

## **Ofqual consultation on Sector Subject Area 6 title change**

### **Response of the Association of School and College Leaders**

#### **A. Introduction**

1. The Association of School and College Leaders (ASCL) represents over 25,000 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 and further education and skills phases. 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.
2. ASCL welcomes the opportunity to contribute to this consultation.

#### **B. Answers to questions**

##### **Question 1: Do you agree or disagree with the proposal to change the title of SSA 6?**

3. Agree. The previous title (Information and communication technology) was too broad, not clearly defined and it was not clear what was included in qualifications with that title. The proposed title (digital technology) is clearer, but there is still room for further clarification in the title, as set out in our response in paragraphs 5 and 6 below.

##### **Question 2: Do you have any comments on the proposed new title for SSA 6 – Digital Technology?**

4. Yes. As stated in paragraph 3 above, the proposed title is clearer than the previous one. This is especially so when used with the qualification descriptions and content. The new title is clearer in terms of what the subject sector contains, although the title 'digital technology' is still quite broad.

##### **Question 3: Do you have any comments on the proposed new title for SSA 6.1 – Digital technology (practitioners)?**

5. Yes. The title makes it clear that this category includes digital technology subjects which are relevant to practitioners. However, the term 'practitioner', despite being explained in the description of the SSA, is still broad and so may be open to interpretation.

##### **Question 4: Do you have any comments on the proposed new title for of SSA 6.2 - Digital technology (users)?**

6. Yes. The proposed new title, whilst an improvement on the previous title, is less clear in terms of how the qualifications differ for 'practitioners' and 'users'. To obtain this clarity, one must read the qualification description and content. The title itself could be more specific so that learners and employers, for example, are clear what the qualification will entitle them to progress onto. It is not clear whether users can progress onto higher level digital technology courses with this qualification.

**Question 5: Are there any regulatory impacts that have not been identified arising from the proposal to change the title of SSA 6? If yes, what are the impacts and are there any additional steps that could be taken to minimise the regulatory impact of the proposals?**

7. No, there are no unidentified regulatory impacts that we are aware of. However, where there are any confusions around subject titles, this may lead to individuals being put on the wrong course for them. This might be true of both practitioners and users unless both have carefully read the title descriptors.

**Question 6: Are there any costs, savings or other benefits associated with the proposals to change the title of SSA 6? Please provide estimated figures where possible.**

8. Don't know. We cannot identify any savings from changing the SSA title. However, as set out in paragraph 7 below, there may be costs to centres from having to amend qualification documentation. Where adult learners are concerned, this cost will normally be passed onto them, in increased registration fees.

**Question 7: Is there any additional information that Ofqual should consider when evaluating the costs and benefits of the proposal to change the title of SSA 6?**

9. Yes. As stated in paragraph 8 above, there may be additional costs to centres, such as those arising from the additional administrative workload involved in changing materials to the new titles(s). Any additional costs need to be minimised by Ofqual and the awarding organisations so that they do not fall on centres or learners.

**Question 8: Do you have any comments on the impact of the proposal on innovation by awarding organisations?**

10. No. We are merely aware of the impact of change on small awarding bodies which we have raised before in our consultation responses.

**Question 9: Are there any potential equalities impacts (positive or negative) on students who share a particular protected characteristic arising from our proposal that Ofqual should consider? Where possible, please separate your answer by protected characteristic.**

11. Yes, there may be negative impacts on students with some special educational needs and disabilities (SEND) as they may be impacted by any changes in titles of qualifications, such as through confusion over course titles, additional costs, etc. It is imperative that learners with SEND are not further disadvantaged because of these changes.
12. Students from disadvantaged socio-economic backgrounds, where their disadvantage has impacted on attendance or achievement may also be affected. Where these students access digital technology qualifications, it is important that they are clear what

qualifications they are taking so that their learning and achievement is not further disrupted.

**Question 10: Are there any steps that Ofqual could take to mitigate any potential negative impacts, resulting from the proposal, on students who share a particular protected characteristic?**

13. Yes. We would expect a full equalities impact on the proposed changes to the SSA titles to accompany Ofqual's response to this consultation. This, in our view, should include the impact on students from disadvantaged socio-economic backgrounds (not currently a protected characteristic). The needs of students with SEND, socio-economic disadvantage and minority ethnic groups must be prioritised when making these changes.
14. We believe that the government's policy of reducing the number of qualifications available at levels 1, 2 and 3 will have a negative impact on students with protected characteristics, as these students are the predominant group taking entry, level 1 and 2 qualifications. Some will also be taking qualifications at level 3 to demonstrate their skills in digital technology, so an equalities impact assessment is needed on this group of people too.

**C. Conclusion**

15. The changes to the SSA titles are a good step forward but there is still a need for more clarity in the proposed titles, for more care to be given to reducing any additional costs arising from the proposed changes to centre or learners, and for a full impact assessment arising from the proposals for learners with protected characteristics.
16. We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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