



After the QCF: A New Qualifications Framework

ICAEW welcomes the opportunity to comment on the consultation After the QCF: A New Qualifications Framework published by Ofqual on 26 March 2015, a copy of which is available from this [link](#).

This response of 28 May 2015 has been prepared on behalf of ICAEW by the Learning & Professional Development department.

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RESPONSES TO SPECIFIC QUESTIONS

Q1: To what extent do you agree or disagree that awarding organisations should assign an appropriate level to their qualifications?

1. We agree that awarding organisations should assign an appropriate level to their qualifications to ensure consistency and transparency for the learner.
2. The design and development of a qualification should remain the responsibility of awarding bodies and stakeholders. This will ensure that qualifications entering the market are fit for purpose and will meet the needs of learners and employers.
3. We recognise that size, content, mode of assessment may all have to flex. We welcome the diversity of the learners' experience that this approach may foster.

Q2: To what extent do you agree or disagree that changing the level of a qualification would constitute a major change requiring an awarding organisation to notify us and others of the proposed change?

4. We would agree that the change of an award's level constitutes a significant change that should be reported to Ofqual and placed in the public domain. From a professional body perspective, a potential change in a qualification's level could impact significantly on the accreditation associated with that qualification.
5. We would welcome a transparent system for notifying Ofqual of significant changes to any qualification that does not prove too onerous for awarding organisations.

Q3: To what extent do you agree or disagree that if an awarding organisation changes the level of a qualification it should be required to put in place, and comply with, a plan to protect the interests of learners?

6. We agree that it is the responsibility of an awarding organisation to appropriately manage transition such as changes to the level of a qualification to protect the interests of learners.
7. However, we would not favour a formal plan which may be bureaucratic and burdensome to awarding organisations. Such an approach may lead to a resistance for change, inhibiting qualification development. A principles-based approach would be welcomed, encouraging an open and productive dialogue between Ofqual and awarding organisations.
8. We would therefore query whether item (b) under "Proposed New General Condition E9" is required and proportionate.
9. We would welcome sight of any plan Ofqual may consider putting in place with guidance as to how compliance will be monitored.

Q4: To what extent do you agree or disagree that if an awarding organisation changes the level of a qualification it should provide clear and accurate information about the change to all relevant users of the qualification?

10. Transparency for the learner is absolutely essential and we agree that all information about a qualification should be completely accurate and clear.
11. Such an approach is vital if learners are to be empowered to make the right decisions about what they want to achieve on their learning journey. As such the title, level and TQT should be clear and concise leaving the learner in no doubt as to what is required of them.

12. Such clarity up front should save any confusion that otherwise may lead to learners not being able to complete qualifications, saving themselves and any sponsoring employers any wasted expenditure.

Q5: We propose to have level descriptors for two categories: knowledge and skills. To what extent do you agree or disagree with this proposal?

13. We agree that the split between knowledge and skills descriptors is useful and aligns well with the approach taken by professional bodies.

Q6: Are there any other categories for which you think we should have descriptors?

14. No, we believe the further descriptors might lead awarding bodies to become too caught up with meeting the requirements of several descriptors, which ultimately limits the freedom with which they design qualifications.

Q7: To what extent do you agree or disagree that our proposed level descriptors reflect the requirements of a qualification at each level?

15. We agree that the descriptors provide a solid basis on which to build qualifications at each level and we support the move towards the descriptors defined as outcomes. They are broad, but give a consistent underpinning that all designers of qualifications should be aware of and make reference to as they build a qualification.

Q8: Is there anything we could add to our proposed Requirements or guidance to help awarding organisations to use the level descriptors?

16. We believe the guidance set out is sufficient and welcome the reference to using the descriptors in line with industry benchmark statements, which layer the generic descriptors with the most relevant content in terms of employers' expectations.
17. We would suggest that the guidance is promoted as widely as possible to ensure both employers and students truly understand the basis on which their qualifications are being developed.

Q9: We currently require qualification titles to include the level of the qualification. To what extent do you agree or disagree that we should retain this requirement?

18. We agree with this approach and feel it offers learners and employers both the motivation to engage with a qualification as well as the transparency needed to make an informed decision about whether a learner's/employer's investment is appropriate.

Q10: Do you have any comments about our proposed General Conditions?

19. We are in broad support of the General Conditions, but would ask for clarification on when sunrise provisions are to be implemented and whether this is the same for all awarding organisations. We would be concerned that the delivery or notification schedule of the sunrise provisions is planned as to ensure that awarding organisations are not suddenly inundated with new specification and reporting requirements.
20. We would also question point B under E9.4 which mentions awarding bodies having to review their qualification's level after revisions are made by Ofqual. We would ask for examples as to how often this might occur and in what circumstances. Whilst inbuilt review of qualifications is essential, we would not welcome additional reviews placing extra burden on awarding bodies.

21. We do support the transparent approach being advocated in regards to recognition for prior learning.

Q11: Do you have any comments about our proposed guidance?

22. No, the guidance set out seems transparent and fair.

Q12: To what extent do you think the draft RPA Criteria will help an awarding organisation determine whether a qualification is relevant for RPA purposes?

23. We agree that the new criteria should simplify matters for considering whether a qualification has the right fit to be considered for RPA purposes.

Q13: How helpful do you think the draft TQT Criteria and guidance will be when awarding organisations calculate the values for a qualification's Guided Learning, Directed Learning and Invigilated Assessment?

24. We welcome the move to Total Qualification Time (TQT). We believe that this new detail and guidance will allow qualifications to show their true scale and value, and the commitment required to achieve them. We therefore think that appropriate guidance in this area, such as that starting to be developed in the appendices to the consultation document will be crucial to accurately navigate the new nomenclature of Guided Learning, Directed Learning and Invigilated Assessment. It is especially helpful to have examples of the activities comprising each sub-component of Total Qualification Time. More specifically, we welcome the inclusion of Invigilated Assessment as part of TQT.
25. Any aspect of learning that contributes to the achievement of a qualification should be considered as valuable. We support the guidance which sets out clearly that work-based learning contributes to Guided Learning Hours.

Q14: We originally proposed to describe: 'The activity of a Learner in preparation, study or any other form of participation in education or training which takes place as directed by – but not under the Immediate Guidance or Supervision of – a lecturer, supervisor, tutor or other appropriate provider of education or training' as 'Directed Study'.

In response to feedback we are considering describing such activities as 'Directed Learning'. Which of these descriptions would you prefer us to use?

26. We support the term Directed Learning as it aligns with the term Guided Learning and should therefore limit confusion for the learner. The term 'study' has an academic connotation and may alienate those on a vocational path.

Q15: We originally proposed to describe: 'The participation of a Learner in the activity of being assessed for a qualification, where the assessment is subject to Invigilation but takes place without the benefit to the Learner of the Immediate Guidance or Supervision of a lecturer, supervisor, tutor or other appropriate provider of education or training' as 'Dedicated Assessment'

In response to feedback we are considering describing such activities as 'Invigilated Assessments'. Which of these terms would you prefer us to use?

27. We prefer 'Invigilated Assessments' as we feel this terminology is more widely understood by both learners and employers.

Q16: We have identified a number of ways in which our proposals may impact (positively or negatively) on persons who share a protected characteristic. Are there any other potential

impacts we have not identified or any additional ways in which potential impacts could be mitigated?

28. We are mindful of our obligation towards learners with Access Arrangements and would advise Ofqual to proactively consult with equality, diversity and access groups to ensure there are no unforeseen impacts.
29. We are hopeful that the proposals should make it easier for those with access arrangements to understand what they can expect when embarking on a new qualification.

Q17: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

30. We feel that as long as the requirements and guidance are promoted widely to those with protected characteristics there should be no negative impact. Although we would advise that regular feedback is sought from this group of learners to ensure any issues are identified quickly.

Q18: Have you any other comments on the impacts of the proposals in this document on persons who share a protected characteristic?

31. No

Q19: Are there any potential regulatory impacts of the proposals in this document that we have not identified?

32. We are concerned that there may be insufficiently complete alignment between the new Framework and the European Qualifications Framework. We would need to be sure that no threat is posed to mutual recognition given to UK qualifications across borders.
33. ICAEW is concerned that there could be a risk of qualifications being artificially intensified in size and scope to meet other regulatory or funding requirements. Ofqual should provide further details on how they propose to deal with this.
34. It is also important to note that ICAEW's qualifications are already subject to oversight by regulators such as the Financial Reporting Council with stringent regulations and rules. We would not want a new qualification framework to come into conflict with an existing set of regulations from another regulator.