body

84. Most criticism refers back to the general feeling that the overall style is not particularly user friendly and perhaps an overall review of the language and explanations used would be more beneficial rather than amendments of specific sections.

‘The whole Criteria document would benefit from a review with the aim of rewriting it and presenting it in a more user friendly style of language.’

Awarding organisation: Qualsafe Awards

85. When asked to what extent the new Criteria will help awarding organisations make the required determinations, the response is relatively mixed. A noticeable theme to emerge from small number of respondents (four) is that the **benefits or otherwise can only really be assessed in practice.**

‘This will need to be determined as organisations work through the criteria to determine TQT.’

Awarding organisations (various)

86. As mentioned in other areas of the consultation, a relatively common complaint is that **a lack of clarity** within the Criteria may impact upon determinations regarding which activities sit in which category. While there is repeating evidence of this type of criticism focusing on how helpful Criteria are in clarifying what activities should or should not be included in each element of TQT, there is a similar level of acceptance that they may however help in determining whether a qualification is relevant for 2008 Act purposes.
87. In common with other points within the consultation, the point was made that the adoption of the Criteria are likely to give rise to **increased bureaucracy and costs.**

‘Whilst the Criteria may help us to determine whether or not a qualification is relevant for the Act, we do not feel the Criteria will help us to make to required determinations of values at all, due to the lack of clarity about which activities sit within which category.’

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Furthermore, we are concerned as stated above that the Criteria place unreasonable burden on AOs (and centres and even learners), and that there are very significant unintended consequences which have not been understood and/or given due consideration.'

Awarding organisations (various)

Implementation

Implications for Credit values for qualifications

Question 12

88. The consultation asked to what extent respondents felt that ‘Ofqual’s proposals would have no impact on Credit values, unless the awarding organisation establishes that its previous estimate of the size of a qualification needs to be changed’. Most respondents (57%) *agreed* with this statement.
89. Six out of ten (57%) of respondents said they either agreed or strongly agreed with the statement while just under a third (29%) said they disagreed or strongly disagreed.

Figure 6: “Our proposals will have no impact on Credit values, unless the awarding organisation establishes that its previous estimate of the size of a qualification needs to be changed.” What is your view of this statement? (Q12)

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Total
Personal views	1	0	2	5	1	9
Official response from an organisation/group	3	50	10	14	8	85
Awarding organisation	3	41	10	11	7	72
Other representative group or interest group	0	5	0	3	0	8
Other organisation [School/college, LA, training provider]	0	3	0	0	1	4
Total (n)	4	51	12	20	9	96

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Total %	4%	53%	13%	20%	9%
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90. Respondents gave reasons why they agreed with the statement that Ofqual’s proposals would have no impact on Credit values, unless the AO establishes that its previous estimate of the size of a qualification needs to be changed. In these comments it can be seen that there is **a level of reservation regarding the acceptance that previous size estimates will need to be revised due to the fact that it closely follows current practice**. This point is mentioned by a number of different types of groups; 1 from an educational specialist, 1 from a representative group/interest group and 4 from AOs.

‘The proposed method for calculating qualification time does not actually differ from our current process; therefore, if this is to be the basis for determination of credits, we do not foresee this having an impact on values.’

Awarding organisation: Lifetime Awarding (LAO)

‘There seems no reason why credit values should be impacted as the proposals calculate credit using a similar process to that already in place.’

Awarding organisation: Rockschool Ltd

‘Our current processes and guidance for assigning credit value based on notional learning time in effect covers all the 3 elements that are now being suggested. We therefore do not envisage any changes in overall credit values.’

Awarding organisation: City & Guilds

91. Among those who disagreed with the statement, the opposite view to that above was raised. Evidence was presented from four respondents that the new method would result in significant changes and that **retrospectively changing credits based on a new system would not be fair**.

‘There will be significant impact on existing credit values for qualifications when the TQT methodology is applied, as any changes to the Guided Learning and Directed Study values would affect the overall credit value of the qualification. It seems unfair

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to apply credit retrospectively using the TQT model to qualifications that have already been credit-valued. What additional purpose does re-crediting them serve, especially in light of the ongoing uncertainty around the future of the Credit Framework?’

Awarding organisation: NCFE

‘...some current qualifications will include Dedicated Assessment in credit, and some may not include Directed Study, and this will vary between similar qualifications. This means that we cannot assume that the application of the new definition of Total Qualification Time will not have an impact on credit.’

Awarding organisation: Pearson

92. Question 12 also contained two questions for additional opportunity to comment on other implications for Credit and further comments.

If you feel there are other implications for Credit, what are they?

Do you have any other comments?

93. Many of the comments for these last two open ended questions are unique and difficult to summarise. However one theme to emerge (from five respondents) focused on **concern regarding the potential impact across the UK**, especially among AOs who operate UK wide as opposed to just in England. Those who raised this point were primarily concerned about the potential impact of different approaches and credit systems and possible issues regarding integration of these elements for such AOs.

‘There is a very real impact for us in terms of nations and in particular Scotland. We would not want significantly different approaches to terminology, processes and requirements.’

Awarding organisation: City & Guilds

‘Although this document addresses only Ofqual regulated qualifications in England, it needs to recognise that most AOs operate UK-wide and that they interact with Higher Education. Any definitions which impinge on credit, as these so obviously do, needs to take account of the other credit systems in the UK to

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avoid creating problems that will ultimately impact on learners, education and training and on their career opportunities’

Awarding organisation: Institute of Leadership & Management

‘If there is a change in the determination of time for England, the credit value could change and as a result this may have implications for potentially different credit values in Wales and NI.’

Awarding organisation: International Association of Book-keepers

In Scotland the term credit is used and defined in a way that includes GLH but does not give specific reference to it. There is a robust process for those who allocate credit (and level) - they must be an approved Credit Rating Body (with the appropriate systems, procedures and methods in place to both allocate and subsequently monitor the application of credit through SCQF qualifications and learning). The system works well and produces quality outputs backed up with evidence.

Awarding organisation: Scottish Qualifications Authority, Accreditation

Transition period

Question 13

94. **Ofqual consulted with respondents on what they feel would be a reasonable length of time after the introduction of a new approach for an awarding organisation to evaluate the three components of TQT for its qualifications.**
95. A significant proportion of stakeholders (37) argued that 12 months would *not* be a sufficient length of time for this evaluation to take place. They often suggested that a **minimum of two years** would be more reasonable.
96. Reasons for believing that 12 months is insufficient included allowing AOs time to review and republish their **qualification specifications**, implement a ‘test year’, allocate **resources**, consult with end users, evaluate **funding**, conduct **training**, and ensure conditions and audits are in place.

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'This could be a lot of work so should be longer than 12 months. If evidence is required from actual learners then at least 24 months may be needed.'

Awarding organisation: FPSB UK

'The new definitions require evidence to support GLH/TQT calculations and in order to provide Awarding Organisations time to review their offer and gather the appropriate supporting evidence, a time period of 18 months to 2 years is considered more appropriate.'

Other organisational response

'2 years minimum. It will allow AOs time to review and republish specifications etc. and Ofqual time to review/feedback to AOs and users to adapt.'

Awarding organisation: ISMM

97. Many respondents (17) also suggested that there should be enough time allowed for a **formal assessment process** to be carried out. The opinion was held that a rushed timeline could lead to confusion or potential complications.
98. Respondents maintained there should be time permitted for a wide variety of processes, including: a **normal review cycle** for a qualification, decision making regarding the assessment and **categorisation** of activities, **consultation** with subject experts, gathering of **evidence** for meeting criteria, establishing new systems/procedures, assigning credit values, and **evaluating costs**.
99. There was a consensus among many stakeholders (13) that the evaluation process should fit in with their **existing work cycle** to minimise disruption, resource shortages, and cost implications.

'Ideally, allowing the evaluation of the qualification to take place near its regulation end date would allow an Awarding Organisation time to collate feedback on the delivery of the qualification, brief out any changes to customers and create a sufficient evaluation of the TQT for the qualification.'

Awarding organisation: NCFE

'The new method should be applied when qualifications are reviewed, so a proper process can be undertaken.'

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Awarding organisation: CIPS

‘Our preference would be to make any changes as qualifications come up for review in our existing Product Maintenance Schedule. This would minimise the impact on our resources.’

Awarding organisation

100. The Federation of Awarding Bodies (FAB) has recommended that the evaluation of the three components of Total Qualification Time (TQT) should be carried out in a **staged approach**. They feel that 12 months is unreasonable and suggest that the implementation of three phases would allow for a smoother transition. Other organisations have made similar statements or indicated their support of the FAB’s suggestions.

‘Stage 1- 18-24 months should be provided to allow AOs to identify qualifications that are relevant for RPA purposes and assign GLH values only to these qualifications. This will ensure that the legislative requirements related to RPA and GLH are met.’

Other organisational response: FAB

‘The transition phase needs to be as long as possible so that organisations are able to gather sufficient evidence and make sure that they can meet all the criteria and Conditions associated with the introduction of this method of calculating learning time.’

Awarding organisation: International Dance Teachers Association

Other considerations

Equality analysis

Question 14

101. To support the evidence base around the proposals on guided learning hours Ofqual has carried out an equality analysis screening exercise and has discussed its proposals with its Equality Advisory Group⁴ and the Access Consultation Forum.⁵ Within the consultation respondents were asked to consider the impact of the proposals on people who share particular protected characteristics⁶ and highlight any specific positive or negative impacts.
102. Two common and related themes emerged within the comments. Firstly a number of respondents, AOs in the main, stated that **learners with any protected characteristic may not have the profile of a ‘typical learner’**. As a result of this respondents argued that the values assigned to areas within TQT may not apply directly to these learners and may ‘mislead them into thinking the qualification can be achieved more quickly than will be the case for them’.
103. The following quote evidences the point made:

‘Where a learner has a particular protected characteristic they may not have the profile of “typical learner”. The values assigned to each of the areas within TQT may mislead them into thinking the qualification can be achieved more quickly than will be the case for them.’

Awarding organisation: UAL Awarding Body

104. A small number of responses also referenced specific protected characteristics and focussed on those with learning difficulties. Respondents argued that

⁴ The Equality Advisory Group provides Ofqual with expert external advice on equality issues relating to the regulation of qualifications and assessments. Group members are appointed, following a competitive process, for their personal expertise and experience.

⁵ The Access Consultation Forum is a multi-stakeholder group that supports Ofqual’s understanding of matters that affect disabled students accessing qualifications and assessments. The members of the group include representatives of awarding organisations and groups representing disabled students.

⁶ Including those defined in the Equality Act 2010, namely: age, disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation.

learners with learning difficulties may be more likely to find it difficult to understand how long they need to dedicate to a qualification, particularly as respondents argued learners with learning difficulties would need more time than the values in the TQT.

‘Learners with learning difficulties are likely to find it very difficult to understand how long they will be required to dedicate to taking a qualification, particularly as their learning time may well be longer than the values which are required to be stated (especially if minimum values are required).’

Awarding organisation: Laser awards

105. The consultation then asked respondents how could any negative impacts be avoided or reduced. In relation to the disadvantage that ‘non typical’ learners may face respondents argued that **AOs should be allowed to develop additional statements that explain values in the TQT are estimates** and may vary for different types of learners.

‘...allow AOs to develop additional statements to explain that the values assigned are estimates and that those learners with particular characteristics may require longer in some or all of the 3 categories of activity.’

Awarding organisation: Quallsafe Awards

106. Related comments also referenced that Ofqual should **allow AOs to report a range of values within aspects of TQT**, which may vary depending on cohort characteristics and size. This was a theme amongst the comments and is evidenced by the following quote:

‘By asking awarding bodies to state value ranges for TQT elements based upon cohort stating points and allowing for flexibilities based upon a number of factors including cohort size.’

Personal views: Teacher

Regulatory impact

Question 15

107. The consultation outlined that the proposals would impact on a wide range of AOs that provide both general and vocational qualifications. Respondents were asked to outline what positive or negative regulatory impacts should Ofqual should consider in relation to these proposals.

108. The strongest theme amongst the comments referred to the **negative regulatory impact the proposals would have on the resources and workloads of AOs**. In some cases this was reported simply as the impact being the increases in workloads or resources that AOs would experience:

‘There could be a larger workload for large Awarding Organisations’

Awarding Organisation: The Institute of Export and International Trade

109. While this was the main theme, many of the other comments made a variety of points as to why the increased burden on AOs would occur and what the impact of this would be. 15 of the comments argued that the burden on AOs would be increased through these proposals **in a time of significant change** with a number of other consultations in progress, further heightening the impact.

‘This proposal comes at a time of significant change where there are a number of important consultations in progress....If implemented, the GLH proposals will undoubtedly have a further impact on the resources of AOs in terms of them checking and, in many cases, recalculating values.’

Awarding organisations (various)

‘Please consider that this is just one consultation out of many launched at around the same time (including by the SFA) which will all have a significant impact on the work of Awarding Organisations from January 2015 onwards.’

Awarding Organisation: apt awards

110. While reform was supported by some caution was raised that Ofqual should not over-burden the sector and ensure change happens at a more measured pace. This was the conclusion made in the FAB response and repeated by others.

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‘We support the activity of the regulator and the drive towards being better able to evidence the validity of VQs but would welcome regulatory changes taking place at a measured pace.’

Awarding organisations (various)

111. A noticeable number of respondents mentioned that the regulatory impact of the proposals would be seen in the form of **increased costs** (due to additional resources, systems and meetings etc. needed). It was argued that these additional costs and resources needed would **divert resources from other activities**, such as innovation. With the related point made that this may then stifle new qualification development, affect quality and ultimately additional costs would be passed onto the end user.

‘The potential workloads involved means yet again sector qualifications will be reworked - all of which stifles new qualification development and innovation.’

Awarding Organisation: MPQC

‘We feel that maintaining the quality of our offer is the most important aspect of our work and would be loath to commit resources away from that focus.’

Awarding Organisation: Future (Awards and Qualifications) Ltd

112. A further theme that emerged in the responses was that the proposals outline a much more detailed process than the current Conditions and that this may **lead to Ofqual ‘micro-managing’ AOs rather than acting in a more pragmatic way**. Although these responses did not specify any further the impact of any micro management.

‘This process is much more detailed than the current Conditions and specifies processes whereas other Conditions are much more general and leave it up to awarding organisations to decide the best procedures to use. There is a concern that Ofqual may be tempted to micro-manage organisations in relation to the specifics of the criteria.’

Awarding Organisation: Graded Qualifications Alliance

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113. When asked to **suggest how any negative regulatory impacts could be reduced or managed** respondents provided a range of responses although a number of clear themes emerged.

114. Firstly, respondents argued that **a clear plan of the regulatory changes should be published** which identifies the impacts upon AOs. Respondents articulated the need to provide clear guidance on the timetable for change, with the following statement repeated by many.

‘By publishing an overall plan of regulatory changes which considers the impact of these changes on AOs and their resources and seeks to introduce changes in a measured and reasonable way.’

Awarding organisations (various)

The development and publication of (and then adherence to) an overall plan for reform, with realistic timescales, which addresses all the issues in a measured, controlled, reasonable and achievable way.

Personal view: General public

115. Secondly, another repeated and related point was the **need for analysis of the impacts of the proposed changes** on AOs to take place so that AOs could have a better understanding of the risks presented by the proposals.

‘Conduct of an analysis to identify how the proposed changes are likely to impact on AOs and to aid a better understanding of the risks presented by the changes and the overall programme of change.’

Awarding organisations (various)

116. A third theme amongst the responses was that negative regulatory impacts could be managed or reduced through **considering the timescales for change and allowing a reasonable time for change**. In the handful of responses that mentioned this it was often also linked to the provision of clear and detailed guidance.

‘By allowing sufficient time for AOs to scope and complete the work in a methodical manner, and by providing clear guidance...’

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Awarding organisation: CABWI Awarding Body

‘This could be mitigated by allowing realistic timescales and providing detailed explanation and guidance.’

Awarding organisation

117. Finally, five respondents stated that any negative impacts related to the audit and monitoring processes could be managed through a more pragmatic approach from Ofqual. With respondents arguing that it would require **consistency by Ofqual in how they monitor AOs and communicate with them.**

‘There is an impact here on the audit and monitoring processes which require a more pragmatic approach from Ofqual in relation to the types of qualification being offered, the level of risk involved for particular types of qualification and the types and quantities of evidence provided by awarding organisations. It will require consistency by Ofqual in monitoring and communication with awarding organisations.’

Awarding Organisation: Imperial Society of Teachers of Dancing

Appendix A: List of consultation respondents

The following organisations responded to the online consultation or provided written submissions.

Organisation name
AAT
ABC Awards
ABMA Education Ltd.
ACCA
Accredited Skills for Industry (ASFI)
Active IQ
apt awards
AQA
ASDAN
Association of School and College Leaders
Association of Teachers and Lecturers (ATL)
ATT Ltd
Awarding First
BIIAB
Blackpool Sixth Form College
Bucks Learning Trust on behalf of the Buckinghamshire County Council
CABWI Awarding Body
CACHE – The Council for Awards in Care, Health and Education
CAFRE

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Cambridge International Examinations
Central Qualifications
Certa
Chartered Institute for Securities & Investment
Chartered Insurance Institute
Chartered Management Institute
CIPS
Cirencester college
CITB- (Construction Industry Training Board)
City & Guilds
Council for Dance Education and Training
CREATIVE SKILLSET
Cskills Awards
EAL
Engineering Construction Industry Training Board (ECITB)
English Speaking Board
Federation of Awarding Bodies
FPSB UK
Future (Awards and Qualifications) Ltd
Gateway Qualifications
General Council for Massage Therapies
GQA Qualifications Ltd
Graded Qualifications Alliance

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Highfield Awarding Body for Compliance
ifs University College
IMI Awards Ltd
Imperial Society of Teachers of Dancing
Institute of Leadership & Management
International Association of Book-keepers
International Baccalaureate (IBO)
International Dance Teachers Association
ISMM
Lantra
Laser Learning Awards
Lifetime Awarding (LAO)
MPQC
National Council for the Training of Journalists
NCFE
Network Exams
NOCN
OCR (Oxford, Cambridge and RSA Examinations)
Open Awards
PAA\VQ-SET
Pearson
Pensions Management Institute
PIABC

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QAA
Qualsafe Awards
Rockschool Ltd
Royal Academy of Dance
RSPH
Safety Training Awards
Scottish Qualifications Authority trading as SQA
Scottish Qualifications Authority, Accreditation
SFJ Awards
Sports Leaders UK
The Institute of Chartered Accountants in England and Wales (ICAEW)
The Institute of Export and International Trade
TLM
Trinity College London
UAL Awarding Body
Voice
WJEC

Appendix B: Consultation Questionnaire

Question 1: Are there any activities where you would be in doubt as to whether they should be included in 'Guided Learning'?

.....
.....

Question 2: "The proposed definition of 'Directed Study' is clear and appropriate."

What is your view of this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer.

.....
.....

Are there any activities where you would be in doubt as to whether they should be included in 'Directed Study'?

.....
.....

Do you have any other comments or suggestions about this definition?

.....
.....

Question 3: "The proposed definition of 'Dedicated Assessment' is clear and appropriate."

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What is your view of this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer.

.....

.....

Are there any activities where you would be in doubt as to whether they should be included in 'Dedicated Assessment'?

.....

.....

Do you have any other comments or suggestions about this definition?

.....

.....

Question 4: Do you have any other comments on the three components of Total Qualification Time? For example, are there other parts of learning time or activities that you expect the definitions to cover that they do not? If so, what are they?

.....

.....

.....

How we will regulate: our new approach

Question 5: Do you have any comments about our proposed General Conditions?

.....

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.....

Which paragraphs are clear and helpful? Why?

.....
.....

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

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Question 6: What Guidance would be most helpful to you in relation to the proposed General Condition E7? Why is this? You may wish to consider what might be positive and negative indicators of compliance with the proposed General Condition.

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Question 7: Is there anything else we should reasonably expect an awarding organisation to consider when determining a qualification’s relevance for the Raising the Participation Age policy (relevance ‘for 2008 Act purposes’)?

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.....

Question 8: “The Criteria document will help awarding organisations in making the required determination of a qualification’s relevance for 2008 Act purposes.”

What is your view of this statement?

- Strongly agree
- Agree
- Neither agree nor disagree

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Disagree

Strongly disagree

Please give reasons for your answer.

.....
.....

Question 9: Are there other methods we should reasonably expect an awarding organisation to consider when calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment?

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.....
.....

Question 10: "The Criteria document will help awarding organisations in calculating values for a qualification's Guided Learning, Directed Study and Dedicated Assessment."

What is your view of this statement?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please give reasons for your answer.

.....
.....

Question 11: What are your views on the proposed wording of the draft new Criteria?

.....

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.....

Which sections are clear and helpful? Why?

.....

.....

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

.....

.....

To what extent will these Criteria help awarding organisations to make the required determinations?

.....

.....

Implementation

Question 12: “Our proposals will have no impact on Credit values, unless the awarding organisation establishes that its previous estimate of the size of a qualification needs to be changed.”

What is your view of this statement?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer.

.....

.....

If you feel there are other implications for Credit, what are they?

.....
.....

Do you have any other comments?

.....
.....

Question 13: What would be a reasonable length of time after the introduction of a new approach for an awarding organisation to evaluate hours of Guided Learning, Directed Study and Dedicated Assessment for its qualifications? Why is that?

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Equality impact

Question 14: Are there any specific positive or negative impacts on people who share particular protected characteristics⁷ that we should consider in relation to these proposals?

.....
.....

How could any negative impacts be avoided or reduced?

.....
.....

Regulatory impact

Question 15: What positive or negative regulatory impacts should we consider in relation to these proposals?

⁷ Including those defined in the Equality Act 2010, namely: age, disability, gender reassignment, marriage and civil partnership, race, religion and belief, sex and sexual orientation.

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.....

.....

How could any negative impacts be avoided, reduced or managed?

.....

.....

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