

## Consultation on Ofqual's approach to regulating technical qualifications

### Joint response of the Association of School and College Leaders (ASCL) and the Principals Professional Council (PPC)

#### A Introduction

1 The Association of School and College Leaders (ASCL) represents over 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the Association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.

The Principals Professional Council (PPC) joined forces with ASCL in 2014 and now operates as a Committee within ASCL. PPC represents Principals and senior leaders in Further Education Colleges.

2 ASCL/PPC welcomes the consultation on Ofqual's approach to regulating technical qualifications. Used appropriately to support the education sector, the regulation of T levels qualifications and Apprenticeship standards, will have the support of employers, providers, students and the general public.

3 We believe that the proposals for the regulation of the new technical qualifications will help providers, students and employers to understand better how technical qualifications are structured, assessed and regulated.

4 ASCL/ PPC broadly agrees with the approach taken by Ofqual to inform the sector, sector representative bodies, employers and policy makers of the approach to regulation of technical qualifications. We do, however, urge Ofqual to ensure that regulation of T levels is not overly complicated for providers, consumers or employers.

5 We expect several institutions, including Schools and FE Colleges who are ASCL/PPC members will be responding to the consultation independently of our response. These ASCL/PPC comments are a broad response and include specific comments from some of our members.

6 ASCL/PPC notes that Ofqual is seeking views on the regulation of T levels in order to ensure that T level qualifications are trusted by the education sector organisations which deliver the qualifications, by employers who want employees to have meaningful qualifications and by recipients of these qualifications. ASCL/ PPC are pleased that Ofqual wishes to understand how deliverers, end users and employers will view and have confidence in the regulatory processes for T levels.

7 Our remarks are organised as follows:

### **A Answers to the 52 consultation questions**

#### **B Conclusions**

### **A Consultation questions**

In terms of the questions in the consultation, our responses are set out below.

Q1 ASCL/PPC agree with the way that technical qualifications are described in the consultation document. T levels should be regulated in the same way as other vocational qualifications. The purpose of these qualifications should be described in terms of the occupational areas that those with the qualifications may progress to, with further study at the next level.

Q2 The associations believe a technical qualification should be described in terms of a core and occupational specialism in the same way that many level 3 vocational qualifications are defined currently.

Q3 We believe that core knowledge and understanding and core skills should be assessed separately.

Q4 We agree with the relative weighting proposed for core knowledge and understanding and core skills within the core.

Q5 The associations consider that the 25% - 40% range is a reasonable weighting for core skills within the core. The actual percentage should relate to the technical area being assessed and the relative importance placed on core skills in the specific occupational area.

Q6 We believe that employers and professional bodies are better placed to set combinations of subjects and therefore we have no comment on this proposal.

Q7 ASCL/PPC agree with the proposal to set a requirement that performance outcomes within occupational specialisms should be assessed separately from each other.

Q8 We support the proposal to set guidance so that, where possible, assessment of performance outcomes within a particular occupational specialism should be taken together.

Q9 The associations are in agreement with the proposal to set guidance on titling of technical qualifications and occupational specialisms.

Q10 We agree with the proposal to set guidance on the number of assessments in the technical qualifications.

Q11 ASCL/PPC agree with the proposal that the whole of the core should be assessed together and the whole of each occupational specialism should be assessed together. This will make it easier to ensure the required standards are achieved and the requirements of the technical qualifications will be clearer to the end user.

Q12 We do not agree with the proposal to hold all assessments in May and June as this puts more pressure on those students who may be taking technical qualifications alongside other qualifications. We suggest there should be some flexibility about the timing of assessments perhaps within an assessment window.

Q13 ASCL/PPC support the proposal that an opportunity should be available for retakes. However we do not agree with a restricted time for retakes unless the student is retaking the whole of the technical qualification which we believe is unlikely.

Q14 The associations disagree with having a hard and fast rule about retakes. We are opposed to not allowing an additional assessment series for retakes as these may be needed for some students, especially those with SEND.

Q15 We endorse your proposal that there should be a requirement that awarding organisations should provide schools and colleges with sufficient information about student performance for them to decide whether a student would benefit from a retake.

Q16 We strongly agree that, where an awarding organisation ceases to offer a technical qualification, they must make provision for students to retake those qualifications – accepting that for practical reasons the retake window may need to be relatively short.

Q17 The associations are in agreement with the proposal that awarding organisations will be required to put in place criteria for assessing and recognising prior learning.

Q18 We agree with the proposal to assess the core knowledge and understanding as a single grade A\* - E. This ensures there is a known grading system relative to A levels.

Q19 The proposal to grade occupational specialisms in terms of pass, credit, distinction is sensible as this makes them comparable with the grading of Diplomas at level 3.

Q20 ASCL/PPC agree with the proposal to have a “working towards” grade below pass for occupational specialisms.

Q21 We agree that for occupational specialisms, the assessment design must take account of the grading model. This helps bring consistency to the approach to assessment in technical qualifications.

Q22 We agree with your proposal to provide guidance on condition H6 in respect of issuing results.

Q23 We have no strong views on the proposal to disapply conditions I3 and I4 for technical qualifications that are taken a part of a T level but retain them for technical qualifications taken outside England.

Q24 ASCL/PPC strongly agrees that technical qualifications must be accredited. This will be important to ensure that appropriate standards are set initially and will be maintained.

Q25 We are in agreement with the proposal to accredit technical qualifications using the same criteria and mechanisms as other vocational qualifications.

Q26 We agree with the proposal that awarding organisations will be required to have in place, and be using, assessment strategy for technical qualifications.

Q27 The associations support your proposal to require awarding organisations to explain through their assessment strategy, their approach to covering the outline content of T levels.

Q28 ASCL/PPC believe the proposed approach to put guidance in place on assessment objectives for core skills is necessary.

Q29 We agree with the proposed approach to setting assessment objectives requirements for core knowledge and understanding.

Q30 In terms of setting and marking assessments for core knowledge and understanding, we agree that this should be assessed by examination but we caution that for some students, who excel in particular technical skills, this may well cause anxiety.

Q31, In terms of core skills and occupational specialisms, we note in the technical annex to the consultation that core skills are proposed to be assessed through a project. It is very logical therefore that awarding organisations should set these assessments for core skills.

Q32 Similar to our response to Q31 above, we agree that awarding organisations should be required to set assessments for occupational specialisms.

Q33 In terms of marking assessments for core knowledge and understanding, we agree with the proposal to set a requirement for core knowledge and understanding to be marked by the awarding organisation. However, we caution that this should not be an overly bureaucratic system or cause delay in confirming T level results.

Q34 In terms of core skills and occupational specialisms, we would respond as we did with Q33. We agree with the proposal but are worried about bureaucracy and possible delays especially with small awarding organisations.

Q35 In terms of occupational specialisms, we do not agree that the assessments should be marked by the awarding organisations unless the awarding organisation is also a professional body.

Q36 In terms of controls on taking assessments, we agree with the proposal that such controls should be put in place.

Q37 We strongly agree that there should be a requirement for awarding organisations to put in place systems and processes for reviewing marking and appealing results

Q38 As the Institute for Apprenticeships has the approval to set outline content, we agree with the proposal to disapply condition E1 for awarding bodies.

Q39, We are not aware of any other general conditions that should be disapplied in terms of T levels.

Q40 In terms of specific guidance for Technical qualifications, we agree that specific guidance should be provided for D3 and E1.

Q41 We are not aware of any other general conditions that should be disapplied.

Q42 ASCL/PPC agrees with the proposed approach to setting and maintaining grade standards in the core.

Q43 We agree with the proposed approach to setting and maintaining grade standards in the occupational specialism.

Q44 In terms of those with protected characteristics, we agree with the approach proposed and have not currently identified any additional potential impacts.

Q45 At this stage we cannot identify any additional steps that Ofqual could take to mitigate any negative impact on students with a protected characteristic

Q46 We believe that there should be flexibilities in the system so that students who share a protected characteristic can have other opportunities for assessment, retakes and grading that take account of their particular disability.

Q47 We anticipate that there will be an additional administrative burden and significant extra cost in permitting an additional retake series. We believe that putting in place checks to ensure the additional retake series was only used by retake students will require extra resource.

Q48 Cost is one of the major concerns that members raise. We anticipate that awarding organisations will raise their fees in the longer term to cover their additional costs and this will be passed on to the teaching organisation; which under current funding rules will only be able to recruit their costs from adult students.

Q49 In terms of the proposals for awarding bodies, we have no further comments on this matter.

Q50 We have nothing to add in terms of additional steps to reduce the impact of the regulatory changes. As we have mentioned previously members' major concerns are about potential extra bureaucracy and delays.

Q51 At this stage we have no other comments on additional costs or benefits of the proposals.

Q52 We are concerned that innovation may be prevented in the early stages of implementation as awarding organisations are likely to keep things very tight to ensure compliance but, at this stage, we have no specific evidence to support this view.

## **B Conclusion**

ASCL/PPC is generally supportive of the proposals and consider they will help to establish the new Technical qualifications and their assessment strategies in a way that can assure users and the general public of their rigour, relevance and quality.

We hope that this response to the consultation is of value. Please note that ASCL/PPC is willing to be further consulted and to assist in any way that we can.

Kevin Gilmartin Post-16 Policy Specialist - Association of School and College Leaders  
Anne Murdoch – General Secretary - Principals Professional Council  
3 August 2018